

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Friday, August 31, 2012 9:54 AM  
**To:** Kubeczko, Dave  
**Subject:** FW: Quicksilver Resources, Welker 42-11 Pad, SENE Sec 11 T6N R92W, Moffat County, Form 2A (#400313382) Review

**Categories:** Orange - Operator Correspondence

Scan No 2034513      CORRESPONDENCE      2A#400313382

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**From:** Pamela Osburn [mailto:posburn@qrinc.com]  
**Sent:** Thursday, August 30, 2012 3:06 PM  
**To:** Kubeczko, Dave  
**Cc:** Cindy Keister  
**Subject:** RE: Quicksilver Resources, Welker 42-11 Pad, SENE Sec 11 T6N R92W, Moffat County, Form 2A (#400313382) Review

**Dave,**  
**Quicksilver approves the following COA's for the Welker 42-11 Pad.**

**Pamela S. Osburn, Sr. Regulatory Analyst**  
Quicksilver Resources, Inc. \* 801 Cherry St. Ste 3700 Unit 19 \* Fort Worth, TX 76102  
817-665-4918 – office \* 817-475-6482 – cell \* 817-665-5009 – fax

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**From:** Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]  
**Sent:** Thursday, August 30, 2012 4:01 PM  
**To:** Pamela Osburn  
**Subject:** Quicksilver Resources, Welker 42-11 Pad, SENE Sec 11 T6N R92W, Moffat County, Form 2A (#400313382) Review

Pam,

I have been reviewing the Welker 42-11 Pad **Form 2A** (#400313382). COGCC would like to attach the following conditions of approval (COAs) based on the information Quicksilver has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

1. **Construction (Section 6):** The box answering the question will salt (>15,000 ppm TDS Cl) or oil based muds (OBM) be used? has been marked **Yes**; therefore the following condition of approval (COA) will apply:  
**COA 11** - A closed loop system must be implemented during drilling (which operator has indicated on the Form 2A); or, if a closed loop system drilling rig is not used/available, then an amended Form 2A will need to be submitted/approved to include a drilling pit, and a Form 15 Earthen Pit Permit will also need to be submitted/approved prior to construction of the pit (the drilling pit will be required to be lined, fenced, and netted). All cuttings generated during drilling with oil based muds or high chloride/TDS mud must be kept in containers, a lined/bermed portion of the well pad, or the lined drilling (if permitted and constructed) prior to offsite disposal. The moisture content of any drill cuttings in a cuttings pit, trench, or pile shall be as low as practicable to prevent accumulation of liquids greater than de minimis amounts.
2. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 5310'. COGCC's review indicated an intermittent stream located approximately 1797' to the northeast. COGCC's rules state that

the distance to the nearest surface water should reflect intermittent, as well as, perennial streams. COGCC has made the change.

3. **General:** The following conditions of approval (COAs) will apply:

**COA 91** - Notify the COGCC 48 hours prior to start of pad construction, pit liner installation (if applicable), rig mobilization, spud, and start of hydraulic stimulation operations using Form 42 (the appropriate COGCC individuals will automatically be email notified, including the LGD for hydraulic stimulation operations).

**COA 5** - Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface or buried pipelines.

**COA 23** - Operator must ensure secondary containment for any volume of fluids contained at well site during drilling and completion operations (as shown on the Proposed BMPs attachment); including, but not limited to, construction of a berm or diversion dike, diversion/collection trenches within and/or outside of berms/dikes, site grading, or other comparable measures (i.e., best management practices (BMPs) associated with stormwater management) sufficiently protective of nearby surface water. Any berm constructed at the well pad location will be stabilized, inspected at regular intervals (at least every 14 days), and maintained in good condition.

**COA 38** - The moisture content of any freshwater generated drill cuttings in a cuttings pit, trench, or pile shall be as low as practicable to prevent accumulation of liquids greater than de minimis amounts. At the time of closure, if the freshwater generated drill cuttings are to be onsite, they must also meet the applicable standards of table 910-1.

**COA 25** - Flowback and stimulation fluids must be sent to tanks, separators, or other containment/filtering equipment before the fluids can be placed into any pipeline, storage vessel, or lined pit (only if an amended Form 2A has been submitted/approved and a Form 15 Earthen Pit Permitted has been submitted/approved) located on the well pad; or into tanker trucks for offsite disposal. The flowback and stimulation fluid tanks, separators, or other containment/filtering equipment must be placed on the well pad in an area with additional downgradient perimeter berming. The area where flowback fluids will be stored/reused must be constructed to be sufficiently impervious to contain any spilled or released material.

**COA 58** - Berms or other containment devices shall be constructed to be sufficiently impervious (preferably corrugated steel with poly liner) to contain any spilled or released material around crude oil, condensate, and produced water storage tanks.

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. If you have any questions, please do not hesitate to call me at (970) 309-2514 (cell), or email. Thanks.

Dave

**David A. Kubeczko, PG**  
**Oil and Gas Location Assessment Specialist**

Colorado Oil & Gas Conservation Commission  
Northwest Area Office  
707 Wapiti Court, Suite 204  
Rifle, CO 81650  
Phone: (970) 625-2497x5  
FAX: (970) 625-5682  
Cell: (970) 309-2514  
[dave.kubeczko@state.co.us](mailto:dave.kubeczko@state.co.us)





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