

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Wednesday, March 17, 2010 3:05 PM
To: Kubeczko, Dave
Subject: FW: Quicksilver Resources, Little Snake Unit 12-33, NWSE Sec 12 T11N R96W, M
Attachments: LITTLESNAKEUNIT#12-33_D.pdf

Scan No 2032956 CORRESPONDENCE 2A#2094475

From: VLLPermitco@aol.com [mailto:VLLPermitco@aol.com]
Sent: Friday, March 12, 2010 10:38 AM
To: Kubeczko, Dave
Subject: Re: Quicksilver Resources, Little Snake Unit 12-33, NWSE Sec 12 T11N R96W, M

Dave,

Please see comments below: Please let me know if you need anything else.

Thanks!

Venessa Langmacher

*Permitco Inc.
P.O. Box 99
Eastlake, CO 80614
303/857-9999 ext. 11
303/450-9200 fax*

*From: Dave.Kubeczko@state.co.us
To: lspermitco@aol.com
Sent: 2/24/2010 2:48:49 P.M. Mountain Standard Time
Subj: Quicksilver Resources, Little Snake Unit 12-33, NWSE Sec 12 T11N R96W, Moffat*

Lisa,

*I have been reviewing the Little Snake Unit 12-33 **Form 2A** (#2094475). COGCC requests the following clarifications regarding the data Quicksilver Resources has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment.*

- 1. **Facilities (Section 5):** Form 2A indicates there will be a flare at this location. Construction layout drawings (Figure #1) indicate that there will be a separate flare pit located east of the reserve pit. This flare pit needs to be marked as a special purpose pit and a Form 15 (Earthen Pit Report/Permit). I can make the change if you send an email with this request. **We will submit a Form 15 ASAP for the Flare Pit.***
- 2. **Construction (Section 6):** The size of the disturbed area during construction (4.94 acres) and size of location after interim reclamation (4.94 acres) are the same. I would think that after interim reclamation, the disturbed area would be noticeably smaller. Can you please confirm what these sizes are. I can*

make the changes if you send an email with this request. **After interim reclamation the pad size will be 2.5 acres.**

3. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 295 feet. COGCC guidelines require designating all locations with close proximity to surface water (i.e., less than 500 feet) a **sensitive area** and requiring the following conditions of approval (COAs):

COA 4 - Location is in a sensitive area because of close proximity to surface water, therefore, operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations.

COA 5 - Operator must implement best management practices to contain any unintentional release of fluids.

Quicksilver proposes to provide secondary site containment capable of containing approximately 110" of volume of fluids located at the well site during drilling and completion operations. An engineered grading plan will be provided and designed to contain fluids in a "ring levee" style system around the entire pad.

4. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 50 feet bgs for a well located 3900 feet away from the proposed pad. COGCC's review did not find any water wells within this distance. There are several water wells to the east, but none seem to have any available information. COGCC found two water wells; one well (Permit No 33639-F-BLM, stock well) was located 12197 feet to the southeast, with a total depth of 100 feet bgs, an estimated depth to groundwater of 50 feet bgs (based on perforated casing depths), and a pumping rate of 15 gpm; the other well (Permit No. 118300-BLM, stock well) was located 27773 feet to the northwest, with a total depth of 320 feet bgs, a depth to groundwater of 66 feet bgs, and a pumping rate of 10 gpm. I believe the first well is the one you located. I can make the change if you send an email with this request. **Please make the necessary change to the Depth of Ground Water**

5. **Rule 303.d.(3).C.:** Neither the scaled construction layout drawing (Figure #1) nor the location drawing show the location of the proposed gas and water pipelines. One of these drawings should show the anticipated locations of these new facilities. Otherwise, a statement indicating that the proposed pipeline locations will follow the access road in the comments section would be sufficient. I can make the change if you send an email with this request. **I have attached the pipeline map. However, the pipeline will follow the roads.**

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. The other issues also need to be addressed prior to permit approval. If you have any questions, please do not hesitate to call me at (970) 625-2497 x5 (office) or (970) 309-2514 (cell), or email. Thanks.

Dave

COGCC requires your written approval of these COAs prior to passing the OGLA review. If you have any questions, please do not hesitate to call me at (970) 625-2497 x5 (office) or (970) 309-2514 (cell), or email. Thanks.

Dave

David A. Kubeczko, PG

Oil and Gas Location Assessment Specialist

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