

## Kubeczko, Dave

---

**From:** Kubeczko, Dave  
**Sent:** Tuesday, September 13, 2011 10:15 AM  
**To:** Kubeczko, Dave  
**Subject:** FW: Resend of Quicksilver Resources, Kline 21-23 Pad, Lot 3 Sec 23 T7N R91W, Moffat County, Form 2A (#400191663) Review

**Importance:** High

**Categories:** Orange - Operator Correspondence

**Scan No 2034000      CORRESPONDENCE      2A#400191663**

---

**From:** Cindy Keister [<mailto:ckeister@qrinc.com>]  
**Sent:** Monday, September 12, 2011 9:22 AM  
**To:** Kubeczko, Dave  
**Cc:** Lisa Smith ([lspermitco@aol.com](mailto:lspermitco@aol.com))  
**Subject:** FW: Resend of Quicksilver Resources, Kline 21-23 Pad, Lot 3 Sec 23 T7N R91W, Moffat County, Form 2A (#400191663) Review  
**Importance:** High

Quicksilver agrees to the following COA's.

Cindy Keister  
Director Regulatory Affairs  
Quicksilver Resources  
801 Cherry Street  
Suite 3700, Unit 19  
Fort Worth, Texas 76102

Direct Line: 817/665-5572  
Cell: 682/429-3861

*This confidential message is for the addressee only. Unauthorized use, disclosure or copying is prohibited and may be unlawful. If you have received this message in error, please call the sender at (817) 665-5572 and delete this message from your system.*

---

**From:** Kubeczko, Dave [<mailto:Dave.Kubeczko@state.co.us>]  
**Sent:** Monday, September 12, 2011 10:12 AM  
**To:** Cindy Keister  
**Subject:** Resend of Quicksilver Resources, Kline 21-23 Pad, Lot 3 Sec 23 T7N R91W, Moffat County, Form 2A (#400191663) Review  
**Importance:** High

---

**From:** Kubeczko, Dave  
**Sent:** Thursday, August 25, 2011 1:24 PM  
**To:** [LSPermitco@aol.com](mailto:LSPermitco@aol.com)  
**Subject:** Quicksilver Resources, Kline 21-23 Pad, Lot 3 Sec 23 T7N R91W, Moffat County, Form 2A (#400191663) Review

Lisa,

I have been reviewing the Kline 21-23 Pad **Form 2A** (#400191663). 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** - The drilling pit, if constructed, must be lined, or a closed loop system (which operator has indicated on the Form 2A) must be implemented during drilling. All cuttings generated during drilling with OBM must be kept in the lined drilling pit, or placed either in containers or on a lined/bermed portion of the well pad; prior to analysis.
  - COA 38** - 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. **General:** The following conditions of approval (COAs) will apply:
  - 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; 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 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 or pit 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.

COGCC would appreciate your concurrence with attaching these COAs (items 1 and 2) 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)





*Please consider the environment before printing this e-mail*