

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, August 07, 2012 3:40 PM
To: Kubeczko, Dave
Subject: FW: Quicksilver Resources, Welker 34-11 Pad, SWSE Sec 11 T6N R92W, Moffat County, Form 2A (#400296129) Review

Categories: Orange - Operator Correspondence

Scan No 2034475 CORRESPONDENCE 2A#400296129

From: Pamela Osburn [<mailto:posburn@qrinc.com>]
Sent: Tuesday, August 07, 2012 1:18 PM
To: Kubeczko, Dave
Cc: Cindy Keister
Subject: RE: Quicksilver Resources, Welker 34-11 Pad, SWSE Sec 11 T6N R92W, Moffat County, Form 2A (#400296129) Review

Dave,

Quicksilver approves the following COA's for the Welker 34-11 pad.

Pamela Osburn
Sr. Regulatory Analyst

From: Kubeczko, Dave [<mailto:Dave.Kubeczko@state.co.us>]
Sent: Tuesday, August 07, 2012 1:57 PM
To: Pamela Osburn
Subject: Quicksilver Resources, Welker 34-11 Pad, SWSE Sec 11 T6N R92W, Moffat County, Form 2A (#400296129) Review

Pam,

I have been reviewing the Welker 34-11 Pad **Form 2A** (#400296129). 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 drilling pit is constructed, it must be lined. All cuttings generated during drilling with oil based muds or high chloride/TDS mud 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 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. **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 (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 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.

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



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