

September 30, 2013

Mr. Matt Lepore
Director
Colorado Oil & Gas Conservation Commission
1120 Lincoln Street, Suite 801
Denver, CO 80203

RE: Expedited Form 2 Request per Rule 303.i. (1) and (2)
Document ID 400477169 and 400483572
Pirtlaw Partners Ltd 32-09 and Pirtlaw Partners Ltd 32-09H
SW/4 NE/4 Section 9, T6N, R87W
Routt County, Colorado

Dear Mr. Lepore:

Quicksilver Resources Inc. (QRI) respectfully requests approval of QRI's above referenced Form 2 Documents without consultation, per Rule 303.i. (1) and (2) for the referenced well. We have complied with all local and state regulatory permitting, wildlife and environmental requirements, and have even received an expedited approval from the Routt County permit authority. The factors driving our request to have the permit expedited are outlined below. These factors are driving our drilling window which closes November 14th allowing us **45** days from today to complete operations. We are immediately available for a phone conference if further details are needed.

HISTORY

We constructed the pad in late 2012, spudded the well on 02/24/13, drilled to 5,215', set intermediate casing, and released the rig 03/20/13 due to wildlife restrictions from 03/20/13 through 07/30/13. QRI planned to move back on the well this fall and drill a vertical well to 7,401' TVD. However, QRI recently completed the remaining portion of an existing lateral in Moffat County and the encouraging results completely changed our operational plans for the Pirtlaw 32-09. QRI now believes it will require horizontal wells to make this play economic. The Pirtlaw 32-09 is being drilled in a complex geologic province of the Sandwash Basin. Guidance given during the time of initial planning has changed with new data received from studies of the Basin; primarily the results in success with completing the horizontal lateral section of the Bret Grandbouche 24-02H. Quicksilver Resources, Inc. will propose subsequent vertical and horizontal tests in order to facilitate the best chance for success in the basin.

Other changes from the original permit include updated studies and guidance on projected formation tops in the area. Quicksilver Resources, Inc. has determined the Frontier Section productive in the recently drilled Pirtlaw Partners 24-33. We are now proposing to drill a pilot well to log and evaluate not only the entire Niobrara formation but the Frontier formation as well. We will then use these logs to plan more accurately drilling parameters for the horizontal section, including but not limited to landing point and dip to drill.

LEASE REQUIREMENTS

Quicksilver has developed a harmonious working relationship (we view it as a partnership) with our surface owner on the Wolf Mountain property and other stakeholders having an interest in the industrial development of Routt County. Among the stakeholders are Pirtlaw Partners Ltd; Wolf Mountain Ranch LLC; Robert L. Waltrip, who is the principal owner of both Pirtlaw Partners and Wolf Mountain Ranch; The Nature Conservancy; The Rocky Mountain Elk Foundation; representatives of Colorado Parks and Wildlife and Chris Brookshire, who is the Routt County Local Governmental Designee to the COGCC. Since early 2011, this group of stakeholders has held regular quarterly meetings to work out mutual issues and to meet an informal objective of showing the public at large that, with a little effort and cooperation from all interested parties, it is possible for oil and gas development to occur in an area with little or no diminishment of scenic, wildlife and human values.

Quicksilver has also developed a good relationship with its Lessor under the subject lease, Victor American Fuel Company. Our lease from Victor American is beyond its primary term and is subject to a top lease. The lease is currently in a continuous development phase and, because of this, all of our operations on this lease are "on the clock." Not only are we subject to a 180-day continuous development provision which requires the drilling of roughly two new wells per year; but we are also subject to a 60-day continuous operations provision on any individual well in order to maintain the lease. Since the Pirtlaw Partners Ltd 32-09H well is not yet productive, Quicksilver must conduct operations on this well no later than October 25, 2013, to maintain the effectiveness of the lease

WILDLIFE STIPULATIONS

This well also has wildlife stipulations that warrant immediate drilling operations. Our approved Form 2A has the following wildlife stipulations:

1. Bald Eagle winter roost site from November 15th through February 28.
2. Columbian Sharp-tailed Grouse leks from March 15 to July 30.



As you can see from the dates, QRI has a limited window from July 31 to November 14 for drilling operations. We have been working diligently with the surface owner, The Nature Conservancy, The Rocky Mountain Elk Foundation, Routt County and CPW, including field inspections. QRI was granted a waiver to the Bald Eagle winter roost site to spud the well in February, 2013 in order to meet lease stipulations but had to move off prior to reaching total depth due to the grouse stipulations. It is possible that a waiver might be issued again for the Bald Eagle winter roost by CPW but we won't know that for sure until early November. QRI works closely with Wolf Mountain Ranch, CPW, The Nature Conservancy, Rocky Mountain Elk Foundation and Routt County, to protect the wildlife. We have funded grouse counts on Wolf Mountain Ranch for the past two years and have donated Greater Sage Grouse tracking collars.

DRILLING RIG AVAILAILABILITY

A rig that is capable of drilling the 5000' horizontal is difficult to find in the area. In addition, it is not economic for a rig to move from any distance to our location to drill one-half a well. The company that owned the rig that was scheduled to finish drilling the well went out of business and our backup rig signed a contract with another company for a two well project. We have been very fortunate to acquire a Nabors rig that has just become available and is capable of drilling the long horizontal. This rig requires an estimated 7 days to move in and rig up and 7 days to rig down and move out as compared to our rig of choice that only took 2 days. This limited window may also cause damage to the horizontal section of the wellbore if we don't have time to drill the well and we have to move off before production casing is set.

TRANSPORTATION ROUTE

The transportation route for the Pirtlaw 32-09 follows US Highway 40 East to Routt County Road #52 Loop then proceeds West to Routt County Road #70 and then northwesterly for 0.9 miles to the ranch road that leads to the well site. There are no other land owners directly affected by our truck traffic or drilling activities except for Pirtlaw Partners Ltd. We have attached a route map for your review.

WATER BASELINE SAMPLING

QRI initiated a baseline groundwater sampling program when it first began development in Colorado. Additionally, we were one of the first Operators to sign onto the COGA Baseline Sampling Program. The water well testing program for the subject property was designed to be a combined effort to reduce risk



associated with development activity and assist the landowner in preserving and increasing their conservation values. We have worked continuously with the landowners to ensure that the program meets their requirements and our intentions.

There are three main water sampling points located on the property, as indicated in the attached map:

1. Headquarters Domestic Well – This well serves as the water supply for the ranch headquarters
2. Artesian Well – this well serves livestock on that area of the ranch
3. Monitor Spring – this spring feeds a small pond that also serves livestock

Each of the water wells located on the property is being sampled every six months continuously. There are also other wells located off of the property that QRI has been sampling. There are eight residential supply wells located to the east of the property along County Road (CR) 52. These wells are being sampled monthly, when accessible (winter sometimes prevents access due to homeowners being away during winter months). There are two additional wells to the south of Pirtlaw Partner Ltd. 32-09 located along CR 52 loop that are sampled every six months, if accessible. All of these wells are visible on the attached map.

Since inception, QRI's baseline sampling program went above and beyond the COGA Program and COGCC Rule 609. Our sampling radius continues to be one-mile from the wellhead, instead of the ½ mile required by COGA and COGCC. Additionally, since program inception, we have made a conscious decision to sample every water well (active with pump installed) within that one-mile radius. Our program currently meets all of the analytical requirements of Rule 609. We continue to test for the same suite of analyses since our program first started.

On two separate occasions, QRI has agreed/offered to sample 50+ groundwater wells on development activities not related to this property. On our proposed Camilletti well, we offered to sample every well in the town of Milner. Some of the water well owners declined our offer, so the number sampled was ultimately lower than 50. On our Weber Federal 32-04 well, we sampled approximately 50+ water wells.

QRI also has a written water well complaint and response process in place whereby we document complaints and water well issues. Part of that process is



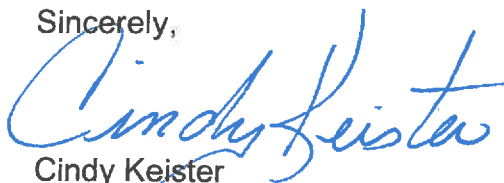
to protect water well owners during the investigation process into their wells. We will supply drinking water as needed immediately upon a complaint being filed.

ROUTT COUNTY PERMITTING

Waivers from the Routt County LGD and the surface owner are attached for your review. Quicksilver complies with the local, state and county regulations and makes every attempt to minimize our request for variances and waivers by planning our work as efficiently as possible. In this case, various issues such as the drilling rig availability, lease obligations, wildlife stipulations, etc. have put us in a situation where we need to drill the well or face the possibility of losing our lease and the horizontal section of the well.

If you would like to have any questions answered or need further information I will be happy to set up a telephone call to discuss our request.

Sincerely,



Cindy Keister
Director Regulatory Affairs

Attachments





LEGEND:

- Proposed Location.



ACCESS ROAD MAP: A TOPO

Quicksilver Resources, Inc.					PIRTLAW PARTNERS, LTD. 32-09		DOWLING LAND SURVEYORS, LLC P.O. BOX 954 HAYDEN, COLORADO 81639 (970) 276-3613 dowling@plotz.biz
					NW1/4 NE1/4		
					SECTION 9, T6N R87W, 6TH P.M. ROUTT COUNTY, COLORADO		
SCALE	DATE	BY	FILE	1335.6' FNL 2385.1' FEL			
	11/08/11		FH11PG12				