

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Thursday, June 10, 2010 6:25 PM  
**To:** Kubeczko, Dave  
**Subject:** FW: Antero Resources, Frei A Pad, SWSW Sec 7 T6S R91W, Garfield County, Form 2A (#400063672) Review  
**Attachments:** Frei A Pad\_SIGNED Surface Consent to BMPs.pdf

Scan No 2033197      CORRESPONDENCE      2A#400063672

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**From:** Hannah Knopping [mailto:hknopping@anteroresources.com]  
**Sent:** Monday, June 07, 2010 11:11 AM  
**To:** Kubeczko, Dave  
**Cc:** Warren, Michael  
**Subject:** RE: Antero Resources, Frei A Pad, SWSW Sec 7 T6S R91W, Garfield County, Form 2A (#400063672) Review

Hi Dave,

Please find attached the **surface owner's signed consent to our Proposed BMP's** since they include recommendations made by the CDOW for wildlife habitat protection.

Let me know if you need anything else to finalize your review of our Form 2A.

Thank you!

*Hannah Knopping*  
**Permit Representative**  
**Antero Resources Corporation**  
1625 17th Street  
Denver, CO 80202  
Office: (303) 357-6412  
Cell: (720) 985-6647

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**From:** Hannah Knopping  
**Sent:** Thursday, June 03, 2010 1:33 PM  
**To:** 'Kubeczko, Dave'  
**Subject:** RE: Antero Resources, Frei A Pad, SWSW Sec 7 T6S R91W, Garfield County, Form 2A (#400063672) Review

Hi Dave,

With respect to water resources, please change the distance to surface water to 160 feet since you have identified two abandoned gravel pits north of the location which are considered an intermittent water feature.

Antero has reviewed the conditions of approval and does concur with them.

Let me know if you need anything else from me.

Thanks!

*Hannah Knopping*  
**Permit Representative**

**Antero Resources Corporation**

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Denver, CO 80202  
Office: (303) 357-6412  
Cell: (720) 985-6647

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**From:** Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]  
**Sent:** Monday, May 31, 2010 3:45 PM  
**To:** Hannah Knopping  
**Subject:** Antero Resources, Frei A Pad, SWSW Sec 7 T6S R91W, Garfield County, Form 2A (#400063672) Review

Hannah,

I have been reviewing the Frei A Pad **Form 2A** (#400063672). COGCC requests the following clarifications regarding the data Antero has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA).

- Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 1086 feet. COGCC's rules state that the distance to the nearest surface water should reflect intermittent (this includes ephemeral streams, irrigation ditches, drainages, abandoned gravel pits), as well as, perennial streams. COGCC's review indicates there is are a couple of what appear to be abandoned gravel pits with water approximately 160 and 385 feet to the north (as seen on the 2009 aerial photograph). I can make the change if you send me an email with this request. COGCC guidelines require designating all locations within close proximity to surface water a **sensitive area**. The following conditions of approval (COAs) will apply:

  - COA 4** - Location is in a sensitive area because of 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.
- General 317B:** The following conditions of approval (COAs) will also apply:

  - COA 6** - Reserve pit must be lined or closed loop system must be implemented during drilling.
  - COA 23** - Operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations. If fluids are conveyed via pipeline, operator must implement best management practices to contain any unintentional release of fluids.
  - 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. At the time of closure, the drill cuttings must also meet the applicable standards of table 910-1.
  - COA 39** - No portion of any pit that will be used to hold liquids shall be constructed on fill material, unless the pit and fill slope are designed and certified by a professional engineer, subject to review and approval by the director prior to construction of the pit. The construction and lining of the pit shall be supervised by a professional engineer or their agent. The entire base of the pit must be in cut.

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. The other issue also needs 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

**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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