

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Monday, August 02, 2010 5:28 PM
To: Kubeczko, Dave
Subject: FW: Antero Resources, CSF E Pad, NESW Sec 9 T7S R91W, Garfield County, Form 2A (#400075954) Review

Scan No 2033277 CORRESPONDENCE 2A#400075954

From: Hannah Knopping [mailto:hknopping@anteroresources.com]
Sent: Monday, July 26, 2010 3:58 PM
To: Kubeczko, Dave
Subject: RE: Antero Resources, CSF E Pad, NESW Sec 9 T7S R91W, Garfield County, Form 2A (#400075954) Review

Hi Dave,

Antero representatives have reviewed the COA's that you listed below for the CSF E Pad and do concur with them.

Let me know if you need anything else to assist in your review of the subject Form 2A.

Thanks!

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

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Monday, July 26, 2010 2:31 PM
To: Hannah Knopping
Subject: Antero Resources, CSF E Pad, NESW Sec 9 T7S R91W, Garfield County, Form 2A (#400075954) Review

Hannah,

I have been reviewing the CSF E Pad **Form 2A** (#400075954). 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).

1. **Water Resources (Section 14):** Form 2A indicates that the distance to the nearest surface water is 550 feet. The following conditions of approval (COAs) will apply:
 - COA 4** - 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.
2. **General:** Due to the steep slopes in this area (averaging 24 percent), the proximity to springs, the moderately permeable topsoil (15 to 36 inches), and the potentially permeable weathered nature of the surface geology, the following conditions of approval (COAs) will also apply:
 - COA 6** - Reserve pit (or any pit containing fluids [if constructed]) 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.

COA 44 - The access road will be constructed as to not allow any sediment to migrate from the access road to nearby surface water or any drainages leading to surface water.

COA 46 - The location is in an area of high run off/run-on potential; therefore the pad shall be constructed to prevent any stormwater run-on and /or stormwater runoff.

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



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