

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, October 19, 2010 9:20 AM
To: Kubeczko, Dave
Subject: FW: Antero Resources, CSF T Pad, SWNW Sec 8 T7S R91W, Garfield County, Form 2A (#400094416) Review

Scan No 2033456 CORRESPONDENCE 2A#400094416

From: Ashlie Mihalcin [<mailto:amihalcin@anteroresources.com>] On Behalf Of Hannah Knopping
Sent: Tuesday, September 28, 2010 9:13 AM
To: Kubeczko, Dave
Subject: RE: Antero Resources, CSF T Pad, SWNW Sec 8 T7S R91W, Garfield County, Form 2A (#400094416) Review

Hi Dave,

I am covering for Hannah while she is on vacation.

Antero has reviewed the COA's listed below identified for the **CSF T Pad** and does concur with them.

Let me know if you need anything else. Thanks!

Ashlie Mihalcin
Permit Representative
Antero Resources Corporation
1625 17th Street
Denver, CO 80202
Office: (303) 357-7323
Cell: (303) 945-0577

From: Kubeczko, Dave [<mailto:Dave.Kubeczko@state.co.us>]
Sent: Monday, September 27, 2010 9:59 AM
To: Hannah Knopping
Subject: Antero Resources, CSF T Pad, SWNW Sec 8 T7S R91W, Garfield County, Form 2A (#400094416) Review

Hannah,

I have been reviewing the CSF T Pad **Form 2A** (#400094416). COGCC would like to attach the following conditions of approval (COAs) based on the information and data Antero has submitted on the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

1. **Water Resources (Section 14):** Form 2A indicates that the distance to the nearest surface water is 35 feet. COGCC guidelines require designating all locations within close proximity to surface water a **sensitive area** (which Antero has already indicated on the Form 2A) and requiring the following conditions of approval (COAs):
 - 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; 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 sufficiently protective of nearby surface water. If fluids are conveyed via pipeline, operator must implement best management practices to contain any unintentional release of fluids.
 - 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 and the potentially permeable nature of the surface geology, the following conditions of approval (COAs) will also apply:

COA 6 – Any pit constructed to hold fluids must be lined or a closed loop system (which Antero has already indicated on the Form 2A) must be implemented during drilling.

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 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

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