

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, January 11, 2011 11:09 AM
To: Kubeczko, Dave
Subject: FW: Antero Resources, Hunter Mesa Compressor, Lot 3 Sec 30 T6S R92W, Garfield County, Form 2A (#2591593) Review

Scan No 2033584 CORRESPONDENCE 2A#2591593

From: Hannah Knopping [mailto:hknopping@anteroresources.com]
Sent: Monday, January 10, 2011 1:08 PM
To: Kubeczko, Dave
Subject: RE: Antero Resources, Hunter Mesa Compressor, Lot 3 Sec 30 T6S R92W, Garfield County, Form 2A (#2591593) Review

Hi Dave,

Thanks for the clarification on the COA about berm construction. Antero does concur with the proposed COA's with the inclusion of the corrected version of COA 58 referencing Rule 604.a.(4) rather than 603e.(12).

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: Thursday, January 06, 2011 6:26 PM
To: Hannah Knopping
Subject: RE: Antero Resources, Hunter Mesa Compressor, Lot 3 Sec 30 T6S R92W, Garfield County, Form 2A (#2591593) Review

Hannah,

The rule referenced should be 604.a.(4)

(4) Berms or other secondary containment devices shall be constructed around crude oil, condensate, and produced water tanks to provide secondary containment for the largest single tank and sufficient freeboard to contain precipitation. Berms and secondary containment devices and all containment areas shall be sufficiently impervious to contain any spilled or released material. Berms and secondary containment devices shall be inspected at regular intervals and maintained in good condition. No potential ignition sources shall be installed inside the secondary containment area unless the containment area encloses a fired vessel.

basically the same requirements as 603.e.(12)

(12) **Berm construction.** Berms or other secondary containment devices in high density areas shall be constructed around crude oil, condensate, and produced water storage tanks and shall enclose an area sufficient to contain and provide secondary containment for one-hundred fifty percent (150%) of the largest single tank. Berms or other secondary containment devices shall be sufficiently impervious to contain any spilled or released material. No more than two (2) crude oil or condensate storage tanks shall be located

within a single berm. All berms and containment devices shall be inspected at regular intervals and maintained in good condition. No potential ignition sources shall be installed inside the secondary containment area unless the containment area encloses a fired vessel. Refer to American Petroleum Institute Recommended Practices, API RP - D16.

but no limit on number of tanks inside a berm area. My error in referencing the 603 rule. I have changed that in eForms.

Dave

From: Hannah Knopping [mailto:hknopping@anteroresources.com]

Sent: Thursday, January 06, 2011 3:02 PM

To: Kubeczko, Dave

Subject: RE: Antero Resources, Hunter Mesa Compressor, Lot 3 Sec 30 T6S R92W, Garfield County, Form 2A (#2591593) Review

Hi Dave,

We have been reviewing the COA's for the Hunter Mesa Compressor Station and just have a question on COA 58 listed below. The rule referenced in that COA, Rule 603.e (12) is for high density areas so we wanted to see what is triggering that COA since the proposed location is definitely not in a high density area.

If you could please let me know I would appreciate it.

Thanks!

Hannah Knopping

Permit Representative

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From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]

Sent: Saturday, January 01, 2011 3:47 PM

To: Hannah Knopping

Subject: Antero Resources, Hunter Mesa Compressor, Lot 3 Sec 30 T6S R92W, Garfield County, Form 2A (#2591593) Review

Hannah,

I have been reviewing the Hunter Mesa Compressor **Form 2A** (#2591593). COGCC would like to attach the following conditions of approval (COAs) based on the data Antero Resources has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

1. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 50 feet. COGCC guidelines also require designating all locations within close proximity to surface water a **sensitive area** (which Antero has indicated on the Form 2A) and requiring the following conditions of approval (COAs):
COA 4 - Location is in a sensitive area because of close proximity to surface water, therefore, operator must ensure secondary containment for any volume of fluids contained at the site during 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 (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 5 - Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary or permanent surface pipelines.

COA 47 - The area of the facility where fluids will be stored/reused must be constructed to be sufficiently impervious to contain any spilled or released material (per Rule 604.a.(4)).

COA 58 - Berms or other containment devices shall be constructed in compliance with Rule 603.e.(12) around crude oil, condensate, and produced water storage tanks.

COA 59 - Use noise reduction equipment on compressors and other production equipment or add sound barriers to limit noise levels at the property boundary where appropriate, economically, and technically feasible.

COGCC would appreciate your concurrence with attaching this COA 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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