

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Tuesday, March 29, 2011 1:24 PM  
**To:** Kubeczko, Dave  
**Subject:** FW: Antero Resources, Left Hand Federal A Pad, SWSW Sec 16 T6S R92W, Garfield County, Form 2A (#400138742) Review

Scan No 2033671      CORRESPONDENCE      2A#400138742

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**From:** Hannah Knopping [<mailto:hknopping@anteroresources.com>]  
**Sent:** Monday, March 28, 2011 2:25 PM  
**To:** Kubeczko, Dave  
**Subject:** RE: Antero Resources, Left Hand Federal A Pad, SWSW Sec 16 T6S R92W, Garfield County, Form 2A (#400138742) Review

Hi Dave,

Antero does concur with the COA's listed below.

With respect to your request that Antero provide COGCC with the COA's and wildlife stipulations that BLM has attached to this location, please note that this is not a federal pad and therefore we do not have any COA's from the BLM. The only reason that we put "federal" in the pad name is because one or more of the wells on the pad bottomhole in a drilling and spacing unit that contains a federal lease. We put federal in the name as a trigger because wells that are part of a federal Comm Agreement require that we file production reports (OGOR) with the MMS, etc. None of the wells, however triggered an actual federal permit because they are on fee surface and bottomhole in fee minerals.

Let me know if you have any questions. Thanks,

*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:** Kubeczko, Dave [<mailto:Dave.Kubeczko@state.co.us>]  
**Sent:** Monday, March 28, 2011 11:52 AM  
**To:** Hannah Knopping  
**Subject:** Antero Resources, Left Hand Federal A Pad, SWSW Sec 16 T6S R92W, Garfield County, Form 2A (#400138742) Review

Hannah,

I have been reviewing the Left Hand Federal A Pad **Form 2A** (#400138742). COGCC would like to attach the following conditions of approval (COAs) based on the data and information Antero has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

1. **General Site:** The following conditions of approval (COAs) will apply:  
**COA 5** - Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface pipelines or buried pipelines.

**COA 9** - Any pit constructed to hold fluids (reserve pit, production pit, frac pit; except for flare pit, if built) must be lined, or a closed loop system (as indicated by operator on the Form 2A) must be implemented .

**COA 23** - Operator must ensure 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 (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 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 25** - Flowback and stimulation fluids must be sent to tanks to allow the sand to settle out before the fluids can be placed into any pipeline or pit located on the well pad. The flowback and stimulation fluid tanks must be placed on the well pad in an area with additional downgradient perimeter berming. The area where flowback 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 604.a.(4) around crude oil, condensate, and produced water storage tanks.

COGCC would appreciate your concurrence with attaching these COAs (item 1) to the Form 2A permit prior to passing the OGLA review. In addition, could Antero provide COGCC with the COAs and wildlife stipulations that BLM has attached to this location. 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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