

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Tuesday, May 17, 2011 5:28 PM  
**To:** Kubeczko, Dave  
**Subject:** FW: Antero Resources, McPherson A Pad, NENW Sec 16 T6S R92W, Garfield County, Form 2A (#400159816) Review

**Categories:** Orange Category

Scan No 2033827      CORRESPONDENCE      2A#400159816

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**From:** Hannah Knopping [<mailto:hknopping@anteroresources.com>]  
**Sent:** Thursday, May 12, 2011 12:19 PM  
**To:** Kubeczko, Dave  
**Subject:** RE: Antero Resources, McPherson A Pad, NENW Sec 16 T6S R92W, Garfield County, Form 2A (#400159816) Review

Hi Dave,

On behalf of Antero Resources Piceance Corporation, I confirm that Antero has reviewed the COA's listed below regarding the McPherson A Pad and concurs with them.

Thanks,

*Hannah Knopping*

**Permit Representative**  
**Antero Resources**  
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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:** Tue 5/10/2011 12:07 PM  
**To:** Hannah Knopping  
**Subject:** Antero Resources, McPherson A Pad, NENW Sec 16 T6S R92W, Garfield County, Form 2A (#400159816) Review

Hannah,

I have been reviewing the McPherson A Pad **Form 2A** (#400159816). 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. 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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