

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, September 14, 2010 10:41 AM
To: Kubeczko, Dave
Subject: FW: Antero Resources, Diemoz A Pab, NWSW Sec 36 T5S R92W, Garfield County, Form 2A (#400086298) Review
Attachments: Diemoz A Pad_SO Consent to BMP's (Signed).pdf

Scan No 2033369 CORRESPONDENCE 2A#400086298

From: Hannah Knopping [mailto:hknopping@anteroresources.com]
Sent: Thursday, September 02, 2010 2:20 PM
To: Kubeczko, Dave
Cc: Warren, Michael
Subject: FW: Antero Resources, Diemoz A Pab, NWSW Sec 36 T5S R92W, Garfield County, Form 2A (#400086298) Review

Dave,

Antero does concur with the COA's listed below for the **Diemoz A Pad**.

#2. This is to confirm that the gas and water pipelines will be constructed along the proposed access road.

Also, I have attached the surface owner's signed consent to our Proposed BMP's.

Please let me know if you need anything else.

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, August 30, 2010 3:57 PM
To: Hannah Knopping
Subject: Antero Resources, Diemoz A Pab, NWSW Sec 36 T5S R92W, Garfield County, Form 2A (#400086298) Review

Hannah,

I have been reviewing the Diemoz A Pad **Form 2A** (#400086298). 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) review.

1. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 65 feet. COGCC's rules state that the distance to the nearest surface water should reflect intermittent (this includes ephemeral streams, irrigation ditches, drainages, abandoned gravel pits), as well as, perennial streams. COGCC guidelines

require designating all locations within close proximity to surface water a **sensitive area** (which Antero has already indicated on the Form 2A). The following conditions of approval (COAs) will apply:

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. **Rule 303.d.(3).C.:** The Location Drawing does not show the proposed locations of the oil, water and gas pipelines or pigging station. This drawing should show any improvements, particularly the proposed location of these pipelines; or, if these lines will be constructed along the access road, then a statement to that effect in the comments section is sufficient.

3. **General:** Due to the potentially fractured nature of the surface material in this area; the following conditions of approval (COAs) will apply:

COA 6 - Reserve pit 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.

COGCC would appreciate your concurrence with attaching these COAs (items 1 and 3) to the Form 2A permit prior to passing the OGLA review. The other issue (item 2) also needs to be addressed prior to permit approval. 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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