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NATURAL RESOURCES USA, INC.

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COGCC

April 6, 2006

Margaret Ash
Colorado Oil and Gas Conservation Commission
1120 Lincoln Street, Suite 801
Denver, CO 80203

RE: Request to Further Review Denied Applications for Production Pits

Dear Margaret,

Pioneer requests that the Commission further review applications for the Sleeping Dog 41-8/Tr, Mack 41-5, and Salapich 23-33 onsite pits. Applications for these production pit applications were denied due to COGCC's determination that the proposed pit were located in sensitive areas.

It is the intention of Pioneer to demonstrate that the aforementioned drilling pits are located outside of a sensitive area as described in Figure 901-1 of COGCC's Rules and Regulations.

Sleeping Dog 41-8/Tr

The sensitive area determination (S.A.D.), performed by COGCC, of this location identified a domestic water well approximately 373 feet downgradient of the proposed pit location. The S.A.D. also identified this proposed location to be 45 feet from the center line of Frio Canyon Spring, with the potential of communicating with surface water within this drainage.

PXD Response: A site investigation of this location identified the alleged domestic water well to be broken and completely inoperable (see photos), the well also functioned as a stock water well, rather than a domestic water well. Produced water from the Sleeping Dog 41-8 and Sleeping Dog 41-8 Tr is going into a water gathering system that is surface discharged at a permitted outfall approximately one-half mile west of this location. Under the CDPS permit, produced water at this outfall is discharged into Frio Canyon. Pioneer requests that the Commission permits one pit at this location, solely for emergency purposes. The pit will have a posted "no dumping" sign and will not routinely store produced water.

Mack 41-5

The S.A.D., performed by COGCC, identified this proposed pit as appearing to be located within a sensitive area. The determination was made after examining the topographical map enclosed in the production pit application.

PXD Response: A site investigation of this location identified the proposed pit to be located outside of the Jarosa Creek drainage, in an upland area. In an attempt to identify the existence of an underlying, shallow water table, Pioneer performed an augering project. Under the guidance of Applied Hydrology International, Site Services (Golden, CO) used a truck-mounted hollow stem auger to place a temporary monitoring well. The PVC casing had a 10 foot screen and the total depth of the well was placed approximately 28 feet below ground surface (bgs). After placing the casing, groundwater was found to be absent in the casing. Approximately 2 weeks later, after allowing groundwater to infiltrate in the temporary well, groundwater was measured at 24 feet bgs. The level of groundwater is approximately 20 feet below the pit bottom (Box 6, COGCC Figure 901-1). Due to the upland location and percolation of water contained within the nearby pit at the time of this project, Pioneer and Applied Hydrology International credit the existence of water in the temporary well to percolated produced water rather than representation of the water table. See photos for further clarification.

Salapich 22-33

The S.A.D., performed by COGCC, identified this proposed pit as appearing to be located within a sensitive area. The determination was made after examining the topographical map enclosed in the production pit application.

PXD Response:

A site investigation of this location identified the proposed pit to be located outside of the Jarosa Creek drainage, in an upland area. In an attempt to identify the existence of an underlying, shallow water table, Pioneer performed an augering project. Under the guidance of Applied Hydrology International, Site Services (Golden, CO) used a truck-mounted hollow stem auger to place a temporary monitoring well. Due to the existence of underlying bedrock at this location, a temporary was not able to be placed. The hollow stem auger encountered bedrock at approximately 13 feet bgs. The drilling crew was instructed to continue drilling, after downward motion became a futile effort, drilling ceased at 16 feet bgs. Bedrock outcrops are visible surrounding the location of the proposed pit. The landowner has also requested an offsite pond on their property, while a pond isn't feasible due to topographical restraints, an onsite pit is very desirable for livestock watering purposes. See photos for further clarification.

It is Pioneer's hope that the information provided in this letter as well as information gathered during site-specific investigations will aid in the Commission's determination that the Sleeping Dog 41-8/Tr, Mack 41-5, and Salapich 22-33 are not located within sensitive areas.

Please feel free to contact me with any further questions or concerns, 303-675-2708

Sincerely,
Pioneer Natural Resources USA, Inc.



Matthew Sanchez
Environmental Coordinator

Pit 285509

DOMESTIC WATER WELL - PERMIT # 95576

LOCATED DOWN GRADIENT FROM SLEEPING DOG 41-8/TR





