

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Tuesday, December 15, 2009 9:24 AM
To: Kubeczko, Dave
Subject: FW: Pioneer Natural Resources, Grants 14-34 Tr, SWSW Sec 34 T32S R66W, Las Animas County, Form 2A (#400011586) Review

Scan No 2032696 CORRESPONDENCE 2A#400011586

From: Kovacik, Georgina [mailto:Georgina.Kovacik@pxd.com]
Sent: Wednesday, December 09, 2009 12:37 PM
To: Kubeczko, Dave
Subject: RE: Pioneer Natural Resources, Grants 14-34 Tr, SWSW Sec 34 T32S R66W, Las Animas County, Form 2A (#400011586) Review

Hi Dave,

I had clarify some of this things with Phyllis Scott as well.

1. This is one of the areas in the field where the section line grid on the topographic map is incorrect. The reliable and accurate section corners are shown on the survey plat.
2. Construction date 4/23/2010 reclamation date: 7/23/2010, regarding the size of the disturbed area after interim reclamation, please change it to 0.5 aces. For the question of salt or oil based muds please mark no.
3. Please change the Soil to GA: Gulnare-Allens Park Complex, 5 to 35% slopes.
4. Please change the distance to nearest surface water to 1089 ft.
5. Please change the static water level to 44 ft.
6. Being on a existing well site, our field coordinator and surveyor don't think that rule 303.d.(3).H. applies.

I hope this covers all your questions, please let me know if you need anything else from us,

Thanks,

Georgina Kovacik
PNR

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Monday, November 16, 2009 2:11 PM
To: Kovacik, Georgina
Subject: Pioneer Natural Resources, Grants 14-34 Tr, SWSW Sec 34 T32S R66W, Las Animas County, Form 2A (#400011586) Review

Georgina,

I have been reviewing the Grants 14-34 Tr (#400011586) **Form 2A**. COGCC requests the following clarifications regarding the data Pioneer has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment.

1. **Location Identification (Section 4):** Based on the longitude and latitude provided in this section, the measurements of 571 feet from the south section line (FSL) and 636 feet from the west section line (FWL) do not match. They appear to be correct based on the plat map provided. Can you confirm which location is correct since all other distance measurements will need to be checked from the correct location.

2. **Construction (Section 6):** The dates for construction and interim reclamation appear to be switched. Can you confirm this. In addition, the size of the disturbed area during construction (1.00 acres) and size of location after interim reclamation (1.00 acres) are the same. I would think that after interim reclamation, the disturbed area would be less. Can you please confirm what these sizes are. A box answering the question will salt (>15,000 ppm TDS Cl) or oil based muds be used?: needs to be marked. I can make the changes if you send an email with these requests.
3. **Soils (Section 12):** The Form 2A indicates the soils to be Saruche-Rombo-Rock Outcrop Complex; however the attachment does not have this description. I can add this attachment if you send an email with this request.
4. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 1235 feet. According to the attached hydrology map, the distance to the nearest surface water is 1089 feet to the northwest. I can make the change if you send an email with this request.
5. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 310 feet bgs for a well located 1922 feet away from the proposed pad. COGCC's review indicates there is a water well (Permit No. 264663-Nicholson, domestic/stock well) to the north-northwest, with a total depth of 310 feet bgs that has been plugged, with no other information available. The number that comes up on our GIS map is 310 feet (this number often pertains to the total depth of the well, not the depth to groundwater). COGCC's review of other nearby water wells found a well located 2271 feet to the southeast (Permit No. 71849-Potter, household well) with a total depth of 100 feet bgs, depth to groundwater of 44 feet bgs, and a pumping rate of 6 gpm; another water well was located 4900 feet to the west-southwest (Permit No. 70811-Balloun, household well) with a total depth of 380 feet bgs, a depth to groundwater of 270 feet bgs, and a pumping rate of 6 gpm. The first well is more representative of the shallow groundwater conditions in this area. I can make this change if you send me an email with this request.
6. **Rule 303.d.(3).H.:** Where the location disturbance is to occur on lands with a slope ten percent (10%) or greater, a construction layout drawing showing cut and fill areas, and a location cross-section plot showing cut and fill areas, as well as locations of any pits is required. The construction layout drawing should also show the locations of existing facilities and the anticipated locations of new facilities. The following conditions of approval (COAs) will apply to this permit if a pit is located within fill material:
 - COA 5** - Operator must implement best management practices to contain any unintentional release of fluids.
 - COA 6** - Due to the potential instability and high permeability of fill material, any drilling pit constructed within fill material must be lined.

In order for COGCC to further process this permit, the actual location of the proposed well needs to be confirmed. The distances to the other features can then be assessed. COGCC would also appreciate your concurrence with attaching these COAs 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) 625-2497 x5 (office) or (970) 309-2514 (cell), or email. Thanks.

Dave

David A. Kubeczko, PG
Oil and Gas Location Assessment Specialist

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