

Kubeczko, Dave

To: Kubeczko, Dave
Subject: FW: Pioneer Natural Resources, Shinarump 11-11 KV, NWNW Sec 11 T33S R67W, Las Animas County, Form 2A (#400015377) Review

Scan No 2032712 CORRESPONDENCE 2A#400015377

From: Kovacik, Georgina [mailto:Georgina.Kovacik@pxd.com]
Sent: Friday, December 18, 2009 9:26 AM
To: Kubeczko, Dave
Subject: RE: Pioneer Natural Resources, Shinarump 11-11 KV, NWNW Sec 11 T33S R67W, Las Animas County, Form 2A (#400015377) Review

Hi Dave,

1. Please change the size of the disturbed area after reclamation to 0.5 acre.
2. Please also change the static water level to 20 ft and to sensitive area. The COA's are ok.

Thanks,

Georgina Kovacik
PNR

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Wednesday, December 09, 2009 5:49 PM
To: Kovacik, Georgina
Subject: Pioneer Natural Resources, Shinarump 11-11 KV, NWNW Sec 11 T33S R67W, Las Animas County, Form 2A (#400015377) Review

Georgina,

I have been reviewing the Shinarump 11-11 KV **Form 2A** (#400015377). 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. **Construction (Section 6):** 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. I can make the change if you send an email with this request.
2. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 167 feet bgs for a well located 331 feet from the proposed well. COGCC's review indicates there is a water well (Permit No. 254483-Big Pine Ridge LOA, domestic well) to the east, with a total depth of 167 feet bgs, a depth to groundwater of 20 feet bgs, and a pumping rate of 10 gpm. I believe this is the well you located. The number that comes up on our GIS map is 167 feet (this number often pertains to the total depth of the well, not the depth to groundwater). I can make the change if you send me an email with this request. Due to the proximity of a domestic water well to the proposed well (less than 1/8 of a mile [660 feet]), as well as shallow groundwater (i.e., less than 20 feet), COGCC guidelines require designating all locations with shallow groundwater and/or within 1/8 of a mile of a domestic water well a **sensitive area**. The following conditions of approval (COAs) will apply:
COA 1 - Location is in a sensitive area because of shallow groundwater; therefore, either a lined drilling pit or closed loop system must be implemented.

COA 4 - Location is in a sensitive area because of proximity to a domestic water well; therefore, operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations.

COA 5 - Operator must implement best management practices to contain any unintentional release of fluids.

COA 8 - Location is in a sensitive area because of proximity to a domestic water well; therefore production pits must be lined.

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. The other issues are very minor and I would like to get this passed. 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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