

Kubeczko, Dave

To: Kubeczko, Dave
Subject: FW: Pioneer Natural Resources, Foothills 12-36 TR, SWNW Sec 36 T32S R67W, Las Animas County, Form 2A (#400015237) Review

Scan No 2032714 CORRESPONDENCE 2A#400015237

From: Kovacik, Georgina [mailto:Georgina.Kovacik@pxd.com]
Sent: Friday, December 18, 2009 9:37 AM
To: Kubeczko, Dave
Subject: RE: Pioneer Natural Resources, Foothills 12-36 TR, SWNW Sec 36 T32S R67W, Las Animas County, Form 2A (#400015237) Review

Hi Dave,

1. Please change the size of the disturbed area after reclamation to 0.5 acre.
2. Thanks for changing the soil type to GA.
3. Please also change the static water level to 60 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 5:50 PM
To: Kovacik, Georgina
Subject: Pioneer Natural Resources, Foothills 12-36 TR, SWNW Sec 36 T32S R67W, Las Animas County, Form 2A (#400015237) Review

Georgina,

I have been reviewing the Foothills 12-36 TR **Form 2A** (#400015237). 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. **Soils (Section 12):** The soil type listed on the Form 2A, Gulnare Rock Outcrop Complex 15 to 50 percent slopes, does not match with the soils shown on the COGCC GIS online map based on the coordinates of the proposed well. The soil type is Gulnares-Allens Park Complex 5 to 35 percent slopes. I have added the NRCS description to the attachments. Due to the fractured nature of the Gulnare, the following condition of approval (COA) will apply:
COA 6 - Location is in a sensitive area because of potential for adverse impacts to groundwater; therefore all pits must be lined.
3. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 150 feet bgs for a well located 3780 feet from the proposed well. COGCC's review indicates there is a water well (Permit No. 92168-McDonald, domestic well) to the northeast, with a total depth of 150 feet bgs, a depth to groundwater of 60

feet bgs, and a pumping rate of 3 gpm. I believe this is the well you located. The number that comes up on our GIS map is 150 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. COGCC guidelines require designating all locations with close proximity to surface water (i.e., less than 500 feet) a **sensitive area** and requiring the following conditions of approval (COAs):

COA 4 - Location is in a sensitive area because of close 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.

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

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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