

Kubeczko, Dave

To: Kubeczko, Dave
Subject: FW: Pioneer Natural Resources, MacKenzie Federal 23-2, NESW Sec 2 T32S R66W, Las Animas County, Form 2A (#400014704) Review

Scan No 2032720 CORRESPONDENCE 2A#400014704

From: Kovacik, Georgina [mailto:Georgina.Kovacik@pxd.com]
Sent: Friday, December 18, 2009 9:11 AM
To: Kubeczko, Dave
Subject: RE: Pioneer Natural Resources, MacKenzie Federal 23-2, NESW Sec 2 T32S R66W, Las Animas County, Form 2A (#400014704) Review

Hi Dave,

1. The COA is ok.
2. Please change the distance to nearest surface water to 708 ft.
3. Also please change the static water level to 26 ft, the water well used has permit No. 24001

Thanks,

Georgina Kovacik
PNR

From: Kubeczko, Dave [mailto:Dave.Kubeczko@state.co.us]
Sent: Thursday, December 10, 2009 6:38 PM
To: Kovacik, Georgina
Subject: Pioneer Natural Resources, MacKenzie Federal 23-2, NESW Sec 2 T32S R66W, Las Animas County, Form 2A (#400014704) Review

Georgina,

I have been reviewing the MacKenzie Federal 23-2 (#400014704) **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. **Soils (Section 12):** The soil type listed on the Form 2A is Gulnare-Allens Park Complex 5 to 35 percent slopes. 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.
2. **Water Resources (Section 14):** Form 2A indicates the distance to the nearest surface water is 1414 feet. According to the attached hydrology map, the distance to the nearest surface water is 708 feet to the north-northwest. I can make the change if you send an email with this request.
3. **Water Resources (Section 14):** Form 2A indicates the depth to groundwater to be 100 feet bgs for a well located 4517 feet away from the proposed pad. COGCC's review could not find a water well at that distance; however, there is a water well (Permit No. 24001-Mathers, stock well) approximately 5278 feet to the southwest, with a total depth of 100 feet bgs, a depth to groundwater of 26 feet bgs, and a pumping rate of 5 gpm. I believe this is the well you located. The number that comes up on our GIS map is 100 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. Although the depth to groundwater cannot be confirmed to be less than 20 feet bgs at this location, the potential exists for surface releases to reach groundwater due to the potentially

permeable nature of the near surface materials and underlying fractured bedrock in this area; therefore, the following conditions of approval (COAs) will apply:

COA 2 - Location may be in a sensitive area due to shallow groundwater; therefore if drilling pits intercept groundwater the pit must be lined or a closed loop system must be used.

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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