

PIONEER

NATURAL RESOURCES

January 25, 2010

Dave Neslin, Director
Colorado Oil and Gas Conservation Commission
1120 Lincoln Street, Suite 801
Denver, CO 80203

Pioneer Natural Resources USA, Inc.
1401 17th Street, Suite 1200
Denver, Colorado 80202
Tel: (303) 298-8100 Fax: (303) 298-7800

RE: Saluki 41-8 well location
COGCC #s 400011171, 400011284
T33S-R66W Section 8: NE/4NE/4
Las Animas County, Colorado

Dear Mr. Neslin:

Pioneer Natural Resources USA, Inc. ("Pioneer") requests a variance to Rule 502.a.1. for the above-referenced well, which was applied for in the associated Forms 2 and 2A. Pioneer is able to meet the surface property line setbacks set forth in Rules 603.a. (2). However, Pioneer is unable to meet the setbacks referenced in this Rule and at the same time meet the building unit setback laid out in Rule 603.a.(1), which requires a setback of 150' from a building unit. As you can see from the plat that I have attached to this letter, the building is located 127' from the proposed wellhead.

This location needs to be drilled to sufficiently capture minerals that are being left in the ground and to allow Pioneer to meet its development obligations to its mineral owner(s). Because of topography, density of housing development and gas development, no other sites exist to properly develop these minerals.

Inasmuch as Pioneer owns both the lot and improvements on the lot, including the above-mentioned building unit, and because Pioneer will insure that the building remains unoccupied during drilling, completion and frac'ing operations by boarding up the building, fencing off the drillsite or performing daily inspections during these periods, Pioneer does not believe that the intent of the COGCC regulations regarding safety will be violated. Also, because Pioneer owns the building itself, a waiver is not necessary.

Should you have any questions, please contact me at 303-675-2717 or Erin Liverance at 303-672-2652. Thank you for your further processing of this application.

Respectfully,



Andy Boden
Senior Landman
Pioneer Natural Resources USA, Inc.
Acb/acb