

PIONEER

NATURAL RESOURCES

Pioneer Natural Resources USA Inc.
5205 N. O'Connor Blvd. Suite 200
Irving, Texas 75039-3746
Main: 972-444-9001 Fax: 972-969-3576

August, 31st, 2016

Director Matt Lepore
Colorado Oil & Gas Conservation Commission
1120 Lincoln Street, Suite 801
Denver, Colorado 80203

RE: COGCC Rule 502.b Variance Request for 1001.c Surface Owner Waiver
for the Lorencito 3-19-34-66, API# 05-071-09042, Location ID: 309068
Township 34 South, Range 66 West, 6th P.M.
Section 19: NE/4NW/4
Las Animas County, Colorado

Dear Director Lepore,

We have obtained a Surface Owner Waiver under Rule 1001.c for final reclamation of the Lorencito 3-19-34-66 location and related access road. We have performed final reclamation on this location in accordance with the surface owner's request. Due to the surface owner's final reclamation requests of the well pad and access road, we are requesting your approval for a variance from requirements of Rule 1004. (a) as specified in Section III "Reclamation Plan Details" of the Site-Specific Final Reclamation Plan within this document. We have provided all of the information and documentation in accordance with COGCC Operator Guidance on Rule 1001.c: Reclamation Variances and Waives from December 17, 2015.

Pioneer has entered into an agreement with the surface owner regarding topsoil protection and reclamation of the Lorencito 3-19-34-66 location. Pioneer has also completed an evaluation of whether public health, safety and welfare will be protected and significant adverse environmental impacts would be prevented if compliance with specified provisions of Rule 1004 is not required. Pioneer's evaluation, along with evidence and demonstrations are included in the Site-Specific Reclamation Plan included in this letter.

The following attached documents contained in this letter for the Lorencito 3-19-34-66 were developed in accordance with the December 17, 2015 version of the COGCC 1001.c: Reclamation Variances and Waivers guidance document:

(1) "Surface Owner Reclamation Letter Agreement" and "Reclamation Consultation Form"

*These two documents fulfill the five requirements of Section I in the December 17, 2015 version of the COGCC 1001.c: Reclamation Variances and Waivers" guidance document.

(2) "Site Specific Final Reclamation Plan"

*This document, along with all images and exhibits, fulfill the eight requirements of Section II.B in the December 17, 2015 version of the COGCC 1001.c: Reclamation Variances and Waivers" guidance document.

(3) Pioneer's Field-Wide Final Reclamation Plan and Best Management Practices

*This document provides more detailed information concerning the local environment and land conditions in the Raton Basin where Pioneer operators, as well as more detailed information concerning Pioneer's application and use of specific reclamation practices and techniques.

We have made a good faith effort to provide the necessary information and evidence requested in the December 17, 2015 version of the COGCC 1001.c: Reclamation Variances and Waivers guidance document in order for the Director to evaluate our request for waiving specified provisions of Rule 1004 to fulfill the surface owner's requests for final reclamation.

We respectfully ask you to review and approve our variance request from the specified sections of the 1004 final reclamation requirements.

Sincerely,

Pioneer Natural Resources USA, Inc.

A handwritten signature in black ink, reading "Kathryn Q. Gillen". The signature is written in a cursive, flowing style.

Kathryn Q. Gillen
Environmental Specialist II

Table of Contents

Surface Owner Reclamation Letter Agreementpages 4-8

- Rule 1001.c. Surface Owner Waiver of 1000-Series Rules
- December 17, 2015 Version Rule 1001.c Reclamation Variances and Waivers” guidance document Section I.1 through I 1.5

Pioneer Final Reclamation Consultation Form.....pages 9-10

- Rule 305.f.(6) Final Reclamation Consultation 300-Series Rules
- December 17, 2015 Version Rule 1001.c Reclamation Variances and Waivers” guidance document Section II.B.5

Site-Specific Final Reclamation Planpages 11-35

- December 17, 2015 Version Rule 1001.c Reclamation Variances and Waivers” guidance document Section I - Section II.B.5

Section I. General Location Description

Section II. Overview

Section III. Reclamation Plan Details

- Well Pad- 1004.(a) rule variances requested
- Right Of Way (ROW) -1004.(a) rule variances requested
- Reclamation work plan
- Successful Reclamation Standards 1004.c: methods of stabilization & vegetative cover
- Status/Condition of Reclamation Photographs, pages 20-24
- COGCC Form 6 Subsequent Well Abandonment Report-*Approved*, pages 25-28
- COGCC Form 27 Remediation Work Plan-Site/Facility Closure-*Approved*, pages 29-31

Section IV. Guidance Document Section I Requirements -*Completeness Checklist*

Section V– Guidance Document Section II.B Requirements -*Completeness Checklist*

Evaluation of Public Health, Welfare Safety and Adverse Environmental Impactspages 35-37

- December 17, 2015 Version Rule 1001.c Reclamation Variances and Waivers” guidance document Section I - Section II.B.8

Pioneer’s Raton Basin Field-Wide Reclamation and Best Management Practices page 37

Surface Owner Reclamation Letter Agreement

Rule 1001.c. Surface Owner Waiver of 1000-Series Rules
(Attachment)

PIONEER

NATURAL RESOURCES

Pioneer Natural Resources Company
5205 N. O'Connor Blvd. Suite 200
Irving, Texas 75039-3746
Main: 972-444-9001 Fax: 972-969-3576

March 14, 2016

B.F. Hill, Managing Partner
Hill Ranch Ltd.
3794 Highway 67 West
Glen Rose, TX 76043

Re: Final Reclamation Agreement
Lorencito 3-18-34-66 Lorencito 12-12-34-67
Lorencito 3-19-34-66 Lorencito 12-19-34-66
Lorencito 4-29-34-66 Lorencito 13-11-34-67
Lorencito 7-13-34-67 Lorencito 14-1-34-67
Lorencito 7-19-34-66 Big Horn Sheep 14-11
Lorencito 8-16-34-66 Catfish 21-11
Lorencito 8-29-34-66 Moose 42-2
Lorencito 12-1-34-67
Township 34 South, Ranges 66 & 67 West, 6th P.M.
Las Animas County, Colorado

Dear Mr. Hill,

Pioneer Natural Resources USA, Inc. ('Pioneer') consulted with you concerning final reclamation on your property following the plugging and abandonment of the above referenced locations. These gas wells have been officially plugged and abandoned.

During our consultation with you concerning final reclamation on your property, you requested that Pioneer not reclaim certain features of these locations back to predrilling conditions. This letter agreement, including the attached Exhibit 'A' for each location, sets forth the agreement between you and Pioneer regarding final reclamation.

Exhibit 'A' for each of the subject locations to this letter agreement sets forth the specific reclamation plan for your property, including, identifying those specific portions of the access road and/or the location for which you have requested Pioneer waive final reclamation requirements under COGCC Rule 1004 and a description of the reclamation plans on those areas that are not subject to the waiver. Pioneer shall conduct its final reclamation in accordance with such plan.

The reasons you have provided for waiving Pioneer's obligation to preform final reclamation include:

1) You intend to use the well site access road and the flat area of the well pad Pioneer had constructed for future vehicle access to your property for staging hunting trips or for other purposes related to your ownership and/or development of your property.

2) You have requested that Pioneer use a seed mix which you have personally selected to seed the areas as specified in the consultation form.

By waiving Pioneer's obligations for final reclamation required under COGCC Rule 1004 as set forth in this letter agreement, you are acknowledging that the current condition of the portions of the access roads and/or oil and gas locations subject to the waiver is satisfactory to you. By executing below and agreeing to the reclamation plan set forth in this letter agreement and the Exhibit 'A' for each location, you acknowledge that you are knowingly and forever waiving all reclamation protections otherwise afforded by COGCC Rule 1004 for that portion of the locations which you are granting the waiver.

This letter agreement contains all of the agreements, conditions, promises and covenants between the parties with respect to the subject matter hereof and supersedes all prior or contemporaneous agreements, representations or understandings with respect to the subject matter hereof. This letter agreement shall be binding upon and inure to the benefit of the parties and their respective agents, officers, employees, shareholders, directors, insurers, legal representatives, heirs, successors and assigns. This letter agreement shall be construed and governed in accordance with the laws of the State of Colorado without regard to the choice of law provisions thereof. This letter agreement may be executed via facsimile or email by PDF format in one or more counterparts, all of which when taken together shall constitute one agreement.

If you are in agreement with the terms and conditions of this letter agreement, please sign below and return a fully executed copy of this letter to myself at chris.hollmann@pxd.com.

Sincerely,

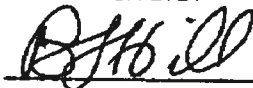
Pioneer Natural Resources USA, Inc.



Chris Hollmann
Staff Landman

ACCEPTED AND AGREED:

HILL RANCH LTD.



By:

As:

Date: 3/24/16

**Surface Owner Reclamation
Letter Agreement
(EXHIBIT A)**

COGCC FACILITY/LOCATION STATUS: CLOSED		Location ID: 309068	
API/Facility ID	Well Name	Location	COGCC Rule Variance
05-071-09042-0000	Lorencito 3-19-34-66	T34S-R66W Sec.19: NE/4NW/4	1004.a Sentence(s) 3, 4, 5, and 6

This document sets forth the specific reclamation plan for your property, including, identifying those specific portions of the access road and/or the location for which you have waived Pioneer's reclamation requirements under COGCC Rule 1004; and a description of the reclamation plans for those areas that are not subject to the waiver. Pioneer shall conduct its final reclamation in accordance with this plan.

Pioneer consulted with you on April 2nd, 2013 in which the reclamation plans to be performed on location were devised. Based on our consultation Pioneer will conduct final reclamation in accordance with your specified requests:

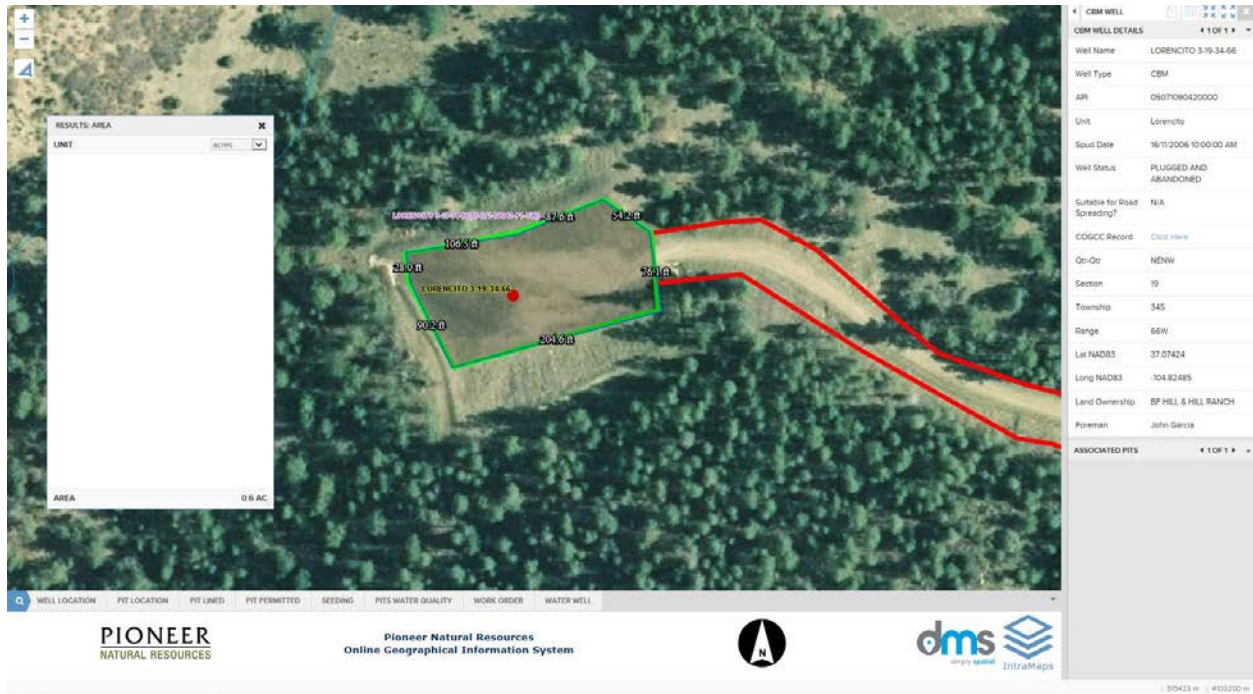
- 1) that the Right-of-Way shall not be returned to pre-disturbance contour; that the Right-of-Way shall remain in place with gravel;
- 2) that any erosion be fixed and culverts be cleaned out along the Right-of-Way;
- 3) that the well pad shall not be returned to pre-disturbance contour; that the well pad shall remain flat with gravel;
- 4) that the well pad shall be ripped and seeded with the agreed upon specified seed mix which you have provided to Pioneer.

Pioneer has conducted final reclamation requirements for all other areas of the location that you have not waived Pioneer from the reclamation requirements in COGCC Rule 1004. Pioneer has performed all reclamation requirements as specified in COGCC Rule 1004 which cannot be waived by the Surface Owner.

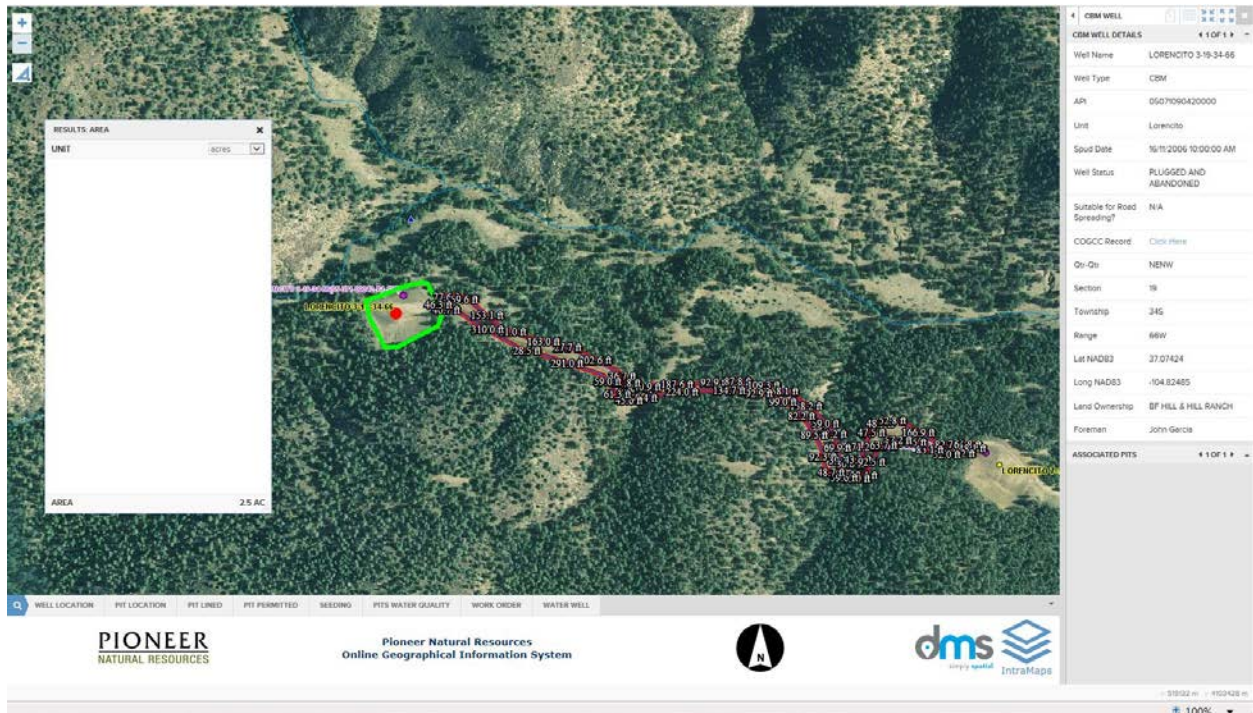
Pioneer well Lorencito 3-19-34-66 has been plugged and abandoned in accordance with COGCC Rule 319. Flowline risers and gathering line risers have been abandoned per COGCC Rule 1103. All Pioneer trash and debris has been removed from the location. Pioneer has performed routine noxious weed control on location per COGCC rule 1004. Stormwater Management has been conducted on location and in accordance with COGCC Rule 1002.f.

Pioneer believes the reclamation plans specified in this Exhibit have been fulfilled. As of October 5, 2015, the Lorencito 3-19-34-66 Location is ready for the Final Reclamation Inspection by COGCC for approval and release as an oil and gas location.

Lorencito 3-19-34-66 Well Pad
T34S-R66W Sec.19: NE/NW
Aerial Image Date: May 2014



Lorencito 3-19-34-66 Right-of-Way (Access Road)
T34S-R66W Sec.19: NE/NW
Aerial Image Date: May 2014



**Pioneer Final Reclamation
Consultation Form**

Rule 306.f. Final Reclamation Consultation

(Attachment)

**Plug & Abandon Consultation Form
(Surface Owner)**

WELL NAME: Lorencito 3-19-34-66
TWN 34 RNG 66 QTR/QTR _____

--	--

Yes <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>	No <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Disposition of Right-of-Way Leave original access road with gravel (As is) Leave road flat and re-seed Reclaim right-of-way to original contours and re-seed Other - <u>fix any erosion Along Road Clean Culverts</u>
---	--	--

Yes <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>	No <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Disposition of Well Pad Leave pad flat with gravel (As is) Leave pad flat and re-seed Reclaim pad to original contours and re-seed Other - <u>Rip & Seed well pad.</u>
---	--	---

Yes <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	No <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Disposition of Pit Leave pit open (As is) Pull back and reclaim pit to original contours and re-seed Other - <u>no pit</u>
---	--	--

Yes <input type="checkbox"/> <input type="checkbox"/>	No <input type="checkbox"/> <input type="checkbox"/>	Work to be Completed by Operator Remove gate at fenced property lines if any Other - _____
---	--	---

Comments/Other: Rip & Seed well pad, leave Road As is with Gravel. Fix any erosion Along R-O-W, Clean Culverts.

Pioneer represented by: Chris Sanchez (Sign) Chris Sanchez (Print)
Discussed this 2nd day of April, 2013.

NOTE: THIS FORM IS FOR THE PURPOSE OF OBTAINING SURFACE OWNER REQUESTS REGARDING THE MATTERS SET FORTH ABOVE AND EXECUTION OF THIS FORM IS NOT INTENDED TO CREATE A BINDING AGREEMENT. ALL REQUESTS ARE SUBJECT TO OPERATOR & COGCC APPROVAL AND IN ACCORDANCE WITH ALL GOVERNMENTAL REGULATIONS IN EFFECT.

OPERATOR IS NOT RESPONSIBLE FOR MAINTENANCE ON WELL PADS OR RIGHTS OF WAY LEFT IN "AS IS" CONDITION.

Surface Owner Signature:

<u>X Mike Powell</u> (Sign)	<u>X Mike Powell</u> (Print)
(Sign)	(Print)

Owner's Address: _____
Telephone No.: _____

THIS IS NOT A BINDING AGREEMENT

502.b Formal Director Variance Approval

Site-Specific Final Reclamation Plan

Pioneer Natural Resources USA, Inc.

I. General Location Description:

API Number	05-071-09042-00					
Well Name:	LORENCITO			Well Number: 3-19-34-66		
Location:	QtrQtr: NENW	Section: 19	Township: 34S	Range: 66W	Meridian: 6	
County:	LAS ANIMAS		Federal, Indian or State Lease Number: _____			
Field Name:	PURGATOIRE RIVER		Field Number: 70830			

Related Facilities

Facility Type	Facility ID/ API	Facility Name/ Number	Operator Name/ Number	Status	Field Name/ Number	Location
<u>WELL</u>	05-071-09042	LORENCITO 3-19-34-66	PIONEER NATURAL RESOURCES USA INC 10084	PA 8/6/2013	PURGATOIRE RIVER 70830	LAS ANIMAS 071/36 NENW 19 34S 66W
<u>LOCATION</u>	309068	LORENCITO-634S66W 19NENW	PIONEER NATURAL RESOURCES USA INC 10084	CL 8/6/2013	PURGATOIRE RIVER 70830	LAS ANIMAS 071/36 NENW 19 34S 66W

II Overview:

This “Site-Specific Final Reclamation Plan” document attempts to both provide a detailed description of the reclamation plan for this location and to follow the “Rule 1001.c Reclamation Variances and Waivers” guidance document dated December 17, 2015. The information in this document aligns with the requirements in the guidance document.

III Reclamation Plan Details

Well Pad Location

The annotated polygon on the aerial image (see **Image A** below) is the approximate, total disturbed surface area before reclamation work was completed. The total disturbed surface area of the Lorencito 3-19-34-66 well pad for Pioneer operations was approximately 1.1 acres.

Image A

(Aerial image from August, 2008)

Lorencito 3-19-34-66
Surface Area Disturbance of Well Pad
Las Animas County, CO
NENW, Sec. 19, T34S, R66W



RESULTS: AREA

UNIT

acres

AREA

1.1 AC



CBM WELL	
CBM WELL DETAILS	
Well Name	LORENCITO 3-19-34-66
Well Type	CBM
API	05071090420000
Unit	Lorencito
Spud Date	16/11/2006 10:00:00 AM
Well Status	PLUGGED AND ABANDONED
Suitable for Road Spreading?	N/A
COGCC Record	Click Here
Qtr-Qtr	NENW
Section	19
Township	34S
Range	66W
Lat NAD83	37.07424
Long NAD83	-104.82485
Land Ownership	BF HILL & HILL RANCH
Foreman	John Garcia
ASSOCIATED PITS	

- WELL LOCATION
- PIT LOCATION
- PIT LINED
- PIT PERMITTED
- SEEDING
- PITS WATER QUALITY
- WORK ORDER
- WATER WELL



The surface owner requested during the final reclamation consultation and has entered into an agreement with Pioneer concerning these specified reclamation plans; that the well should not be returned to contour; that the well pad remain flat; that the gravel should not be removed from the flat portions of the well pad; Pioneer will leave some disturbed areas compacted, stabilized and covered with gravel that will remain in place to minimize new soil disturbance and minimize soil erosion; and that the well pad should be drilled and seeded with the surface owner's specified seed mix.

In order to fulfill the surface owner's requests concerning final reclamation Pioneer is seeking a variance for the below specified portions of the well pad from select requirements in Rule 1004.(a):

Rule 1004.a;

- 1) Sentence 3 – "All access roads to plugged and abandoned wells and associated production facilities shall be closed, graded and re-contoured."**
- 2) Sentence 5 – "Well locations, access roads and associated facilities shall be reclaimed."**
- 3) Sentence 6 – "As applicable, compaction alleviation, restoration, and re-vegetation of well sites, associated production facilities, and access roads shall be performed to the same standards as established for interim reclamation under Rule 1003."**

and Rule 1004.c.(2);

4) Sentence (1) – On non-crop land, reclamation has been performed as per Rules 1003 and 1004, and disturbed areas have been either built on, compacted, covered, paved, or otherwise stabilized in such a way as to minimize erosion to the extent practicable, or a uniform vegetative cover has been established that reflects pre-disturbance or reference area forbs, shrubs, and grasses with total percent plant cover of at least eighty percent (80%) of pre-disturbance or reference area levels, excluding noxious weeds, as determined by the Director through a visual appraisal.

Since the surface owner has requested that the gravel be left on the well pad the vegetative growth will not likely reach a total percent plant cover of eighty percent (80%) of pre-disturbance or reference area levels; therefore, a variance from rule 1004.c.(2) has been requested as a requirement for achieving successful final reclamation thresholds for release of financial assurance.

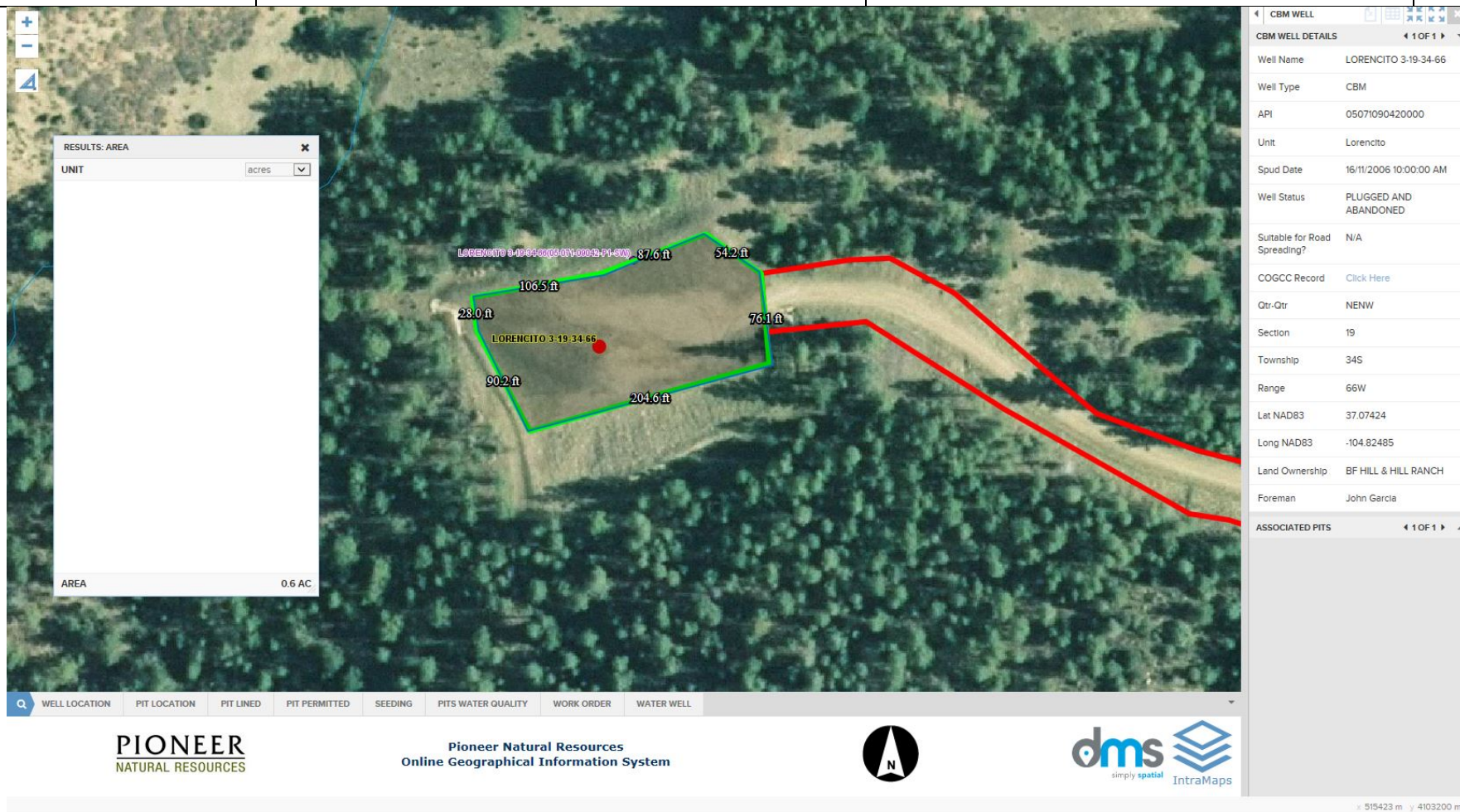
Pioneer has performed all other specified requirements in 1004.(a) on the Lorencito 3-19-34-66 location including;

- Sentence 1 – "All pits, mouse and rat holes and cellars shall be backfilled."
- Sentence 2 – "All debris, abandoned gathering line risers and flowline risers [if existed] have been removed."
- Sentence 2 – Guy line anchors and guy liner anchor markers have been removed.
- Sentence 7 – "All other equipment, supplies, weeds, rubbish, and other waste materials that existed on location have been removed."

Additionally, Pioneer has performed the following reclamation work on the well pad to achieve successful reclamation on the location and to a condition satisfactory to the surface owner.

- The cut slope where the well pad was constructed was graded to achieve slope stabilization.
- The slope was cross-rippled and seeded to establish slope stabilization.
- The surface owner requested a specific seed mix that was used to seed the well pad.
- Stormwater BMPs were constructed and maintained to achieve site stabilization.
- Drainage features were constructed along west side of well pad.
- The perimeter of the pad was contoured to divert runoff from the face of the sloped areas to prevent and reduce erosion.
- Pioneer has performed additional seeding on the well pad as needed.

After all reclamation has been completed, disturbed surface of the “Waiver Area” for the well pad is approximately 0.6 acres (down from 1.1 acres) (see **Image B** below). Pioneer left some disturbed areas compacted, stabilized and covered with gravel that will remain in place to minimize new soil disturbance and minimize soil erosion.



Access Road ROW

The annotated polygon on the aerial image (see **Image C** below) is the approximate, disturbed surface area before reclamation work was completed. The disturbed area of the Lorencito 3-19-34-66 access road for Pioneer operations was approximately 2.5 acres.

The surface owner requested during the Final Reclamation Consultation and has entered into an agreement with Pioneer concerning these specified reclamation plans; that the Right-of-Way (access road) should not be returned to contour; that the Right-of-Way (access road) remain flat; that the gravel should not be removed from the Right-of-Way (access road); and that any erosion be fixed and culverts be cleaned out along the Right-of-Way.

In order to fulfill the surface owner's requests concerning final reclamation, Pioneer is seeking a variance for the specified below portions of the Right-of-Way (access road) from select requirements in Rule 1004.(a):

5.) Sentence 3 – “All access roads to plugged and abandoned wells and associated production facilities shall be closed, graded and re-contoured.”

6.) Sentence 4 – “Culverts and any other obstructions that were part of the access road(s) shall be removed.”

7.) Sentence 5 – “Well locations, access roads and associated facilities shall be reclaimed.

8.) Sentence 6 – “As applicable, compaction alleviation, restoration, and re-vegetation of well sites, associated production facilities, and access roads shall be performed to the same standards as established for interim reclamation under Rule 1003.

and Rule 1004.c (2);

9.) Sentence 1 – “On non-crop land, reclamation has been performed as per Rules 1003 and 1004, and disturbed areas have been either built on, compacted, covered, paved, or otherwise stabilized in such a way as to minimize erosion to the extent practicable, or a uniform vegetative cover has been established that reflects pre-disturbance or reference area forbs, shrubs, and grasses with total percent plant cover of at least eighty percent (80%) of pre-disturbance or reference area levels, excluding noxious weeds, as determined by the Director through a visual appraisal.”

Since the surface owner has requested that the gravel be left on the Right-of-Way (access road) the vegetative growth will not likely reach a total percent plant cover of eighty percent (80%) of pre-disturbance or reference area levels; therefore, a variance from rule 1004.c.(2) has been requested to waive this requirement for achieving successful final reclamation thresholds for release of financial assurance.

Pioneer performed the following reclamation work on the Right-of-Way (access road) to achieve successful reclamation on the location and to a condition satisfactory to the Surface Owner:

- The cut slope where the ROW was constructed was graded to achieve slope stabilization.
- The slope was cross-rippled and seeded to establish slope stabilization.
- The surface owner requested a specific seed mix that was used to seed the ROW.
- Stormwater BMPs were constructed and maintained to achieve site stabilization.

- Pioneer has performed additional seeding on the well pad as needed

After all reclamation has been completed, disturbed surface of the “Waiver Area” for the ROW (access road) is approximately 2.5 acres (See **Image C** below).

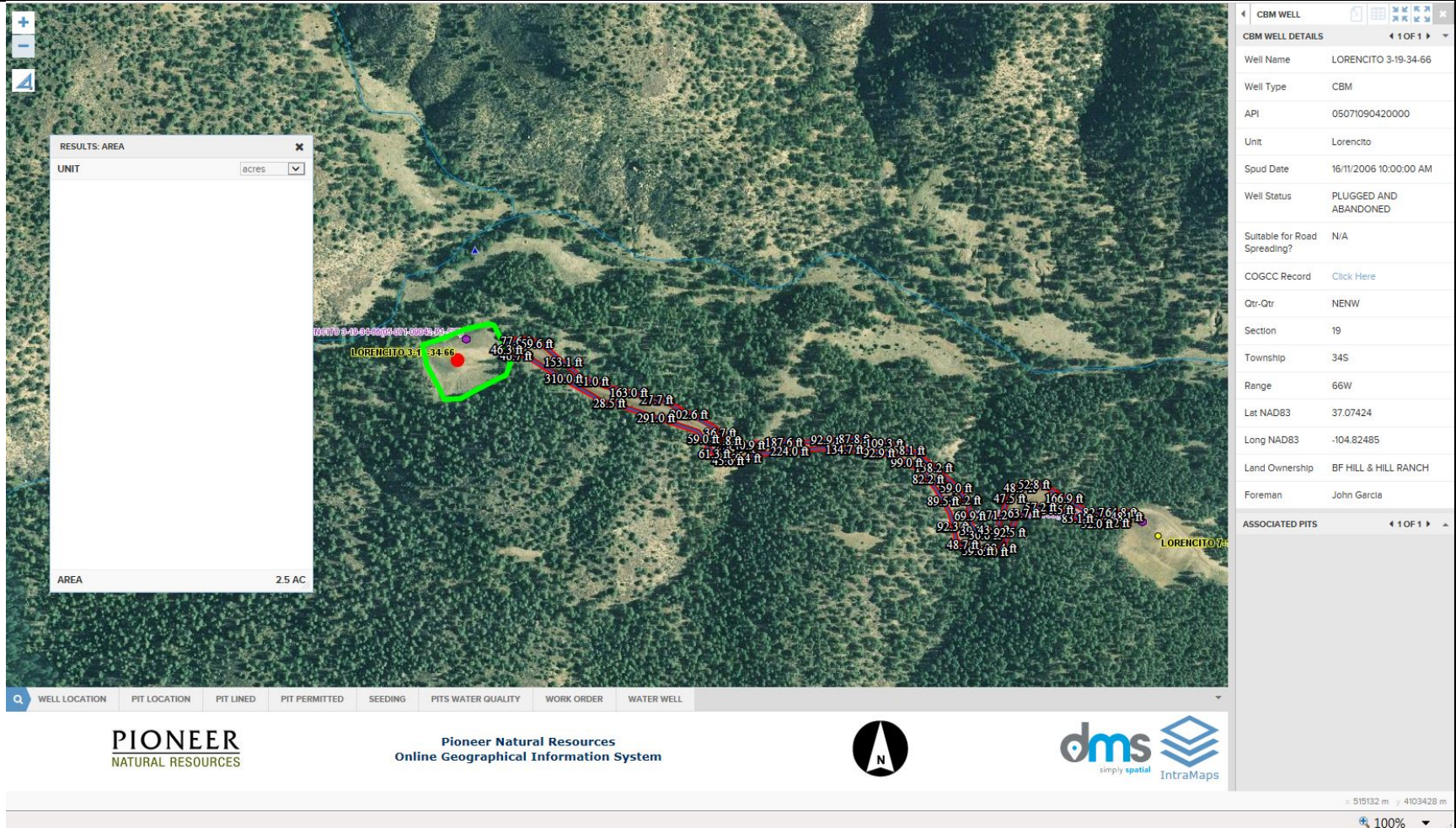


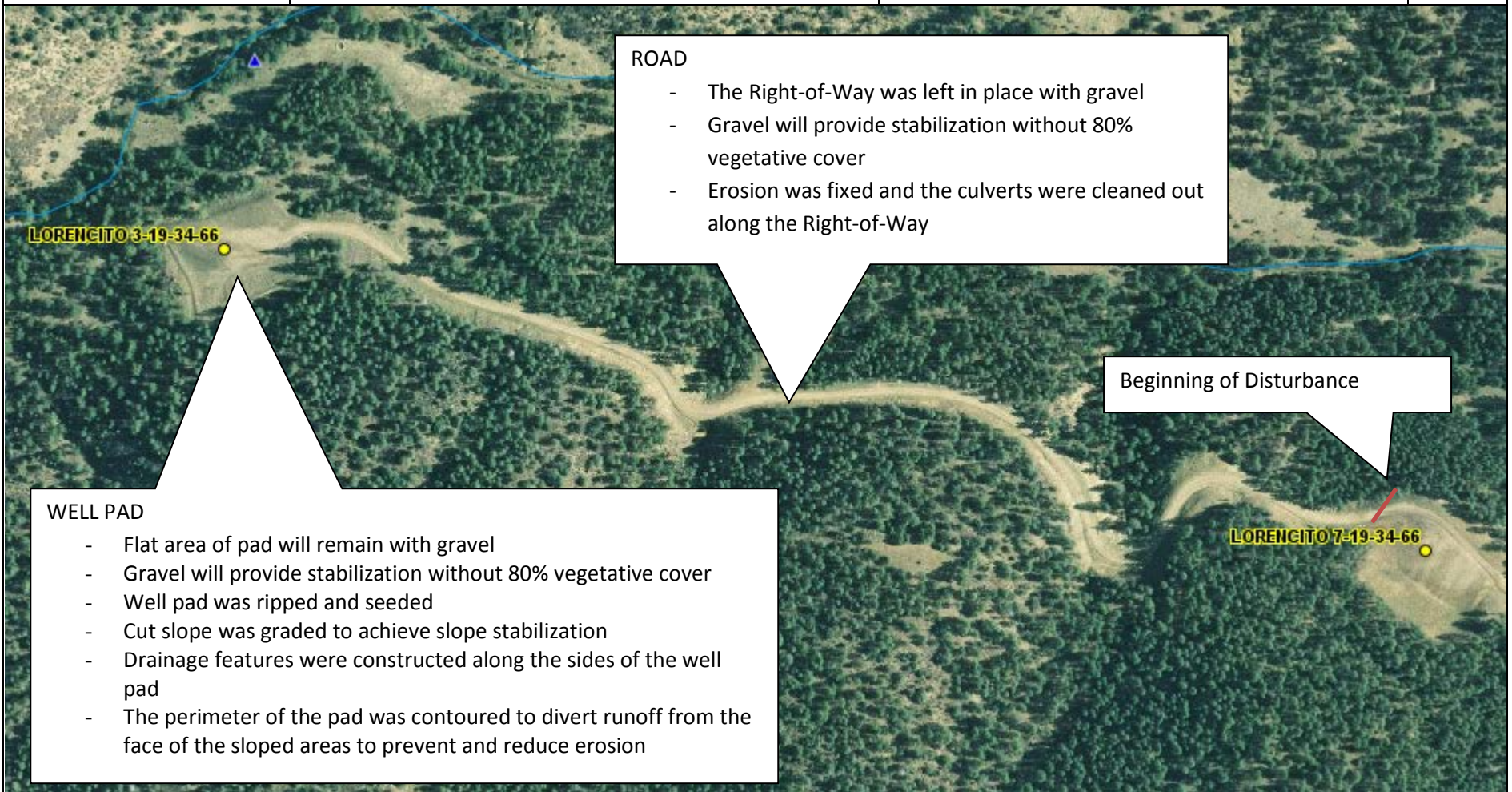
Image D

(Aerial image from May, 2014)

Lorencito 3-19-34-66
Reclamation Diagram
Las Animas County, CO
NENW, Sec. 19, T34S, R66W



1:3500 ft



Photographs of Location

Photographs of location fulfillment of the **Section II.B.2- Section II.B.4 and Section II.B.6 and 7** of the COGCC Rule 1001.c Reclamation Variances and Waivers” guidance document dated December 17, 2015.

(Attachment)

Condition of Reclamation Photographs



Picture .1. Fill slope facing northwest.



Picture.2. Cut slope facing west.



Picture.3. Cut slope facing west.



Picture.4. ROW facing east.



Picture.5. ROW facing west.



Picture.6. Intersection of ROW and main access road facing northwest, shared access to Lorencito 7-19-34-66.



Picture.7. ROW facing west, shared access to Lorencito 7-19-34-66.



Picture.8. ROW facing northwest, shared access to Lorencito 7-19-34-66.

COGCC FORM 6 – WELL ABANDONMENT REPORT

“Approved Well Abandonment – Subsequent Form 6” in fulfillment of the **Section II.B.I** of the COGCC Rule 1001.c Reclamation Variances and Waivers guidance document dated December 17, 2015.

(Attachment)

FORM
6Rev
12/05State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203 Phone: (303) 894-2100 Fax: (303) 894-2109



DE ET OE ES

Document Number:

400480627

Date Received:

09/13/2013

WELL ABANDONMENT REPORT

This form is to be submitted as an Intent to Abandon whenever an abandonment is planned on a borehole. After the abandonment is complete, this form shall again be submitted as a Subsequent Report of the actual work completed. The approved intent shall be valid for six months after the approval date, after that period, a new intent will be required. Attachments required with the Intent to Abandon are wellbore diagrams of the current configuration and the proposed configuration with plugs set.

A Subsequent Report of Abandonment shall indicate the actual work completed. Attachments required with a Subsequent Report are a wellbore diagram showing plugs that were set and casing remaining in the hole, the job summaries from all plugging contractors used, including wireline and cementing (third party verification) and any logs that may have been run during abandonment.

OGCC Operator Number: 10084

Contact Name: Donald Wirth

Name of Operator: PIONEER NATURAL RESOURCES USA INC

Phone: (303) 675-2669

Address: 1401 17TH ST STE 1200

Fax: (303) 294-1265

City: DENVER State: CO Zip: 80202

Email: Donald.Wirth@pxd.com

For "Intent" 24 hour notice required,

Name: _____ Tel: _____

COGCC contact:

Email: _____

API Number 05-071-09042-00

Well Name: LORENCITO

Well Number: 3-19-34-66

Location: QtrQtr: NENW Section: 19 Township: 34S Range: 66W Meridian: 6

County: LAS ANIMAS

Federal, Indian or State Lease Number: _____

Field Name: PURGATOIRE RIVER

Field Number: 70830

☐ Notice of Intent to Abandon☒ Subsequent Report of Abandonment

Only Complete the Following Background Information for Intent to Abandon

Latitude: 37.074250

Longitude: -104.824850

GPS Data:

Date of Measurement: 04/24/2007

PDOP Reading: 5.5

GPS Instrument Operator's Name: JAMES ROYBAL

Reason for Abandonment: ☐ Dry ☐ Production for Sub-economic ☐ Mechanical Problems☐ Other _____Casing to be pulled: ☐ Yes ☐ No Estimated Depth: _____Fish in Hole: ☐ Yes ☐ No If yes, explain details belowWellbore has Uncemented Casing leaks: ☐ Yes ☐ No If yes, explain details below

Details: _____

Current and Previously Abandoned Zones

Formation	Perf. Top	Perf. Btm	Abandoned Date	Method of Isolation	Plug Depth
RATON-VERMEJO COALS	710	1354	08/06/2013	B PLUG CEMENT TOP	690

Total: 1 zone(s)

Casing History

Casing Type	Size of Hole	Size of Casing	Weight Per Foot	Setting Depth	Sacks Cement	Cement Bot	Cement Top	Status
CONDUCTOR	14+3/4	12+3/4	32	14	0	0	0	
SURF	11	8+5/8	23	278	140	278	0	CALC
1ST	7+7/8	5+1/2	17	1,817	529	1,817	0	CBL

Plugging Procedure for Intent and Subsequent Report

CIBP #1: Depth 690 with 10 sacks cmt on top. CIPB #2: Depth _____ with _____ sacks cmt on top.
CIBP #3: Depth _____ with _____ sacks cmt on top. CIPB #4: Depth _____ with _____ sacks cmt on top.
CIBP #5: Depth _____ with _____ sacks cmt on top.

NOTE: Two(2) sacks cement required on all CIBPs.

Set 40 sks cmt from 0 ft. to 328 ft. Plug Type: CASING Plug Tagged: ☐
Set _____ sks cmt from _____ ft. to _____ ft. Plug Type: _____ Plug Tagged: ☐
Set _____ sks cmt from _____ ft. to _____ ft. Plug Type: _____ Plug Tagged: ☐
Set _____ sks cmt from _____ ft. to _____ ft. Plug Type: _____ Plug Tagged: ☐
Set _____ sks cmt from _____ ft. to _____ ft. Plug Type: _____ Plug Tagged: ☐

Perforate and squeeze at _____ ft. with _____ sacks. Leave at least 100 ft. in casing _____ CICR Depth

Perforate and squeeze at _____ ft. with _____ sacks. Leave at least 100 ft. in casing _____ CICR Depth

Perforate and squeeze at _____ ft. with _____ sacks. Leave at least 100 ft. in casing _____ CICR Depth

(Cast Iron Cement Retainer Depth)

Set _____ sacks half in. half out surface casing from _____ ft. to _____ ft. Plug Tagged: ☐

Set _____ sacks at surface

Cut four feet below ground level, weld on plate Above Ground Dry-Hole Marker: ☐ Yes ☒ No

Set _____ sacks in rat hole Set _____ sacks in mouse hole

Additional Plugging Information for Subsequent Report Only

Casing Recovered: _____ ft. of _____ inch casing

Plugging Date: 08/06/2013

*Wireline Contractor: Graco - 4/12/2010

*Cementing Contractor: Pioneer Pumping Services

Type of Cement and Additives Used: Neat Class 'G' cement, 15.8 ppg, 1.15 cu ft/sk yield

Flowline/Pipeline has been abandoned per Rule 1103 ☒ Yes ☐ No

*ATTACH JOB SUMMARY

Technical Detail/Comments:

--

I hereby certify all statements made in this form are, to the best of my knowledge, true, correct, and complete.

Signed: _____

Print Name: Donald Wirth

Title: Staff Operations Engineer

Date: 9/13/2013

Email: Donald.Wirth@pxd.com

Based on the information provided herein, this Well Abandonment Report (Form 6) complies with COGCC Rules and applicable orders and is hereby approved.

COGCC Approved: MOOS, JUSTIN

Date: 1/2/2014

CONDITIONS OF APPROVAL, IF ANY:

COA Type

Description

--	--

Attachment Check List

<u>Att Doc Num</u>	<u>Name</u>
400480627	FORM 6 SUBSEQUENT SUBMITTED
400480635	WIRELINE JOB SUMMARY
400480637	CEMENT JOB SUMMARY
400480638	WIRELINE JOB SUMMARY
400480639	WELLBORE DIAGRAM

Total Attach: 5 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Permit	When was the CIBP set? It appears this well was TA since 4/2010	9/13/2013 10:11:07 AM

Total: 1 comment(s)

COGCC FORM 27- REMEDIATION WORK PLAN

Facility Closure for Production Pit

“Approved Remediation Work Plan Form 27” in fulfillment of the **Section II.B.8** of the COGCC Rule 1001.c Reclamation Variances and Waivers” guidance document dated December 17, 2015.

**State of Colorado
Oil and Gas Conservation Commission**

1120 Lincoln Street, Suite 801, Denver, Colorado 80203 (303)894-2100 Fax:(303)894-2109



received 09/26/2013
Project 7999
Remediation 200387947

SITE INVESTIGATION AND REMEDIATION WORKPLAN

This form shall be submitted to the Director for approval prior to the initiation of site investigation and remediation activities. Form 27 is intended to be used whenever possible. Additional documentation will be required when large volumes of soil and groundwater have been impacted or involve large facilities with multiple source areas. See Rule 910. Attach as many pages as needed to fully describe the proposed work.

OGCC Employee:

☐ Spill ☐ Complaint
☐ Inspection ☐ NOAV

Tracking No:

CAUSE OF CONDITION BEING INVESTIGATED AND REMEDIATED

☐ Spill or Release ☐ Plug & Abandon ☐ Central Facility Closure ☒ Site/Facility Closure ☐ Other (describe): _____

OGCC Operator Number: 10084

Name of Operator: Pioneer Natural Resources USA, Inc.

Address: 1401 17th Street, Suite 1200

City: Denver State: CO Zip: 80202

Contact Name and Telephone:

David Castro

No: 303-298-8100

Fax: 303-298-7800

API Number: 05-071-09042

County: Las Animas

Facility Name: Lorencito 3-19-34-66 pit

Facility Number: _____

Well Name: Lorencito

Well Number: 3-19-34-66

Location: (QtrQtr, Sec, Twp, Rng, Meridian): NENW, Sec. 19, T34S, R66W, 6th P.M. Latitude: 37.07425 Longitude: -104.82485

TECHNICAL CONDITIONS

Type of Waste Causing Impact (crude oil, condensate, produced water, etc): produced waterSite Conditions: Is location within a sensitive area (according to Rule 901e)? ☐ Y ☒ N If yes, attach evaluation.Adjacent land use (cultivated, irrigated, dry land farming, industrial, residential, etc.): Submitted on 2aSoil type, if not previously identified on Form 2A or Federal Surface Use Plan: Submitted on 2aPotential receptors (water wells within 1/4 mi, surface waters, etc.): Nearest permitted water well - 365' (if SEO point is accurate)Nearest surface water - 280' (if live water is present)

Description of Impact (if previously provided, refer to that form or document):

Impacted Media (check):



Soils



Vegetation



Groundwater



Surface Water

Extent of Impact:

soil within pit

How Determined:

unlined

REMEDIALTION WORKPLAN

Describe initial action taken (if previously provided, refer to that form or document):

Produced water from this well was being stored in this onsite pit. The well is P&A.

Describe how source is to be removed:

Produced water is not being sent to this pit and it is no longer needed.

Describe how remediation of existing impacts is to be accomplished, including removal and disposal at an injection well or licensed facility, land treatment on site, removal of impacted groundwater, insitu bioremediation, burning of oily vegetation, etc.:

Well is P&A.

Submit Page 2 with Page 1



REMEDIATION WORKPLAN (Cont.)

OGCC Employee: _____

Tracking Number: _____
Name of Operator: _____
OGCC Operator No: _____
Received Date: _____
Well Name & No: _____
Facility Name & No: _____

If groundwater has been impacted, describe proposed monitoring plan (# of wells or sample points, sampling schedule, analytical methods, etc.):

It is not expected that produced water stored in this pit communicated with nor affected groundwater.

Describe reclamation plan. Discuss existing and new grade recontouring; method and testing of compaction alleviation; and reseeding program, including location of new seed, seed mix and noxious weed prevention. Attach diagram or drawing. Use additional sheet for description if required.

If back berm of pit exists, this material will be utilized to backfill pit. Native fill material may be collected from the recontouring of cut and fill slopes. Fill material will be brought onsite, if needed, to adequately backfill pit. The top 3 feet of the pit will be filled with at least 25% native soil. If topsoil exists, this material will be overlain on the fill material. Backfilled material may be contoured in a manner to be utilized as a stormwater BMP.

Attach samples and analytical results taken to verify remediation of impacts. Show locations of samples on an onsite schematic or drawing.

Is further site investigation required? ☐ Y ☒ N If yes, describe:

No impact to the surrounding environment occurred from the use of this pit.

Final disposition of E&P waste (landtreated and disposed onsite, name of licensed disposal facility, recycling, reuse, etc.):

Well is P&A.

IMPLEMENTATION SCHEDULE

Date Site Investigation Began: _____ Date Site Investigation Completed: 9/2013 Date Remediation Plan Submitted: 9/26/2013
Remediation Start Date: upon approval Anticipated Completion Date: 4th Qtr 2013 Actual Completion Date: _____

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct, and complete.

Print Name: David Castro

Signed: **David Castro**

Digitally signed by David Castro
DN: cn=David Castro, o=Pioneer Natural Resources
USA, Inc., ou=email=david.castro@pxd.com, c=US
Date: 2013.09.26 13:46:54 -06'00'

Title: Environmental Specialist

Date: 9/26/2013

OGCC Approved: **Peter Gintautas**

Digitally signed by Peter Gintautas
DN: cn=Peter Gintautas, o=COGCC, ou=Environmental
Protection Specialist, email=peter.gintautas@state.co.us,
c=US
Date: 2013.10.03 17:27:44 -06'00'

Date: _____

**CHECKLIST OF INFORMATION and DOCUMENTATION PROVIDED FOR
DIRECTORS' REVIEW & APPROVAL OF 1001.c: RECLAMATION VARIANCE
REQUEST**

In fulfillment of COGCC Rule 1001.c Reclamation Variances and Waivers guidance document dated
December 17, 2015.

IV -- Guidance Document Section I Requirements

Section I of the “Rule 1001.c Reclamation Variances and Waivers” guidance document dated December 17, 2015 requires a signed agreement between the operator and the surface owner. Specifically, there are five bullet points that highlight these requirements. Many of these requirements have been addressed with a signed agreement with the surface owner that is attached to this variance request.

Completeness Checklist

Rule 1001.c Reclamation Variances and Waivers” guidance document dated December 17, 2015. Below is a checklist and summary of where the requirements have been fulfilled in the attachments contained in this variance request:

Rule 1001.c Reclamation Variances and Waivers” guidance document Section I.1 through I 1.5

I.1 A clear description of the specific portions of an access road or oil and gas location for which the surface owner is waiving the operator’s obligation to perform interim or final reclamation.

Requirements fulfilled in attached Documents:

- ✓ **List 1-6 in Exhibit A of the “Surface Owner Reclamation Letter Agreement”**
- ✓ **Maps contained in Site Specific Final Reclamation Plan**

I.2 A brief explanation of the surface owner’s reasons for waiving the operator’s obligation to perform interim or final reclamation for the specified portions of an access road or oil and gas location.

Requirements fulfilled in attached Documents:

- ✓ **Landowner Reclamation Letter Agreement**

I.3 The surface owner’s acknowledgement that the current condition of the portions of the access road or oil and gas location subject to the waiver is satisfactory to the surface owner or will be satisfactory once the operator performs the agreed upon plan.

Requirements fulfilled in attached Documents:

- ✓ **Signed Landowner Reclamation Letter Agreement**

I.4. For interim reclamation waiver requests, the surface owner’s acknowledgement.

➤ ***DOES NOT APPLY TO THIS LOCATION SINCE IT IS 1004. FINAL RECLAMATION***

I.5 In addition to items 1 through 4, above, if an operator intends to seek a variance under Rule 502.b. to be relieved from its obligation to comply with specified provisions of Rule 1004 – Final Reclamation Well Sites and Associated Production Facilities – the following information should be included in a written agreement:

- a.** The surface owner’s acknowledgement that once the variance is approved and all agreed upon actions have been conducted the surface owner knowingly, and forever, waives all reclamation protections otherwise afforded by the specified provisions of Rule 1004; and
- b.** A brief description of the operator’s plans for compliance with the specified provisions of Rule 1004 on areas of the oil and gas locations or access roads that are not subject to the variance.

Requirements fulfilled in attached documents:

- ✓ **Listed 1-6 in Exhibit A of the “Landowner Reclamation Letter Agreement”**
- ✓ **305.f.(6) Final Reclamation Consultation Form**

✓ **Maps and description contained in Site Specific Final Reclamation Plan**

V -- Guidance Document Section II.B Requirements

Section II.B of the “Rule 1001.c Reclamation Variances and Waivers” guidance document dated December 17, 2015 describes the baseline information necessary for COGCC to evaluate whether public health, safety and welfare will be protected and significant adverse environmental impacts prevented if compliance with specified provisions of Rule 1004 is not required. There are eight bullet points that highlight the baseline evidence and information for COGCC evaluation.

Completeness Checklist: Rule 1001.c Reclamation Variances and Waivers guidance document dated December 17, 2015. Below is a checklist and summary of where the requirements have been fulfilled in the attachments contained in this variance request:

Rule 1001.c Reclamation Variances and Waivers guidance document Section II.B through II.B.8

II.B.1 Evidence that all wells on the location are plugged and abandoned, and that a Form 6 subsequent was submitted for each well.

Requirements fulfilled in attached documents:

- ✓ **Attached Subsequent Approved Form 6**

II.B.2 Evidence that all oil and gas equipment has been removed from the location, including flowline risers and gathering line risers.

Requirements fulfilled in attached documents:

- ✓ **Attached photos of the location**

II.B.3 Evidence that trash and debris belonging to the operator or its agents has been removed from the location.

Requirements fulfilled in attached documents:

- ✓ **Attached photos of the location**

II.B.4 Evidence that noxious weeds have been controlled as required by Rule 1004.

Requirements fulfilled in attached documents:

- ✓ **Attached photos of the location**
- ✓ **Reference Pioneer’s Field-Wide Reclamation and Best Management Practices**

II.B.5 Documentation showing the operator consulted in good faith with the surface owner regarding final reclamation pursuant to Rule 305.f.(6) Information describing the consultation (who, what, where, when) should be provided.

Requirements fulfilled in attached documents:

- ✓ **305.f.(6) Final Reclamation Consultation Form**

II.B.6 Documentation of the existing state/condition of reclamation for the entire location.

Requirements fulfilled in attached documents:

- ✓ **Photos of the location taken in August of 2015**

II.B.7 Documentation detailing how the oil and gas location will be stabilized and details about what required stormwater management controls will be in place prior to COGCC’s final signoff reclamation inspection.

Requirements fulfilled in attached documents:

- ✓ **Photos of the location taken in August of 2015**
- ✓ **Site-Specific Final Reclamation Section III Plan Reclamation Plan Details**

II.B.8 The operator's analysis of how public health, safety, and welfare will be protected and significant adverse environmental impacts prevented if compliance with the specified provisions of Rule 1004 receive a variance.

Requirements fulfilled in attached documents:

- ✓ **Site-Specific Reclamation Plan**
- ✓ **Attached Approved Form 27**
- ✓ **The Form 2A was reviewed to identify specific information relevant to the evaluation of potential impacts and standards for final reclamation**

Analysis of Public Health, Welfare, Safety and Environmental Impact

Pioneer has evaluated if variance from compliance with the specific sections of the 1004.(a) rule requested for this location prevent the protection of public health, public welfare, and public safety and if compliance with the specified sections of rule 1004.(a) are necessary to prevent significant adverse environmental impacts. The depth of Pioneer's analysis was conducted in accordance with the scope of the variance requested. In cases where Pioneer utilized existing ranch roads, the enhanced construction of the road directly benefits the land owner adding economic value and utility to their property. The surface owner's request to retain flat surface areas of the well pad and the access roads for future access does not present any significant adverse impact to the environment. Pioneer has performed reclamation on disturbed areas in order to achieve overall soil stability. The analysis expected by COGCC as stated in the final paragraph of Section II.B. 8 in the Rule 1001.c Reclamation Variances and Waivers" guidance document include: "1) the specific nature of the location, including urban vs. rural, proximity to surface water, wildlife areas, 317B area, or sensitive area classification have been completed and verified using information about the location in official records provided to COGCC. (e.g. Form 2A, Form 27, COGCC Map GIS Layers for Wildlife, Sensitive Area, 608.b Water Wells, 317B Areas etc.); and "2) comparative benefits of re-contouring and reseeding vs. just reseeding" is discussed in detail in our *Raton Basin Field-Wide Final Reclamation Plan and Best Practices*, which has been provided to COGCC Reclamation Staff for review.

Public Health

The specified variances requested from Rule 1004. (a) for the Lorencito 3-19-34-66 well pad and access road are minor requests which have minimal potential for negative impact on public health. Pioneer is not requesting any variance from the reclamation requirements of the COGCC 1000 or 900 series rules for any aspect of reclamation of the gas operations at the location that would adversely affect public health.

- ✓ The fulfillment of waste remediation under the COGCC 900 series rules was successfully completed for the site/facility remediation and closure of the production pit associated with the Lorencito 3-19-34-66. Soil samples collected for the pit met all 910 standards and it was closed with an approved Form 27. * Verified in Form 27, COGIS Database-Pit Layer
- ✓ The Reclamation Rule variance requests as specified in "Exhibit A" and the "Site-Specific Plan" do not trigger under COGCC 1000 Reclamation Rules the requirement to consult with Colorado Department of Public Health and Environment or Division of Water Resources. *Verified in Form 2A, COGIS Database-Water Resources, Colorado Parks and Wildlife, Surface Ownership Layers
- ✓ Variance from compliance with the specific sections of Rule 1004.(a) which have been requested for this location are remotely or unrelated to public health as the location has been remediated of all oil and gas

waste and there are no potential receptors in close proximity; therefore it will have minimal potential to negatively impact public health.

Public Welfare

The specified variances requested from Rule 1004.(a) for the Lorencito 3-19-34-66 well pad and access road are minor requests which will not prevent the protection of public welfare. The enhanced construction of the road and well pad directly benefits the surface owner adding economic value and utility to their property. Pioneer is not requesting any variance from the reclamation requirements of the 1000-series rules for any aspect of reclamation of the gas operations at the location that is likely to adversely affect public welfare.

- ✓ The Lorencito 3-19-34-66 location is on private property with restricted access to the public. The surface owner uses this portion of his property for participating in the Colorado Parks and Wildlife Ranching for Wildlife Program. The flat portions of the well pad provide valuable access for staging hunting and the right of way reclaimed to a ranch road provides access to the property for guiding hunts.
- ✓ The Lorencito 3-19-34-66 location is not on cropland and the adjacent land use is non-cropland.
- ✓ The county zoning for the Lorencito 3-19-34-66 location is classified as “rural.” The reclamation requests by the surface owner for the Lorencito 3-19-34-66 location are consistent with the local county land use zoning standards. *Verified in Las Animas, County Zoning Maps
- ✓ Variance from compliance with the specific sections of Rule 1004.(a) which have been requested for this location have minimal potential to negatively impact public welfare rather, the variance allows for the surface owner to retain features of the location which add value to the property. Variance from the reclamation rules requested for this location will have minimal potential to negatively impact public welfare.

Public Safety

The specified variances requested from Rule 1004.(a) for the Lorencito 3-19-34-66 well pad and access road are minor requests which will not prevent the protection of public safety. Pioneer is not requesting any variance from the reclamation requirements of the 1000-series rules for any aspect of reclamation of the gas operations at the location that would endanger public safety.

- ✓ Variance from compliance with the specific sections of Rule 1004.(a) which have been requested for this location are unrelated to public safety as the location is under private property ownership with restricted access to the public, and no feature(s) of the oil, and gas operations have been left unreclaimed that could be a public safety hazard; therefore, it will have minimal potential to endanger public safety.

Environmental

The specified variances requested from Rule 1004.(a) for the Lorencito 3-19-34-66 well pad and access road are minor requests which are unlikely to result in any significant adverse environmental impact. The location has been remediated of all oil and gas equipment and waste that could potentially impact the environment in accordance with COGCC rules. The location has been reclaimed to meet the conditions for final land use as set by the surface owner. Pioneer is not requesting any variance from the reclamation requirements of the 1000-series rules for any aspect of reclamation of the gas operations at the location that could potentially result in a significant adverse environmental impact.

- ✓ The Lorencito 3-19-34-66 location is not within an “Urban Mitigation Area” as defined in the COGCC definitions. *Verified in Form 2A, COGIS Database

- No Urban Mitigation Areas within ½ mile
 - Nearest Urban Mitigation Area Over 1 Mile
- ✓ The Lorencito 3-19-34-66 location is not within a Sensitive Wildlife Habitat or a Restricted Surface Occupancy Area. *Verified in Form 2A, COGIS Database
 - No Sensitive wildlife habitats within ½ mile
 - Nearest Sensitive Wildlife Habitat is Over 1 Mile
 - No Restricted Surface Occupancy Areas within ½ mile
 - Nearest Restricted Surface Occupancy Area Over 1 Mile
- ✓ The Lorencito 3-19-34-66 location is not within a zone defined in COGCC Rule 317B.*Verified in Form 2A, COGIS Database
 - Nearest Rule 317B area Over 1 Mile
- ✓ The Lorencito 3-19-34-66 location is not in a designated wetlands area and did not require any Army Corp of Engineers Section 404 Permit. *Verified in Form 2A, COGIS Database
 - No designated wetlands areas within ½ mile
 - Nearest designated wetlands area Over ½ Mile
- ✓ The Lorencito 3-19-34-66 location has 4 likely receptors within a 1/2 mile radius of the location, there are no Public Water Supply Systems within a 1/2 mile radius of the location, *Verified in Form 2A, COGIS Database-Water Resources Layer
 - Nearest permitted Water Well -441.7' (based on SEO database)
 - 2 permitted water wells within ½ mile
 - Nearest live surface water-265' (USGS 24K series topo map waterway)
 - 2 live surface water bodies within ½ mile
- ✓ Variance from compliance with the specific sections of Rule 1004.(a) which have been requested for this location have minimal potential result in any significant adverse environmental impact as the location has achieved soil stabilization and contains no environmentally hazardous materials or features. The Lorencito 3-19-34-66 location is not on Colorado Parks and Wildlife land or within RSO or SWH area. There are two perennial, surface water bodies within a ½ mile radius of the location; however, the features of the location for which a variance has been requested, pose no substantial risk of impacting the surface water bodies in any way. Therefore the variances requested for this location will have minimal potential to result in any significant adverse environmental impact.

Field-Wide Reclamation and Best Management Practices

Pioneer has created a Field-Wide Final Reclamation Plan which documents the process for evaluating the potential impacts of the variance requests. This document also provides important information concerning the reclamation objectives for every Pioneer location subject to the COGCC 1003 and 1004 rules. Pioneer uses this plan to meet the reclamation performance standards described in COGCC Rule 1003 and 1004. Pioneer's reclamation practices are adapted to the site specific conditions, environmental constraints, and the landowner preferences. Included in the Field-Wide Reclamation Plan are the procedures and practices Pioneer employs for all areas of the location for which Pioneer is not seeking variance from the reclamation requirements under COGCC 1004. Pioneer has provided our *Raton Basin Field-Wide Reclamation and Best Management Practices* to COGCC Reclamation Staff. This document was provided to COGCC Reclamation Staff to accompany Pioneer's Reclamation variance requests under Rule 1001.c.