

# PIONEER

## NATURAL RESOURCES

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

September, 1<sup>st</sup> 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 Big Horn Sheep 14-11, API# 05-071-06695, Location ID: 307626  
Township 34 South, Range 66 West, 6<sup>th</sup> P.M.  
Section 11: SW/4SW/4  
Las Animas County, Colorado

Dear Director Lepore,

We have obtained a Surface Owner Waiver under Rule 1001.c for final reclamation of the Big Horn Sheep 14-11 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 Big Horn Sheep 14-11 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 Big Horn Sheep 14-11 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

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# **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, 6<sup>th</sup> 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](mailto:chris.hollmann@pxd.com).

Sincerely,

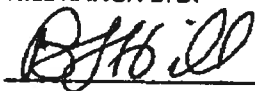
Pioneer Natural Resources USA, Inc.



Chris Hollmann  
Staff Landman

ACCEPTED AND AGREED:

HILL RANCH LTD.



By:

As:

Date: 3/24/16

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

<b>COGCC FACILITY/LOCATION STATUS: ACTIVE</b>		<b>Location ID: 307626</b>	
<b>API/Facility ID</b>	<b>Well Name</b>	<b>Location</b>	<b>COGCC Rule Variance</b>
05-071-06695-0000	Big Horn Sheep 14-11	T34S-R66W Sec.11: SW/4SW/4	1004.a Sentence(s) 2, 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 October 22<sup>nd</sup>, 2014 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 onsite pit shall be backfilled and reclaimed to original contours;
- 2) that the onsite pit shall be reseeded with the agreed upon specified seed mix which you have provided to Pioneer;
- 3) that the Right-of-Way shall not be returned to pre-disturbance contour; that the Right-of-Way shall remain as is with gravel;
- 4) that the Right-of-Way shall be ripped and seeded with the specified seed mix of your choice which you have provided to Pioneer once the SCADA towers are removed;
- 5) that the well pad shall not be returned to pre-disturbance contour; that the well pad shall remain flat with gravel;
- 6) that the SCADA towers will remain on location;
- 7) that the area of the well pad not needed for access to the SCADA tower shall be ripped and seeded with the agreed upon specified seed mix which you have provided to Pioneer.

Pioneer will conduct 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 will perform all reclamation requirements as specified in COGCC Rule 1004 which cannot be waived by the Surface Owner.

Pioneer well Big Horn Sheep 14-11 has been plugged and abandoned in accordance with COGCC Rule 319. Flowline risers and gathering line risers will be abandoned per COGCC Rule 1103. All Pioneer trash and debris will be removed from the location. Pioneer will perform routine noxious weed control on location per COGCC rule 1004. Stormwater Management will be conducted on location and in accordance with COGCC Rule 1002.f.

**Big Horn Sheep 14-11 Well Pad**  
**T34S-R66W Sec.11: SW/SW**  
**Aerial Image Date: May 2014**



**Big Horn Sheep 14-11 Right-of-Way (Access Road)**  
**T34S-R66W Sec.11: SW/SW**  
**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: Big Horn Sheep 14-11  
TWN 34 RNG 66 QTR/QTR SW 1SW

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Yes	No	<b>Disposition of Right-of-Way</b>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Leave original access road with gravel (As is)
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Leave road flat and re-seed
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Reclaim right-of-way to original contours and re-seed
		Other - _____

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

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

Comments/Other: Ranch Requests pit be left on location. Ranch  
will Allow Road to be left in place until  
Study towers are removed at which point  
Road must be Ripped & Seeded.

Pioneer represented by: Chris Smith (Sign) Chris Sander (Print)

Discussed this 22 day of October, 2014.

**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:

X Mike Powell (Sign) X Mike Powell (Print)  
\_\_\_\_\_(Sign) \_\_\_\_\_(Print)

Owner's Address: \_\_\_\_\_

Telephone No.: \_\_\_\_\_

**THIS IS NOT A BINDING AGREEMENT**

Revised 11/5/2013

## 502.b Formal Director Variance Approval

### Site-Specific Final Reclamation Plan

Pioneer Natural Resources USA, Inc.

#### I. General Location Description:

API Number	05-071-06695-00					
Well Name:	BIG HORN SHEEP			Well Number: 14-11		
Location:	QtrQtr: SWSW	Section: 11	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
PIT	119956	RITA 36A	PIONEER NATURAL RESOURCES USA INC 10084	AC 9/23/1999	PURGATOIRE RIVER 70830	LAS ANIMAS 071/36 SWSW 11 34S 66W
WELL	05-071-06619	RITA 36	STROUD OIL PROPERTIES INC 83530	DA 11/5/1998	LONG CANYON 51425	LAS ANIMAS 071/36 SWSW 11 34S 66W
WELL	05-071-06695	BIG HORN SHEEP 14-11	PIONEER NATURAL RESOURCES USA INC 10084	PA 11/5/2014	PURGATOIRE RIVER 70830	LAS ANIMAS 071/36 SWSW 11 34S 66W
PIT	257978	RITA 36A	PIONEER NATURAL RESOURCES USA INC 10084	CL 6/4/2015	PURGATOIRE RIVER 70830	LAS ANIMAS 071/36 SWSW 11 34S 66W
LOCATION	307626	BIG HORN SHEEP-634S66W 11SWSW	PIONEER NATURAL RESOURCES USA INC 10084	AC 6/4/2015	PURGATOIRE RIVER 70830	LAS ANIMAS 071/36 SWSW 11 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 Big Horn Sheep 14-11 well pad for Pioneer operations is approximately 1.0 acres.

# Image A

(Aerial image from May, 2014)

**Big Horn Sheep 14-11**  
**Surface Area Disturbance of Well Pad**  
**Las Animas County, CO**  
**SWSW, Sec. 11, T34S, R66W**



The surface owner requested during the final reclamation consultation and has entered into an agreement with Pioneer concerning these specified reclamation plans; that the onsite pit shall be backfilled and reclaimed to original contours; that the onsite pit shall be reseeded with the agreed upon specified seed mix which has been provided to Pioneer; that the well pad should not be returned to contour; that the well pad remain flat with gravel; that the SCADA towers be left on location; and that the well pad should be ripped 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):

- 1) Sentence 2 – "All surface equipment shall be removed within three (3) months of plugging a well.
- 2) Sentence 3 – "All access roads to plugged and abandoned wells and associated production facilities shall be closed, graded and re-contoured."
- 3) Sentence 5 – "Well locations, access roads and associated facilities shall be reclaimed."
- 4) 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);

5) 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 Big Horn Sheep 14-11 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 will be graded to achieve slope stabilization.
- The slope will be cross-rippled and seeded to establish slope stabilization.
- The surface owner requested a specific seed mix that will be used to seed the well pad.
- Stormwater BMPs will be constructed and maintained to achieve site stabilization.
- Drainage features will be constructed along the sides of the well pad.
- The perimeter of the pad shall be contoured to divert runoff from the face of the sloped areas to prevent and reduce erosion.
- Pioneer will perform additional seeding on the well pad as needed.

After all reclamation has been completed, disturbed surface of the “Waiver Area” for the well pad will be approximately 0.8 acres (down from 1.0 acres), **Image B**.





### **Access Road ROW**

The annotated polygon on the aerial image (see **Image C** below) is the approximate, disturbed surface area before reclamation work is completed. The disturbed area of the Big Horn Sheep 14-11 access road for Pioneer operations is approximately 0.1 acres (less than 1 acre).

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 gravel should not be removed from the Right-of-Way (access road); and that the Right-of-Way (access road) should be ripped and seeded with the Surface Owner's specified seed mix after the SCADA towers are removed.

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):

- 1) Sentence 3 – "All access roads to plugged and abandoned wells and associated production facilities shall be closed, graded and re-contoured."
- 2) Sentence 4 – "Culverts and any other obstructions that were part of the access road(s) shall be removed."
- 3) Sentence 5 – "Well locations, access roads and associated facilities shall be reclaimed."
- 4) 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."

Pioneer has performed the following reclamation work on the Right-of-Way (access road). When the SCADA towers are removed to achieve successful reclamation on the location and to a condition satisfactory to the Surface Owner Pioneer will evaluate and reseed:

- The cut slope where the Right-of-Way was constructed was graded to achieve slope stabilization.
- The slope was cross-ripped and seeded to establish slope stabilization.
- The surface owner requested a specific seed mix that was used to seed the Right-of-Way.
- Stormwater BMPs were constructed and maintained to achieve site stabilization.
- Pioneer performed additional seeding on the Right-of-Way to achieve site stabilization.

After all reclamation has been completed, disturbed surface of the "Waiver Area" for the Right-of-Way (access road) will be approximately 0.1 acres, **Image D**.

**Image E** provides an overview of well pad and Right-of-Way reclamation tasks performed at the Big Horn Sheep 14-11 location.



# Image C

(Aerial image from May, 2014)

**Big Horn Sheep 14-11**  
**Surface Area Disturbance of R-O-W**  
**Las Animas County, CO**  
**SWSW, Sec. 11, T34S, R66W**







## Image E

(Aerial image from May, 2014)

Big Horn Sheep 14-11

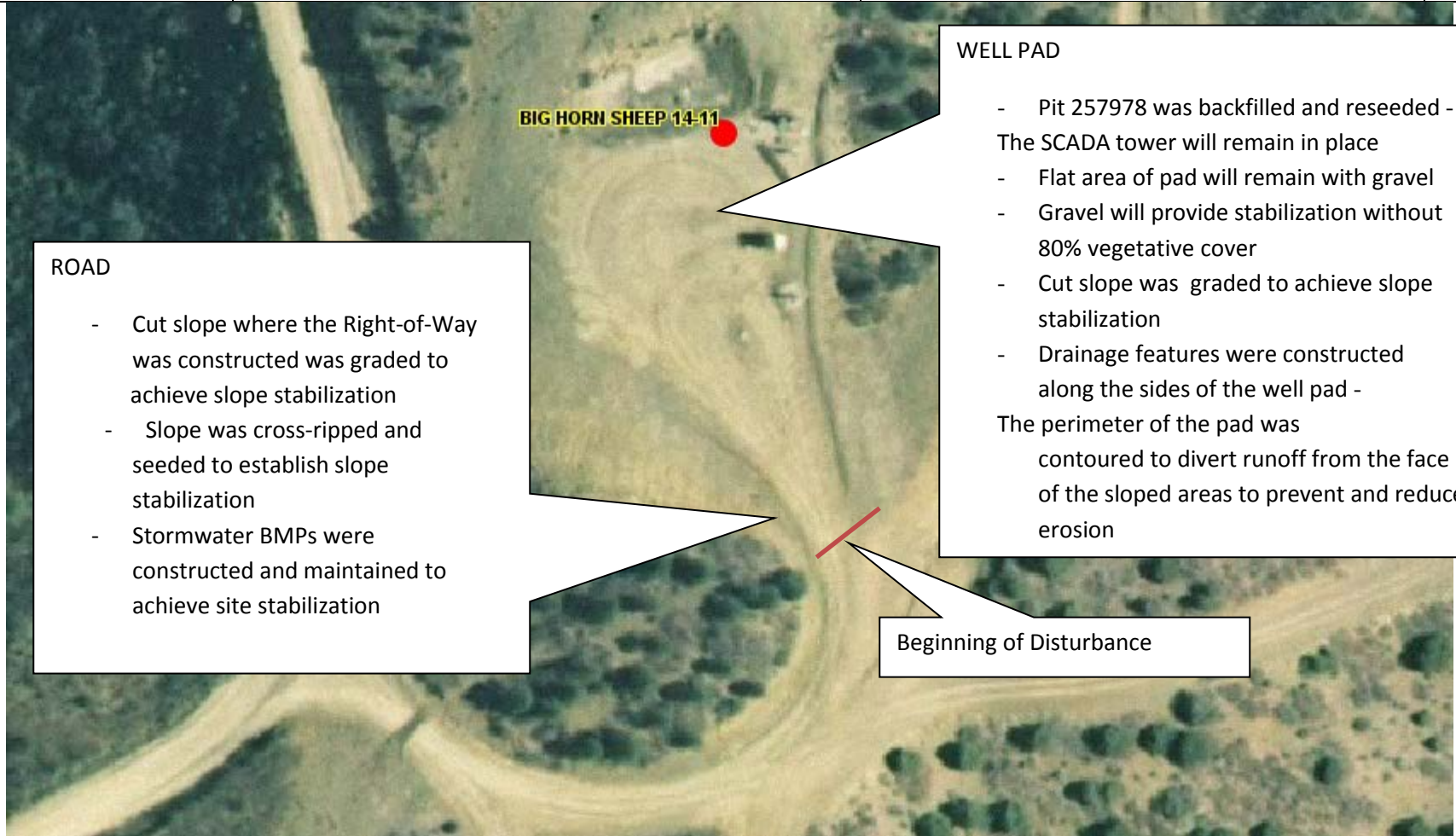
Reclamation Diagram

Las Animas County, CO

SWSW, Sec. 11, T34S, R66W



1:1000 ft



### ROAD

- Cut slope where the Right-of-Way was constructed was graded to achieve slope stabilization
- Slope was cross-rippled and seeded to establish slope stabilization
- Stormwater BMPs were constructed and maintained to achieve site stabilization

### WELL PAD

- Pit 257978 was backfilled and reseeded - The SCADA tower will remain in place
  - Flat area of pad will remain with gravel
  - Gravel will provide stabilization without 80% vegetative cover
  - Cut slope was graded to achieve slope stabilization
  - Drainage features were constructed along the sides of the well pad -
- The perimeter of the pad was contoured to divert runoff from the face of the sloped areas to prevent and reduce erosion

Beginning of Disturbance

## 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)

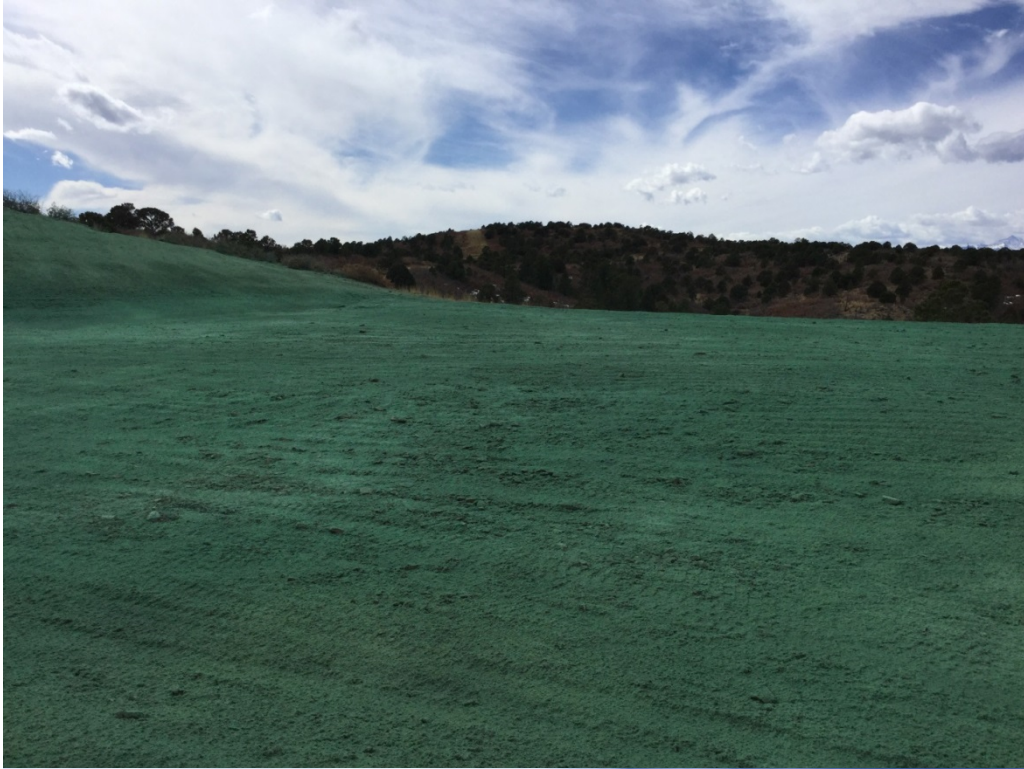


















## COGCC FORM 6- WELL ABONDONMENT REPORT

“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:

400764914

Date Received:

01/06/2015

## 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:

City: DENVER State: CO Zip: 80202

Email: Donald.Wirth@pxd.com

For "Intent" 24 hour notice required,

Name:

Tel:

COGCC contact:

Email:

API Number 05-071-06695-00

Well Name: BIG HORN SHEEP

Well Number: 14-11

Location: QtrQtr: SWSW Section: 11 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: 37.092310

Longitude: -104.754070

GPS Data:

Date of Measurement: 08/13/2007

PDOP Reading: 2.4

GPS Instrument Operator's Name: James Roybal

Reason for Abandonment: ☐ Dry ☐ Production for Sub-economic ☐ Mechanical Problems☐ OtherCasing 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
VERMEJO COAL	1657	1808	09/17/2014	B PLUG CEMENT TOP	1618

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
SURF	8+3/4	7	15	210	60	210	0	CALC
1ST	6+1/4	4+1/2	9.5	1,877	235	1,877	0	CBL



## Plugging Procedure for Intent and Subsequent Report

CIBP #1: Depth 1618 with 25 sacks cmt on top. CIBP #2: Depth \_\_\_\_\_ with \_\_\_\_\_ sacks cmt on top.  
CIBP #3: Depth \_\_\_\_\_ with \_\_\_\_\_ sacks cmt on top. CIBP #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 27 sks cmt from 380 ft. to 726 ft. Plug Type: CASING Plug Tagged: ☐  
Set 20 sks cmt from 0 ft. to 260 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: ☐

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: 11/05/2014

\*Wireline Contractor: Gemini Wireline LLC

\*Cementing Contractor: Pioneer Pumping Services

Type of Cement and Additives Used: Neat Class 'G' cement, 15.8 ppg, 5.0 gal/sk water, 1.15 cuft/sk yield

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

\*ATTACH JOB SUMMARY

Technical Detail/Comments:

Casing leak isolated between 644' and 686'. Set cement plug from 349' to 726'. Wait on cement overnight. Tag plug at 380'.

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

Signed: \_\_\_\_\_

Print Name: Judy Glinisty

Title: Lead Engineering Tech

Date: 1/6/2015

Email: Judy.Glinisty@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: SUTPHIN, DIRK

Date: 4/2/2015

### CONDITIONS OF APPROVAL, IF ANY:

#### COA Type

#### Description

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### Attachment Check List

<u>Att Doc Num</u>	<u>Name</u>
2519625	WIRELINER JOB SUMMARY
400764914	FORM 6 SUBSEQUENT SUBMITTED
400764938	CEMENT JOB SUMMARY
400764939	CEMENT JOB SUMMARY
400764940	WELLBORE DIAGRAM

Total Attach: 5 Files

### General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
Permit	Attached provided wireline ticket.	1/27/2015 9:57:13 AM
Permit	Requested wireline ticket for the CIBP.	1/27/2015 8:46:27 AM

Total: 2 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.

(Attachment)

State of Colorado  
Oil and Gas Conservation Commission

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



received 05/13/2015  
Project 9115  
Remediation 200433780  
Pit Facility 119956

## 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.

☐ 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: 05-071-06695

County: Las Animas

Facility Name: Big Horn Sheep 14-11 pit aka Rita 36A

Facility Number: 257078

119956

Well Name: Big Horn Sheep

Well Number: 14-11

Location: (QtrQtr, Sec, Twp, Rng, Meridian): SWSW, Sec. 11, T34S, R66W, 6th P.M. Latitude: 37.09239 Longitude: -104.75417

### TECHNICAL CONDITIONS

Type of Waste Causing Impact (crude oil, condensate, produced water, etc): produced water

Site 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 2a

Soil type, if not previously identified on Form 2A or Federal Surface Use Plan: Submitted on 2a

Potential receptors (water wells within 1/4 mi, surface waters, etc.): Nearest permitted water well - 3190' (if SEO point is accurate)

Nearest surface water - 1120' (if live water is present)

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

Impacted Media (check):



Soils

Extent of Impact:

soil within pit

How Determined:

unlined



Vegetation



Groundwater



Surface Water

### REMEDIATION 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:

Well is P&A.

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.





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

Page 2

**REMEDIATION WORKPLAN (Cont.)**

OGCC Employee: \_\_\_\_\_

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: 5/2015 Date Remediation Plan Submitted: 5/13/2015  
Remediation Start Date: upon approval Anticipated Completion Date: 3rd qtr 2015 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: \_\_\_\_\_

Title: Senior Environmental Specialist

Date: 5/13/2015

OGCC Approved: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

**Peter Gintautas**

Digitally signed by Peter Gintautas  
DN: cn=Peter Gintautas, o=OGCC,  
ou=Environmental Protection Specialist,  
email=peter.gintautas@state.co.us, c=US  
Date: 2015.06.04 11:15:01 -06'00'

Notify COGCC when closure process is completed.

#### METALS

Analytical results demonstrate that background concentrations of arsenic (As) exceed Table 910-1 concentration levels. Analytical results demonstrate that concentrations of As in soils in the pit also exceed Table 910-1 concentration levels and the pit concentrations are less than or within analytical uncertainty of being equal to the background concentrations. The analytical results are summarized below:

METAL	BACKGROUND CONCENTRATION (MG/KG)	PIT CONTENTS, SOIL/BEDROCK BELOW PIT OR IMPACTED MEDIA (MG/KG)	TABLE 901-1 CONCENTRATION LEVELS (MG/KG)
Arsenic	2.6-4.1	1.9-3.2	0.39

COGCC and CDPHE have consulted and agree that operators do not need to request variances from CDPHE for instances where the concentrations of metals in impacted soils are equal to or less than background concentrations, but do not meet Table 910-1 concentration values. Operators must ensure that remaining pit contents are covered with a minimum of 3 feet of backfill and soil. The soil horizons must be replaced in their original relative position, and reclaimed in accordance with 1000 Series Rules.

# **CHECKLIST OF INFORMATION and DOCUMENTATION PROVIDED FOR DIRECTORS' REVIEW & APPROVAL OF 1001.c: RECALMATION 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 February 2016**

**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 Big Horn Sheep 14-11 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 Big Horn Sheep 14-11. 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 Big Horn Sheep 14-11 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 Big Horn Sheep 14-11 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 Big Horn Sheep 14-11 location is not on cropland and the adjacent land use is non-cropland.
- ✓ The county zoning for the Big Horn Sheep 14-11 location is classified as “rural.” The reclamation requests by the surface owner for the Big Horn Sheep 14-11 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 Big Horn Sheep 14-11 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.

### **Significant Adverse Environmental Impacts**

The specified variances requested from Rule 1004.(a) for the Big Horn Sheep 14-11 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 Big Horn Sheep 14-11 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 Big Horn Sheep 14-11 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 Big Horn Sheep 14-11 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 Big Horn Sheep 14-11 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 Big Horn Sheep 14-11 location has 4 likely receptors i.e., water wells or surface waters within a half mile radius, there are no Public Water Supply Systems. \*Verified in Form 2A, COGIS Database-Water Resources Layer
  - Nearest permitted Water Well-3096’ (based on SEO database)
  - 0 permitted water wells within ½ mile
  - Nearest live surface water-1120’ (USGS 24K series topo map waterway )
  - 4 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 Big Horn Sheep 14-11 location is not on Colorado Parks and Wildlife land or within RSO or SWH area, there are four perennial, surface water body 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.