

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

September 08, 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 Jumping Cow 42-28, API# 05-071-06838, Location ID: 386620
Township 32 South, Range 65 West, 6th P.M.
Section 28: SE/4NE/4
Las Animas County, Colorado

Dear Director Lepore,

We have obtained a Surface Owner Waiver under Rule 1001.c for final reclamation of the Jumping Cow 42-28 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 Jumping Cow 42-28 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 Jumping Cow 42-28 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 USA, Inc.
5205 N. O'Connor Blvd. Suite 200
Irving, Texas 75039-3746
Main: 972-444-9001 Fax: 972-969-3576

September 9, 2016

Jerry Decker &
Judith Veris-Decker
6762 County Road 53.1
Trinidad, CO 81082

Re: Final Reclamation Agreement
Jumping Cow 42-28
Township 32 South, Range 65 West
Section 28: SE/4NE/4
Las Animas County, Colorado

Dear Mr. & Mrs. Decker,

Pioneer Natural Resources USA, Inc. ("Pioneer") consulted you August 31, 2016 concerning final reclamation on your property following the plugging and abandonment of the Jumping Cow 42-28. This gas well was officially plugged and abandoned on July 13, 2007. You have agreed to the reclamation plan in that consultation and a copy of the consultation has been included for your reference.

During our consultation concerning final reclamation on your property, it was requested that Pioneer not reclaim certain features of the location to the predrilled conditions. This letter agreement (including any exhibits) sets forth the agreement between you and Pioneer regarding final reclamation.

Exhibit "A" 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 waive final reclamation requirements under Colorado Oil and Gas Conservation Commission ("COGCC") Rule 1004 and a description of the reclamation plans on those areas that are not subject to the waiver. Pioneer has conducted its final reclamation in accordance with such plan.

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

- 1) Landowner requests the flat area of the well pad and the access road will be left in place to be utilized as a camp site and for hunting access.
- 2) Landowner prefers the Pioneer Interim seed mix 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 road and/or oil and gas location subject to the waiver is satisfactory to

you. By executing below and agreeing to the reclamation plan set forth in this letter agreement (including Exhibit "A"), you acknowledge that you are knowingly and forever waiving all reclamation protections otherwise afforded by COGCC Rule 1004.

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 in the enclosed self-addressed stamped envelope.

Sincerely,

Pioneer Natural Resources USA, Inc.

Chris Hollmann
Staff Landman

ACCEPTED AND AGREED:



Jerry Decker

9-9-2016
Date



Judith Veris-Decker

9-9-2016
Date

EXHIBIT "A"
Final Reclamation Agreement

COGCC FACILITY/LOCATION STATUS: CLOSED		Location ID: 386620	
API	Well Name	Location	COGCC Rule Variance
05-071-06838	Jumping Cow 42-28	T32S-R65W Sec. 28: SE/4NE/4	1004.a Line(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 August 31, 2016 in which the reclamation plans to be performed on location were devised and you have agreed to such plan. Based on that consultation Pioneer shall conduct final reclamation in accordance with the specified requests:

- 1) The Right-of-Way that accesses the well pad will not be returned to pre-disturbance contour, erosion controls will be added and gravel will be left in place;
- 2) The well pad will not be returned to pre-disturbance contour. The well pad has been left in place with gravel and seeded. Minor erosion will be fixed and bare spots will be re-seeded;
- 3) The location of the wellhead will be appropriately marked;
- 4) Areas that require re-seeding will be seeded with the Pioneer Interim seed mix.

All other reclamation requirements required in COGCC Rule 1004 have been completed by Pioneer. Additionally, Pioneer has performed all reclamation requirements as specified in COGCC Rule 1004 which cannot be waived by the Surface Owner.

The Jumping Cow 42-28 has been plugged and abandoned in accordance with COGCC Rule 319. Pioneer has removed all equipment from the location. The 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 will be responsible for noxious weed control and stormwater management on location per COGCC Rule 1002.f until the COGCC Final Reclamation Inspection and approval for release of the location.


Initial

Well Pad for Jumping Cow 42-28 T32S, R65W, Sec 28: SE/4NE/4



Right-of-Way for Jumping Cow 42-28 T32S, R65W, Sec 28: SE/4NE/4



**Pioneer Final Reclamation
Consultation Form**

Rule 305.f. (6) Final Reclamation Consultation

(Attachment)

Final Reclamation Landowner
Consultation Form

WELL NAME: Jumping Cow 42-28

TWN 32 S RNG 65 W QTR/QTR SE/NE

Please confirm below if the road corridor and any associated stream or drainage crossing(s) on your property utilized by Pioneer to access this well existed prior to the drilling of the well:

☒ Existed prior to well drilling
Description of original road or
corridor: _____

What are your requests involving the well pad and associated access road on your property?
Do you want Pioneer to perform:

☐ Full Reclamation and restore all disturbed areas as nearly as practicable to predrilling conditions within the boundaries of the surface use agreement
Description _____

☒ Partial Reclamation (identify improvements of value to you as a landowner (well pad, road, etc.) that you would like to retain
Description FLAT SPOT TO BE USED FOR CAMPSITE AND HUNTING ACCESS

Seed Mix to be used for Reclamation Reseeding and Revegetation

☐ Use Recommended NRCS Seed Mix
Comments or changes to this mix: _____

☒ Use Landowner Specified Seed Mix
Comments USE PNR INTERIM SEED MIX

(Provide seed mix tag for variance request)

Reclamation of Access Road(s)

What are your specific requests involving the access road on your property associated with this well?
Do you want Pioneer to:

☐ Close the access road and reclaim and recontour. Grade and remove all culverts and any other road improvements and obstructions (fences, gates, cattle guards) that were a part of the access road.
Comments: _____

☒ Leave access road, culverts, and other stormwater controls in place for Landowner's use.
Comments: PART OF ACCESS ROAD IS SUBDIVISION ACCESS. USED ALSO TO ACCESS PAD

Reclamation or other work to be completed on access road(s) if Landowner requests that the road be left in place for the Landowner's use;

Landowner's reason for keeping the access road and intended land use: USED TO ACCESS WELL PAD

Access Road

- ☐ Regrade road
☒ Fix or add erosion and stormwater controls
☐ Rip and seed Road

Gravel on access road(s) if seeding:

- ☐ Remove prior to seeding/ Seed
☒ Leave in place

Gate to Access Road

- ☐ Remove
☐ Leave in place N/A

Access road to be left in place (show on photo or map): _____

Access road to be closed (if any, as shown on photo or map): _____

Reclamation of Well Pad

☐ Reclaim well pad to, remove gravel, recontour and reseed

Comments: _____

☒ Leave well pad in place with location of plugged well appropriately marked

Comments: FIX MINOR EROSION SPOTS. RE-SEED BARE SPOTS. LEAVE GRAVEL AND SOIL DRAIN

Reclamation work to be completed on well pad if Landowner requests that well pad be left in place for future use

Landowner's reason for keeping the well pad and intended final designated land use: CAMPING SITE AND HUNTING SITE

Size of well pad to be left in place (indicate on map, drawing, or photo): _____

Portions of well pad to be reclaimed (indicate on map, drawing or photo): _____

Gravel on well pad

- ☐ Remove/ Reseed
☒ Leave Gravel/ Reseed
☐ Leave Gravel/ NO Reseed

Comments: _____

☐ Show location of additional stormwater, erosion control structures to be added on photo, map or drawing

The COGCC rules require certain actions on the part of Pioneer which cannot be waived by a landowner. Here are some examples of activities Pioneer must perform until COGCC approves final reclamation upon inspection and releases well site from bond:

- Remove all Pioneer oil and gas production equipment from location
- Remove all Pioneer waste material and debris onsite
- Reclaim all pits, cellars, rat holes and other bores
- Remove guy line anchors
- Perform noxious weed control
- Stabilize areas disturbed during operations and reclaim location for erosion control
- Install stormwater management controls on affected location
- Ensure that leaving a road or well pad in place will not result in significant environmental impact

Comments/Other:

Pioneer represented by



(Sign)

Ran Cobley

(Print)

Discussed this 31st day of AUGUST, 2016


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.

Once final reclamation has been performed by Pioneer and approved by the COGCC, Pioneer (the OPERATOR) IS NOT RESPONSIBLE FOR future MAINTENANCE OF WELL PADS OR RIGHTS OF WAY or access roads on your property.

Surface Owner Signature:

 (Sign)

Jerry Decker (Print)

 (Sign)

Judith Veris-Decker (Print)

Owner's Address:

6762 C.R. 53.1 TRINIDAD CO 8082

Telephone No.:

(719) 680-3286

Requests made on this form shall be formalized in a letter agreement prepared by a Pioneer Landman. The letter agreement will be sent to you for signature and once the plan set forth in such letter agreement is approved by the COGCC the letter agreement shall be a binding agreement between Pioneer and you as the landowner for the subject well.

Site-Specific Final Reclamation Plan

502.b Formal Director Variance Approval

Pioneer Natural Resources USA, Inc.

I. General Location Description:

API Number 05-071-06838	
Well Name: <u>Jumping Cow</u>	Well Number: <u>42-28</u>
Location (QtrQtr, Sec, Twp, Rng, Meridian): <u>SE, NE Sec. 28-T32S-R65W</u>	
County: <u>Las Animas</u>	Federal, Indian or State Lease Number: <u>N/A</u>
Field Name <u>Purgatoire River</u>	Field Number: <u>70830</u>

Related Facilities

Facility Type	Facility ID/ API	Facility Name/ Number	Operator Name/ Number	Status	Field Name/ Number	Location	Related Facilities
WELL	05-071-06838	JUMPING COW 42-28	PIONEER NATURAL RESOURCES USA INC 10084	PA 7/13/2007	PURGATOIRE RIVER 70830	LAS ANIMAS 071 SENE 28 32S 65W 6	
PIT	258425	JUMPING COW 42-28 PIT	PIONEER NATURAL RESOURCES USA INC 10084	AC 11/3/2000	PURGATOIRE RIVER 70830	LAS ANIMAS 071 SENE 28 32S 65W 6	
LEASE	258898	JUMPING COW 42-28	EVERGREEN OPERATING CORPORATION 6385	PR 11/3/2000	PURGATOIRE RIVER 70830	LAS ANIMAS 071 SENE 28 32S 65W 6	
LOCATION	386620	JUMPING COW-632S65W 28SENE	PIONEER NATURAL RESOURCES USA INC 10084	CL 4/14/2009	PURGATOIRE RIVER 70830	LAS ANIMAS 071 SENE 28 32S 65W 6	

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 A** below is the approximate, total disturbed surface area before reclamation work was completed. The total disturbed surface area of the Jumping Cow 42-28 well pad for Pioneer operations was approximately 0.9 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 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; that some minor erosion will be fixed; that some bare spots will be reseeded; and that the well pad should be drilled and seeded with the Pioneer interim 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 Jumping Cow 42-28 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.
- 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 0.3 acres (down from 0.9 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 Jumping Cow 42-28 access road for Pioneer operations was approximately 0.2 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 Right-of-Way (access road) remain flat; that erosion controls will be added where necessary; and that the gravel should not be removed from the Right-of-Way (access road).

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 has 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.



Image D provides an overview of well pad and Right-of-Way reclamation tasks scheduled for the spring of 2016 at the Jumping Cow 42-28 location



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)



Picture .1. Access road south to the location off of the main road.



Picture.2. Surface owner requested that the gravel remain on Right-of-Way.



Picture 3. View facing south.



Picture 4. Fill slope on east side of location.

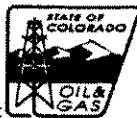
COGCC FORM 6- WELL ABONDONMENT REPORT

“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)

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver Colorado 80203 (303) 894-2100 Fax (303) 894-2105



DE	ET	OE	ES
RECEIVED			
AUG 17 07			
COGCC			

WELL ABANDONMENT REPORT

Submit original plus one copy. This form is to be submitted as an intent whenever a plugging is planned on a borehole. The approved intent shall be valid for twelve months after the approval date after that period a new intent will be required. After the plugging is complete, this form and one copy shall again be submitted as a subsequent report of the work as actually completed.

COGCC Operator Number 10084		Contact Name & Telephone		24 hour notice required, contact:																
Name of Operator: Pioneer Natural Resources USA, Inc.		Judy Glinisty																		
Address: 1401 17th Street, Suite 1200		No: 303-675-2658																		
City: Denver State: CO Zip: 80228		Fax: 303-294-1275		Tel: _____																
API Number 05-071-06838		Complete the Attachment Checklist <table border="1"><tr><td></td><td>Oper</td><td>OGCC</td></tr><tr><td>Wellbore Diagram</td><td></td><td></td></tr><tr><td>Cement Job Summary</td><td></td><td></td></tr><tr><td>Wireline Job Summary</td><td></td><td></td></tr><tr><td></td><td></td><td></td></tr></table>					Oper	OGCC	Wellbore Diagram			Cement Job Summary			Wireline Job Summary					
	Oper					OGCC														
Wellbore Diagram																				
Cement Job Summary																				
Wireline Job Summary																				
Well Name: Jumping Cow Well Number: 42-28																				
Location (QtrQtr, Sec, Twp, Rng, Meridian): SE, NE Sec. 28-T32S-R65W																				
County: Las Animas Federal, Indian or State Lease Number: N/A																				
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: _____	Longitude: _____
GPS Data: _____	
Date of Measurement: _____	PDOP Reading: _____ Instrument Operator's Name: _____
Reason for Abandonment <input type="checkbox"/> Dry <input type="checkbox"/> Production Sub-economic <input type="checkbox"/> Mechanical Problems <input type="checkbox"/> Other	
Casing to be Pulled: <input type="checkbox"/> Yes <input type="checkbox"/> No	Top of Casing Cement: _____
Fish in Hole: <input type="checkbox"/> Yes <input type="checkbox"/> No	If yes, explain details below
Wellbore has Uncemented Casing Leaks <input type="checkbox"/> Yes <input type="checkbox"/> No	If yes, explain details below
Details: _____	

Current and Previously Abandoned Zones

Formation	Perforations - Top	Perforations Bottom	Date Abandoned	Method of Isolation (None, Squeezed, BP, Cement, etc.)	Plug Depth
Raton	592'	968'	7/13/2007	Cement, CIBP	444' - 570'
Vermejo	1050'	1241'	7/13/2007	Cement, CIBP	985' - 1382'

Casing History

String	Size of Hole	Size of Casing	Weight per ft	Setting Depth	Sacks Cement	Cement Bottom	Cement Top
Surface	11"	8 5/8"	23#	563'		563'	Surface
Production	7 7/8"	5 1/2"	15.5#	1382'		1382'	Surface

Plugging Procedure for Intent and Subsequent Report

CIBP #1: Depth 570' with 12 sacks cmt on top. CIBP #2: Depth 985' with 4 sacks cmt on top		NOTE: Two (2) sacks cement required on all CIBPs.
Set 46 sks cmt from 985' ft. to 1382' ft. in	<input checked="" type="checkbox"/> Casing <input type="checkbox"/> Open Hole <input type="checkbox"/> Annulus	
Set _____ sks cmt from _____ ft. to _____ ft. in	<input type="checkbox"/> Casing <input type="checkbox"/> Open Hole <input type="checkbox"/> Annulus	
Set _____ sks cmt from _____ ft. to _____ ft. in	<input type="checkbox"/> Casing <input type="checkbox"/> Open Hole <input type="checkbox"/> Annulus	
Set _____ sks cmt from _____ ft. to _____ ft. in	<input type="checkbox"/> Casing <input type="checkbox"/> Open Hole <input type="checkbox"/> Annulus	
Set _____ sks cmt from _____ ft. to _____ ft. in	<input type="checkbox"/> Casing <input type="checkbox"/> Open Hole <input type="checkbox"/> Annulus	
Perforate and squeeze at _____ ft. with _____ sacks	Leave at least 100 ft. in casing	
Perforate and squeeze at _____ ft. with _____ sacks	Leave at least 100 ft. in casing	
Perforate and squeeze at _____ ft. with _____ sacks	Leave at least 100 ft. in casing	
Set 12 sacks half in, half out surface casing from 570 ft. to 444 ft.		
Set 4 sacks at surface		
Cut four feet below ground level, weld on plate	Dry-Hole Marker: <input type="checkbox"/> Yes <input type="checkbox"/> No	
Set _____ sacks in rat hole	Set _____ sacks in mouse hole	

Additional Plugging Information for Subsequent Report Only

Casing Recovered: _____ ft. of _____ in. casing	Plugging date: 7/13/2007
*Wireline Contractor: Superior	*Cementing Contractor: PWS
Type of Cement and Additives Used: Class 'C' cement	
*Attach job summaries.	

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

Print Name Donald Wirth	Email: _____
Signed: <u>Donald Wirth</u>	Title: Operations Engineer II Date: 08/17/07
OGCC Approved: <u>[Signature]</u>	Title: PE II Date: 3/20/08

CONDITIONS OF APPROVAL, IF ANY:

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:

- ✓ **Photos provided upon completion**

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:

- ✓ **Photos provided upon completion**

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

Requirements fulfilled in attached documents:

- ✓ **Photos provided upon completion**
- ✓ **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 provided upon completion**

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 provided upon completion**

✓ **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**
- ✓ **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 Jumping Cow 42-28 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 Jumping Cow 42-28. 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 Jumping Cow 42-28 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 Jumping Cow 42-28 location is on private property with restricted access to the public. The flat portions of the well pad provide valuable access for staging hunting.
- ✓ The Jumping Cow 42-28 location is not on cropland and the adjacent land use is non-cropland.
- ✓ The county zoning for the Jumping Cow 42-28 location is classified as “rural.” The reclamation requests by the surface owner for the Jumping Cow 42-28 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 Jumping Cow 42-28 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 Impacts

The specified variances requested from Rule 1004.(a) for the Jumping Cow 42-28 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 Jumping Cow 42-28 location is not within an “Urban Mitigation Area” as defined in the COGCC definitions. *Verified in Form 2A, COGIS Database
 - 0 Urban Mitigation Areas within ½ mile
 - Nearest Urban Mitigation Area is greater than 1 mile

- ✓ The Jumping Cow 42-28 location is not within a Sensitive Wildlife Habitat or a Restricted Surface Occupancy Area. *Verified in Form 2A, COGIS Database
 - 0 Sensitive wildlife habitats within ½ mile
 - Nearest Sensitive Wildlife Habitat is greater than 1 mile
 - 0 of Restricted Surface Occupancy Areas within ½ mile
 - Nearest Restricted Surface Occupancy Area greater than 1 mile

- ✓ The Jumping Cow 42-28 location is not within a zone defined in COGCC Rule 317B.*Verified in Form 2A, COGIS Database
 - Nearest Rule 317B area greater than 1 mile

- ✓ The Jumping Cow 42-28 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
 - 0 designated wetlands areas within ½ mile
 - Nearest designated wetlands area greater than 1 mile

- ✓ The Jumping Cow 42-28 location has 2 possible receptors i.e., water wells, surface waters within ½ mi, there are no Public Water Supply Systems within ½ mi. *Verified in Form 2A, COGIS Database-Water Resources Layer
 - Nearest permitted Water Well-1125' (based on SEO database)
 - 1 permitted water wells within ½ mile
 - Nearest live surface water-550' (USGS 24K series topo map waterway)
 - 1 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 Jumping Cow 42-28 location is not on Colorado Parks and Wildlife land or within RSO or SWH area, there is one perennial surface water within a ½ mile radius of the location; 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.