

## Koepsell, Arthur

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**From:** Kovacik, Georgina [Georgina.Kovacik@pxd.com]  
**Sent:** Wednesday, February 09, 2011 10:53 AM  
**To:** Koepsell, Arthur  
**Subject:** FW: M Gonzales - Revised Location Plat  
**Attachments:** Loction\_M\_Gonzales\_41-32.pdf

Hi Arthur,

Here is the location drawing with the corrections you requested.

Also, the change to a sensitive area is ok as well as the rest of the conditions of approval.

Please let me know if you need anything else from our end.

Thanks,

Georgina Kovacik

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**From:** Koepsell, Arthur [<mailto:Arthur.Koepsell@state.co.us>]  
**Sent:** Tuesday, February 08, 2011 9:06 AM  
**To:** Kovacik, Georgina  
**Subject:** M. Gonzales 41-32 Form 2A Document #400130343, Pioneer

Georgina,

The COGCC is reviewing the Form 2A (#400130343) for the Pioneer M. Gonzales 41-32 location, located in the NENE Sec 32 T31S R66W Las Animas County, Colorado. The COGCC requests the following changes regarding the data submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA).

1. Sensitive area: Due to the Gulnare-Rock outcrop complex soil type the site should be considered a sensitive area.
2. Construction/Location Drawing: A review of the location drawing indicates that the entire disturbed area is not properly delineated on the drawing. Per the 100 series definitions an **OIL AND GAS LOCATION** shall mean a definable area where an operator has disturbed or intends to disturb the land surface in order to locate an oil and gas facility. The attached location drawing does not include the entire disturbed area only the well pad. The location drawing also does not identify all of the improvements within 400 feet of the perimeter of the disturbed area, in particular it does not give distances or identify to the two county roads within the 400 feet. There also appears to be other improvements within the 400 feet that were not identified either.
  - Please make the necessary correction to the location drawing and resubmit the drawing.

3. **Conditions of Approval:** The following conditions of approval (COAs) will apply to the M. Gonzales 41-32 location:

- Location fill is on steep slopes; therefore the slope should be constructed in such a manner to manage site drainage and slope stability. The slope vegetation should be established immediately after the slope has been constructed.
- Prior to putting production pits into service Pioneer shall submit an Earthen Pit Report/Permit Form 15 to the Director for approval in accordance with rule 903.a.. No production water shall be placed in a pit without a pre-approved form 15.
- Location is in a sensitive area because of potential for adverse impacts to ground water/surface water; therefore all pits will be lined.

These COAs are consistent with Pioneers proposed oil and gas operations, however, COGCC would appreciate your concurrence with the COA prior to passing the OGLA review.

If you have any questions or concerns, please do not hesitate to contact me.

Thanks,

Arthur

Arthur W. Koepsell, P.G.  
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Southern Area

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