

## Koepsell, Arthur

---

**From:** Kovacik, Georgina [Georgina.Kovacik@pxd.com]  
**Sent:** Thursday, March 03, 2011 9:18 AM  
**To:** Koepsell, Arthur  
**Subject:** RE: Vallejo 32-19 Form 2A Document #400131875, Pioneer

Arthur,

Sorry about that, I somehow missed this.  
The changes are ok and the COA's are also ok.

Thanks,

Georgina Kovacik

---

**From:** Koepsell, Arthur [<mailto:Arthur.Koepsell@state.co.us>]  
**Sent:** Thursday, March 03, 2011 8:00 AM  
**To:** Kovacik, Georgina  
**Subject:** Vallejo 32-19 Form 2A Document #400131875, Pioneer

Georgina,

I sent this email on 2/11/2011 and kind not find a response. The public comment period closes today so I would like to get approval for the changes and COAs.

Arthur

The COGCC is reviewing the Form 2A (#400131875) for the Pioneer Vallejo 32-19 location, located in the SWNE Sec 19 T33S R67W 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 Saruche-Rombo-Rock Outcrop Complex soil type the site should be considered a sensitive area.
2. Location Identification/PDOP: The PDOP reading on the form 2A is 9.9 which exceeds the rule 215 criteria of 6. If possible please submit PDOP reading that meets rule 215. If such a Reading is currently unavailable please submit the coordinates and PDOP reading via Sundry when it becomes available.
3. **Conditions of Approval:** The following conditions of approval (COAs) will apply to the Vallejo 32-19 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.

- Operator must implement site-specific best management practices in accordance with good engineering practices, including, but not limited to, construction of a berm or diversion dike, site grading, or other comparable measures, sufficient to prevent a release of drilling, completion, produced fluids, or chemical products from migrating off the location.

These COAs are consistent with Pioneer's 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.  
Oil & Gas Location Assessment Specialist  
Southern Area

Oil and Gas Location Assessment  
Colorado Oil and Gas Conservation Commission  
1120 Lincoln St. Suite 801  
Denver Colorado 80203  
Phone (303) 894-2100 ext. 5148

---

**Statement of Confidentiality:**

This message may contain information that is privileged or confidential. If you receive this transmission in error, please notify the sender by reply e-mail and delete the message and any attachments.