

## Koepsell, Arthur

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**From:** Kovacik, Georgina [Georgina.Kovacik@pxd.com]  
**Sent:** Tuesday, May 03, 2011 10:27 AM  
**To:** Koepsell, Arthur  
**Subject:** RE: Kelly Bushing 22-36 Form 2A Document #400151237, Pioneer  
**Attachments:** GA.pdf

Arthur,

Attached is the Map Unit description for the Gulnare-Allens Park Complex, I tried attaching it to the e-form but I wasn't able to add any additional attachments.

You can change it to a Sensitive area and also the reference photos will be submitted within the next 12 months.

The COA's are ok.

Thanks,

Georgina Kovacik

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**From:** Koepsell, Arthur [<mailto:Arthur.Koepsell@state.co.us>]  
**Sent:** Monday, April 25, 2011 9:50 AM  
**To:** Kovacik, Georgina  
**Subject:** Kelly Bushing 22-36 Form 2A Document #400151237, Pioneer

Georgina,

The COGCC is reviewing the Form 2A (#400151237) for the Kelly Bushing 22-36 location, located in the SENW Sec 36 T32S 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. Soil: A review of soil information on the COGCC website indicates that the Gulnare-Allens Park complex, 5 to 35 percent slopes is present on the site and well as the report Trujillo-Sandy Loam, 9 to 25% slopes.
  - The COGCC requires that the Gulnare-Allens Park complex, 5 to 35 percent slopes be added to the Form 2A.
2. Sensitive area: Due to the Gulnare-Allens Park complex, 5 to 35 percent slopes soil type the site should be considered a sensitive area.
3. Reference area Photos: If reference area photos are available please provide them. If they are not available at this time they will be required within 12 months of the Form 2A issue date.
4. **Conditions of Approval:** The following conditions of approval (COAs) will apply to the Kelly Bushing 22-36:
  - 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.
- Reference area pictures shall be provided to the COGCC within 12 months of approval of the form 2A.

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

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Colorado Oil and Gas Conservation Commission  
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