

## Koepsell, Arthur

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**From:** Kovacik, Georgina [Georgina.Kovacik@pxd.com]  
**Sent:** Wednesday, May 25, 2011 9:11 AM  
**To:** Koepsell, Arthur  
**Subject:** RE: Brooks 23-22 TR Form 2A Document #400165953, Pioneer

Arthur,

The changes are ok. We'll send that sundry in and the COA's are ok as wells.

Thanks,

Georgina Kovacik

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**From:** Koepsell, Arthur [<mailto:Arthur.Koepsell@state.co.us>]  
**Sent:** Wednesday, May 25, 2011 8:29 AM  
**To:** Kovacik, Georgina  
**Subject:** Brooks 23-22 TR Form 2A Document #400165953, Pioneer

Georgina,

The COGCC is reviewing the Form 2A (#400165953) for the Brooks 23-22 location, located in the NESW Sec 22 T32S 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-Allens Park complex, 5 to 35 percent slopes soil type the site should be considered a sensitive area.
  - The sensitive area tab should be changed to YES.
2. Pioneer currently has an approved form 15 (Fac. ID #285201) for an unlined pit on this location that was not previously constructed. An unlined pit would be in conflict with the COAs for this location so the following will apply:
  - Prior to building and putting the production pit into use Pioneer will submit a Sundry (Form 4) for Fac. ID #285201 changing the pit from an unlined earthen pit to a lined earthen pit.
3. **Conditions of Approval:** The following conditions of approval (COAs) will apply to the Graham 32-22 TR:
  - Prior to building and putting the production pit (Fac. ID #285201) into use Pioneer will submit a Sundry (Form 4) for Fac. ID #285201 changing the pit from an unlined earthen pit to a lined earthen pit.
  - 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.
  - Reference area pictures shall be provided to the COGCC within 12 months of approval of the form 2A.

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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