

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

April 13, 2017

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 Eclipse 34-16 TPC, API# 05-071-08103, Location ID: 386790
Township 32 South, Range 67 West, 6th P.M.
Section 16: SW/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 Eclipse 34-16 TPC 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 Eclipse 32-16 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 Eclipse 34-16 TPC 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

Table of Contents

Surface Owner Reclamation Letter Agreementpages 4-8

- Rule 1001.c. Surface Owner Waiver of 1000-Series Rules
- December 17, 2015 Version Rule 1001.c Reclamation Variances and Waivers” guidance document Section I.1 through I 1.5

Pioneer Final Reclamation Consultation Form.....pages 9-10

- Rule 305.f.(6) Final Reclamation Consultation 300-Series Rules
- December 17, 2015 Version Rule 1001.c Reclamation Variances and Waivers” guidance document Section II.B.5

Site-Specific Final Reclamation Planpages 11-29

- December 17, 2015 Version Rule 1001.c Reclamation Variances and Waivers” guidance document Section I - Section II.B.5

Section I. General Location

Description Section II. Overview

Section III. Reclamation Plan Details

- Well Pad- 1004.(a) rule variances requested
- Right Of Way (ROW) -1004.(a) rule variances requested
- Reclamation work plan
- Successful Reclamation Standards 1004.c: methods of stabilization & vegetative cover
- Status/Condition of Reclamation Photographs, pages 18-20
- COGCC Form 6 Subsequent Well Abandonment Report-*Approved*, pages 21-22
- COGCC Form 27 Remediation Work Plan-Site/Facility Closure-*Approved*, pages 23-25

Section IV. Guidance Document Section I Requirements -*Completeness Checklist*

Section V– Guidance Document Section II.B Requirements -*Completeness Checklist*

Analysis of Public Health, Welfare Safety and Adverse Environmental Impactspages 29-31

- December 17, 2015 Version Rule 1001.c Reclamation Variances and Waivers” guidance document Section I - Section II.B.8

Pioneer’s Raton Basin Field-Wide Reclamation and Best Management Practices page 32

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

March 18, 2016

Kit Page, District Manager
Colorado State Board of Land Commissioners
P.O. Box 88
305 Murphy Drive, Suite A
Alamosa, CO 81101

Re: Final Reclamation Agreement
Eclipse 34-16 TPC
Township 32 South, Range 67 West
Section 16: SW/4NE/4
Las Animas County, Colorado

Dear Sir,

Pioneer Natural Resources USA, Inc. ("Pioneer") consulted with you on July 23, 2013 concerning final reclamation on your property following the plugging and abandonment of the Eclipse 34-16 TPC. This gas well was officially plugged and abandoned on August 16, 2007. A copy of your consultation has been included for your reference.

During our consultation with you concerning final reclamation on your property, you 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 have requested Pioneer 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 shall conduct its final reclamation in accordance with such plan.

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

- 1) Landowner requests the flat area of the well site be left in place and reseeded which will be beneficial for wildlife.
- 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

McDonald
AG # 45945

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 or via email to Chris Hollmann at chris.hollmann@pxd.com.

Sincerely,

Pioneer Natural Resources USA, Inc.


Chris Hollmann
Staff Landman

ACCEPTED AND AGREED:

Colorado State Board of Land Commissioners


Kit Page, District Manager

3/21/16
Date

EXHIBIT "A"
Final Reclamation Agreement

COGCC FACILITY/LOCATION STATUS: CL		Location ID: 386790	
API	Well Name	Location	COGCC Rule Variance
05-071-08103-0000	Eclipse 34-16 TPC	T32S-R67W Sec.16: SW/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 July 23, 2013 in which the reclamation plans to be performed on location were devised. Based on our consultation Pioneer shall conduct final reclamation in accordance with your specified requests:

- 1) The well pad will not be returned to pre-disturbance contour. The well pad shall remain flat and the existing gravel will remain and the well pad will be re-seeded;
- 2) Logs will be used to block entrance to the well pad.

All other reclamation requirements required in COGCC Rule 1004 will be completed by Pioneer. Additionally, Pioneer shall perform all reclamation requirements as specified in COGCC Rule 1004 which cannot be waived by the Surface Owner.

The Eclipse 34-16 TPC has been plugged and abandoned in accordance with COGCC Rule 319. Pioneer will remove all equipment from the location. The flowline risers and gathering line risers shall be abandoned per COGCC Rule 1103. All Pioneer trash and debris shall be 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.

Well Pad for Eclipse 34-16 TPC T32S, R67W, Sec 16: SW/4NE/4



CBM WELL	
CBM WELL DETAILS	
Well Name	ECLIPSE 34-16 TPC
Well Type	CBM
API	0507081030000
Unit	Sengre de Cristo
Soud Date	28-06/2004 2:45:00 PM
Well Status	PLUGGED AND ABANDONED
Suitable for Road Surrounding?	YES
COGCC Record	Click Here
Qtr-Qtr	NWSE
Section	16
Township	32S
Range	67W
Lat NAD83	37.25507
Long NAD83	-104.89019
Land Ownership	No
Foreman	Jack Wiseman
ASSOCIATED PITS	
1 OF 1	
Pit Name	ECLIPSE 34-16 TPCQ05-071-08103-P1
Pit ID	05-071-08103-P1
Pit Status	PERMITTED
Pit Lat NAD83	37.25502
Pit Long NAD83	-104.88966
Location	On Pad
Pit Ever Constructed	False
Pit Permit No (Facility ID)	278485
COGCC Record	Click Here

**Pioneer Final Reclamation
Consultation Form**

Rule 305.f. (6) Final Reclamation Consultation

(Attachment)

**Plug & Abandon Consultation Form
(Surface Owner)**

WELL NAME: ECLIPSE #32-16 TR

TWN 32 S RNG 67 W QTR/QTR SW/NE

--	--

Yes	No	Disposition of Right-of-Way	
<input type="checkbox"/>	<input type="checkbox"/>	Leave original access road with gravel (As is)	<u>N/A</u>
<input type="checkbox"/>	<input type="checkbox"/>	Leave road flat and re-seed	
<input type="checkbox"/>	<input type="checkbox"/>	Reclaim right-of-way to original contours and re-seed	
<input type="checkbox"/>	<input type="checkbox"/>	Other - _____	

Yes	No	Disposition of Well Pad	
<input type="checkbox"/>	<input type="checkbox"/>	Leave pad flat with gravel (As is)	<u>N/A</u>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Leave pad flat and re-seed	
<input type="checkbox"/>	<input type="checkbox"/>	Reclaim pad to original contours and re-seed	
<input type="checkbox"/>	<input type="checkbox"/>	Other - _____	

Yes	No	Disposition of Pit	
<input type="checkbox"/>	<input type="checkbox"/>	Leave pit open (As is)	<u>N/A</u>
<input type="checkbox"/>	<input type="checkbox"/>	Pull back and reclaim pit to original contours and re-seed	
<input type="checkbox"/>	<input type="checkbox"/>	Other - _____	

Yes	No	Work to be Completed by Operator	
<input type="checkbox"/>	<input type="checkbox"/>	Remove gate at fenced property lines if any	<u>N/A</u>
<input type="checkbox"/>	<input type="checkbox"/>	Other - _____	

Comments/Other: USE LOGS TO BLOCK ENTRANCE. REMOVE REMAINS

Pioneer represented by: [Signature] (Sign) Ryan Cosbey (Print)

Discussed this 23rd day of July, 2013

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.

OPERATOR IS NOT RESPONSIBLE FOR MAINTENANCE ON WELL PADS OR RIGHTS OF WAY LEFT IN "AS IS" CONDITION.

Surface Owner Signature:

[Signature] (Sign)

Kit Page (State Land Board) (Print)

(Sign)

(Print)

Owner's Address: P.O. Box 88, Alamosa, CO 81101

Telephone No.: 719-589-2360

THIS IS NOT A BINDING AGREEMENT.

Revised 6/6/2012



Site-Specific Final Reclamation Plan 502.b Formal Director Variance Approval

Pioneer Natural Resources USA, Inc.

I. General Location Description:

API Number 05-071-08103	
Well Name: Eclipse	Well Number: 34-16 Tpc
Location (QtrQtr, Sec, Twp, Rng, Meridian): SW/SE Sec.16-T32S-R67W	
County: Las Animas	Federal, Indian or State Lease Number: N/A
Field Name: Purgatoire River	Field Number: 70830

Related Facilities

WELL	05-071-08103	ECLIPSE 34-16 TPC	PIONEER NATURAL RESOURCES USA INC 10084	PA 8/16/2007	PURGATOIRE RIVER 70830	LAS ANIMAS 071 SWSE 16 32S 67W 6	
LEASE	275138	ECLIPSE 34-16 TPC	PIONEER NATURAL RESOURCES USA INC 10084	PR 12/6/2004	PURGATOIRE RIVER 70830	LAS ANIMAS 071 SWSE 16 32S 67W 6	
PIT	278485	ECLIPSE 34-16TPC ONSITE	PIONEER NATURAL RESOURCES USA INC 10084	CL 12/6/2012	PURGATOIRE RIVER 70830	LAS ANIMAS 071 SWSE 16 32S 67W 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 Eclipse 34-16 TPC well pad for Pioneer operations was approximately 0.8 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 pad should not be returned to contour; that the gravel should not be removed from the flat portions of the well pad; that logs will be placed in the entrance area to discourage entrance to the reclaimed 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; and that the well pad should be drilled and seeded with the PNR 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 and the fill slopes are composed of mostly large rocks, 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 Eclipse 34-16 TPC location including;

- 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 surface owner requested the PNR interim seed mix that was used to seed the well pad.
- Stormwater BMPs were constructed and maintained to achieve site stabilization.
- 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 0.6 acres (down from 0.8 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.



Image C provides an overview of well pad reclamation tasks completed at the Eclipse 34-16 TPC 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. The well pad was not returned to contour per landowner request.



Picture 2. Sides of location left in place to preserve existing vegetation.



Picture 3. Logs were used to block entrance to location per landowner request.



Picture 4. Location was reseeded using PNR interim seed mix as requested by landowner.

COGCC FORM 6 – WELL ABANDONMENT 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) 894-2109

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.

DE	ET	OE	ES
RECEIVED			
OCT 10 07			
COGCC			

COGCC Operator Number: 10084	Contact Name & Telephone Judy Glinisty	24 hour notice required, contact: Tel: _____		
Name of Operator: Pioneer Natural Resources USA, Inc.	No: 303-675-2658			
Address: 1401 17th Street, Suite 1200	Fax: 303-294-1275	Complete the Attachment Checklist		
City: Denver State: CO Zip: 80202				
API Number 05-071-08103				
Well Name: Eclipse Well Number: 34-16 Tpc				
Location (QtrQtr, Sec, Twp, Rng, Meridian): SW/SE Sec.16-T32S-R67W		Wellbore Diagram		
County: Las Animas Federal, Indian or State Lease Number: N/A		Cement Job Summary		
Field Name: Purgatoire River Field Number: 70830		Wireline Job Summary		

☐ 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: ☐ Dry ☐ Production Sub-economic ☐ Mechanical Problems ☐ Other
Casing to be Pulled: ☐ Yes ☐ No Top of Casing Cement: _____
Fish in Hole: ☐ Yes ☐ No If yes, explain details below
Wellbore has Uncemented Casing Leaks: ☐ Yes ☐ 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
Trinidad Poison Canyon	1046'	1060'		8/16/2007	600'

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"	24#	504'	159	504'	0
Production	7 7/8"	5 1/2"	17#	1270'	172	1270'	0

Plugging Procedure for Intent and Subsequent Report

CIBP #1: Depth 1006' with _____ sacks cmt on top. CIBP #2: Depth _____ with _____ sacks cmt on top. NOTE: Two (2) sacks cement required on all CIBPs.

Set 110' _____ sks cmt from 1006' _____ 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
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 _____ sacks half in, half out surface casing from _____ ft. to _____ ft.
Set _____ sacks at surface
Cut four feet below ground level, weld on plate Dry-Hole Marker: ☐ Yes ☐ 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: 8/16/2007
*Wireline Contractor: _____ *Cementing Contractor: _____
Type of Cement and Additives Used: _____
*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: Rob Benyo Email: Rob.Benyo@pxd.com
Signed: Rob Benyo Title: Sr. Operations Engineer Date: 10/10/2007
OGCC Approved: _____ Title: PE II Date: 3/20/08

CONDITIONS OF APPROVAL, IF ANY:

COGCC FORM 27- REMEDIATION WORK PLAN

Facility Closure for Production Pit

“Approved Remediation Work Plan Form 27” in fulfillment of the **Section II.B.8** of the COGCC Rule 1001.c Reclamation Variances and Waivers” guidance document dated December 17, 2015.

(Attachment)

Pit was never constructed. Attached approved Form 4 sundry notice detailing such.



received 12/06/2012
Facility 278485
Document 200371557

SUNDRY NOTICE

Submit original plus one copy. This form is to be used for general, technical and environmental sundry information. For proposed or completed operations, describe in full on Technical Information Page (Page 2 of this form.) Identify well or other facility by API Number or by OGCC Facility ID. Operator shall send an informational copy of all sundry notices for wells located in High Density Areas to the Local Government Designee (Rule 603b.)

1. OGCC Operator Number: 10084	4. Contact Name: David Castro	Complete the Attachment Checklist OP OGCC
2. Name of Operator: Pioneer Natural Resources USA, Inc.	Phone: 303-298-8100	
3. Address: 1401 17th Street, Suite 1200 City: Denver State: CO Zip: 80202	Fax: 303-298-7800	
5. API Number 05-071-08103	OGCC Facility ID Number 278485	Survey Plat
6. Well/Facility Name: Eclipse 34-16 Tpc	7. Well/Facility Number	Directional Survey
8. Location (Qtr/Sec, Twp, Rng, Meridian): SWSE, Sec. 16, T32S, R67W, 6th P.M.		Surface Equipmt Diagram
9. County: Las Animas	10. Field Name:	Technical Info Page
11. Federal, Indian or State Lease Number:		Other <input checked="" type="checkbox"/>

General Notice

<input type="checkbox"/> CHANGE OF LOCATION: Attach New Survey Plat (a change of surface qtr/qtr is substantive and requires a new permit)	
Change of Surface Footage from Exterior Section Lines:	<input type="checkbox"/> Full/FSL <input type="checkbox"/> Full/FHL
Change of Surface Footage to Exterior Section Lines:	<input type="checkbox"/>
Change of Bottomhole Footage from Exterior Section Lines:	<input type="checkbox"/>
Change of Bottomhole Footage to Exterior Section Lines:	<input type="checkbox"/> attach directional survey
Bottomhole location Qtr/Sec, Twp, Rng, Mer	
Latitude	Distance to nearest property line
Longitude	Distance to nearest bldg, public rd, utility or RR
Ground Elevation	Distance to nearest lease line
	Is location in a High Density Area (rule 603b)? Yes/No <input type="checkbox"/>
	Distance to nearest well same formation
	Surface owner consultation date:
GPS DATA:	
Date of Measurement	POOP Reading
	Instrument Operator's Name
<input type="checkbox"/> CHANGE SPACING UNIT	
Formation	Formation Code
Spacing order number	Unit Acreage
Unit configuration	
<input type="checkbox"/> Remove from surface bond	
Signed surface use agreement attached	
<input type="checkbox"/> CHANGE OF OPERATOR (prior to drilling):	
Effective Date:	
Plugging Bond: <input type="checkbox"/> Blanket <input type="checkbox"/> Individual	
<input type="checkbox"/> CHANGE WELL NAME	
From:	NUMBER
To:	
Effective Date:	
<input type="checkbox"/> ABANDONED LOCATION:	
Was location ever built? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Is site ready for inspection? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Date Ready for Inspection:	
<input type="checkbox"/> NOTICE OF CONTINUED SHUT IN STATUS	
Date well shut in or temporarily abandoned:	
Has Production Equipment been removed from site? <input type="checkbox"/> Yes <input type="checkbox"/> No	
MIT required if shut in longer than two years. Date of last MIT	
<input type="checkbox"/> SPUD DATE:	
<input type="checkbox"/> REQUEST FOR CONFIDENTIAL STATUS (5 mos from date casing set)	
<input type="checkbox"/> SUBSEQUENT REPORT OF STAGE, SQUEEZE OR REMEDIAL CEMENT WORK	
*submit cbl and cement job summaries	
Method used	Cementing tool setting/perf depth
Cement volume	Cement top
Cement bottom	Date
<input type="checkbox"/> RECLAMATION: Attach technical page describing final reclamation procedures per Rule 1004.	
Final reclamation will commence on approximately	
<input type="checkbox"/> Final reclamation is completed and site is ready for inspection.	

Technical Engineering/Environmental Notice

<input type="checkbox"/> Notice of Intent		<input type="checkbox"/> Report of Work Done	
Approximate Start Date:		Date Work Completed:	
Details of work must be described in full on Technical Information Page (Page 2 must be submitted.)			
<input type="checkbox"/> Intent to Recomplete (submit form 2)	<input type="checkbox"/> Request to Vent or Flare	<input type="checkbox"/> E&P Waste Disposal	
<input type="checkbox"/> Change Drilling Plans	<input type="checkbox"/> Repair Well	<input type="checkbox"/> Beneficial Reuse of E&P Waste	
<input type="checkbox"/> Gross Interval Changed?	<input type="checkbox"/> Rule 502 variance requested	<input type="checkbox"/> Status Update/Change of Remediation Plans	
<input type="checkbox"/> Casing/Cementing Program Change	<input checked="" type="checkbox"/> Other: new pit never built	for Spills and Releases	

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

Signed: **David Castro** Digitally signed by David Castro
DN: cn=David Castro, o=Pioneer Natural Resources USA, Inc., ou=Environmental, email=david.castro@pxd.com, c=US
Date: 2012.12.06 10:55:37 -0700
Print Name: **David Castro** Title: **Environmental Specialist**

COGCC Approved: _____ Title: _____ Date: _____

CONDITIONS OF APPROVAL, IF ANY:

TECHNICAL INFORMATION PAGE



FOR OGCC USE ONLY

1. OGCC Operator Number: 10084 API Number: 05-071-08103
2. Name of Operator: Pioneer Natural Resources USA, Inc. OGCC Facility ID # 278485
3. Well/Facility Name: Eclipse 34-16 Tpc Well/Facility Number:
4. Location (QtrQtr, Sec, Twp, Rng, Meridian): SWSE, Sec. 16, T32S, R67W, 6th P.M.

This form is to be completed whenever a Sundry Notice is submitted requiring detailed report of work to be performed or completed. This form shall be transmitted within 30 days of work completed as a "subsequent" report and must accompany Form 4, page 1.

5. **DESCRIBE PROPOSED OR COMPLETED OPERATIONS**

Pioneer beleives that a new pit for the now P&A Eclipse 34-16 Tpc was never constructed. Annual aerial photography dating back to before drilling of the well shows no evidence of a new pit ever existing on the location. Multiple COGCC inspection forms show no evidence of a new pit ever constructed. Apit permit application was submitted and approved for a pit correlating to this well. However, the diagram submitted with the pit permit application illustrates use of the existing pit for the existing well on location, the Eclipse 33-16. Based on the information available, Pioneer would like to request reversal of the unsatisfactory inspection rating given for closure of a pit without submission of a Form 27.

facility 278485 closed in database with annotation that the produced water pit described in the approved permit was not constructed as shown on aerial photos and inspection reports.

Peter Gintautas

Digitally signed by Peter Gintautas
DN: cn=Peter Gintautas, o=COGCC, ou=Environmental
Protection Specialist, email=peter.gintautas@state.co.us, c=US
Date: 2012.12.06 13:44:17 -0700

**CHECKLIST OF INFORMATION and DOCUMENTATION PROVIDED FOR
DIRECTORS' REVIEW & APPROVAL OF 1001.c: RECLAMATION 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:

- ✓ **Listed in Exhibit A of the “Final 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:

- ✓ **Final 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:

- ✓ **Final 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 in Exhibit A of the “Final 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:

- ✓ **Attached photos of the location**

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:

- ✓ **Attached photos of the location**

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

Requirements fulfilled in attached documents:

- ✓ **Attached photos of the location**
- ✓ **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:

- ✓ **Attached photos of the location**

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:

- ✓ **Attached photos of the location**
- ✓ **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 Adverse 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 Eclipse 34-16 TPC 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 Eclipse 34-16 TPC. Attached Form 4 approved sundry request showing that the pit was never constructed on location.

- ✓ 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 Eclipse 34-16 TPC well pad 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 Eclipse 34-16 TPC 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 Eclipse 34-16 TPC location is not on cropland and the adjacent land use is non-cropland.
- ✓ The county zoning for the Eclipse 34-16 TPC location is classified as “rural.” The reclamation requests by the surface owner for the Eclipse 34-16 TPC 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 Eclipse 34-16 TPC well pad 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 Eclipse 34-16 TPC well pad 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 Eclipse 34-16 TPC 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 greater than 1 mile
- ✓ The Eclipse 34-16 TPC 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 Restricted Surface Occupancy Areas within ½ mile
 - Nearest Restricted Surface Occupancy Area greater than 1 mile
- ✓ The Eclipse 34-16 TPC 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 Eclipse 34-16 TPC 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
 - 1 designated wetlands areas within ½ mile
 - Nearest designated wetlands area 800’
- ✓ The Eclipse 34-16 TPC location has two possible receptors i.e., water wells, surface waters, Public Water Supply Systems etc. within ½ mi. *Verified in Form 2A, COGIS Database-Water Resources Layer
 - Nearest permitted Water Well-2865’ (based on SEO database)
 - 0 permitted water wells within ½ mile
 - Nearest live surface water-200’ (USGS 24K series topo map waterway)
 - 2 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 Eclipse 34-16 TPC location is not on Colorado Parks and Wildlife land or within RSO or SWH area, there are three perennial, surface water body within a ½ mile radius of the location; however, the features of the location for which a variance has been requested, pose no substantial risk of impacting the surface water bodies in any way; 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.