



December 28, 2020

City of Aurora
Planning
Zoning and Plan Review
Attn: Stephen Rodriguez
15151 East Alameda Parkway
Aurora, CO 80112

**RE: Natural Gas Pipeline As-Built Site Plan Amendment #1
Rush North Lateral
Letter of Introduction**

To Whom it May Concern:

On behalf of the applicant, the Operator, Crestone Peak Resources Midstream LLC (CPRM), Westwood Professional Services, Inc. (WW) presents this amendment to the *Natural Gas Pipeline Gathering System, As-Built Site Plan* to include the *Rush North Lateral*. The *Natural Gas Pipeline Gathering System, As-Built Site Plan* was approved by the City of Aurora (City) on September 29, 2020. This amendment application summarizes the connection between the existing *Rush South Lateral* to the *Rush North Oil & Gas Well Pad*.

The *Rush North Lateral* is located in Section 28, Township 4 South, Range 65 West, is approximately 1,500 feet long, and is a steel pipeline, six inches in diameter. The gas pipeline will be within an existing fifty foot wide permanent easement, with a twenty five foot temporary construction easement on the east side of the easement. There are no proposed above ground appurtenances for this lateral, not including the appurtenances located on the oil and gas well pad. The lateral does not cross any City of Aurora Right-of-Ways, utilities, or any floodplains. The alignment of the *Rush North Lateral* was chosen due to the proximity to the *Rush North Oil & Gas Well Pad* and the *Rush South Lateral*.

The existing *Rush South Oil & Gas Well Pad* access road will be used as the haul route for this proposed pipeline. The existing access road is accessed to the south from Jewell Avenue, in Section 29, Township 4 South, Range 65 West. Prior to traveling on the access road, the construction traffic will follow routes per the agreed upon Road Maintenance Agreement, signed December 18, 2019, and subsequently assigned to CPRM. The weight of the loads for construction traffic will have a maximum load of 140,000 lbs.

The existing zoning within and surrounding the proposed *Rush North Lateral* easement is R-2 – Medium-Density Residential District. The existing land use for the pipeline easement is crop land.

General Pipeline Information

Pipelines are the safest method to transport material, reducing the possibilities of hazards such as fires, explosions, spills, or leaks. During normal pipeline operations, there will be minimal emissions and fluids released, and solely related to pigging operations; no dust is produced. Without pipelines,

hydrocarbons and produced water would be trucked. The decreased truck traffic due to the pipeline will reduce impact to the lifespan of roadway surfaces.

Pipeline infrastructure is monitored remotely 24/7/365. In the event of an emergency, the operator will initiate its Site Specific Emergency Response Plan. This plan is included with this application. If a problem arises, the location of concern can be isolated at appurtenance sites, remotely.

There will be no above-ground impacts to the landscape, that warrant visual mitigation. There are no lights or noise associated with pipeline infrastructure. Because the pipeline corridor is not fenced, natural wildlife movements are not compromised. After construction, the disturbed land will be re-vegetated with native grasses or returned to agricultural croplands.

If these pipelines are no longer needed, they will either be abandoned in place, flushed, filled with inert gas and capped, or completely removed in accordance with City, Colorado Oil and Gas Conservation Commission (COGCC), Department of Transportation (DOT) and Pipeline and Hazardous Materials Safety Administration (PHMSA) rules and regulations. Continual maintenance on pipelines that have been de-commissioned is not anticipated. If all the utilities within an easement are de-commissioned, the pipeline easement may be released to the landowner.

The proposed pipeline lateral will not have undue adverse effects on existing and future development of the surrounding area. The design of the proposed pipeline lateral mitigates negative impacts on the surrounding area to the greatest extent feasible. The disturbed area shall be maintained during construction by the applicant or property owner in such a manner to control soil erosion, dust, and the growth of noxious weeds.

Please refer to the separate attachment to this Letter of Introduction that describes how each of the required BMPs are addressed with this application.

If you have any questions during the course of this application process, please do not hesitate to contact me directly at 720.249.3539.

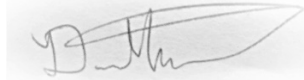
Sincerely,

Westwood Professional Services, Inc.



Melinda E. Lundquist, PE
Director, Private Development Colorado

Crestone Peak Resources Midstream, LLC



David A. Stewart
Vice President, EHS & Regulatory

cc: Jay Knutson, and Kathy Denzer, Crestone Peak Resources Midstream, LLC
1801 California Street, Suite 2500
Denver, CO 80202
(720) 410-8487
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BEST MANAGEMENT PRACTICES FOR PIPELINES

The *Natural Gas Pipeline Gathering System, As-Built Site Plan* was approved by the City of Aurora on September 29, 2020. That application was subject to the third party oil and gas operator agreement between the City of Aurora and Elevation Midstream, LLC, finalized in July 2019. The City of Aurora is currently working through creating an Oil and Gas Manual. On December 14, 2020 City staff delivered an updated BMP list, specific to pipeline applications. As understood from City staff, this application is subject to that pipeline BMP list and each of the BMPs listed are required to be addressed. The following describes how this application will specifically adhere to the required applicable BMPs or describe how a required BMP is not applicable to this application.

1. Access Roads: No new access roads are proposed with this application. Access roads are typically not proposed for pipeline projects.
2. Air Quality: A Fieldwide Air Quality Plan (09.29.2020) was approved with the original As-Built application. Minimal emissions and minor leaks of the natural gas pipeline may exist. The equipment used to construct pipelines does produce emissions which are regulated by entities other than the City of Aurora.
3. Automatic Safety Protective Systems/Surface Safety Valves: Please refer to Section 8.2 of the approved Integrity Management Plan (09.29.2020), which addresses pipeline isolation with isolation valves. This document is a field-wide plan, submitted and approved with the As-Built application.
4. Buildings, Structures, Appurtenances: This application does not propose any new buildings, structures or above ground appurtenance equipment. There are no buildings along the main gathering system pipelines. There are existing buildings on the well pad sites where pipelines connect.
5. Chemical Disclosure and Storage: There are areas where chemicals are stored and/or used which are next to existing pipeline above ground appurtenances. Maximum volume at each of these sites is 330 gallons. Any hazardous chemicals that are to be used for construction or maintenance activities will be reported to the City of Aurora Life Safety Department or SDS Sheets can be provided.
6. Color/Paint Color: All permanent above ground appurtenance equipment shall be painted in a tan or brown matte finish unless a different color is necessary for safety. This application does not propose any new above ground appurtenance equipment.
7. Construction of Gathering System and Flowline: This pipeline application memorializes the construction of the proposed natural gas pipeline lateral, thus satisfying the intent of this BMP. In the event that the pipelines described in the original application are temporarily taken out of service, conveyance of the natural gas will be accomplished in accordance with the terms of the Elevation Midstream, LLC Operator Agreement, where applicable.
8. Construction Work Hours: The construction of the pipeline will occur during daylight hours, per the City of Aurora Zoning Code. Pipeline delivery to the construction site will be restricted between 7AM and 8PM.
9. Cultural and Historical Resource Protection: No impacts to City identified cultural or historical structures, sites or districts are anticipated.
10. Discharge Valves: Appurtenance sites will be protected with a security fence that limits access to authorized personnel. Valves will be blinded (where necessary) and locked. This application does not propose any new appurtenance sites.
11. Emergency Response/Action Plan: A Fieldwide Emergency Response Plan (09.29.2020) was approved with the original As-Built application that is in accordance with the provisions detailed in Section II.16 of the Elevation Midstream, LLC Operator Agreement, including filing it with local emergency responders, providing contact information for CPRM's responsible parties, creating as-built mapping, describing a detailed response to all anticipated emergency scenarios, including evacuation routes and contacts for emergency care facilities, demonstrating operator preparedness relative to personnel, supplies and training, listing Material Safety Data Sheets (MSDS), if applicable, coordinating training with local emergency responders, agreeing to reimbursement to local emergency responders for expenses attributed to CPRM, describing emergency shut-down procedures, including logistics and notifications thereof, and agreeing to use non-toxic foam in mitigating fires. A Site-Specific Emergency Response Plan is included with this application that has specific details for the proposed location.

12. Events or Incidents to be reported: CPRM will report any COGCC reportable safety events or OSHA reportable injuries to the City.
13. Fencing/Security Fencing: No fencing is proposed with this amendment.
14. Fugitive Dust Suppression: There is no on-going dust generation activity associated with this pipeline project. During construction of the pipeline, dust will be mitigated with practices including but not limited to treating with water and restriction of construction activity during high-wind days. Areas that have been devoided of vegetation to facilitate construction, will be seeded and mulched. The approved Fieldwide Air Quality Plan (09.29.2020) discusses dust suppression measures.
15. General Maintenance: CPRM will operate and maintain the pipeline infrastructure pursuant to manufacturer specifications and with the intent to comply with the Best Management Practices.
16. Insurance: CPRM can and will comply with the insurance requirements stipulated in the Elevation Midstream, LLC Operator Agreement.
17. Lighting: There is no permanent lighting planned for this pipeline project. All construction activities will occur during daylight hours. Routine maintenance activities will occur during daylight hours.
18. Maintenance of Machinery: Routine field maintenance of vehicles or mobile machinery shall not be performed within 500 feet of any Waters of the United States, as defined by the Environmental Protection Agency. All fueling shall occur over impervious material and spills shall be cleaned up and properly disposed.
19. Mechanical Integrity Program: The Integrity Management Plan (09.29.2020) was approved with the original As-Built Application.
20. Mud Tracking: Tracking of sediment onto public roads will be mitigated per the Stormwater Management Plan.
21. Noise Management Plan/Noise Mitigation: There is no noise associated with typical pipeline operations. During construction, there is noise associated with the excavation equipment, unloading of pipeline materials, and vehicular traffic. There may be noise at the appurtenance sites during typical maintenance activities. CPRM will comply with the City of Aurora noise regulations.
22. Notifications to the City Regarding Commencement of Operations and Phases of Operations/Notifications to the City regarding Commencement of Construction at CGF and Pipeline Operations/Notifications to the City: Written notice shall be provided thirty days (30) prior to construction commencement of any pipelines. No CGF is planned by CPRM.
23. Noxious Weed Control: A Fieldwide Weed Control Plan is included with this submittal.
24. PHA-Hazard and Operability Study: A Fieldwide Hazards & Operability Study (HAZOP) (09.29.2020) was approved with the original As-Built application. A site specific PHA-HAZOP letter is included with this submittal.
25. Reclamation/Decommissioning: After construction, the disturbed land will be re-vegetated with native grasses or returned to agricultural croplands. If these pipelines are no longer needed, they will either be abandoned in place, flushed, filled with inert gas and capped, or completely removed in accordance with City, Colorado Oil and Gas Conservation Commission (COGCC), DOT and Pipeline and Hazardous Materials Safety Administration (PHMSA) rules and regulations. Continual maintenance on pipelines that have been de-commissioned is not anticipated. If all the utilities within an easement are de-commissioned, the pipeline easement may be released to the landowner.
26. Removal of Debris: The pipeline corridor shall be free of debris concluding construction activities as well as be maintained in a debris-free condition during the life of the pipeline.
27. Risk Management: An FMEA (Failure Mode and Effects Analysis) risk analysis is included in the approved Fieldwide Emergency Response Plan (09.29.2020) and some aspects of risk are also addressed in the approved Integrity Management Plan (09.29.2020).
28. Spills: CPRM shall notify the City of Aurora of any spills of a reportable quantity, as defined by the COGCC.
29. Stormwater Management: The proposed pipeline will be entitled through a separate application, including a site-specific stormwater management plan. A field-wide SWMP report was approved by the City of Aurora on December 16, 2013.
30. Strict Application of BMP Standards: This application is in accordance with the intent of the Elevation Midstream, LLC, Operator Agreement, and no variances are currently being pursued. In the event a variance is needed, the request will be made in accordance with City of Aurora requirements.
31. Tree mitigation: No tree removal is anticipated with this pipeline construction. Future pipeline infrastructure will be planned in a manner that minimizes tree impacts.

32. Visual Mitigation: Visual mitigation is largely not applicable, as the pipeline infrastructure is below grade. No above ground appurtenance sites or fencing are proposed with this amendment.
33. Wastewater and Waste Management: Waste is only produced during pigging operations and is collected in a contained skid at multiple pig receiver locations throughout the gathering system. Any waste collected in the skid(s) is removed via vac-truck and taken to a licensed disposal facility.
34. Water Quality Monitoring Plan/Groundwater Pollution Mitigation: Adverse groundwater impacts are not anticipated with pipeline construction. In the event that groundwater is encountered during construction, the City of Aurora will be notified, further a groundwater discharge permit will be obtained from the Colorado Department of Public Health and Environment (CDPHE). CPRM will utilize stormwater BMPs, such as silt fencing, construction markers, sediment control logs and seeding and mulching in order to minimize erosion and sediment transport during construction. CPRM will utilize leak detection technology to identify locations of maintenance and/or repair in order to minimize leaching into the groundwater table.
35. Water Supply: CPRM agrees to comply with applicable laws, rules and regulations concerning the source(s) of water used in the operations phases of this pipeline, which would be for hydrostatic testing purposes.
36. Wildlife Impact Mitigation Plan: A Site Specific Wildlife Impact Plan is included with the submittal documents.

RESPONSE TO PRE-APPLICATION NOTES, DATED NOVEMBER 24, 2020

The following responses are pertinent to all the “numbered” conditions. Text from the Pre-Application Notes are shaded. Responses are stated in the ***bold italicized*** text.

Standards and Issues:

1. Land Use - Historic Land Use – The land between Rush North and Rush South has previously been vacant land or used for agricultural purposes. The Rush South Well Site is already constructed. The land between Reserve North and Big Sandy has previously been vacant land or used for agricultural purposes. Each of those Well Sites has already been constructed.

Acknowledged.

2. Best Management Practices (BMPs) for Pipelines

Please see the attached Best Management Practices (BMPs) for Pipelines; these are the City of Aurora’s current standards and include the following components:

- Access Roads
- Air Quality
- Anchoring
- Automatic Safety Protective Systems / Surface Safety Valves
- Buildings, Structures, Appurtenances
- Burning
- CGF and Associated Facilities Documentation
- CGF and Compressor Station Construction Specification BMP
- Chemical Disclosure and Storage
- Color / Paint Color
- Construction of Gathering System and Flowlines
- Construction Work Hours
- Containment Berms
- Cultural and Historical Resource Protection
- Electric Equipment
- Emergency Response / Action Plan
- Events or Incidents / Events to be Reported
- Flammable Material
- Flowlines
- Fugitive Dust Suppression
- General Maintenance
- Insurance
- Landscaping
- Lighting
- Lightning Protection
- Mitigation Barriers using Berms, Bales and Sound Walls
- Mud Tracking
- Noise Management Plan / Noise Mitigation
- Notifications to the City Regarding Commencement of Construction at CGF and Pipeline Operations
- / Notifications to the City
- Noxious Weed Control
- Odor
- PHA-Hazard and Operability Study
- Platting Requirements
- Reclamation
- Removal of Debris
- Removal of Equipment
- Risk Management
- Road Repairs

- Spills
- Stormwater Management
- Strict Application of BMP Standards
- Trailers
- Transportation and Circulation
- Transportation and Storage of Fluids
- Tree Mitigation
- Use of Pipelines
- Visual Mitigation
- Wastewater and Waste Management
- Water Protection Requirements
- Water Quality Monitoring Plan / Groundwater Pollution Mitigation
- Water Supply
- Wildlife Impact Mitigation Plan

Per discussions with City staff, a new BMP list has been created for pipeline applications. The BMPs from said list are individually addressed in this Letter of Introduction, as well as in the Oil and Gas BMPs – Pipeline Form.

Similarly, attached is an Oil and Gas Submittal Documents Checklist that correspond to the BMPs; the required documents include:

- Notated Checklist- If an item is not marked, it MUST have a brief note explaining why it is not required, e.g. “NA – No proposed roads.” - ***Included with submittal.***
- Pipelines- Plan Set (including all standard City of Aurora site plan requirements)
 - o Vicinity/Context Map - ***Included with Site Plan Amendment submittal.***
 - o Interim Reclamation Plan – ***Not needed for Pipelines.***
 - o Visual Mitigation Plan – ***There are no proposed above ground structures with this application.***
 - o Lighting Plan – ***There is no proposed lighting with this application.***
 - o Building and Structure Elevations- ***No buildings or above ground structures are proposed with this application.***
 - o Within 1,800 feet of the Flowline, show:
 - Existing Land Use – ***Land use is consistent within 1,800 feet of the flowline. Zoning is shown on Sheet 2 of the Site Plan Amendment.***
 - Approved Plans – ***Existing neighborhoods are shown on Sheet 3 of the Site Plan Amendment, Civil Plan approval numbers are shown for the approved well sites.***
 - Zone Districts and Overlays - ***Zone Districts and Overlays are shown on Sheet 2 of the Site Plan Amendment.***
 - Floodplains and Floodways – ***Floodplains are shown on Sheet 4 of the Site Plan Amendment. The Rush North Lateral is 250 feet from the nearest floodplain.***
 - o Within 500 feet of the Flowline, show:
 - Visible Improvements – ***Shown on the Site Plan Amendment.***
 - Pipelines- Letter of Introduction (including variance requests with justifications) - ***Included with submittal.***
 - o Project Summary (including name, address, email, and telephone number of the applicant) - ***Included with the Letter of Introduction submittal.***
 - A description of the Gathering System and Flowline, including the product(s) or substance(s) being transported and its/their source, size, terminus or end of route, and type of Facility, including any support structures involved- ***Included with the Letter of Introduction submittal.***
 - All public utility crossings labeling the diameter and type of utility crossing to include bridges, culverts, water, wastewater, and stormwater infrastructure. Also identify all public utilities within a 150-foot buffer from Gathering System and Flowline- ***There are no public utility crossings with this application or any public utilities within 150-feet of the flowline.***
 - A description of the route or location of the Gathering System and Flowline and reasons for its selection. - ***Included with the Letter of Introduction submittal.***
 - A description of any haul routes during construction, identifying the roads and bridges involved and the weight of the loads- ***Included with the Letter of Introduction submittal.***
 - A statement which provides evidence of compliance with the following standards:

- The Gathering System and Flowline will not have undue adverse effects on existing and future development of the surrounding area. Include standard practices in case future development proposes a vehicular crossing over your pipeline- ***Included with the Letter of Introduction submittal.***
- The design of the proposed Gathering System and Flowline mitigates negative impacts on the surrounding area to the greatest extent feasible - ***Included with the Letter of Introduction submittal.***
- The disturbed area shall be maintained during construction by the applicant or property owner in such a manner to control soil erosion, dust, and the growth of noxious weeds - ***Included with the Letter of Introduction submittal.***
 - Soils reports required for Gathering System and Flowline crossings or any Gathering System and Flowline encroaching in public right-of-way, if required by the Department of Public Works. – ***There no are public right-of-way utility crossings with this application.***
 - Applicable BMPs Addressed (Narrative List) - ***Included with the Letter of Introduction submittal, as well as in the Operations Plan.***
 - Neighborhood Meeting Schedule & Results / Response to Public Comments - ***Per City staff direction, a neighborhood meeting is not needed at this time.***
 - Response to Pre-Application Notes / Review(s) - ***Included with the Letter of Introduction submittal.***
 - Pipelines- Operations Plan- ***Per discussions with City staff, this is not required for this application.***
 - Project Development Schedule (An outline of the planned construction, including startup and commissioning schedule, and include timing of each. The City acknowledges that this outline is subject to change, due to factors including, but not limited to, contractor availability, weather, ability to close ROW tracts, and the timing of third party facility completion.) - ***Per discussions with City staff, this is not required for this application.***
 - Procedures to be employed in mitigating any adverse impacts of the proposed routes or sites of the Gathering System and Flowline- ***Included with the Letter of Introduction submittal.***
 - Security Plan - ***Included with the Letter of Introduction submittal.***
 - Decommissioning / Final Reclamation Plan - ***Included with the Letter of Introduction submittal.***
 - Emergency Response Plan – ***Site Specific ERP included with submittal.***
 - PHA-HAZOP Analysis Letter- ***Included with submittal.***
 - License Agreements (must also be submitted separately to Real Property) – ***No License Agreements will be needed with this submittal.***
 - Recorded Surface Use Agreement (must also be submitted separately to Real Property) - ***Included with submittal.***
 - Property Owner Authorizations- ***Included with submittal as Surface Use Agreements.***
 - Pipelines:
 - Operator shall provide either authorization letters or agreements from all impacted property owners to verify application can be accepted. If using a third-party easement, the original easement signed by landowners that allows assignment rights will suffice- ***Included with submittal as Surface Use Agreements.***
 - Easements or rights-of-way for the Gathering System and Flowline from other land owners or a statement that the applicant is currently in good faith negotiations with the owners of surface properties, irrigation ditch companies, and/or affected irrigation ditch easement owners of record at the point crossed by the Gathering System and Flowline
 - Water Supply Plan / Delivery Method – ***Not needed for pipelines, see BMP responses.***
 - Groundwater Quality Monitoring Plan – ***Not needed for pipelines, see BMP responses.***
 - Fugitive Dust Suppression Plan – ***Not needed for pipelines, see BMP responses.***
 - Fluid Disposal Plan – ***Not needed for pipelines, see BMP responses.***
 - Water Use Plan CDPHE Reg. 84 – ***Not needed for pipelines.***
 - Weed Control Plan – ***Field Wide Weed Control Plan included with submittal.***
 - Wildlife Impact Mitigation Plan – ***Site Specific Wildlife Impact Plan included with submittal.***
 - Stormwater Management Plan (Contact Public Works for a separate Pre-Submittal meeting) – ***Acknowledged***
 - Road Maintenance / Construction – ***Road Maintenance Agreement previously approved between the City of Aurora and Crestone Peak Resources.***
 - Air Quality Plan – ***Field Wide Air Quality Plan approved with original application applies to these laterals.***
 - Noise Management Plan – ***Not needed for pipelines, see BMP responses.***

- Application Form – ***Checklist included with submittal.***
- 350 Foot Radius Abutters List - ***Included with submittal.***
- COGCC Forms/ 2A / DOT Registration – ***No forms or registrations are required for this application.***
- Fee Payment – ***To be paid once available on the portal.***

3. **FDP / Master Plan / GDP**

Not applicable.

Acknowledged.

4. **Landscape Design/Land Use Issues**

Not applicable.

Acknowledged.

5. **Surface Use Agreement / Property Owner Authorizations**

This requirement will be fulfilled by submittal of a recorded Surface Use Agreement, as itemized in the attached checklist.

For Pipelines, Operator shall provide either authorization letters or agreements from all impacted property owners to verify application can be accepted. If using a third-party easement, the original easement signed by landowners that allows assignment rights will suffice. Easements or rights-of-way for the Gathering System and Flowline from other land owners or a statement that the applicant is currently in good faith negotiations with the owners of surface properties, irrigation ditch companies, and/or affected irrigation ditch easement owners of record at the point crossed by the Gathering System and Flowline.

Surface Use Agreements are included with the submittal.

6. **New CAD Standards**

The City of Aurora has developed a CAD Data Submittal Standard for internal and external use to streamline the process of importing AutoCAD information into the City's Enterprise GIS. Digital Submission meeting the CAD Data Submittal Standards are required by consultants on development projects before submitting to the City for signature sets and on capital projects funded by the City. Please review the CAD Data Submittal Standards, including templates and required layer file labeling, at CAD Data Submittal Standards.

Acknowledged.

7. **PDF Requirements**

The application will be uploaded through the city's development review website/portal as separate PDFs. Please ensure that all AutoCAD SHX text items are removed from the "Comment" section during the PDF creation process and that the sheets are flattened to reduce ability to select items. PDFs will be rejected during pre-acceptance reviews if they do not comply with this requirement, which could result in delays in application start times if the applicant is asked to re-upload corrected PDFs

Acknowledged.

8. **Community Participation/Neighborhood Meeting:**

This requirement has been waived per the Oil and Gas Division Manager during the Pre-Application meeting.

Acknowledged.

9. **Neighborhood Services Liaison:**

- Your Neighborhood Services Liaison is Scott Campbell. He has put together a report attached to these notes listing the registered neighborhood organizations within one-mile of your proposed project and can assist in scheduling and facilitating meetings with community members. Please work with the organizations that express interest in your project to address comments and mitigate concerns.
- All meetings with registered neighborhood organizations should also include the Planning and Development Services Department Case Manager so that questions concerning the UDO and procedures can be properly addressed. The Case Manager will record any project-related commitments that are made to the community at these meetings.

- Additional information about the Neighborhood Liaison Program can be found on the Neighborhood Services page of the city website.

Acknowledged.