



January 29, 2021

Colin Smith, Planner
City of Aurora Planning Division
15151 E. Alameda Parkway, Ste. 2300
Aurora, CO 80012

RE: Initial Submission Review-Lone Tree North Phase 2 – Oil and Gas
Application Number: **DA-2093-02**
Case Number: **2017-6027-03**

Dear Mr. Smith:

CVL Consultants of Colorado, Inc. has received comments from the City of Aurora Planning Department for the above referenced project. We have restated the comments below and addressed them per the bold, italicized responses.

SITE PLAN COMMENTS

1. Plan Set

1A. Comment: Remove the AutoCAD SHX comments and flatten the PDF for the second submission.

Response: The AutoCAD SHX have been removed and the pdf has been flattened.

1B. Sheet 8 (Landscape)

- Comment: Update the Landscape Buffer Requirement Table Notes to reflect evergreen trees and the correct reference to Code.

Response: The Buffer Requirement Table Notes now reflect evergreen trees and correctly reference the coded.

1C. Sheet 9 (Traffic)

- Comment: Add note similar to Traffic Letter indicating that the proposed haul route is outside the City of Aurora limits.

Response: A note has been added haul route sheet indicating this route is outside City of Aurora limits.

- Comment: Add to legend for Haul Route in City of Aurora limits.

Response: A legend has been added to the haul route sheet.

1D. Comment: Match the well pad acreage and area of disturbance across the Plan Set's Data Block, the Letter of Introduction, and the Form 2A (Planning)

Response: The acreages match across the Plan Set Data Block, Letter of Introduction, and the Form 2A.

1E. Comment: Add cattle guard locations and label on all pertinent sheets (Planning)

Response: No cattle guards are planned for this location.

1F. Comment: Context Map on all pertinent sheets: Add a legend, and Limits of the 100 Year Floodplain, 500 Year Floodplain, Water Monitoring Locations, Access Road, and pre- & post-pipeline Haul Routes (see Eastern Hills South for an example), and the abandoned well State Smith 1-16 (Planning)

Response: A Context Map has been added to all pertinent sheets reflecting Limits of the 100 Year Floodplain, 500 Year Floodplain, Water Monitoring Locations, Access Road, and pre- & post-pipeline Haul Routes and the abandoned well State Smith 1-16.

1G. Comment: Title Block on Sheets 1—10 and 13—15: Update the site location with the actual address (Planning)

Response: The title block with the address has been added to sheets 1-10 and sheets 13-15.

1H. Comment: Vicinity Map on Sheets 1 and 2: Match the base layer from Eastern Hills South (Planning)

Response: The base layer has been revised on sheets 1 and 2.

1I. Sheet Number 1 (Planning)

- Comment: Add the cultural features distances table (see Eastern Hills South for an example)

Response: The cultural distance table has been added to sheet 1.

- Comment: Add the Arapahoe County parcel number per the redline

Response: The Arapahoe County parcel number has been added.

- Comment: Update the language of Site Plan Note #5 to reflect the revised, executed Road Maintenance Agreement

Response: The language regarding the RMA has been revised to reflect the 12/18/19 execution of the amendment.

1J. Sheet Number 2 (Planning)

- Comment: Add the Context Map inset, revised as requested above

Response: The revised Context Map has been added to sheet 2.

1K. Sheet Numbers 4—7 (Planning)

- Comment: Add entry, wellhead, and tank battery signage detail insets and show/label on the layout, as applicable

Response: Entry, wellhead, and tank battery sign insets have been added to the sheet and labeled on the layout.

1L. Sheet Numbers 4—6 (Planning)

- Comment: Add fence height to all labels

Response: Fence height has been added to all labels.

- Comment: Add dimensions and height to the berm labels

Response: Dimensions and height have been added to all berms.

1M. Sheet Numbers 4-5 (Planning)

- Comment: Add the privacy fence to the layout and the detail inset to the Sheet, or remove from the legend

Response: The privacy fence has been removed from the legend on sheets 4 and 5.

1N. Sheet Numbers 4 & 7 (Planning)

- Comment: Add the swinging gate and 23'-wide access road labels from Sheet 6, and add height to the gate label

Response: The swing gate and 23' wide access road have been added to sheets 4 - 7.

1O. Sheet Number 4 (Planning)

- Comment: Specify in the label that the trash area is a dumpster

Response: The label has been revised to reflect a trash dumpster.

- Comment: Add dimensions to the temporary living quarters/offices' label

Response: Dimensions have been added to the living quarters.

- Comment: Add the wildlife fence inset detail to the Sheet

Response: The wildlife inset has been added.

- Comment: Add General Construction Note #8 regarding recontour, reclaim, and reseed from Eastern Hills South

Response: General Construction Note #8 regarding recontour, reclaim, and reseeding has been added.

- Comment: Remove the second sentence in General Construction Note #5 as it is not applicable

Response: The second sentence of Note #5 has been removed.

- Comment: Specify that Table 4-3 is for noise mitigation

Response: The table has been labeled as noise mitigation.

1P. Sheet Numbers 5—6 (Planning)

- Comment: Add height to the swinging gate label

Response: The height has been labeled on the swing gate.

1Q. Sheet Numbers 5 & 7 (Planning)

- Comment: Add height to the containment wall label

Response: The height has been added to the containment wall label.

1R. Sheet Number 5 (Planning)

- Comment: Show the entry sign and wellhead sign on the layout and label

Response: The entry and wellhead signs have been added to the layout.

- Comment: Add the 23'-wide access road label from Sheet 6

Response: The 23' wide access road label has been added.

- Comment: Enlarge the legend, details, table, and context map to fill the unused space

Response: The legend, details, table and context map have been enlarged to fill the unused space.

1S. Sheet Numbers 6—7 & 10 (Planning)

- Comment: Add the pad site elevation label to the layout

Response: The pad site elevation has been added.

1T. Sheet Number 6 (Planning)

- Comment: Add the sound walls to the layout, or remove from the legend

Response: The sound walls has been removed from the legend.

- Comment: Enlarge the legend, details, and context map to fill the unused space

Response: The legend, details, table and context map have been enlarged to fill the unused space.

1U. Sheet Number 7 (Planning)

- Comment: Add dimensions to the Spoils Storage labels

Response: Dimensions have been added to the Spoils Storage labels.

- Comment: Label the wellheads

Response: The wellheads have been labeled.

- Comment: Add the privacy and wildlife fence details insets to the Sheet

Response: The privacy and wildlife fence detail insets have been added.

1V. Sheet Number 10 (Planning)

- Comment: Fix the Title Block text overlap

Response: The Title Block has been corrected.

2. Vicinity / Context Map (Planning)

2A. Comment: Please continue to incorporate into the overall Plan Set.

Response: Acknowledged.

3. Interim Reclamation Plan (Planning)

3A. Comment: Please continue to incorporate into the overall Plan Set.

Response: Acknowledged.

4. Visual Mitigation Plan (Planning)

4A. Comment: N/A

Response: Acknowledged

5. Landscape Plan (Planning/Landscape)

5A. Comment: Please continue to incorporate into the overall Plan Set.

Response: Acknowledged.

6. Lighting Plan (Planning)

6A. Comment: Please continue to incorporate into the overall Plan Set.

Response: Acknowledged.

7. Building and Structure Elevations (Planning)

7A. Comment: Please continue to incorporate into the overall Plan Set.

Response: Acknowledged.

LETTER OF INTRODUCTION COMMENTS

Comment: The Plat Package section is not as robust as previous applications (Eastern Hills North and Rush North, as examples); please include more sheet details in the next submission.

Response: A more detailed plat has been added to the Letter of Introduction.

8. Project Summary (Planning)

8A. Comment: Spell out that “R2” is “Medium Density R2 District”.

Response: The zoning has been revised to R2 Medium Density Residential.

8B. Comment: Match the well pad acreage and area of disturbance across the Letter of Introduction, the Form 2A, and the Plan Set’s Data Block.

Response: The acreages match across the Plan Set Data Block, Letter of Introduction, and the Form 2A.

8C. Comment: Is the 4.8 acres the size of the drilling pad during drilling and completion, or the size of the site after interim reclamation? See Eastern Hills South summary for an example.

Response: 4.8 acres is the size of the surface of pad the drilling pad during drilling and completions. Additional verbiage has been added to Summary to clarify.

8D. Comment: Add in details regarding the existing topography and slope, and stormwater flow. See Eastern Hills South summary for an example.

Response: Additional verbiage has been added regarding existing topography, slope, and stormwater flow.

8E. Comment: Specify the length of the 23’-wide access roadway.

Response: The length of the 23’-wide access roadway has been added.

8F. Comment: Add in details regarding the pre- and post- pipeline haul routes. See Eastern Hills South summary for an example.

Response: There is only one access route for this location.

8G. Comment: Add in cattle guards, if applicable.

Response: There are no planned cattleguards for this location.

8H. Comment: Specify the height of the wildlife fence.

Response: The height has been added to the wildlife fence.

9. Applicable BMPs Addressed (Narrative List) (Planning)

9A. **Reclamation**- Comment: Refine “cropland” to “rangeland” to match the Form 2A, or vice versa.

Response: Cropland had been revised to rangeland to match the Form 2A. however, The Applicant is

in the process of revising the Form 2A to comply with COGCC's new rulemaking. Applicant will provide the Form 2A draft as soon as it's complete.

9B. **Transportation and Circulation**- Comment: List the pre- and post- pipeline haul routes, as per previous applications.

Response: There is only one access route for this location.

9C. **Water Protection Requirements**- Comment: Add in the language regarding results of the vibratory study and the 350' setback. See Eastern Hills South for an example.

Response: The results of the vibratory have been added to the BMP.

10. Neighborhood Meeting Schedule & Results / Response to Public Comments (Planning)

10A. Comment: The Neighborhood Meeting Results summary is acceptable as submitted.

Response: Acknowledged.

11. Response to Pre-Application

Comments (Planning)

11A. Comment: N/A

Response:

OPERATIONS PLAN COMMENTS

12. Operations Plan (Planning)

12A. Comment: The field-wide Operations Plan has been previously accepted by the City.

Response:

13. Project Development Schedule (Planning)

13A. Comment: Match the construction dates across the site-specific Air Quality Plan and the Form 2A.

Response: The construction dates match across the site-specific AQP and the Form 2A.

14. Security Plan (Planning)

14A. Comment: The field-wide Operations Plan has been previously accepted by the City.

Response: Acknowledged

15. Decommissioning / Final Reclamation Plan (Planning)

15A. Comment: The field-wide Operations Plan has been previously accepted by the City.

Response: Acknowledged

EMERGENCY RESPONSE PLAN COMMENTS

16. Emergency Response Plan (Building/Life Safety) Field-Wide Plan

16A. Comment: The field-wide Emergency Response Plan has been previously accepted by the City.

Response: Acknowledged

Site-Specific Plan

16B. Comment: This requirement is acceptable as submitted.

Response: An updated ERP is included with this submission.

17. PHA-HAZOP Analysis

(Building/Life Safety)

Field-Wide

17A. Comment: The field-wide PHA-HAZOP Analysis has been previously accepted by the City.

Response: Acknowledged

Site-Specific

17B. Comment: Please revise the letter to reflect the accurate Development Application number of DA-2093-02.

Response: The PHA-HAZOP has been revised to reference DA-2093-02.

COMMENTS ON OTHER REQUIRED ITEMS

18. Traffic Letter / Plan (Traffic)

18A. Comment: This requirement is acceptable as submitted.

Response: Acknowledged

19. License Agreements (Real Property)

19A. Comment: Notate recording information on the pipeline easement in Hayesmount Rd, and provide the City with a copy of the easement at the next submission.

Response: The pipeline easement is on private land. The Arapahoe County reception number has been added to the Plan Set.

19B. Comment: Some pages are missing labeling of road and width.

Response: All pages have the road and with labeled.

19C. Comment: If a License for the Hayesmount lateral crossing has been obtained, provide a copy with the next submission. If not, obtain a License Agreement.

Response: The lateral will not cross Hayesmount road.

19D. Comment: Work with Real Property to obtain License Agreements related to lay-flat lines.

Response: All necessary License Agreements will be obtained for the lay-flat lines.

20. Recorded Surface Use Agreement (Real Property) 20A.

Comment: This requirement is acceptable as submitted.

Response: Acknowledged

21. Property Owner Authorizations (Real Property)

21A. Comment: This requirement is acceptable as submitted.

Response: Acknowledged

22. Water Delivery Method/Water Supply Plan (Water)

Water Delivery Agreement

22A. Comment: The field-wide Water Delivery Agreement has been

previously accepted by the City.

Response: Acknowledged

Water Supply Plan

22B. Comment: This requirement is acceptable as submitted.

Response: Acknowledged

23 Groundwater Quality Monitoring Plan (Water)

23A. Comment: It is acknowledged that there is a potential downgradient domestic supply well that can be used for monitoring “Lone Tree North Phase 2”. The operator needs to show that the monitoring well is installed, is viable for sampling, and that the owner is willing to allow for sampling.

Response: Crestone is in the process of securing permission to sample the domestic water well Northeast of the location. Crestone will provide a letter demonstrating approval from the landowner to sample their domestic well as soon as possible.

24B. Comment: Until initial sampling, City staff and operator staff will have a standing call every other week to provide an update on the sampling effort.

Response: Acknowledged.

24C. Comment: If applicable and as noted in the field-wide submittal, operator will notify the City at least 40 weeks prior to drilling if the “requested well” is not possible, or progress is no longer and that parties (City and operator) will have to pursue the “easement well” protocol in order to comply with the monitoring well requirement.

Response: Acknowledged.

24D. Comment: If applicable and as noted in the submittal, operator will notify the City immediately of any delays related to the Water Quality Monitoring Plan.

Response: Acknowledged.

24. Fugitive Dust Suppression Plan (Water)

24A. Comment: The field-wide Fugitive Dust Suppression Plan has been previously accepted by the City.

Response: Acknowledged.

25. Fluid Disposal Plan (Water)

25A. Comment: The field-wide Fluid Disposal / Waste Management Plan has been previously accepted by the City.

Response: Acknowledged.

26. Water Use Plan CDPHE Reg. 84

26A. Comment: N/A

Response: Acknowledged.

27. Weed Control Plan (Water and PROS)

27A. Comment: The field-wide Weed Control Plan has been previously accepted by the City.

Response: Acknowledged.

28. Wildlife Impact Mitigation Plan (PROS)

28A. Comment: This requirement is acceptable as

submitted.

Response: Acknowledged.

29. Stormwater Management Plan

29A. Comment: These Civil documents will be reviewed and commented on by the standard SWMP Review team via upload through the separate Public Works portal; please contact Public Works at 303-739-7457 to set up a Pre-Submittal meeting.

Response: The SWMP and Drainage Letter have been approved by Public Works.

29B. *FYI*: Comment: Profiles for gathering lateral pipelines crossing any Aurora Water utilities, ROWs, and floodplains will be required as part of the SWMP plan. (Water)

Response: The gathering lines will not cross any Aurora Water Utilities, or ROW, or floodplains. The SWMP and Drainage Letter have been approved by Public Works.

29C. *FYI*: Comment: Outlet structures will be required on detention basins- detail required (Water)

Response: The SWMP plans have been revised to include outlet structure detail, and have been approved.

29D. *FYI*: Comment: An I&M plan for maintenance of all sediment and detention basins, as well as all other private stormwater infrastructure, is required to be submitted with SWMP plans.

Response: The I&M plan has been approved by Public Works.

30. Preliminary Drainage Report / Letter

30A. Comment: The Drainage Conformance Letter must still be approved by Public Works.

Response: The Drainage Conformance Letter has been approved by Public Works.

31. Road Maintenance / Construction (Public Works)

31A. Comment: Please upload the revised executed Road Maintenance Agreement at the next submission.

Response: The revised executed RMA has been included with this submission.

32. Air Quality Plan (Planning)

Field-Wide Plan

32A. Comment: The field-wide Air Quality Plan has been previously accepted by the City.

Response: Acknowledged.

Site-Specific Plan

32B. Comment: Submit a complete Plan, including confirmed monitoring locations, pre-construction baseline air monitoring results, established alert level thresholds, all pre-activity information, all location-specific considerations, any anticipated location modifications and timeline, and location data plan.

Response: A complete AQP including the requirements above has been included with this submission.

32C. Comment: The Plan should reference how the reports will include trend identification related to increases / decreases / spikes in concentration or emissions as related to the health-based criteria.

Response: The plan includes trend identification related to increases / decreases / spikes in concentration or emissions as related to the health-based criteria.

32D. Comment: Spell out what “NAAQS” and “ATSDR” stand for.

Response: The Acronyms have been spelled out in the report.

32E. Comment: Match the construction timeline (Pad Build ETA, under Monitoring Strategy) across the Project Development Schedule and Form 2A.

Response: The construction timeline matches across the Project Development Schedule and Form 2A.

32F. Comment: Pre-construction baseline air monitoring (under Monitoring Strategy) is still missing language about prior notification to the City (please reference Eastern Hill South’s final submission for the preferred language, as previously agreed-upon between the City and the applicant).

Response: Additional language has been added regarding baseline air monitoring mimicking the Eastern Hills language.

32G. Comment: Specify the subject pad site as “Lone Tree North” on the map.

Response: The pad has been identified as the “Lone Tree North” on the map.

33. Noise Management Plan (Planning)

33A. Comment: Specify the chosen sound mitigation measures (berms, acoustical wall, and acoustical panels) in Section 3.3, 3rd paragraph, last sentence, instead of listing all of the possible options.

Response: Section 3.3 has been revised to reflect the choice of sound walls to mitigate sound, please also refer to sections 4.2, 4.3 and 5 demonstrating the results after using sound walls.

34. Application Form (Planning)

Checklist

34A. Comment: Revise License Agreements to reflect requirement for lay-flat lines, and Hayesmount lateral crossing if applicable; delete the “N/A” accordingly.

Response: The checklist has been revised to reference the requirement of license agreements for lay-flat lines. The well connect/lateral will not cross Hayesmount Road.

35. Mile Radius AbuttersList (Planning)

35A. Comment: This requirement is acceptable as submitted.

Response: At the request of the city the Applicant has included an updated Abutter’s list.

36. COGCC Forms / 2A (Planning)

36A. Comment: Match the well pad acreage and area of disturbance across the Form 2A, the Plan Set’s Data Block, and the Letter of Introduction.

Response: The acreages match across the Form 2A, the Plan Set’s Data Block, and the Letter of Introduction, however the Applicant is in the process of revising the Form 2A to comply with COGCC’s new rulemaking. Applicant will provide the Form 2A draft as soon as it’s complete.

36B. Comment: Match the construction dates across the Project Development Schedule and the site-specific Air Quality Plan.

Response: The construction dates match across the Project Development Schedule and the site-specific Air Quality Plan.

36C. Comment: Match the Current and Future Land Use type(s) to the Letter of Introduction (rangeland versus cropland in the Summary and Reclamation BMP, respectively).

Response: The current and future land use types now match the Form 2A. The Applicant is in the

process of revising the Form 2A to comply with COGCC's new rulemaking. Applicant will provide the Form 2A draft as soon as it's complete.

36D. Comment: Upload the final version at the next submission.

Response: The Applicant is in the process of revising the Form 2A to comply with COGCC's new rulemaking. Applicant will provide the Form 2A draft as soon as it's complete.

Sincerely,

Melinda Lundquist, PE
Director, Private Development Colorado
CVL, a Westwood team