

Planning Division
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303.739.7250



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June 11, 2020

Meghan Mearsha
Crestone Peak Resources
1801 California Street, Suite 2500
Denver, CO 80202

Re: Initial Submission Review – Crestone Peak Resources Midstream Pipeline – Site Plan

Application Number: **DA-2235-00**
Case Number: **2019-6017-00**

Dear Ms. Mearsha:

Thank you for your initial submission. We reviewed it and attached our comments along with this cover letter. The first section of our review highlights our major comments. The following sections contain more specific comments, including those received from other city departments and community members.

Since several issues remain, you will need to make another submission. Please revise your application and make another submission by Tuesday, June 30th to maintain a final decision date of September 14th, at the latest.

Note that all our comments are numbered. When you resubmit, include a cover letter specifically responding to each item. Planning & Development Services reserves the right to reject any resubmissions that fail to address these items. If you have made any other changes to your documents other than those requested, be sure to also specifically list them in your letter.

If you have any comments or concerns, please contact me. I can be reached at text@auroragov.org and 303-739-7450.

Sincerely,

Tanner Axt, LEED Green Associate
Planner I
City of Aurora, Planning & Development Services

cc: Melinda Lundquist, CVL Consultants
Scott Campbell, Neighborhood Liaison
Laura Rickhoff, ODA
Filed: K:\\$DA\2000-2999\2235-00rev1.docx



CRESTONE PEAK PIPELINE **OIL AND GAS PERMIT REVIEW**

Initial Submission Review

SUMMARY OF KEY COMMENTS FROM ALL DEPARTMENTS

- As a reminder, the City has developed CAD Data Submittal Standards for internal and external use to streamline the process of importing AutoCAD information into the city's Enterprise GIS. Please note that a digital submission meeting the CAD Data Submittal Standards is required before your final Site Plan mylars can be routed for signatures or recorded. Please review the CAD Data Submittal Standards, including templates and required layer file labeling, at <http://tinyurl.com/AuroraCAD>. Email your Case Manager the appropriate Site Plan and Pipeline Easement files before submitting your final Site Plan mylars. Once received, the City's AutoCAD Operator will run an audit report and your Case Manager will let you know whether the file meets or does not meet the City's CAD Data Submittal Standards. Please email CADGIS@auroragov.org for questions or more detailed instructions.
- Respond to additional redline comments.

REVIEWERS

- Planning – Steve Rodriguez and Tanner Axt / 303-739-7186 and 303-739-7450 / srodrigu@auroragov.org and taxt@auroragov.org / Comments in dark teal
- Planning/Landscape – Kelly Bish / 303-739-7189 / kbish@auroragov.org / Comments in bright teal
- Public Works – Kristin Tanabe / 303-739-7306 / ktanabe@auroragov.org / Comments in green
- Building/Life Safety – Will Polk / 303-739-7371 / wpolk@auroragov.org / Comments in blue
- Traffic – Brianna Medema / 303-739-7336 / bmedema@auroragov.org / Comments in orange
- Real Property – Grace Gray / 303-739-7277 / ggray@auroragov.org / Comments in magenta
- Water – Steve Dekoskie and Joshua Godwin / 303-739-7490 and 720-859-4307 / sdekoski@auroragov.org and jgodwin@auroragov.org / Comments in red
- Parks, Recreation, and Open Space (PROS) – Curtis Bish / 303-739-7131 / cbish@auroragov.org / Comments in purple

**PLAN SET COMMENTS****1 Plan Set**

- 1.A All road crossings require a License Agreement. (Real Property)
- 1.B Utilize consistent north arrows. For N/S segments, have all north arrows point left or all north arrows point right. (Planning)
- 1.C Sheet 1
 - 1.C.1 Add the following notes that shall be applicable to all amendments to this plan: (Planning)
 - THE CITY OF AURORA REQUIRES PLAN AND PROFILES (P&P) OF THE PROPOSED PIPELINE AT CITY OF AURORA RIGHTS-OF-WAY AND EASEMENTS WITH ALL LICENSE AGREEMENTS AND CIVIL PLAN SUBMITTALS. THE P&PS SHALL SHOW ALL EXISTING AND KNOWN PROPOSED UTILITIES WITH VERIFIED ELEVATIONS BASED ON PRE-DESIGN POTHOLOING AND DEMONSTRATE THE REQUIRED MINIMUM HORIZONTAL AND VERTICAL UTILITY CLEARANCES ARE BEING MET.
 - AS-BUILT DRAWINGS SHALL BE PROVIDED TO THE CITY OF AURORA WITHIN 30 DAYS OF FINAL CONSTRUCTION IN A FORMAT THAT MEETS THE LATEST CITY OF AURORA CAD DATA SUBMITTAL STANDARDS.
 - PIPELINES CONSTRUCTED THROUGH COLLECTORS OR LOCALS SHALL PROVIDE 15' OF COVER MINIMUM, UNLESS OTHERWISE STATED ON PLANS. IF A CROSSING WILL NOT MEET MINIMUM COVER, A VARIANCE REQUEST WILL BE REQUIRED.
 - PIPELINES CONSTRUCTED THROUGH ARTERIALS SHALL PROVIDE 20' OF COVER MINIMUM, UNLESS OTHERWISE STATED ON PLANS. IF A CROSSING WILL NOT MEET MINIMUM COVER, A VARIANCE REQUEST WILL BE REQUIRED.
 - DISTURBED GROUND TO BE RETURNED TO EXISTING ELEVATIONS.
 - IN THE EVENT GROUNDWATER IS ENCOUNTERED DURING PIPELINE CONSTRUCTION, CONTRACTOR SHALL NOTIFY THE CITY OF AURORA AND BE PREPARED TO REPORT THE LOCATION AND DEPTH OF THE GROUNDWATER. ADDITIONALLY, IF DEWATERING OF THE TRENCH IS NECESSARY, A DEWATERING PERMIT FROM COLORADO DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT MAY BE REQUIRED.
 - A FLOODPLAIN DEVELOPMENT PERMIT IS REQUIRED FOR ALL WORK WITHIN A FEMA DESIGNATED FLOODPLAIN.
 - UPON REMOVING A GATHERING SYSTEM OR FLOWLINE FROM SERVICE, ALL SEGMENTS MUST BE REMOVED OR ABANDONED IN PLACE USING FLOWFILL OR SIMILAR.
- 1.D Sheet 2
 - 1.D.1 List the additional safety measures required on line 7 through ACRE. (Water)
- 1.E Sheet 3
 - 1.E.1 Provide burial depths of laterals in the pipeline easements located both inside and outside of the City. (Water)
- 1.F Sheet 4
 - 1.F.1 Add the following note:
 - “All amendments to this site plan shall utilize easements that do not significantly encumber curbside landscaping or street frontage landscape buffers for future developments. This can be done by either locating all easements outside of these identified areas or including easement language that allows sufficient plantings (as determined by the City Landscape Architect) to be installed within easements.” (Landscaping)
- 1.G Sheet 6
 - 1.G.1 Provide ROW widths for the identified intersection. The NE corner may have had ROW lines turned



off. (Traffic)

1.H Sheet 10

- 1.H.1 Include Aurora Water's pipelines at all crossings where the pipeline easements cross water infrastructure. License agreements are required at all Aurora Water utilities. (Water)

2 Vicinity / Context Map (Planning)

- 2.A No Comments

3 Interim Reclamation Plan (Planning)

- 3.A N/A

4 Visual Mitigation Plan

- 4.A N/A

5 Landscape Plan

- 5.A No Comment

6 Lighting Plan (Planning)

- 6.A N/A

7 Building and Structure Elevations (Planning)

- 7.A N/A

LETTER OF INTRODUCTION COMMENTS

8 Project Summary (Planning)

- 8.A No comments.

9 Applicable BMPs Addressed (Narrative List) (Planning)

- 9.A N/A

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

- 10.A N/A

11 Response to Pre-Application Review Letter (Planning)

- 11.A No comments.

OPERATIONS PLAN COMMENTS

12 Operations Plan (Planning)

- 12.A N/A

13 Project Development Schedule (Planning)

- 13.A N/A

14 Security Plan (Planning)

- 14.A N/A

15 Decommissioning / Final Reclamation Plan (Planning)



15.A All amendments must meet applicable decommissioning standards at the time.

EMERGENCY RESPONSE PLAN COMMENTS

16 Emergency Response Plan (Building/Life Safety)

16.A Sheet 1

- 16.A.1 The submitted ERP is lacking critical information and needs to be revised by creating a comprehensive **Fieldwide ERP**. A comprehensive **Fieldwide Emergency Response Plan** is required to be submitted with your application package. The Emergency response plan shall specifically define how various potential events will be handled. The plan should cover emergencies that are larger in scope or duration and extend beyond a simple operational set-up handle by operations personnel. The plan will be required to include **an Executive Summary** that indicates the specific measures to be taken according to the Emergency Response Plan which will aid in the response to the emergency.
- 16.A.2 You will also need a summarized **Site-specific ERP** when lateral work is submitted.
- 16.A.3 The **Site-specific ERP** will need to address all operations in the City of Aurora. A site-specific plan will be required for each lateral - So you'll need a field wide (kept on file once approved) and site-specific emergency response plans. (9 categories, and several sub-categories).
- 16.A.4 Once the field-wide plans are approved, a shared folder will be created by staffed to store for future submittals. An approved Field-wide plans are acceptable for future submittals. However, each site requires site specific plans, studies, analyses, and letters
- 16.A.5 In addition to the HazOp analysis or Integrity Plan, provide a **letter**, by a **certified facilitator** that a pipeline review was conducted, and the findings will be incorporated into the emergency response plan

16.B Sheet 4

- 16.B.1 Provide the list of phones for verification purposes.
- 16.B.2 Contact City of Aurora OEM for training opportunities.
- 16.B.3 Submit a copy to your assigned case manager and the office of emergency management (OEM).
- 16.B.4 Submit the plan to your case manager.
- 16.B.5 Contact City of Aurora OEM for training opportunities.

17 PHA-HAZOP Analysis/Integrity Management Plan (Building/Life Safety)

- 17.A Provide a HazOp Analysis or update the submitted Integrity Management Plan. Please note, we are looking for the following to be analyzed, but is not limited to:
- 17.B Guide Word (By Node)
- 17.C High Flow , High level Low Flow, Low level Zero Flow, Empty Reverse Flow High pressure (venting, relief rate) Low pressure (venting, relief rate) High temperature Low temperature Impurities (Gaseous, Liquid, Solid) Change in composition / Change in concentration / Two phase flow / Reactions Testing (Equipment / Product) Plant items (Operable / maintainable) Electrical (Area Classification / Isolation / Earthing) Instruments (Sufficient for control / Too many / Correct location)
- 17.D Guide Word (Overview)
- 17.E Toxicity Services Required Materials of Construction Commissioning Start-up Shut-down (Isolation, Purging) Breakdown (Power failure, Air, Steam, Water, Vacuum, Fuel, Vents, Computer, Other) Effluent (Gaseous, Liquid, Solid Noise (Sources, Problem, Control measures) Fire / Explosion Safety Equipment (Personal, Fire detection, Firefighting, Means of escape) Quality and Consistency Output - Reliability and bottlenecks Efficiency - Losses Simplicity
- 17.F Engineer of Record Letter - The operator needs to provide a letter that the HAZOP study or integrity management has been completed and the Engineer of record has incorporated all applicable PHA-HazOp



recommendations in the design. The letter shall be from the engineer of record stating the applicant has or will incorporate the recommendations into the well site design or providing the credentials of the PE or certified facilitator.

COMMENTS ON OTHER REQUIRED ITEMS

18 Traffic Letter / Plan (Traffic Engineering)

18.A No comments.

19 License Agreements (Real Property)

19.A License agreements are required.

20 Recorded Surface Use Agreement (Real Property)

20.A N/A

21 Property Owner Authorizations (Real Property)

21.A N/A

22 Water Delivery Method/Water Supply Plan (Water)

22.A N/A

23 Groundwater Quality Monitoring Plan (Water)

23.A N/A

24 Fugitive Dust Suppression Plan (Water)

24.A N/A

25 Fluid Disposal Plan (Water)

25.A N/A

26 Water Use Plan CDPHE Reg. 84

26.A N/A

27 Weed Control Plan (Water and PROS)

27.A N/A

28 Wildlife Impact Mitigation Plan (PROS)

28.A N/A

29 Stormwater Management Plan (Public Works)

29.A 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.

30 Preliminary Drainage Report / Letter (Public Works)

30.A This document will be reviewed and commented on by the standard SWMP Review team via upload through the separate Public Works portal; please coordinate with Public Works to utilize that portal if you haven't already.



31 Road Maintenance / Construction (Public Works)

31.A N/A

32 Air Quality Plan (Planning)

32.A No Comments.

33 Noise Management Plan (Planning)

33.A N/A

34 Application Form (Planning)

34.A No Comments.

35 1-Mile Radius Abutters List (Planning)

35.A N/A

36 Registration Form (Planning)

36.A Provide proof of registration with the applicable government agency (COGCC/DOT/etc)

37 Arapahoe County Planning Division (Diane Kocis / 720-874-6650 / referrals@arapahoe.gov)

37.A Thank you for the opportunity to review and comment on this project. Your applicant will be using Arapahoe County roads for this project, as a result, we will need \$7,500 per well for road impact fees. The applicant will need to arrange for a preconstruction inspection with Arapahoe County engineer inspector Wayne Habenicht who can be reached at 303-944-0123. The applicant will need to apply for a street cut permit (aka access permit) and an oversize/overweight permit, as appropriate. Wayne can answer questions about these 2 permits. You may also want to let Crestone know that we anticipate our BOCC to adopt much higher road impact fees over the next few months. If they provide their fee now, it will be significantly lower than what will be approved soon.