



May 12, 2020

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

**RE: Oil and Gas Pipeline As-Built Site Plan  
Letter of Intent**

To Whom it May Concern:

On behalf of the applicant, the Operator, Crestone Peak Resources Midstream LLC (CPRM), CVL Consultants of Colorado, Inc. (CVL) presents this *Natural Gas Pipeline Gathering System, As-Built Site Plan*. This application summarizes the existing pipeline infrastructure that Bronco Pipeline Company constructed over the last several years within the City of Aurora (City) in order to serve the oil and gas wells drilled, operated and completed by ConocoPhillips Company. This thirty-three mile network of pipeline is generally located east of Powhaton Road, west of Watkins Road, north of Yale Avenue and south of 56<sup>th</sup> Avenue.

The existing pipelines convey natural gas in diameters of four inches to twelve inches. Water pipelines and telecommunication are also planned within these corridors. A crude oil pipeline project by DJ South Infield Gathering, LLC, a subsidiary of ARB Midstream LLC, is currently being permitted to allow construction, adjacent to the aforementioned existing natural gas pipelines. This As-Built site plan, and future subsequent amendments to thereof, pertains to natural gas and water pipelines that may be constructed in the future by CPRM.

Pipeline easements are generally fifty feet for all four utilities, however some easements are wider, at seventy-five and one hundred feet. Natural gas is gathered from the oil and gas wells and transported to compressor stations in the vicinity of the oil field, where it is then taken to market. Pony Station is an existing natural gas compressor station in Adams County; Mustang Station is a natural gas compressor station in Aurora, that is currently under construction. Crude oil will be gathered by ARB from the oil and gas wells and transported to Bennett Station, in Adams County and then to various pipeline interconnects in Platteville, Colorado. Water will be gathered from the oil and gas wells and transported to an injection well facility. Telecommunication will be used to operate the adjacent utilities.

Above ground valve sites are located along the pipeline alignments so that pressure within the pipes can be regulated, including isolation operations needed during maintenance activities or emergencies. These sites are also used as access points for cleaning and maintenance operations. These above-ground appurtenance locations will be fenced, restricting access to authorized personnel only.

Pipeline locations are determined on a variety of factors, including minimizing land disturbance, avoiding locations of natural resources such as mature trees and wildlife habitats, and consolidating infrastructure corridors. Existing roadways and Federal Emergency Management Agency (FEMA) floodplains will be bored to avoid ground disturbance and disruption to existing traffic patterns. Pipelines placed in open trenches are buried with a minimum of four feet of cover.

Engineering and construction of pipelines is governed by the United States Department of Transportation (DOT) regulations, as well as the City land development code, ordinances and operator agreements. Example

construction practices to increase safety include clearing the limits of construction from vegetation to reduce fire risk during pipe welding, pressure testing to reduce the potential for leaks, and pipe coating to protect against corrosion. Based on Colorado State Statutes, prior to construction activity, professionals must conduct utility locates to identify the horizontal and vertical locations of existing infrastructure, including pipelines such as those proposed herein. Signage installed along the pipeline route provides visual advisement. Among the safety measures created by deep burial depths, the State regulations, surface markers, and warning systems, inadvertent encounters with pipelines are minimized.

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 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 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.

With the exception of the intermittent appurtenance sites and pipeline warning markers, there is little 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), DOT and Pipeline and Hazardous Materials Safety Administration (PHMSA) rules and regulations. Above-ground valve sites may be removed, including removal of the appurtenance equipment, gravel pad and surrounding security fencing. Continual maintenance on pipelines that have been de-commissioned is not anticipated. If all the above-described utilities within an easement are de-commissioned, the pipeline easement may be released to the landowner.

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

On January 23, 2020, CVL and Bronco Pipeline Company met with City staff for a pre-application meeting; we received comments on February 6, 2020. On March 3, 2020 CPRM purchased the Bronco Pipeline Company asset and will be continuing the entitlement efforts for the pipeline infrastructure.

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,  
**CVL Consultants of Colorado, Inc.**

**Crestone Peak Resources Midstream, LLC**



Melinda E. Lundquist, PE  
Senior Vice President



Meghan Mearsha  
Senior Regulatory Analyst

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## Section II. BEST MANAGEMENT PRACTICES FOR CENTRAL GATHERING FACILITIES (CGF), GATHERING SYSTEMS, FLOWLINES AND ASSOCIATED FACILITIES

The City of Aurora entered into an oil and gas operator agreement with Elevation Midstream, LLC in July 2019 (OPERATOR AGREEMENT). As understood from City staff, this application is subject to that third party agreement and CPRM is required to address each of the BMPs listed in that agreement. 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. Access to the pipelines are taken from the access roads constructed to the oil and gas well pads that are served by the pipelines. Most pipelines are parallel to public roadway rights-of-way. Above-ground appurtenance sites are largely located near roadway intersections, so access roads are not necessary. Gravel driveways may be constructed to access appurtenance locations.
2. Air Quality: Minimal emissions and minor leaks of the natural gas pipeline, may exist. The equipment used to construct these pipelines does produce emissions which are regulated by entities other than the City of Aurora.
3. Automatic Safety Protective Systems: Please refer to section 8.2 of the Mechanical Integrity Plan, which addresses pipeline isolation with isolation valves.
4. Buildings Structures, and Associated Appurtenances: There are no buildings along the main *gathering system* pipelines; there are buildings on the well pad sites where *lateral* pipelines connect to equipment at the wellheads. Small unoccupied buildings exist and will be proposed for future pipeline projects. Buildings will be constructed and permitted per the City of Aurora building code.
5. Burning: No burning activities are planned with the installation or operation of the pipeline project.
6. CGF and Compressor Station Construction Specification BMP: Compressor stations are entitled through a separate application process within the City. This pipeline project does not propose any compressor stations or a central gathering facility.
7. 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.
8. Construction Work Hours: The construction of the pipelines 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. Class II Underground Injection Control Wells: Injections wells are entitled through a separate application process with the City. This pipeline project does not propose any injection wells. Furthermore, pipeline infrastructure does not utilize injection wells. The use of injection wells is associated with oil and gas well drilling and completing operations.
10. 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.
11. Combustion Devices: N/A for pipeline projects.
12. Containment Berms: Containment berms are not a necessary BMP for pipeline projects, as there are no tanks associated with pipeline infrastructure along the pipeline route. At pipeline terminus locations, such as a terminal, refinery or injection well facility, containment berms are provided.
13. Cultural and Historical Resource Protection: No impacts to City identified cultural or historical structures, sites or districts are anticipated.
14. 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.
15. Electric Equipment: There is no powered equipment associated with pipeline projects.
16. Emergency Response Plan: In conjunction with this application, CPRM is submitting an Emergency Response Plan that is in accordance with the provisions detailed in Section II.16 of the OPERATOR AGREEMENT, including filing it with local emergency responders, providing contact information for CPRM's responsible parties, creating as-built mapping (including this application), 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.

17. Events to be reported: CPRM will report any COGCC reportable safety event or OSHA reportable injuries to the City.
18. 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.
19. CGF and Associated Facilities Documentation: There are no CGF facilities proposed with this pipeline project. CGF facilities are entitled through a separate application process within the City.
20. Security Fencing: Fencing will be erected around all above-ground appurtenance sites, outside sight distance triangles at existing intersections.
21. Flammable Material: There are no permanent storage vessels of flammable material associated with the operation of this pipeline project.
22. 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 by 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.
23. 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 of the OPERATOR AGREEMENT.
24. Insurance: CPRM can and will comply with the insurance requirements stipulated in the OPERATOR AGREEMENT.
25. 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.
26. Lightning Protection: Lightning protection is not required for this pipeline project.
27. 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.
28. Mechanical Integrity Program: In conjunction with this application, CPRM is submitting a Mechanical Integrity Plan that is in accordance with the provisions detailed in OA.
29. Mud Tracking: Tracking of sediment onto public roads will be mitigated per the Stormwater Management Plan.
30. 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.
31. Notifications to the City Regarding Commencement of Construction at CGF and Pipeline Operations: Written notice shall be provided thirty days (30) prior to construction commencement of any pipelines. No CGF is planned by CPRM.
32. Noxious Weed Control: N/A to existing pipeline which has been in the ground since 2013. Will provide site specific plans with Amendments.
33. Operations and Maintenance of the CGF Work Hours: N/A to pipeline projects. No CGF planned.
34. Odor: There is no odor associated with typical pipeline operations.
35. PHA-Hazard and Operability Study: N/A to pipeline projects; only CGF projects. No CGF planned.
36. Platting Requirements: The pipeline easement will not prohibit the underlying parcels from being platted.
37. 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.

38. Risk Management: This plan is not applicable for existing pipelines. An FMEA risk analysis is included in the Emergency Response plan and some aspects of risk are also addressed in the Mechanical Integrity Plan.
39. Spills: CPRM shall notify the City of Aurora of any spills of a reportable quantity, as defined by the COGCC.
40. Stormwater Management: Various stormwater management plans (SWMP) were approved by the City of Aurora for the pipelines described within the As-built Site Plan. Future / proposed pipelines 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.
41. Strict Application of BMP Standards: This application is in accordance with the intent of the 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,
42. Trailers: No construction trailers will be utilized during the construction of this pipeline. No existing or permanent trailers are included with this application.
43. Transportation and Circulation: With the utilization of pipelines, there will not a large increase in truck traffic. Site specific transportation management plans will be prepared and submitted with amendments to the As-Built Site Plan in accordance with City of Aurora requirements.
44. Tree mitigation: No tree removal is anticipated with this pipeline construction. Future pipeline infrastructure will be planned in a manner that minimizes tree impacts.
45. Construction of Gathering System and Flowlines: This application memorializes the construction of the natural gas pipelines that are currently in place, thus satisfying the intent of BMP #45. In the event that the pipelines described in this application are temporarily taken out of service, conveyance of the natural gas will be accomplished in accordance with the terms of this OPERATOR AGREEMENT, where applicable.
46. Visual Mitigation: A landscape plan is not required for pipeline projects. Visual mitigation is largely not necessary, as the pipeline infrastructure is below grade. At locations where pipeline infrastructure is above ground, as in appurtenance sites, solid fencing will be installed around the perimeter.
47. 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-truc and taken to a licensed disposal facility.
48. 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.
49. Wildlife Impact Mitigation Plan: Burrowing owls, prairie dogs, deer, antelope, red-tailed hawks, doves and pheasant are present in the areas of the pipeline corridors. For future pipeline projects, CPRM shall investigate prior to construction whether the pipeline corridor is planned in a sensitive wildlife habitat, as defined by the Colorado Division of Wildlife, or a natural area or open space. If it is determined that such an area will be impacted, CPRM shall work with the City of Aurora Parks Recreation and Open Space as well as the Colorado Division of Wildlife to develop a mitigation plan to minimize impacts. If it is determined that the project will not impact these areas, CPRM will provide the City of Aurora documentation of their findings.



## RESPONSE TO PRE-APPLICATION NOTES, DATED FEBRUARY 6, 2020

The following responses are pertinent to only the “numbered” *All Applications*, *General*, and *As-Built* conditions and not the *Amendment* conditions. Responses are stated in the ***bold italicized*** text. Responses to the Amendment conditions will be provided on Amendment applications.

### Submission Requirements:

#### 1 Generally

1.A If any of the following requirements have been waived by the City of Aurora, include a brief statement stating the date the waiver has been agreed to and the department that granted the waiver where the analysis would have otherwise been included. In other words, if a requirement in the Letter of Introduction was waived, include the waiver approval date and department under a heading within the Letter of Introduction, but if a standalone plan was waived, upload a separate document with the appropriate title that then includes waiver approval date and department.

***There are no waivers from the requirements listed in these pre-application notes or the OPERATOR AGREEMENT.***

#### 2 Site Plan

##### 2.A As-Built

2.A.1 Cover Sheet with the following:

2.A.1.a Large Amendment Block

2.A.1.b Decommissioning Plan for Existing infrastructure

2.A.2 Scale should be 1”=100’ or larger.

2.A.3 Do not include pipeline profiles in the Site Plan set.

2.A.4 Include an overview/context map including the entire network on one sheet (or one sheet per county if one sheet is too busy), all major streets/freeways, sections, and city boundaries.

2.A.4.a Label any street that a pipeline follows for a significant distance.

2.A.5 Include the following layers regarding the existing Oil and Gas infrastructure, at a minimum:

2.A.5.a Easement Lines

2.A.5.b Easement Centerline

2.A.5.c Standard sections showing easement relation to ultimate road buildout

2.A.5.d Above-ground Appurtenance Locations

2.A.5.e Above-ground Appurtenance Elevations

2.A.5.f All Pad Sites

2.A.5.g Include all recorded easements identified for future laterals with a different line type or a different label.

2.A.6 Also include the following layers, when available, at a minimum:

2.A.6.a ROW

- Existing Streets, Sidewalks, etc.
- Future Streets, Sidewalks, etc.
- Street Name Labels

2.A.6.b Dirt Roads

2.A.6.c Fences

2.A.6.d Water Features (Creeks, Ponds, etc.)

2.A.6.e Floodplain/Floodway

2.A.6.f Railroad/Railroad ROW

2.A.6.g Easements

2.A.6.h County Lines

2.A.6.i Section Lines

2.A.6.j Contours

2.A.6.k Building Roofprints

2.A.6.l Property Information

- Property Lines
- Subdivision, Block, Lot or “UNPLATTED” Labels
- Zoning Labels

*All the above-listed information described in 2A is included on the submitted As-Built Site Plan. Note that individual property owners are not stated, only whether the property is associated with a subdivision or not. Please refer to the stand-alone sheet within the site plan that illustrates zoning and subdivision mapping.*

- 3 Letter of Introduction
  - 3.A Include a Letter of Introduction that includes the following:
    - 3.A.1 All Applications
      - 3.A.1.a Project Summary (including name, address, email, and telephone number of the applicant)  
*Please refer to the first page of the Letter of Intent for the project summary and the second page of the Letter of Intent for the applicant contact information.*
      - 3.A.1.b 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.  
*Please refer to the first page of the Letter of Intent.*
      - 3.A.1.c Operations Plan  
*Please refer to the first page of the Letter of Intent. Future amendments will provide updated plan as well as an estimated timeline.*
      - 3.A.1.d Procedures employed in mitigating any adverse impacts of the routes of the pipeline  
*Please refer to pages 1 and 2 of the Letter of Intent.*
      - 3.A.1.e A description of the hazards, if any, of fire, explosion and other dangers to the health, safety and welfare of the applicant's or the operator's employees and the public.  
*Please refer to pages 1 and 2 of the Letter of Intent.*
      - 3.A.1.f A Decommissioning Plan.
        - Address how the flowline will be properly cleaned, capped and maintained if the flowline will be Properly Abandoned in Place or whether the flowline will be removed from the ground.  
*Please refer to page 2 of the Letter of Intent.*
      - 3.A.1.g Signature of the applicant.  
*The signature of the applicant is included on page 2 of the Letter of Intent.*
    - 3.A.2 As-Built
      - 3.A.2.a Each BMP listed in OIL AND GAS MIDSTREAM OPERATOR AGREEMENT (Exhibit B, Section II and Exhibit D) and a description of how the application meets or does not meet each.  
*Please refer to pages 3 to 5 of the Letter of Intent.*- 4 Property Owner Authorizations
  - 4.A As-Built
    - 4.A.1 Provide executed easements from all property owners on route.  
*Copies of the executed pipeline easements are included with this application.*
- 5 Other Plans/Studies/Agreements
  - 5.A Note that some of these plans do not require in-depth analysis. For example, a Lighting Plan might only consist of a description of how light is mitigated during construction (for example, only doing construction during the daylight), followed by a statement that confirms the project does not have lighting once installed. Others, like an Emergency Response Plan may be several hundred pages long.  
*Acknowledged.*
  - 5.B Once fieldwide plans are approved, they will not need to be resubmitted with each amendment.  
*Acknowledged.*
  - 5.C All ConocoPhillips' plans shall be changed or updated to address pipeline-specific BMPs. None that have been approved for pad sites are appropriate as written for a fieldwide pipeline plan. Some may be amended to fit, but all must be reviewed again to check for pipeline BMP compliance and applicability.  
*Generally, the field-wide plans that ConocoPhillips Company submitted were relative to oil and gas well sites, however the City approved Stormwater Management Plan Report addressed pipeline construction as well.*

- 5.D Fieldwide Plans  
*There are several fieldwide plans listed, however many of them are not applicable to either pipeline projects, such as reclamation plans, PHA-HAZOP, and drainage reports, or they are not applicable to this As-Built application because the infrastructure is already built and construction is complete, such as a Wildlife Impact Plan. Further, some of these fieldwide plans are not overly complex and do not warrant a lengthy dissertation. Rather than submit stand-alone document files for each of these twelve items that may indicate that they are not applicable to this application, we have elected to respond within this narrative to each of these twelve items. Please refer to separate stand-alone fieldwide plans for: Emergency Response Plan (pre-app comment #5.D.5), Mechanical Integrity Plan, Air Quality Plan (pre-app comment #5.D.12). Others are incorporated within this document, Operations Plan (pre-appcomment #3.A.1c) and Noxious Weed Plan (BMP #32)*
- 5.D.1 Interim Reclamation Plan  
*N/A to pipeline projects, only oil and gas well pads, where once the well is drilled, the flat gravel well pad is reduced in footprint and recontoured to pre-existing topography.*
- 5.D.2 Visual Mitigation Plan  
*Visual mitigation is generally not applicable to pipeline projects. Please refer to the discussion on page 5 of this Letter of Intent, BMP #46 Visual Mitigation.*
- 5.D.3 Lighting Plan  
*Lighting is generally not applicable to pipeline projects. Please refer to the discussion on page 4 of this Letter of Intent, BMP #25 Lighting.*
- 5.D.4 Fugitive Dust Suppression Plan  
*Fugitive dust suppression is generally not applicable to pipeline projects. Please refer to the discussion on page 5 of this Letter of Intent, BMP #22 Fugitive Dust Suppression.*
- 5.D.5 Emergency Response Plan  
*Please refer to the stand-alone Emergency Response Letter that is included with this application. This ERP is an actual excerpt from Crestone's full fieldwide Emergency Response Plan. This ERP Section 9 is focused on pipeline.*
- 5.D.6 Fluid Disposal Plan  
*The only fluids produced with pipeline needed be disposed of are during pigging operations. Please refer to no. 47 Wastewater and Waste Management.*
- 5.D.7 Noise Management Plan  
*Noise is generally not associated with pipeline projects. Please refer to the discussion on page 4 of this Letter of Intent, BMP #30 Noise Mitigation.*
- 5.D.8 Security Plan (Depending on Level of Analysis)  
*Fencing will be erected around all above-ground appurtenance sites, outside distance triangles at existing intersections. Access will be restricted to authorized personnel only. In the instance where unauthorized personnel gain access to the appurtenance sites, valves are blinded and locked.*
- 5.D.9 Final Reclamation Plan  
*N/A to pipeline projects, only oil and gas well pads, where once the well is no longer viable, the wells are plugged and abandoned and the flat gravel well pad is removed and recontoured to pre-existing topography.*
- 5.D.10 Wildlife Impact Plan  
*Because this application is relative to an as-built condition, no wildlife impacts will occur. Future pipeline projects, i.e. "Amendments" may require a Wildlife Impact Mitigation Plan. Please refer to the discussion on page 5 of this Letter of Intent, BMP #49 Wildlife Impact Mitigation Plan.*
- 5.D.11 Preliminary Drainage Report  
*N/A to pipeline projects, as drainage patterns and percent impervious values are unchanged with pipeline construction.*
- 5.D.12 Air Quality Plan  
*Please refer to the stand-alone Air Quality Plan that is included with this application.*
- 5.D.13 Road Maintenance Agreement  
*Please refer to the stand-alone executed Road Maintenance Agreement.*
- 5.D.14 Registration Form(s) from Applicable Regulatory Agency/Agencies (COGCC/PUC/DOT/FERC/Etc) Crestone Peak Resources Midstream LLC lines are Type C gathering. No registration documents are currently necessary through Colorado Public Utilities Commission. Jurisdictional reviews are conducted yearly to analyze and evaluate changes in jurisdiction status. If the jurisdictional status of the pipelines changes, such that it becomes a regulated onshore gathering pipeline, Crestone Peak Resources Midstream LLC will comply with the Gas



pipeline Safety Standards specified in 49 CFR, Part 191 and Part 192, as well as all applicable Colorado Public Utilities Commission regulations.

CPRM is in the process of acquiring an approved Transfer of Operator for all Form 12s filed with the Colorado Oil and Gas Conservation Commission (COGCC). Form 12 Gas Facility Registration includes all of the active gas gathering located within the system. In the event that Crestone Peak Resources Midstream LLC expands or decommissions sections of the gas gathering system, the changes will be reported annually through a Form 12 to the COGCC.

5.E Site-Specific Plans

*Please refer to the “Natural Gas Pipeline Gathering System, As-Built Site Plan, Crestone Peak Resources Midstream, LLC” by CVL Consultants of Colorado, Inc.*

5.E.1 License Agreements

*License agreements are required when private infrastructure, such as these constructed pipelines, are installed in City right-of-way or City owned easements, such as the easement for the Prairie Waters raw waterline. As understood, BroncoPipeline Company obtained license agreements for the As-Built pipelines. Future pipelines that will be entitled through the Amendment process, will be required to secure additional license agreements if they encroach within City owned rights-of-way or City owned easements. CPRM acknowledges this.*

5.E.2 PHA-HAZOP

*N/A to pipeline projects.*

5.E.3 Project Development Schedule

*N/A. This pipeline project is already constructed. CPRM can provide schedule estimates for future pipelines that go through the Amendment process.*

5.E.4 Security Plan (Depending on Level of Analysis)

*Please refer to the response to comment #5.D.8.*

5.E.5 License Agreements

*This requirement is presumably a repeat of 5.E.1.*

5.E.5.a Note that License Agreements generally take 10 weeks to process. With an abbreviated timeline, Amendments would be approved with a condition that License Agreements are executed prior to issuance of a Notice to Proceed.

*Acknowledged.*

5.E.6 Traffic Letter/Plan

*A traffic letter/plan is not applicable, as this pipeline project is already constructed. Future pipeline projects will not have measurable vehicular traffic, as it operates without creating traffic demands. There will be insignificant traffic relative to the maintenance operations at the valve sites.*

5.E.7 Wildlife Impact Plan Addendums or Supplements

*Please refer to the discussion on page 5 of this Letter of Intent, BMP #49 Wildlife Impact Mitigation Plan.*

5.E.8 Amended Registration Form(s) from Applicable Regulatory Agency/Agencies (COGCC/PUC/DOT/FERC/Etc) Please reference answer provided for 5.D.14

6 Notification Requirements

6.A As-Built

6.A.1 No notification is required.

*Acknowledged.*

7 Landscape Design Issues

For further information, please feel free to contact our Senior Landscape Architect, Kelly K. Bish at (303) 739-7189. The general landscape comments on your proposal are listed below:

7.A General Landscape Plan Comments.

7.A.1 The applicant has been asked to submit an as-built site plan for the existing Bronco Pipeline Company gathering system. This will be amended each time a gas pipeline lateral is proposed for installation from either an existing or proposed ConocoPhillips well site.

*Acknowledged. This application is for the As-Built.*

7.A.2 Where the existing gathering system parallels a road, the applicant shall include where existing and proposed easements are relative to future and current road rights-of-ways.

*Cross-sections are included on the site plan that indicate the requested easement and right-of-way information.*

- 7.A.3 In addition, as laterals are proposed adjacent to roads, detailed road cross sections shall be included with each submission depicting the ultimate roadway condition i.e. the location of curb and gutter, ultimate rights-of-way, proposed curbside landscape areas (formerly tree lawns) detached sidewalks and the proposed laterals and associated utilities like water, fiber optic etc. if being proposed as part of the pipeline lateral infrastructure.

*The aforementioned cross-sections in comment #7.A.2 include the future roadway planimetrics and all four utilities that are planned in the pipeline easement, including natural gas, crude oil, water and telecommunications. These are general locations and the precise location of each of these lines may vary within the pipeline easement. Only the natural gas has been constructed. The crude oil is being permitted by another company. The water and telecommunications have yet to be engineered.*

- 7.A.3.a The purpose of these cross sections is to assist staff in determining whether the proposed easements and utilities will preclude the installation of future curbside landscape i.e. street trees and required buffers.

*Acknowledged. The pipeline easement has been located in consideration of future roadway rights-of-way, per the City of Aurora master transportation plans. Therefore, ultimate roadway planimetrics should not be compromised by this pipeline easement. Street trees may be planted within the roadway right-of-way. While small shrubs may be planted in the pipeline easement, trees cannot.*

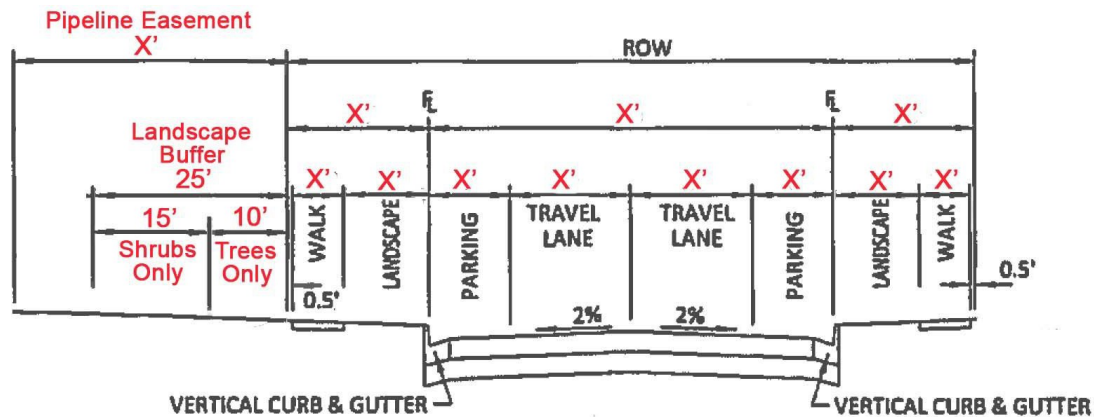
- 7.A.3.b The applicant should work with the Public Works Department to ensure that they are showing the correct ultimate street cross sections for any roads that will be impacted.

*As responded to comment #7.A.3.a, the ultimate roadway cross-sections have been depicted per the City of Aurora master transportation studies.*

- 7.A.3.c The zoning associated with each lot determines what the required buffers would normally be. As an example, a future arterial street with industrial zoning would require a 25' wide buffer as measured from the back of walk. It may be possible working with the applicant, to allow for a narrower buffer if trees would be permitted within the first 10' of the easement should the easement fall directly at the back of walk.

*Please refer to the response to comment #7.A.3.a. Landscape buffers will be required of the developer of the adjacent parcel, not the operator of the pipeline easement.*

- 7.A.3.d Below is a typical street cross section example of what should be included with the overall as built plan for the Bronco Conoco Company gathering system as well as future amendments for the pipeline laterals. If the Bronco Pipeline Company has specific vegetation i.e. trees and shrubs that are permitted within their easements, they should include that with their as-built site plan submittal.



*The landscape buffer is included in the typical cross-sections with a note that says "Landscape buffers shall be created when adjacent land is developed. Buffers vary in size depending on the land use / zoning. Proposed vegetation in the landscape buffer shall be coordinated with the pipeline easement holder. No trees shall be installed within the pipeline easements."*

8 Adjustments/Variances

8.A If you decide to request any Adjustments from Planning standards or Variances from BMPs, clearly list them in your Letter of Introduction and on the cover sheet of your Site Plan.

*Acknowledged. We do not anticipate requesting of variances at this time.*