



Planning Division
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March 12, 2020

Kathy Denzer
Crestone Peak Resources
1801 California Street
Denver, CO 80202

Re: First Technical Corrections Review – Rush South (Phase 2) – Oil and Gas Permit
Application Number: **DA-2012-03**
Case Numbers: **2017-6005-04**

Dear Ms. Denzer:

Thank you for your latest submission for technical corrections, which we started to process on Wednesday, February 26, 2020. We have reviewed it and attached our comments along with this cover letter.

Since several important outstanding technical issues still remain, another technical corrections submission will be required.

Note that all our comments are numbered. When you resubmit, include a cover letter specifically responding to each item. The Planning Department 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.

As always, if you have any comments or concerns, please give me a call. I may be reached at 303-739-7186.

Sincerely,

Stephen Rodriguez, Planning Supervisor
City of Aurora Planning Department

cc: Melinda Lundquist, CVL Consultants, 10333 E. Dry Creek Rd. Ste. #240 Englewood CO 80112
Scott Campbell, Neighborhood Liaison
Mark Geyer, ODA
Filed: K:\\$DA\2012-03tech1.rtf



RUSH SOUTH OIL AND GAS PERMIT REVIEW

First Technical Corrections Submittal Review

SUMMARY OF KEY COMMENTS FROM ALL DEPARTMENTS

- License needed should there be a culvert at Jewell in the access road (Real Property). Clearly show on the site plan. (See Item 19)
- See the comments from Engineering/Public Works. (See Items 29 and 30)
- Provide more detail on the Groundwater Quality Monitoring Plan and Air Quality Plan in the next submission (see Items 23 and 32)
- Final approval from the COGCC is still required (see item 36)
- Respond in your resubmittal to all summary comments and redlines in a separate comment response letter.

REVIEWERS

- Planning – Stephen Rodriguez 303-739-7186 / srodrigu@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) – Chris Ricciardiello and Curtis Bish / 303-739-7154 and 303-739-7131 / cricciar@auroragov.org and cbish@auroragov.org / Comments in purple

Reviewers: Please list your comments, including summarization of PDF red-lines, under each pertinent document category below. This will be the only comment document provided, and must be utilized to encapsulate all substantive review remarks from each individual department.

SITE PLAN COMMENTS

1. Site Plan (Multiple departments)

1A. Sheet 1 (Planning)

- Update the zoning district to R2-Medium Density Residential in the Data Block
- Revise Site Plan Note #5 to reflect the executed RMA amendment

LETTER OF INTRODUCTION COMMENTS

8. Project Summary (Planning)

8A. Update the zoning district to “R2-Medium Density Residential.”

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

9A. Noise Mitigation- Add in the chosen noise mitigation berm.

9B. Reclamation- Match the site description to the Current and Future Land Use listed in the COGCC Form 2A.

9C. Road Repairs- Update the Road Maintenance Agreement amendment language to reflect the revised execution.

9D. Transportation and Circulation- Update the Road Maintenance Agreement amendment language to reflect the revised execution.



10. Neighborhood Meeting Schedule / Results / Comments (Planning)

10A. This requirement was acceptable as previously submitted.

11. Response to Approval Conditions (Planning)

11A. Baseline air quality testing must be pre-construction, not post-construction.

OPERATIONS PLAN COMMENTS

12. Operations Plan (Planning)

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

COMMENTS ON OTHER REQUIRED ITEMS

19. License Agreements (Real Property)

19A. The applicant must obtain a License for any items encroaching Powhaton Road and Prairie Waters.

19B. Any crossing in the Public Service Company of CO (PSCO) easement needs an agreement with PSCO.

23. Groundwater Quality Monitoring Plan (Aurora Water)

23A. Prior to the Notice to Proceed:

- If applicable- At least 40 weeks prior to the Notice and to drilling, the applicant shall notify the City that the “requested well” is not possible and that the parties (City and applicant) will have to pursue the “easement well” protocol in order to comply with the monitoring well requirement.
- If the applicant is instead pursuing the “requested well”, the details must be coordinated with the City.
- If the applicant is instead pursuing monitoring of a “domestic water well”, the details (including agreement with the well owner) shall be provided to the City.
- The above information must be submitted as part of review and approval from Planning.

29. Stormwater Management Plan (Public Works)

29A. 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)

30A. This requirement has been satisfied.

32. Air Quality Plan (Planning)

Field-Wide Plan

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

Site-Specific Plan

32B. 2. Scope

- Second bullet- Define “met data”, and spell out “CDPHE” and “EPA”
- Second bullet- The last sentence is awkwardly worded; please consider revision to better indicate the intent.
- Second bullet- Add back in language related to targeted alert levels and reports (and to match Section 4, 4th bullet)

32C. 7. CDPHE Health Guidelines

- Add in methane, to match the Field-Wide Plan
- Define “TCEQ”, “PPRTV”, “ATSDR”, “RA”, and “CalEPA”

32D. Prior to the Notice to Proceed:

- Alert level thresholds must be established, pre-activity information must be determined, location-specific considerations must be identified and described, equipment siting must be finalized, possible timing for re-locations and modifications must be provided, and the location data plan must be details must be confirmed.
- Required pre-construction ambient air quality baseline monitoring shall be conducted and the results added to the Plan.
- The above data must be added to the Plan and submitted for review and approval to Planning.



36. COGCC Forms / 2A (Planning)

36A. The construction timeline must match the Project Development Schedule.

36B. The size of disturbed area and interim reclamation acreage must match the Letter of Introduction and plan set Data Block.

36C. Current and Future Land Use must match the site description in the Project Summary and Reclamation BMP in the Letter of Introduction.

36D. Final approval from the COGCC, Form 2 and form 2A, is required prior to issuance of the Notice to Proceed, and must reflect the above revisions.