



February 8, 2021

Colin Brown
Senior Planner
City of Aurora Planning Department
15151 E. Alameda Pkwy, Suite 2300
Aurora, CO 80018

Re: Initial Submission Review – Reserve North Lateral Natural Gas Pipeline No2 Site Plan Amendment
Application Number: **DA-2235-02**
Case Number: **2020-6017-02**

Dear Mr. Brown:

We have received comments from City of Aurora Oil and Gas, Tri-County Health Department and Xcel Energy for the referenced project. We have restated the comments below and addressed them per the bold, italicized responses.

Initial Submittal Review

SUMMARY OF KEY COMMENTS FROM ALL DEPARTMENTS

- Comment: Make necessary revisions to Plan Set

Response: Completed.

- Comment: Make necessary revisions to the Letter of Introduction

Response: Completed.

• Comment: 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* file 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.

Response: Acknowledged. CAD file to be sent prior to submittal of final Site Plan Mylars

- Comment: Respond to additional redline comments

Response: Completed.

PLAN SET COMMENTS

1. Plan Set

1A. Comment: Add the following Notes to Sheets 1-4:

- “The Gathering System and Flowline will not have any undue adverse effects on existing and future development of the surrounding area as set forth in applicable City Master Plans. The design of the proposed Gathering System and Flowline mitigates negative impacts on the surround 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.”

Response: Completed.

- Comment: Add the note from Sheet 4 to Sheets 1-3 (Note below appurtenance example image).

1B. Sheet 1 (Planning)

Response: Completed.

- Comment: Add date of amendment to Page 9 and Page 27 labels in the Sheet Index.

Response: Completed.

- Comment: Add Signature Block for Amendment Site Plans.

Response: Per the discussion with Colin Brown on 02-03-2021, this comment has been withdrawn. The amendment signature block is only applicable for major amendments.

1C. Sheet 4 (Planning)

- Comment: Add floodplain shown on map to Legend.

Response: Per the discussion with Colin Brown on 01-28-2021, this comment has been withdrawn.

1D. Sheet 9 (Planning)

Comment: Show and label well locations on Reserve North well pad, Update Legend as needed.

Response: Per the discussion with Colin Brown on 01-28-2021, this comment has been withdrawn.

- Comment: Show facilities on Reserve North and Big Sandy well pads, update Legend as needed.

Response: Per the discussion with Colin Brown on 01-28-2021, this comment has been withdrawn. Well pad facilities were not included on the original approved Site Plan. In addition, well pad facilities are not part to the pipeline project scope.

- Comment: Show and label proposed bore hole locations (if applicable).

Response: Not applicable. There are no bore locations for this lateral.

- Comment: Add Legend to map/sheet.

Response: Per the discussion with Colin Brown on 01-28-2021, this comment has been withdrawn. The legend is included on the cover sheet and not on individual sheets per the original approved Site Plan.

2. Vicinity / Context Map (Planning)

2A. Comment: On the Vicinity Map shown on Sheet 1, make a change to the label of the proposed lateral amendment so it is more noticeable and stands out. Possibly add a white background to the lateral label box.

Response: Completed.

3. Interim Reclamation Plan (Planning)

3A. Comment: N/A to pipeline projects without above-ground appurtenances/structures or CGF facilities.

Response: Acknowledged.

4. Visual Mitigation Plan (Planning)

4A. Comment: N/A to pipeline projects without above-ground appurtenances/structures or CGF facilities.

Response: Acknowledged.

5. Landscape Plan (Planning/Landscape)

5A. Comment: N/A to pipeline projects without above-ground appurtenances/structures or CGF facilities.

Response: Acknowledged.

6. Lighting Plan (Planning)

6A. Comment: N/A to pipeline projects without above-ground appurtenances/structures or CGF facilities.

Response: Acknowledged.

7. Building and Structure Elevations (Planning)

7A. Comment: N/A to pipeline projects without above-ground appurtenances/structures or CGF facilities.

Response: Acknowledged.

LETTER OF INTRODUCTION COMMENTS

8. Project Summary (Planning)

8A. Comment: For any approved, field wide plan or road maintenance agreement mentioned in the Letter of Introduction, please reference the standard Version numbering/naming conventions (i.e. Crestone Peake Midstream Field Wide Air Quality Version 2020.09.29).

Response: Completed.

8B. Comment: In the 'RE:' section at the top of the letter, add TRS, parcel number, and 2501 N Hudson Rd for address.

Response: Completed.

8C. Comment: List the products/substances being transported through the lateral, including the starting and terminus points (Elevation OA, Page 9, Item 9 – BB).

Response: Completed. The following sentence has been added to the Letter of Introduction: "The Reserve North Lateral will carry natural gas from the Reserve North Oil & Gas Pad to the existing Big Sandy Lateral."

8D. Comment: Add a period after 'VTC (Vehicle Tracking Control)' in the 3rd paragraph on page 1.

Response: Acknowledged. The paragraph regarding construction access has been edited for clarity and for consistency with Rush North Letter of Introduction.

8E. Comment: In the second to last sentence in the 3rd paragraph on page 1, remove 'aforementioned' and refer to the Road Maintenance Agreement using the standard version numbering/naming conventions.

Response: Completed.

8F. Comment: Add a period to the last sentence in the 3rd paragraph on page 1.

Response: Completed.

8G. Comment: In the ‘General Pipeline Information’ section, add more details related to potential hazards to the health, safety and welfare of the operator’s employees and the public.

Response: *Per the discussion with Colin Brown on 01-28-2021, the approved Field Wide Integrity Management Plan and Emergency Response Plan have been referenced in the Letter of Introduction. The following sentence has been added: “Refer to the approved Integrity Management Plan (Crestone Peak Midstream Field Wide Integrity Management Plan Version 2020.09.29) and the approved Field Wide Emergency Response Plan (Crestone Peak Midstream Field Wide ERP Version 2020.09.29) for more details regarding methods put in place to remove potential hazards to the health, safety, and welfare of the operator’s employees and the public.”*

8H. Comment: Add a paragraph that outlines the planned construction timeline, including startup and commissioning schedule. This can be a general timeframe for planned construction (i.e. construction in Q3 2021, startup and product flowing in Q4 2021)

Response: *Completed. The following sentence has been added to the Letter of Introduction: “The Reserve North Lateral is anticipated to begin construction in Q2 2021, with startup and product flowing in Q3 2021.”*

8I. Comment: Add in sentence that says requirement for Neighborhood Meeting was waived during the Pre-Application meeting on 11/12/2020.

Response: *Completed. The following sentence has been added to the Letter of Introduction: “The requirement for a Neighborhood Meeting was waived during the Pre-Application Meeting.”*

8J. Comment: Add in sentence that explains why the requirement for soils reports is not applicable.

Response: *Completed. The following sentence has been added to the Letter of Introduction: “The requirement for a soils report is not applicable for this project because there are no public right-of-way utility crossings with this application.”*

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

9A. Comment: Provide more details for the following BMPs:

- Comment: Events or Incidents to be reported – What time frame will events be reported in? Use specific BMP language.

Response: *Completed. The following language from the draft City of Aurora Oil & Gas Manual has been added to BMP #12: “Any COGCC or OSHA reportable injuries, accidents, or natural events shall be reported to the City within twenty-four (24) hours. Once the applicable forms are submitted to the agency, a copy of that form will also be provided to the City. In the event of a fire that is not controllable by Operator personnel, explosion, or need for emergency services response, 911 shall be called.”*

- Comment: Removal of Debris – Use specific BMP language.

Response: *Completed. The following language from the draft City of Aurora Oil & Gas Manual has been added to BMP #26: “All construction-related debris shall be removed from the pipeline corridor for proper disposal in a timely manner. The pipeline corridor shall be always maintained free of debris and excess materials during operation. Operator shall also not stockpile debris at the pipeline corridor.”*

9B. Comment; For any approved, field wide plan or road maintenance agreement mentioned in the Letter of Introduction, please reference the standard Version numbering/name (i.e. Crestone Peake Midstream Field Wide Air Quality Version 2020.09.29).

Response: Completed.

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

10A. Comment: The Neighborhood Meeting requirement was waived during the Pre-Application meeting on 11/12/2020. 10B. Additional Electronic Neighborhood Comments received by the City:

- Name: Kathy Boyer
Organization: Tri-County Health Department, 6162 S. Willow Drive, Suite 100, Greenwood Village CO 80111 (aheinrich@tchd.org)
Comment: Please see the attached letter.
The comments from Tri-County Health are restated and responded to later in this response letter.
- Name: Donna George
Organization: Public Service Company of Colorado, 1123 W. 3rd Ave, Denver CO 80223 (donna.l.george@xcelenergy.com)
Comment: Please see attached letter.
Response: Acknowledged.

11. Response to Pre-Application Comments (Planning)

11A. Comment: The Response to Pre-Application Comments requirement was waived during the Pre-Application meeting on 11/12/2020.

Response: Acknowledged.

OPERATIONS PLAN COMMENTS

12. Operations Plan (Planning)

Integrity Management Plan

12A. Comment: This requirement was satisfied with the approved Crestone Peak Midstream Field Wide Integrity Management Plan Version 2020.09.29.

Response: Acknowledged.

Operations Plan

12B. Comment: This requirement was waived during the Pre-Application meeting on 11/12/2020.

Response: Acknowledged.

13. Project Development Schedule (Planning)

13A. Comment: Refer to comment 8H, listed above in Section #8.

Response: See the response to Comment 8H, listed above in Section #8.

14. Security Plan (Planning)

14A. Comment: The Security Plan requirement was waived during the Pre-Application meeting on 11/12/2020.

Response: Acknowledged.

15. Decommissioning / Final Reclamation Plan (Planning)

15A. Comment: This requirement is acceptable as submitted.

Response: Acknowledged.

EMERGENCY RESPONSE PLAN COMMENTS

16. Emergency Response Plan (Building/Life Safety)

Field-Wide Plan

16A. Comment: This requirement was satisfied with the approved Crestone Peak Midstream Field Wide ERP Version 2020.09.29.

Response: Acknowledged.

Site-Specific Plan

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

Response: Acknowledged.

17. PHA-HAZOP Analysis (Building/Life Safety)

Field-Wide Plan

17A. Comment: This requirement was satisfied with the approved Crestone Peak Midstream Field Wide PHA-HAZOP Version 2020.09.29.

Response: Acknowledged.

Site-Specific Plan

17B. Comment: Provide a “Site-Specific HAZOP” for the lateral pipeline. The HAZOP that is on file dated June 24th is a “Fieldwide” document that addresses the Watkins Pipeline. Each proposed lateral requires a site-specific HAZOP/Integrity Management Plan at the time of submittal. If adjustments are made during construction, a revision will be required to update the files on record. We request a PHA-HAZOP analysis for laterals, which allows for a systematic process for evaluation and risk management. The intent of the study is that potential hazards and operability problems are identified and addressed, creating an exchange of ideas on how to eliminate risk and potential deviations.

Response: Per the discussion with Colin Brown, Jeffrey Moore, and Will Polk on 01-29-2021, the Site Specific HAZOP Letter submitted with the 1st submittal is acceptable as submitted. Once the lateral has been constructed, as-built drawings will be provided to the city. At the end of each calendar year, Crestone Peak Resources Midstream LLC will update the approved Field Wide HAZOP Plan (Crestone Peak Midstream Field Wide PHA-HAZOP Watkins Version 2020.09.29) to include the as-built drawings and laterals on all associated maps.

COMMENTS ON OTHER REQUIRED ITEMS

18. Traffic Letter / Plan (Traffic)

18A. Comment: The Traffic Letter/Plan requirement was waived during the Pre-Application meeting on 11/12/2020.

Response: Acknowledged.

19. License Agreements (Real Property)

19A. Comment: License Agreements will only be required when there are encroachments to City ROW's, easements or City owned property.

Response: Acknowledged.

20. Recorded Surface Use Agreement (Real Property)

20A. Comment: Submitted as Property Owner Authorization.

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: N/A to pipeline projects without above-ground appurtenances/structures or CGF facilities.

Response: Acknowledged.

Water Supply Plan

22B. Comment: N/A to pipeline projects without above-ground appurtenances/structures or CGF facilities.

Response: Acknowledged.

23. Groundwater Quality Monitoring Plan (Water)

23A. Comment: N/A to pipeline projects without above-ground appurtenances/structures or CGF facilities.

Response: Acknowledged.

24. Fugitive Dust Suppression Plan (Water)

24A. Comment: This requirement is acceptable as submitted.

Response: Acknowledged.

25. Fluid Disposal Plan (Water)

25A. Comment: N/A to pipeline projects without above-ground appurtenances/structures or CGF facilities.

Response: Acknowledged.

26. Water Use Plan CDPHE Reg. 84

26A. Comment: N/A to pipeline projects without above-ground appurtenances/structures or CGF facilities.

Response: Acknowledged.

27. Weed Control Plan (Water and PROS)

27A. Comment: This requirement is acceptable as submitted.

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: Acknowledged.

29B. *FYI*: Comment: The City of Aurora Storm Drainage Design and Technical Criteria, and by reference the Mile High Flood District Urban Storm Drainage Criteria Manual, shall be used for designing required features of any extended detention basins including: trickle channel, forebay, micropool, maintenance access, pond volume, emergency overflow weir and outlet structure. It shall be noted that an approved Pond Certificate is required prior to returning Fiscal Security Deposit (as well as other conditions within the Stormwater Permit) and prior to commencement of business operations. (Public Works)

Response: Acknowledged.

29C. *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: Acknowledged.

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

Response: Acknowledged.

29E. *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: Acknowledged.

30. Preliminary Drainage Report

30A. Comment: The Preliminary Drainage Report requirement was waived during the Pre-Application meeting on 11/12/2020.

Response: Acknowledged.

31. Road Maintenance / Construction (Public Works)

31A. Comment: This requirement is acceptable as submitted.

Response: Acknowledged.

32. Air Quality Plan (Planning)

32A. Comment: This requirement was satisfied with the approved Crestone Peak Midstream Field Wide Air Quality Plan Version 2020.09.29.

Response: Acknowledged.

33. Noise Management Plan (Planning)

33A. Comment: N/A to pipeline projects without above-ground appurtenances/structures or CGF facilities.

Response: Acknowledged.

34. Application Form (Planning)

Checklist

34A. Comment: This requirement is acceptable as submitted.

Response: Acknowledged.

35. 350 Foot Radius Abutters List (Planning)

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

Response: Acknowledged.

36. DOT/PHMSA Forms (Planning)

36A. Comment: This requirement has been waived. There are no DOT/PHMSA required forms for this project.

Response: Acknowledged.

TRI-COUNTY HEALTH DEPARTMENT, Kathy Boyer / Land Use and Build Environment Specialist / 720-200-1575 / kboyer@tchd.org

Protection of Above-Ground Valves

Comment: Thank you for the opportunity to review and comment on the Site Plan Amendment for an 800-foot long steel gas pipeline located at the southwest corner of 26th Avenue and Hudson Road. Tri-county Health Department (TCHD) staff has reviewed the application for compliance with applicable environmental and public health regulations and principles of healthy community design. After reviewing the application, TCHD has no comments.

Response: Acknowledged.

XCEL ENERGY, Donna George, Right of Way and Permits / 303-571-3306 / donna.l.george@xcelenergy.com

Comment: Public Service Company of Colorado's (PSCo) Right of Way & Permits Referral Desk has reviewed the site plan amendment for **Reserve North Lateral Natural Gas Pipeline No. 2**. Please be aware PSCo owns and operates existing underground electric distribution facilities within the area of the proposed pipeline, and requests that this electric line and the transformer are shown on the plans, and, that proper clearances are observed.

Response: Acknowledged.

Comment: Should the project require any modification to these existing facilities, the property owner/developer/contractor must complete the application process via xcelenergy.com/InstallAndConnect.

Response: Acknowledged.

Comment: As a safety precaution, PSCo would like to remind the developer to call the Utility Notification Center by dialing 811 for utility locates prior to construction.

Response: Acknowledged.

Thank you for providing these review comments to enhance our submittal. If you have any questions, please do not hesitate to contact me at 720.249.3539.

Sincerely,
CVL, a Westwood team

Melinda E. Lundquist

Director, Private Development Colorado