



December 13, 2019

Juliana Berry, Planner II  
City of Aurora Planning Department  
15151 E. Alameda Parkway, Ste. 2300  
Aurora, CO 80012

RE: **Second Submission Review**– Eastern Hills North Phase Two – Oil and Gas Permit  
Application Number: **DA-2023-03**  
Case Numbers: **2019-6043-00**

Dear Ms. Berry:

ConocoPhillips Company has considered comments from City of Aurora Planning Department and other City of Aurora Departments and Agencies for the referenced project. We have restated the comments below and addressed them per the italicized responses.

#### **SITE PLAN COMMENTS**

##### **1. Plan Set**

1A. Sheet 1 – Repeated comment: Please add the following note: No work shall commence until the Amendment to the Roadway Maintenance Agreement is executed. (Public Works)

***RESPONSE: Note set updated.***

##### **1B. Sheet Number 1 (Planning)**

- Add the Best Management Practices Notes from the initial submission back in

***RESPONSE: Best Management Practices Notes added to Drilling Site Plan Sheet.***

- Add the proposed groundwater monitoring wells and air quality monitoring stations to the context maps on the individual Phase 2 sheets too.

***RESPONSE: PROPOSED Groundwater Monitoring Wells and PROPOSED air monitoring stations added to Context map and all locus maps. At this time we have not received the right from the property owner to install either the monitoring wells or the air monitoring stations, negotiations are ongoing. The monitoring wells have not been permitted through the State of Colorado and therefore do not have ID#'s***

- *Repeated Comment*: Specify “Phase 2” in the legal description title, and in the Title and Title Block of all Phase 2 sheets

***RESPONSE: “Phase 2” added to all sheet titles. Phase 1 sheets compiled into a single “Existing Conditions” Sheet.***

- *Repeated Comment*: Add the Weed Control BMP to Note #4

***RESPONSE: Note Set updated.***

- Specify that the equipment layout is the layout for graphical purposes only in General Construction Note #3

***RESPONSE: Note Set updated.***

- *Repeated Comment*: Reference to lighting in General Construction Note #6 should be only from the Lighting BMP, and the noise mitigation measures must or will be used (not “may need to be used”)

***RESPONSE: Note Set updated.***

- Spell out what “VRT” stands for in the Data Block

**RESPONSE:** *Updated to define VRT as Vapor Recovery Tower.*

- Update the Zoning District to “R2” in the Data Block

**RESPONSE:** *Updated.*

1C. Sheet Numbers 6—8 (Planning)

- *Repeated Comment:* Add the Phase 1 approval note

**RESPONSE:** *Sheets 6-8 compiled into a single “Existing Conditions” sheet.*

1D. Sheet Number 9 (Planning)

- Label the individual shapes in the Existing Phase 1 Production Equipment area too

**RESPONSE:** *Labels added.*

- Add the Drilling Equipment Representative Dimension Table to an elevation sheet too

**RESPONSE:** *Tables Added.*

- *Repeated Comment:* Legend was not added

**RESPONSE:** *legend added.*

- *Repeated Comment:* Add fence height to the label where indicated

**RESPONSE:** *Heights added.*

1E. Sheet Number 10 (Planning)

- Label the individual shapes in the Existing Phase 1 Production Equipment area too

**RESPONSE:** *Labels added.*

- Add the Production Equipment List table to an elevation sheet too

**RESPONSE:** *Tables added to elevation sheets.*

- *Repeated Comment:* Legend was not added

**RESPONSE:** *Legend added.*

- *Repeated Comment:* Add fence height to the label where indicated

**RESPONSE:** *Heights added.*

- Add the wildlife fence detail and signage details from Sheet 11 too

**RESPONSE:** *Detail added.*

- There is a label at the southeast corner of the shown site which just reads “Existing”. Please add the relevant word(s)

**RESPONSE:** *Label corrected to show all text.*

- Correct spelling of “existing” where indicated

**RESPONSE:** *Spelling corrected.*

1F. Sheet Number 11 (Planning)

- *Repeated Comment:* Legend was not added

**RESPONSE:** *Legend added.*

- *Repeated Comment:* Add fence height to the label where indicated

**RESPONSE:** *Heights added.*

- Does the “No Work Area” label remaining (near northeast corner of the shown site) also need to be removed?

**RESPONSE:** *Label removed.*

- Add the privacy fence inset to the Production Phase sheet (Sheet 10) and amend the corresponding note to reflect that the fence will be built during the Production Phase or Interim Reclamation Phase, Whichever Comes First to ensure that privacy is maintained throughout the life of the wells after drilling and completions

**RESPONSE:** *Privacy fence will only be installed in conjunction with interim reclamation. Interim reclamation will occur within 3 months after first production pursuant to COGCC rule 1003 (b.) The Operator Agreement states, “Operator shall install fencing in conjunction with the interim reclamation of the site.” Therefore, the privacy fence detail will not be added to the production phase site plan sheet.*



1G. Sheet Number 12 (Planning)

- Label contours on the west side of the shown site too

**RESPONSE: Labels added.**

1H. Sheet Number 13 (Planning)

- Label contours on the west side of the shown site too

**RESPONSE: Labels added.**

- Label the individual shapes in the Existing Phase 1 Production Equipment and Existing Well Head areas too

**RESPONSE: Labels added.**

1I. Sheet Number 15 (Planning)

- *Repeated Comment:* Legend was not added

**RESPONSE: Legend added.**

1J. Show and label cattle guards on all pertinent sheets (Planning)

**RESPONSE: Existing cattle guard added.**

1K. Add the abandoned well (State Smith 1-16) to the Context Map and context map insets on all Phase 2 sheets (Planning)

**RESPONSE: Abandoned well is identified on the context map and all map insets. The well is identified by a plugged well symbol located in the NW/4 of section 16 and labeled "Trans Texas Energy Inc., State-Smith 1-16"**

1L. Include well ID numbers. Are you able to sample these wells? Improve text on all plan sheets. (Water)

**RESPONSE: Groundwater Monitoring Wells are proposed for this site and negotiations with the landowner for the right to install the wells is ongoing. Since the wells are only proposed and do not exist, no well ID numbers are available. Text was degraded through the submittal process. Copies of the site plan of adequate resolution have been provided to the city with this submittal.**

1M. A drainage easement and I&M plan are required for private detention ponds. Vehicle maintenance access to the top of the outlet structure is required. (Water)

**RESPONSE: Applicant met with the City's Office of Development Assistance, Water Department and Real Property on November 19 to discuss requests 1M and 1N. Applicant agreed to design the site to include outlet structures constructed to release stormwater at rates consistent with sediment basin riser pipes. Office of Development Assistance informed Applicant that the sediment basin may essentially remain the same, but must include a permanent outlet structure. Applicant sent an engineered drawing of the outlet structure and hinge detail to the City on December 5, 2019 and is still waiting for approval from Vern Adams and Steve Dekoskie.**

*The City requested contractual references from the Surface Use Agreement that this outlet structure will be removed at the end of the life of the well. Applicant is contractually required to provide interim reclamation and final reclamation in compliance with COGCC Rules 1003 and 1004 respectively and in Section 14 of the Amended and Restated Surface Use and Damage Agreement (the "SUDA") between the surface owners and the Applicant dated January 25, 2017. Final reclamation will require complete removal of the outlet structure including the sediment basin riser pipes in both the SUDA and under COGCC Rule 1004. The final reclaimed site must be inspected by a COGCC inspector and must meet the State's reclamation threshold as outlined in 1004 c. in order to release financial assurance back to the Applicant. Applicant agrees to maintain the outlet structure over the life of the pad and agrees to enter into an Inspections and Maintenance Agreement (I&M Agreement) with the City.*

*(See attached email from Laura Rickhoff dated November 22, 2019.)*

1N. Once the drainage easement is complete, a License Agreement will be required for the outlet structures- see the redline on Sheet 9 (Real Property)

**RESPONSE:** Pursuant to email from Laura Rickhoff dated December 5, the City agreed that a drainage easement is not necessary as Applicant has instead redesigned the outlet structure which the City. Therefore, a License Agreement is not required.

1O. A License Agreement will be required for the access across Powhatan and the culvert- see the redline on Sheet 10 (Real Property)

**RESPONSE:** Access road was approved and constructed as a part of Phase 1 (#2017-6057-00) and is depicted as an existing condition on the "Existing Conditions" Sheet. There is no culvert located within the prescriptive easement for Powhatan Rd.

1P. Traffic sign labels appear missing or truncated on Sheets 7, 10, and 13. (Traffic Engineering)

**RESPONSE:** Sign labels added.

1Q. See redline comments on Sheet 17 regarding required auxiliary lanes. (Traffic Engineering)

**RESPONSE:** Acknowledged.

2. **Vicinity / Context Map (Planning)**

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

**RESPONSE:** Acknowledged.

3. **Interim Reclamation Plan (Planning)**

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

**RESPONSE:** Acknowledged.

4. **Visual Mitigation Plan (Planning)**

4A. N/A

5. **Landscape Plan (Planning/Landscape)**

5A. Please continue to incorporate into the overall Plan Set, and do not upload separately.

**RESPONSE:** Acknowledged.

6. **Lighting Plan (Planning) Field-Wide Lighting Plan**

6A. The field-wide Lighting Plan was not submitted but has been previously accepted by the City.

**RESPONSE:** Acknowledged.

**Site-Specific Plan**

6B. Please continue to incorporate into the overall Plan Set.

**RESPONSE:** Acknowledged.

7. **Building and Structure Elevations (Planning)**

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

**RESPONSE:** Acknowledged.

**LETTER OF INTRODUCTION COMMENTS**

8. **Project Summary (Planning)**

8A. Add a paragraph on equipment, such as: "Equipment will consist of a temporary drill rig and associated support equipment, followed by a completion phase utilizing hydraulic fracturing, and ultimately 7 wellheads with minimal on-site pumping and oil and gas equipment."

**RESPONSE:** Project summary language updated.

9. **Applicable BMPs Addressed (Narrative List) (Planning)** 9A. Noise Mitigation

- Provide a summary of the results of the baseline ambient sound level study.

**RESPONSE:** Summary of results added.



- List the chosen noise mitigation measures, and briefly describe how the mitigation will be monitored for success.

**RESPONSE:** *Chosen noise mitigation added. Sound measurements can be taken during implementation of the project to validate the model and the effectiveness of the proposed mitigation measures.*

9B. Plugged and Decommissioned Well Testing

- Add language that the applicant will keep the City informed as to the timing and results of soil testing

**RESPONSE:** *BMP Language updated.*

10. Neighborhood Meeting Schedule / Results (Planning) 10A. This is acceptable as submitted.

10A. **RESPONSE:** *Acknowledged.*

10B. Additional Comments received by the City:

- Name: Darrell Eurich

Organization: 126 N. Ider Street, Aurora CO 80018 (darrell.eurich@gmail.com)

Comment: "I oppose any additional wells to be added to this project in phase 2. Only the 2 wells approved in phase 1 should go forward for review. There should not be any additional wells added after phase 1 approval. Adding more wells should require new applications for each new well!"

**RESPONSE:** *Phase 1 of this project was fully approved as of March 7, 2018. This application is for the new wells.*

- Name: Urban Drainage and Flood District Organization: submittals@udfcd.org

Comment: "We have no comments on the referenced project as it is not eligible for maintenance. The site is not adjacent to a major drainageway or mapped floodplain and does not include any proposed UDFCD master plan improvements. We do not need to review future submittals."

**RESPONSE:** *Acknowledged*

- Name: Sue Liu

Organization: Arapahoe County Public Works and Development, 6924 South Lima Street, Centennial CO 80112  
Comment: "The Arapahoe County Public Works and Development – Engineering Services Division appreciates the opportunity to review and comment on the Eastern Hills North Phase 2 – Oil and Gas Permit project. We have reviewed the project documents and offer the following comment:

1. A \$7,500 road impact fee is required for each well if the County's right-of-ways are proposed as the haul route. Please coordinate with the County Oil and Gas Specialist, Diane Kocis at 720-874-6650, if any questions occur to this fee.

2. Please coordinate with the County Inspector, Wayne Habenicht at 720-874-6500 to determine the associated permits required for using the County right-of-ways as the haul route.

Thank you again for the opportunity to review this project and continued correspondence in this matter. Please let me know if you need additional information or clarification on any item listed above."

**RESPONSE:** *Acknowledged. ConocoPhillips will coordinate with Arapahoe County.*

- Name: David Murphy

Organization: 237 S. Newbern Court, Aurora CO 80018 (davidmurphy22@yahoo.com)

Comment: "As a property owner in the Adonea subdivision, I am opposed to all the oil/gas wells constructed with less than a one mile setback from all residential neighborhoods. Currently the Eastern Hills North is less than half a miles from houses. But clearly the City of Aurora is going to move forward with granting

permits without listening to the people impacted by these wells. Since the City of Aurora is going to receive a windfall tax revenue from these wells, is the city willing to reduce our property tax bill? Currently all property owners have to pay an 'extra' mill levy tax called the 'Adonea Metro District #2' tax at a rate of 79.232?"

**RESPONSE:** *At ConocoPhillips, we believe that to be a good corporate citizen, we must first be good neighbors. We are committed to be an environmentally prudent operator and to protect the health and safety of all people living and working around our locations.*

- Name: Terri Maulik

Organization: Arapahoe County Planning Division, 6924 South Lima Street, Centennial CO 80112

Comment: "Thank you for the opportunity to review and comment on this project. If County roads will be used for this project, the applicant must provide Arapahoe County road impact fees and arrange a preconstruction inspection with Engineering Services."

**RESPONSE:** *Acknowledged. ConocoPhillips will coordinate with Arapahoe County.*

- Name: Donna George

Organization: Public Service Company of Colorado dba Xcel Energy

Comment: "Public Service Company of Colorado's (PSCo) Right of Way & Permits Referral Desk has reviewed the second referral oil and gas well permit documentation for Eastern Hills North Phase Two and acknowledges working with electric distribution personnel for power needs at the project site.

However, pertaining to the existing electric transmission facilities along Powhaton Road, for safety reasons, PSCo advises the property owner/developer/contractor to contact our Siting and Land Rights department at [www.xcelenergy.com/rightofway](http://www.xcelenergy.com/rightofway) or email [coloradorightofway@xcelenergy.com](mailto:coloradorightofway@xcelenergy.com) to have this project assigned to an Agent for development plan review, and execution of a License Agreement as necessary."

**RESPONSE:** *No construction is planned within the PSCo easement. The access road was completed in Phase 1 and is an existing condition for which a license agreement was executed.*

- Name: Annemarie Heinrich Organization: Tri-County Health Department

Comment: "Thank you for the opportunity to review and comment on the Oil and Gas Permit Amendment for the approval of the second phase, consisting of seven (7) additional wells, of a multi-well oil and gas permit on 7.7 acres located southwest of Powhaton Road and Alameda Avenue. Tri-County Health Department (TCHD) staff previously reviewed the application for the Development Permit and provided comments in a letter dated October 31, 2018.

TCHD received a response from the applicant, dated February 5, 2019, and the applicant has responded to our comments. Please feel free to contact me at 720-200-1585 or [aheinrich@tchd.org](mailto:aheinrich@tchd.org) if you have any questions."

**RESPONSE:** *Acknowledged*

#### 11. Response to Initial Review Comment Letter (Planning)

11A. This is acceptable as submitted.

**RESPONSE:** *Acknowledged.*



## **OPERATIONS PLAN COMMENTS**

### **12. Operations Plan (Planning)**

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

**RESPONSE:** *Acknowledged.*

### **13. Project Development Schedule (Planning)**

13A. Please show dates for the overall Completions Phase as well.

**RESPONSE:** *Acknowledged*

13B. Define “Toe Prep” and “PDO/Tbg”.

**RESPONSE:** *Toe Prep: operation where we initiate the Toe Valve at the bottom-hole of the well to allow for Completions tools to be pumped downhole for Completions Operations. PDO/Tbg: Plug Drill Out and Tubing Installation.*

13C. Clarify whether the Reclamation Phase Start and End are the Final or Initial Reclamation (no dates provided, so it’s unclear).

**RESPONSE:** *Clarification added*

### **14. Security Plan (Planning)**

14A. This requirement was satisfied at initial submission.

**RESPONSE:** *Acknowledged*

15. **Decommissioning / Final Reclamation Plan (Planning)** 15A. This requirement was satisfied at initial submission.

**RESPONSE:** *Acknowledged*

## **EMERGENCY RESPONSE PLAN COMMENTS**

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

16A. The field-wide Emergency Response Plan has been previously accepted by the City. Please note that the Rush North site-specific ERP is attached to the Eastern Hills North field-wide ERP at this second submission; this will not affect the City’s previous approval of the field-wide ERP as that approval didn’t include any site-specific information.

**RESPONSE:** *Acknowledged*

Site-Specific Plan

16B. This requirement is acceptable as submitted.

**RESPONSE:** *Acknowledged*

### **17. PHA-HAZOP Analysis (Building/Life Safety) Field-Wide**

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

**RESPONSE:** *Acknowledged*

Site-Specific

17B. This requirement is acceptable as submitted.

**RESPONSE:** *Acknowledged*

## **COMMENTS ON OTHER REQUIRED ITEMS**

### **18. Traffic Letter / Plan (Traffic)**

18A. Traffic Letter is accepted (identified auxiliary lanes with met thresholds are required). Continue to submit this letter for Eastern Hills South and Grande South when they are submitted.

***RESPONSE: Acknowledged***

19. **License Agreements (Real Property)**

19A. This requirement was satisfied at initial submission.

***RESPONSE: Acknowledged***

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

20A. The version of the Agreement submitted is acceptable to Real Property.

***RESPONSE: Acknowledged***

21. **Property Owner Authorizations (Real Property)**

21A. This requirement was satisfied at initial submission.

***RESPONSE: Acknowledged***

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

22A. This requirement was satisfied at initial submission.

***RESPONSE: Acknowledged.***

23. **Groundwater Quality Monitoring Plan (Water)**

23A. Until initial sampling, City staff and COPC environmental staff will have a standing call every other week to provide an update on the sampling and/or (if applicable) status update of the “requested well” installation schedule.

***RESPONSE: Acknowledged***

23B. If applicable and as noted in the submittal, COPC will notify the City at least 40 weeks prior to drilling if the

“requested well” is not possible and that parties (City and COPC) will have to pursue the “easement well” protocol in order to comply with the monitoring well requirement.

***RESPONSE: Acknowledged***

23C. If applicable and as noted in the submittal, COPC will notify the City immediately of any delays outside of COPC’s control.

***RESPONSE: Acknowledged***

23D. The field-wide Groundwater Quality Monitoring Plan has been previously accepted by the City.

***RESPONSE: Acknowledged***

24. **Fugitive Dust Suppression Plan (Water)**

24A. This requirement was satisfied at initial submission.

***RESPONSE: Acknowledged***

25. **Fluid Disposal Plan (Water)**

25A. This requirement was satisfied at initial submission.

***RESPONSE: Acknowledged***

26. **Water Use Plan CDPHE Reg. 84**

26A. N/A

27. **Weed Control Plan (Water and PROS)**

27A. This requirement was satisfied at initial submission.

***RESPONSE: Acknowledged***



28. **Wildlife Impact Mitigation Plan (PROS)**

28A. This requirement was satisfied at initial submission.

**RESPONSE:** *Acknowledged*

29. **Stormwater Management Plan**

29A. 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.

**RESPONSE:** *Acknowledged*

30. **Preliminary Drainage Report / Letter**

30A. 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.

**RESPONSE:** *Acknowledged*

31. **Road Maintenance / Construction (Public Works)**

31A. An amendment is under review by the City.

**RESPONSE:** *Acknowledged*

32. **Air Quality Plan (Planning) Field-Wide Plan**

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

**RESPONSE:** *Acknowledged*

**Site-Specific Plan**

32B. 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:** *Acknowledged*

32C. The Plan should also reference health-based criteria for exposure limits, as found in the NAAQS and ATSDR, and how the reports will include trend identification related to increases / decreases / spikes in concentration or emissions.

**RESPONSE:** *In the future, as the plans are developed, health-based criteria for exposure limits (as found in NAAQS and ATSDR) will be referenced and incorporated into targeted alert levels and reports*

33. **Noise Management Plan (Planning)**

33A. Provide the results of the baseline ambient sound level study.

**RESPONSE:** *The results of the ambient sound level study were originally delivered as a separate report to ConocoPhillips. The full contents of that report have been added to Section 3 – Ambient Sound Level Survey and Appendix B – Ambient Sound Level Survey Data of the revised noise modeling report dated 11-21-19.*

33B. Explain the referenced “adjustment to the allowable dBC noise limit from 65 dBC to 66.6 dBC” on page 6 of the Noise Modeling Report.

**RESPONSE:** *Section 3 of the revised noise modeling report dated 11-21-19 includes Table 3-2 and a preceding paragraph to explain why this particular data from the ambient sound level survey is relevant to the OA code and this noise modeling report. Additional verbiage on P.9 and P.10 of the noise modeling report dated 11-20-19 has been added to further clarify the permissible code limit adjustments allowed in Section 2.6 of the OA, supported by the ambient data presented in Section 3 of the report, and presented in Table 4-2 of the report.*

33C. Be clear as to what listed noise mitigation measures will be chosen for the site, and explain how the ambient noise level results are factored on. Additionally, how will the mitigation measures be monitored for success?

**RESPONSE:** The recommended mitigation measures are listed and discussed in Section 5.2 of the noise modeling report dated 11-21-19. The mitigation measures presented in this report are recommendations based upon the data collected and the analysis performed by BAENC. The selection of the mitigation measures to be installed is at the discretion of ConocoPhillips. Please note that the analysis is based upon the drilling and completions equipment selection and orientation as outlined in Section 5 the report. Changes to either could affect the predicted performance or selection of the recommended mitigation and if such changes occur it may be advisable to update the noise modeling study accordingly. The second paragraph of P.13 and P.20 has additional language clarifying that the ambient data is not included in the modeling results and why. The OA does not currently provide any outline or requirement for how acoustical mitigation measures will be “monitored for success”. BAENC is capable of providing either Compliance Sound Level Surveys and/or Web-Based Continuous Sound Level Monitoring Systems that could satisfy this request.

34. **Application Form (Planning)**

34A. This requirement is acceptable as submitted.

**RESPONSE:** Acknowledged

35. **1-Mile Radius Abutters List (Planning)**

35A. This requirement is acceptable as submitted.

**RESPONSE:** Acknowledged

36. **COGCC Forms / 2A (Planning)**

36A. This requirement is acceptable as submitted.

**RESPONSE:** Acknowledged

If you have any additional questions, please do not hesitate to contact me directly at 720.249.3539.

Sincerely,

**CVL Consultants of Colorado, Inc.**



Melinda Lundquist, PE  
Senior Vice President



## Denzer, Kathy F

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**From:** Rickhoff, Laura <lricks@auroragov.org>  
**Sent:** Friday, November 22, 2019 5:24 PM  
**To:** Blair, Maxwell O; Denzer, Kathy F; Melinda Lundquist  
**Cc:** Irvin, Vinessa; Dekoskie, Steven; Bender, Janet; Horstmann, Richard; Rachael, Victor; McKenney, Christine  
**Subject:** [EXTERNAL]detention reqs - Eastern Hills North and Grande North

Max, Kathy and Melinda,

Thank you for your patience as staff met internally this week to further discuss our meeting this past Tuesday. In an effort to continue to move Eastern Hills North and Grande North towards resubmittal and permit issuance, while still satisfying the requirements of Public Works and Water, we present the following solution for these two applications:

Please design these sites to include outlet structures constructed to release stormwater at rates consistent with sediment basin riser pipes. For these two sites, the sediment basin may essentially remain the same, but must include a permanent outlet structure.

If there is language in the surface use agreements for these two sites which details final reclamation and removal of the sediment basin, please provide this. We are trying to help you avoid obtaining drainage easements on these properties, but still must ensure that final reclamation will occur. I realize you speak to final reclamation in your Operations Plan, Introduction Letter and in the SWMP (final rec plan included), and so I think if you can ensure future removal of the basin, we will not need the drainage easement, and subsequently, the license agreement.

However, we need to ensure that COPC will maintain the basin over the life of the pad, so we will require an Inspections and Maintenance (I&M) agreement. This may come in with your civil resubmittal and is a standard detention basin requirement.

Please note that we are meeting internally next week to further discuss Water and Public Works requirements moving forward, and to progress efforts to standardize City processes, regardless of the type of development. We will certainly take your concerns into consideration going in to these meetings.

Please let me know if you have questions, and have a nice weekend.

**Laura Rickhoff**

Project Coordinator  
Office of Development Assistance | City of Aurora  
direct 303.739.7585

