

September 17, 2021

Mr. Colin Brown, Senior Planner
City of Aurora Oil and Gas
15151 E. Alameda Parkway, Suite 5900
Aurora, CO 80012

Re: Initial Submission Review Grande North Lateral Crude Oil Pipeline No 3 Site Plan Amendment
Application Number: **DA-2201-03**
Case Numbers: **2019-6048-02**

Dear Mr. Brown:

Westwood has received comments from City of Aurora, Arapahoe County Public Works and Tri-County Health Department and Xcel Energy for the above referenced project. We have restated the comments below and addressed them per the bold, italicized responses.

CITY OF AURORA OIL AND GAS, Colin Brown, Senior Planner
PLAN SET COMMENTS

1. Plan Set

1A. Add the following Notes to Sheets 1-4 (Planning):

• Comment: “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. For accuracy however, the note has been revised to remove the references to ‘Flowline’. Per the COGCC definition, flowlines are the piping between the wellhead and the facilities (i.e.: tanks and separators) which are located on the well pad and belong to the drilling operator. The crude oil gathering system included in this plan set does not include flowlines. Additionally, in the second sentence the word ‘surround’ has been updated to ‘surrounding’

• Comment: “All amendments to this site plan shall utilize easements that do not significantly encumber curbside landscaping or street frontage landscape buffers for future developments. This can be done by either locating all easements outside of these identified areas or including easement language that allows sufficient plantings (as determined by the City landscape architect) to be installed within easements.”

Response: Completed.

1B. Sheet 16 (Planning)

• Comment: Update label on Grande South Pad to reflect Crestone Peak Resources as owner/operator.

Response: Completed.

1C. Sheet 56 (Planning)

• Comment: Add COA SWMP Approval #219249 to label on Grande North Pad.

Response: Completed.

2. Vicinity / Context Map (Planning)

2A. Comment: This requirement is acceptable as submitted.

Response: Acknowledged.

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

Response: Completed.

8B. Comment: For any approved, field wide plan or road maintenance agreement mentioned in the Letter of Introduction and BMPs, please reference the standard Version numbering/naming conventions (i.e. DJSI Field Wide Integrity Management Plan Version 2021.06.23).

Response: Completed.

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

9A. Comment: For any approved, field wide plan or road maintenance agreement mentioned in the BMP Narrative List, please reference the standard Version numbering/naming conventions (i.e., DJSI Field Wide Integrity Management Plan Version 2021.06.23).

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 3/4/2021.

Response: Acknowledged.

10B. Comment: Additional Electronic Comments received by the City:

• Name: Kathy Boyer, REHS

Organization: Tri-County Health Department, 6162 S. Willow Drive, Suite 100, Greenwood Village CO 80111
(kboyer@tchd.org)

Comment: Please see the attached letter.

• Name: Sue Lie, P.E.

Organization: Arapahoe County Public Works and Development 6924 South Lima Street, Centennial CO 80112
(publicworks@arapahoegov.com)

Comment: Please see the attached 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 the attached letter

• Name: Diane Kocis
Organization: Arapahoe County Planning Division 6924 South Lima Street, Centennial CO 80112
(referrals@arapahoe.gov)
Comment: THANK YOU FOR THE OPPORTUNITY TO REVIEW AND COMMENT ON THIS PROJECT. THE ARAPAHOE COUNTY PLANNING DIVISION HAS NO COMMENTS; HOWEVER, OTHER DEPARTMENTS AND/OR DIVISIONS MAY SUBMIT COMMENTS
Response: Acknowledged.

11. Response to Pre-Application Comments (Planning)

11A. Comment: This requirement is acceptable as submitted.
Response: Acknowledged.

OPERATIONS PLAN COMMENTS

12. Operations Plan (Planning)

Integrity Management Plan

12A. Comment: This requirement was satisfied with the approved DJSI Wide Integrity Management Plan Version 2021.06.23

Response: Acknowledged.

Operations Plan

12B. Comment: This requirement was waived during the Pre-Application meeting on 3/04/2021.

Response: Acknowledged.

13. Project Development Schedule (Planning)

13A. Comment: This requirement is acceptable as submitted.

Response: Acknowledged.

14. Security Plan (Planning)

14A. Comment: The Security Plan requirement was waived during the Pre-Application meeting on 3/04/2021.

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 DJSI Field Wide ERP Version 2021.07.13.

Response: Acknowledged.

Site-Specific Plan

16C. 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 DJSI Field Wide Surge Study Report Version 2021.07.13.

Response: Acknowledged.

17B. Comment: The Letter of Introduction states that “a site specific PHA-HAZOP letter is included with this submittal.”, but the Letter was not uploaded to the portal. Please upload the site specific PHA-HAZOP letter with your next submittal.

Response: No Site Specific PHA-HAZOP Letter is required for this project. The statement has been removed from the pre-app review comments. The following response is included in the Letter of Intent under BMP #24 PHA-Hazard and Operational Study: “24. PHA-Hazard and Operability Study: A Fieldwide System Surge Study Report was approved with the original application to satisfy the requirement for a PHA-HAZOP Study. The Surge Study Report provided to and approved by City staff in March of 2019 adequately addresses the additional production volumes and related pressure changes resulting from the connection of the Cottonwood Creek North well pad. The DJ South Infield Gathering Crude Oil Pipeline system is designed and rated to handle pressures in excess of 1480 PSI but runs at a standard operating pressure of only 740 PSI, which allows for any variations in pressure caused by routine pipeline isolations or shut ins, and/or additional production from new well connections. Therefore, no site specific letter or report is needed for this project.”

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 3/04/2021.

Response: Acknowledged.

19. License Agreements (Real Property)

19A. Comment: License Agreements will only be required when there are encroachments to future or existing City ROW's, easements or City owned property. Make sure all current and future road crossings are covered by a License Agreement. For clarification, easements will not be given by the City.

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 was satisfied with the approved DJSI Field Wide Weed Control Plan Version 2021.06.23

Response: Acknowledged.

28.Wildlife Impact Mitigation Plan (PROS)

Field-Wide Plan

28A. Comment: This requirement was satisfied with the approved DSI Field Wide Wildlife Impact Mitigation Plan Version 2021.06.23.

Response: Acknowledged.

Site Specific Plan

28B. 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. Comment: *FYI:* 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. No detention basins are proposed for this project.

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

Response: Acknowledged. No detention basins are proposed for this project.

29E. Comment: *FYI:* 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. No detention basins are proposed for this project.

30. Preliminary Drainage Report

30A. Comment: The Preliminary Drainage Report requirement was waived during the Pre-Application meeting on 3/04/2021.

Response: Acknowledged.

31. Road Maintenance / Construction (Public Works)

31A. Comment: This requirement was satisfied with the approved DJSI crude oil gathering system application (DA 2201-00, Case Number 2019-6048-00).

Response: Acknowledged.

32. Air Quality Plan (Planning)

32A. Comment: This requirement was satisfied with the approved DJSI Field Wide Air Quality Plan Version 2021.06.23.

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: Please update the Checklist with the version numbers for all approved Field Wide plans.

Response: Completed.

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.

37. Insurance Forms (Planning)

37A. Comment: This requirement is acceptable as submitted.

Response: Acknowledged.

ARAPAHOE COUNTY PUBLIC WORKS & DEVELOPMENT, Sue Liu, PE

Comment: Engineering Services Division of Arapahoe County Public Works and Development (Staff) thanks you for the opportunity to review the outside referral for the proposed project located in the City of Aurora. Staff has no comments regarding the referral at this time based on the information submitted.

Response: Acknowledged.

Comment: Please know that other Divisions in the Arapahoe County Public Works Department may submit comments as well.

Response: Acknowledged.

TRI-COUNTY HEALTH DEPARTMENT, Kathy Boyer REHS

Sanitary and Solid Waste Disposal

Comment: The application does not specify how sanitary and solid waste will be provided during the construction for construction workers. We anticipate that trash dumpsters and portable toilets will be necessary during construction. TCHD has no objection to the use of portable toilets, provided they are properly maintained. TCHD recommends that the applicant address these, in terms of numbers, locations, and vendor.

Response: Portable toilets may be located along the pipeline corridor. They shall be securely staked on a flat surface, so that they do not fall over. Placement of toilets shall consider nearby equipment, drainageways and vehicular traffic so they are not inadvertently knocked over.

XCEL ENERGY, Donna George, Right of Way and Permits

Comment: Public Service Company of Colorado's (PSCo) Right of Way & Permits Referral Desk has reviewed the site plan amendment for Grande North Lateral Crude Oil Pipeline No. 3. Please be aware PSCo owns and operates existing overhead electric distribution facilities along Powhaton Road. Bear in mind that per the National Electric Safety Code, a minimum 10-foot radial clearance must be maintained at all times from all overhead electric facilities including, but not limited to, construction activities and permanent structures.

Response: Acknowledged. No disturbance is proposed within any Xcel Right-of-Way for this project.

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. No disturbance is proposed within any Xcel Right-of-Way for this project.

If you have any questions, please feel free to contact me at 720-249-3539.

Please contact me if you have any questions.

Sincerely,



Westwood Professional Services Inc.
Melinda Lundquist
Director, Private Development Division