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September 12, 2019

Kathy Denzer  
Conoco Phillips Company  
34501 E. Quincy Ave, Bldg 1  
Watkins, CO 80137

**Re: Second Submission Review**– Rush North – Oil and Gas Permit  
Application Number: **DA-2154-01**  
Case Numbers: **2019-6035-00**

Dear Ms. Denzer:

Thank you for your second submission, which we started to process on Wednesday, August 28, 2019. We reviewed it and attached our comments along with this cover letter. The first section of our review highlights our major comments. The following sections contain more specific comments, including those received from other city departments and community members.

Since several important issues still remain, you will need to make another submission. Please revise your previous work and send us a new submission on or before Thursday, September 19, 2019.

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 303-739-7209.  
Sincerely,

Juliana Berry, Planner II  
City of Aurora Planning Department

cc: Justin Garrett, Ascent Geomatics Solutions, 7535 Hilltop Circle, Denver, CO 80221  
Scott Campbell, Neighborhood Liaison  
Mark Geyer, ODA  
Filed: K:\SDA\2154-01rev2.rtf



## **RUSH NORTH OIL AND GAS PERMIT REVIEW**

### *Second Submittal Review*

#### **SUMMARY OF KEY COMMENTS FROM ALL DEPARTMENTS**

##### *Previous Comments:*

- Remove reference to Conditional Use (see Item 1)
- Provide a cut sheet detail of the proposed fixture, and add the associated details to the Lighting Fixture Schedule box. Location and type of lighting fixture must be final to determine compliance with the BMP (see Item 1)
- Show the proposed location of any buildings, and add dimensions to the associated labels. It is recognized that no buildings will be constructed by the applicant on this site; however, if a LACT structure or other buildings are anticipated to be erected by a pipeline company then those structures' elevations should be provided at third submission. (see Items 1 and 7)
- Make necessary Building/Life Safety revisions (see Items 1, 16, and 17)
- Address all applicable BMPs in the Letter of Introduction as a narrative; be site-specific and ***don't simply refer to where they appear in various plans*** (see Item 9)
- Explain how you will respond to specific neighborhood comments in the third submittal (see Item 10)
- The PHA-HAZOP analysis must be signed and stamped by a Professional Engineer (see Item 17)
- Turn-lane thresholds are believed to be met, and the lanes must be built (see Item 18)
- Provide a legible copy of all portions of the Surface Use Agreement in the third submittal (see Item 20)
- Revise the Groundwater Quality Monitoring Plan (see Item 23)
- Make necessary revisions to the submitted generic field-wide and site-specific Air Quality Plans (see Item 32)
- Address all sections of the Noise Mitigation BMP in the Noise Management Plan, and be consistent with adherence to the maximum permissible noise levels for a Light Industrial Use per COGCC Rule 604.c(2)A (see Item 33)
- Provide a notated and consistent checklist (see Item 34)

##### *New Comments:*

- Lighting notes must be in conformance with the BMP; no caveats are allowed (see Item 1)
- The Interim Reclamation Plan is meant to illustrate stabilization and maintenance of the area by compaction, coverage, paving, uniform vegetative cover, or other methods to minimize dust and erosion, per the COGCC definition; the Plan sheet is lacking these details (see Item 1)
- The City must receive the amended Form 2A prior to decision (see Item 36)
- 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 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](mailto:CADGIS@auroragov.org) for questions or more detailed instructions.
- Respond to additional redline comments



## **REVIEWERS**

- Planning – Steve Rodriguez and Juliana Berry / 303-739-7186 and 303-739-7209 / [srodrigu@auroragov.org](mailto:srodrigu@auroragov.org) and [jberry@auroragov.org](mailto:jberry@auroragov.org) / Comments in dark teal
- Planning/Landscape – Kelly Bish / 303-739-7189 / [kbish@auroragov.org](mailto:kbish@auroragov.org) / Comments in bright teal
- Public Works – Kristin Tanabe / 303-739-7306 / [ktanabe@auroragov.org](mailto:ktanabe@auroragov.org) / Comments in green
- Building/Life Safety – Will Polk / 303-739-7371 / [wpolk@auroragov.org](mailto:wpolk@auroragov.org) / Comments in blue
- Traffic – Brianna Medema / 303-739-7336 / [bmedema@auroragov.org](mailto:bmedema@auroragov.org) / Comments in orange
- Real Property – Grace Gray / 303-739-7277 / [ggray@auroragov.org](mailto:ggray@auroragov.org) / Comments in magenta
- Water – Steve Dekoskie and Joshua Godwin / 303-739-7490 and 720-859-4307 / [sdekoski@auroragov.org](mailto:sdekoski@auroragov.org) and [jgodwin@auroragov.org](mailto: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](mailto:cricciar@auroragov.org) and [cbish@auroragov.org](mailto:cbish@auroragov.org) / Comments in purple

## **SITE PLAN COMMENTS**

### **1. Site Plan**

- 1A. Show the proposed location of the LACT Building and other buildings and sand towers on the site plan (Real Property)
- 1B. Clearly show all boundaries with measurements of the site on the Site Plan as noted in the Exhibits for the Surface Use Agreement. (Real Property)
- 1C. Note the Quarter calls the site is located in with the Section, Township and Range. (Real Property)
- 1D. Make the lines of the road darker so it is visible. No portion of improvements can encroach ROW. (Real Property)
- 1E. Clearly show the Section line and quarter sections throughout the Site Plan. (Real Property)
- 1F. Revise Gate “Knox Hardware” to “Knox Box” (Building/Life Safety)
- 1G. Revise Fire Access Road Please revise Note 2. to include "clear of any structures or obstructions, and an all weather surface" (Building/Life Safety)
- 1H. Show the location for the ground water sampling well for this well site. All groundwater sampling wells to be located down gradient of the well pad site. (Water)
- 1I. Include all pipe sizes for the gathering laterals. (Water)
- 1J. Delineate separation distances from well heads to water mains. (Water)
- 1K. Please see the redline comments on Sheets 1 and 6 (Public Works)
- 1L. Sheet 1 (Planning)
  - Re-order the Sheet Index to show the Interim Reclamation Plan before the Drilling Operation Site Plan
  - Missing the USGS topo base to the Context Map from the initial submission. Add a colored legend for the Context Map
  - Re-word the Noise Mitigation Plan note (#6) to reflect the comments under the Noise Mitigation Plan section below
  - Identify the flowlines in note #11 as “on-location flowlines”
  - Fix the tree mitigation note (#12), amend to reflect that the site “will” (not “should”) be constructed in a manner to minimize the removal of and damage to existing trees, and elaborate on any existing trees needing mitigation per the BMP
  - Notes on the fencing from the initial submission is missing; add back in. Include the requested height detail from the initial review comment
- 1L. Sheet 2 (Planning)
  - Adjust with a new scale so that the Vicinity Map fits the Sheet
- 1M. Sheet 3 (Planning)
  - Darken the label arrow lines (not the drainage flow lines)
  - No trash disposal area? If intend, show and label with dimensions
  - Add the privacy fence with 8’ label
  - Use the context map instead of the vicinity map
  - General Construction Note #2 refers to layout changes; revise to indicate that the layout is final
  - Are the “proposed underground pipeline”s on-location flowlines? If so, amend the label

**1N. Sheet 4 (Planning)**

- Darken the label arrow lines (not the drainage flow lines)
- Is there designated permanent parking? If so, show and label
- “proposed well sign” should reference the signage page and read “proposed entry wellhead signs” instead
- Righthand title block is incorrectly titled “Exhibit 09 – Interim Reclamation Plan” instead of “Production Operations Site Plan”
- Add the privacy fence inset to the Interim Reclamation Plan Sheet
- Revise the “803. Lighting” note to reflect the initial submission and the Lighting BMP; no caveats are allowed per the BMP
- Are the “proposed underground pipeline”’s on-location flowlines? If so, amend the label

**1O. Sheet 6 (Planning)**

- Missing the USGS topo base to the Haul Route from the initial submission. Add a colored legend for the Haul Route
- Revise the “803. Lighting” note to reflect the initial submission and the Lighting BMP; no caveats are allowed per the BMP

**1O. Sheet 7 (Planning)**

- Add the height to the wildlife fence label instead of “XX”
- “proposed well sign” should reference the signage page and read “proposed entry wellhead signs” instead
- Will the privacy fence be present during interim reclamation? If so, show and label
- Will the temporary lighting be installed/utilized during interim reclamation? If so, show and label
- Are the “proposed underground pipeline”’s on-location flowlines? If so, amend the label
- How does this sheet address stabilization and maintenance of the area by compaction, coverage, paving, uniform vegetative cover, or other methods to minimize dust and erosion per the COGCC definition of interim reclamation?

This sheets appears to require major revision

**1P. Sheet 8 (Planning)**

- Add the height to the wildlife fence label
- Are the “proposed underground pipeline”’s on-location flowlines? If so, amend the label

**1Q. Sheet 10 (Planning)*****Previous Comments:***

- Provide a cut sheet detail of the proposed fixture, and add the associated details to the Lighting Fixture Schedule box
- Darken the fixture symbolization to make it easier to see
- Add a context map inset
- Remove reference to Conditional Use in the title

**1R. Sheet 11 (Planning)*****Previous Comments:***

- Eliminate mention of “typical drilling rig photometric plan” and that the actual configuration may vary; the lighting fixtures and locations should be determined now to prove compliance with the BMP
- Label and clarify the measured light intensity level inset; does this extend beyond the well site or property boundaries?
- Remove reference to Conditional Use in the title

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

2A. Continue to incorporate this Sheet into the overall Plan Set.

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

3A. Continue to incorporate this Sheet into the overall Plan Set.

**4. Visual Mitigation Plan**

4A. N/A

**5. Landscape Plan**

5A. This is acceptable as submitted.

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

6A. Adhere to the Lighting BMP: "Lighting must be downcast and will not shine beyond the boundaries...". Revise to prove conformance with all downcast fixtures and no possibility of light shining past the site borders.

**Site-Specific Plan**

6B. Continue to incorporate this Sheet into the overall Plan Set.

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

7A. Staff recognizes that no buildings will be constructed by the applicant on this site; however, if a LACT structure or other buildings are anticipated to be erected by a pipeline company then those structures' elevations should be provided at third submission.

**LETTER OF INTRODUCTION COMMENTS****8. Project Summary (Planning)**

8A. The description of the project, regarding the 8 proposed wells / purpose / equipment from the initial submission is missing, as is the requested detail of the permanent equipment from the PHA-HAZOP Analysis as requested in the initial review comments. Please add.

8B. Add the proposed cattle guards to the described safety features (fence and locked gate).

**9. Applicable BMPs Addressed (Narrative List) (Planning)****9A. Previous Comment:**

Not submitted; please provide *site-specific* details in the second submittal. *Do not* just refer to plan notes. Overlooked BMPs include, but are not limited to (Planning):

- Burning
- Class II Underground Injection Control Wells
- Cultural and Historical Research Protection
- Discharge Valves
- Electric Equipment
- Flowlines
- General Maintenance
- Low Profile Tanks
- Notifications to the City (Steve Rodriguez at [srodrigu@auroragov.org](mailto:srodrigu@auroragov.org) is preferred)
- Reduced Emission Completions
- Tree Mitigation
- Water Supply
- Wellbore Integrity and Aquifer Protection

**10. Neighborhood Meeting Schedule / Results (Planning)****10A. Received by the City (Planning):**

- *Name:* Cindy & Don Hull

*Organization:* 23768 E. Byers Place, Aurora CO 80018

*Comment:* "We are sending our vote as NO to this gas permit. We don't feel fracking belongs in areas that are primarily populated as residential. We don't want the environmental impact and upheaval to our places of refuge....our homes. Those of us with wells don't want to take the chance of chemicals leaching into our water source. And we'd be willing to bet if any of you lived in this area...you wouldn't want it either!!"



- *Name:* Sue Liu

*Organization:* Arapahoe County Public Works and Development – Engineering Services Division

*Comment:* “Thank you for the opportunity to review the outside referral for the proposed oil and gas pad site at southeast area of Jewell Ave and Powhatan Rd.

The purpose of this letter is to inform you that we have the following comments regarding the referral at this time based on the information submitted:

1. A \$7,500 road impact fee is required for each well using the County right-of-ways as 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 (such as Oversize/Overweight Vehicle Permit). Please know that other Divisions in the Public Works Department may submit comments as well.”

- *Name:* Urban Drainage and Flood District

*Organization:* Urban Drainage and Flood District

*Comment:* “This letter is in response to the request for our comments concerning the above referenced project. We generally have no comments on this project as it does not meet the requirements for maintenance eligibility. There does not appear to be any improvements in the floodplain and does not include any proposed UDFCD master plan improvements.”

- *Name:* Terri Maulik

*Organization:* Arapahoe County Planning Division

*Comment:* “If the applicant plans to use or uses Unincorporated Arapahoe County roads in the construction, drilling, completion or production phases, a road impact fee, on a per well basis, must be paid to Arapahoe County and a pre-construction inspection must be scheduled with the Arapahoe County Engineering Services Division.”

- *Name:* Donna George

*Organization:* Xcel Energy

*Comment:* “Public Service Company of Colorado’s Right of Way & Permits Referral Desk has reviewed the second referral documentation for Rush North and has no further concerns or comments to what was stated in the first submittal.”

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

11A. Please include how you will address public concerns from individuals and organizations who submitted comments separate from the Open House in the third submission.

## **OPERATIONS PLAN COMMENTS**

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

12A. Add the details from the initial submittal Operations Plan regarding surface holes, casing, water sampling, depth/dimensions/grade/psi, fracture stages, and add details from the anchoring BMP.

12B. Provide description of the secondary containment for above-ground storage during drilling, completion, flowback, and other produced fluids per the Closed-Loop Pitless Systems for the Containment and/or Recycling of Drilling Fluids BMP and per the initial submittal comments.

12C. Elaborate on conformance with the Wellbore Integrity and Aquifer Protection BMP (regarding continuous column of surface casing cement, production casing, and integrity testing and monitoring) per the initial review comments.

12D. Elaborate on conformance with the Transportation and Storage of Fluids BMP (regarding non-potable water for hydraulic fracturing transported by temporary above-ground water lines, the number/construction of permanent tanks and associated shutdown devices, valves/drip buckets and direction of vapor, and third-party trucking contractors’ HSE policies/training/environmental program/incident notification/reporting/investigations/bonding/vapor return lines/transfer trucks) per the initial review comments.





- 12E. Elaborate on the Combustion Devices BMP/Air Quality Plan per the initial review comments.
- 12F. Elaborate on the Cultural and Historical Resource Protection BMP to prove conformance.
- 12G. Identify whether a trailer is “construction” versus “temporary residential or security” wherever mentioned, per the Trailer BMP.
- 12H. Ensure that the locking gate and cattle guards at the site entrance are shown and labeled on the plans, along with dimensions.
- 12I. Elaborate on the Electric Equipment BMP to prove conformance.
- 12J. Elaborate on the Plugged and Decommissioned Well Testing BMP regarding reporting, notice, and soil gas survey to prove conformance.
- 12K. Elaborate on the Containment Berms and Automatic Safety Protective Systems BMPs to prove conformance.
- 12L. Reference that the PHA-HAZOP Analysis must be prepared by the Engineer of Record and stamped/signed by a Professional Engineer per the BMP and Building/Life Safety comments.

### **13. Project Development Schedule**

- 13A. This requirement was satisfied at first submittal.

### **14. Security Plan**

- 14A. This is acceptable as submitted.

### **15. Decommissioning / Final Reclamation Plan**

- 15A. This is acceptable as submitted.

## **EMERGENCY RESPONSE PLAN COMMENTS**

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

- 16A. *Previous Comment:* This information is required to verify that you have the correct contact information. Please provide the local notifications and LEPCs information.

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

- 17A. *Previous Comment:* The PHA-HAZOP portion of the site plan submittal shall be signed & stamped by a Professional Engineer.

## **COMMENTS ON OTHER REQUIRED ITEMS**

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

- 18A. See comments on Traffic Letter. Traffic Management Plan needs to be resubmitted and revised based on previous comments as well.
- 18B. The westbound left-turn threshold is believed to be met for the combined site access. Show a left-turn lane in the traffic letter and on the plans.
- 18C. The southbound right-turn lane threshold is met on Watkins & Jewell per the traffic letter. This lane must be built, and traffic control plans in lieu of a turn lane will not be accepted.
- 18D. The assumption that all water will be piped to the site is not reasonable. Assume water will also be trucked per previous traffic letter.

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

- 19A. Continue to complete the License with Tom Clark for the access road.

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

- 20A. *Previous Comment:* Some of the pages of the legal description in various Exhibits of the Surface Use Agreement are still illegible. Provide better copies that are legible.

### **21. Property Owner Authorizations**

- 21A. See comment 20A. above.



## **22. Water Delivery Method/Water Supply Plan**

22A. This is acceptable as submitted.

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

23A. It's recognized that potentially viable domestic wells have been identified for sampling. The comments below, while repeated on other response letters, are still applicable.

Many of the following comments have been addressed and discussed with ConocoPhillips. Those comments will be prefaced with "(Discussed)" to illustrate the comments that have been covered.

23B. (Discussed) The "Installation of Water Monitoring Well Process" document at the end of the variance request should be included in the field-wide plan and relabeled to "Installation of Monitoring Wells"

23C. (Discussed) When existing water wells to sample, it needs to be clarified that domestic water wells are being discussed.

23D. (Discussed) Under section 2.0 paragraph 2, when discussing "Due Diligence", it's highly recommended that APTIM/ConocoPhillips include contacting the owners of the identified wells to sample as part of their Due Diligence prior to submitting an application to the City. If it's found that the well(s) assumed for sampling are not available, then it could delay your schedule.

23E. (Discussed) Below is the **current** "Installation of Monitoring Wells" section of the Field-Wide submittal that is a collaborative product between COP staff and City staff:

*If the City requires the installation of water monitoring well(s) (Requested Wells), the following will occur.*

*1. Prior to ConocoPhillips submitting the O&G permit to the City, ConocoPhillips will attempt to obtain rights to drill water monitoring well(s) on property down gradient from the proposed O&G location.*

*a. APTIM will perform the preliminary surface location review and provide a downgradient map and will also coordinate with ConocoPhillips Surface Land to identify the optimal monitoring well location(s) and obtain rights to a downgradient location(s) from surface landowners. Monitoring well location options will be communicated with the City prior to finalizing the location with the surface landowner.*

*2. Once rights to drill are obtained by ConocoPhillips and after receiving notice to proceed, APTIM will submit permit application(s) to install monitoring well(s) to the SEO. It is anticipated that monitoring well(s) will be installed at least one month prior to the commencement of drilling for the O&G location.*

*a. Monitoring wells will be installed as either a nested well or as individual wells capable of testing all available aquifers downgradient from the O&G location and will be located on or near the location. ConocoPhillips and the City will agree on the placement, design, and installation schedule of the monitoring well(s) prior to monitoring well permit submittal to the SEO.*

*3. If ConocoPhillips is unable to obtain rights to drill a monitoring well on property down gradient from the proposed O&G location, the City may request that ConocoPhillips drill monitoring well(s) capable of testing all available aquifers on one of the City of Aurora's existing easements (Easement Well) within ½ mile of the O&G location.*

*a. If an Easement Well is requested, ConocoPhillips and the City will coordinate to identify the optimal monitoring well location(s) downgradient from the O&G location. Once the location is finalized, APTIM will submit permit application(s) to install monitoring well(s) to the SEO. It is anticipated that monitoring wells will be installed at least one month prior to the commencement of drilling for the O&G location.*

*b. Monitoring wells will be installed as either a nested well or as individual wells capable of testing all available aquifers on one of the City of Aurora's existing easements. ConocoPhillips and the City will agree on the placement, design, and installation schedule of the monitoring wells prior to monitoring well permit submittal to the SEO.*

*c. If the City has not obtained an easement prior to ConocoPhillips beginning drilling operations, the City may request the easement well be installed anytime during the drilling, completions, or production phase of the O&G well once the City has obtained a suitable easement.*





4. *The City's request to drill a City Easement Well is outside of the O&G permit application process. The City shall not delay the O&G permit application process if the City chooses to request that Operator drill a City Easement Well. The City shall process Operator's OGP's once the Operator has complied with or received a variance regarding the Baseline Water Quality Testing or has agreed to drill a Requested Well.*
5. *Monitoring wells will be constructed according to industry standards as per the Well Construction Rule 2 CCR 402-2 and according to any permit requirements as directed by the SEO. Construction diagrams which are representative of typical monitoring well construction as per Rule 2 CCR 4020-2 are shown in Figure 2. Construction diagrams specific to this O&G location will be provided as part of continued discussions with the City regarding monitoring well construction, placement, and approval for this O&G location.*
6. *Testing of these monitoring wells will be conducted using standard industry procedures, consistent with the COGCC Rule 609 Model Sampling and Analysis plan and will include the intervals and analytes as listed in Section 3.2 and 4.0 below for baseline and subsequent sampling.*
7. *The anticipated monitoring well permitting and installation schedule is included in Appendix C.*
8. *Any timelines listed herein will be subject to change based on City requirements and O&G location specific issues which may be outside of ConocoPhillips' control.*
- 23F. (Discussed) Under the section titled "Well Owner Communication", add a paragraph that includes what steps the operator will take if the wells to sample become unavailable, both prior to drilling as well as after the SPUD date.
- 23G. (Discussed) In figure 1, "permitted wells within a ½ mile radius", include "expected" down gradient zones for both the Denver Basin and the Alluvial aquifers.
- 23H. (Discussed) If a drilling a monitoring well ("requested well" or "city easement well") is anticipated, then include the schedule, location, and design to install the well in the site specific submittal. These are required for a conditional permit. An anticipated "city easement well" timeline of events is needed in the "Installation of Monitoring Well" section.
- 23I. (Discussed) Because of the possibility that the applicant may not fulfill all obligations prior to obtaining a permit and has expressed a desire to not impede their intended schedule, a conditional permit may be issued. Conditions set in the conditional permit are such that if the requirements listed are not met by listed dates, then the permit can be revoked until requirements are met.

#### **24. Fugitive Dust Suppression Plan**

24A. This is acceptable as submitted.

#### **25. Fluid Disposal Plan**

25A. This is acceptable as submitted.

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

26A. N/A

#### **27. Weed Control Plan**

27A. This is acceptable as submitted.

#### **28. Wildlife Impact Mitigation Plan**

28A. This is acceptable as submitted.

#### **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.

#### **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.

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

31A. An amendment to the Road Maintenance Agreement is required before the proposed haul route can be utilized; the amendment is in process but not yet complete. Please see the redline comment on page 1.

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

32A. Add in the Odor BMP (routing to close-loop systems)

32B. Tie the air pollutant data to health-based criteria for exposure limits and exceedances of National Ambient Air Quality Standards (NAAQS) or Agency for Toxic Substances and Disease Registry (ATSDR) acute or chronic exposure levels. Explain how you will use this data to evaluate the adequacy of any air pollution control devices and emission reduction measures.

32C. Data communication should include trend identification related to increases/decreases/spikes in concentration or emissions.

*New Comment:*

32D. See redline comments.

**Site-Specific Plan**

32E. Add in the site-specific power source (electric power part of BMP).

32F. Add in the Tier 2 and Tier 4 fracturing pump utilization from the Field-Wide Plan.

32G. See redline comments.

**33. Noise Management Plan (Planning)***Previous Comments:*

33A. Be consistent with adherence to the maximum permissible noise levels for a ***Light*** Industrial use per COGCC Rule 604.c(2)A, *and* to the Operator Agreement BMP with respect to compliance with maximum permissible noise levels for land use type Residential/Agricultural/Rural or four dB(A) higher than baseline ambient sound during all well site phases other than construction, drilling, or completions.

33B. Address the Noise Mitigation BMP with respect to adjacency to residential building units (1,320 feet) or high occupancy buildings (1,500 feet) and associated additional noise mitigation based on site-specific characteristics such as the nature and proximity to nearby development, prevailing weather patterns, and vegetative cover and topography- ***Specifically, assess whether any residential building units are within 1,320 feet or within the applicable zone and longitudinal location listed in sections 2.3, 2.4, and 2.6 of the BMP, and provide mitigation as applicable***

**34. Application Form (Planning)**

34A. Be consistent with the Checklist- Don't reference internal exhibit numbers, and either don't indicate previous submission stage or remove from the notations (i.e. the neighborhood meeting schedule / narrative list of BMP compliance in the Letter of Introduction / Response to PreApp Notes / Application Form checklist / 1-mile Radius Map & Abutters were not included with the first submittal upload, license agreements and Water Use Plan are not checked off but are shown to have exhibit numbers, and Form 2A is being revised).

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

35A. The radius map and abutters list provided as a separate upload is for ½ mile; please revise to show a radius of 1 mile and abutters list for within that mile as the PDF.

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

36A. This requirement was satisfied at first submittal; but if the Form is being revised for the COGCC then the City must receive the amended form prior to decision.