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August 10, 2021

Amanda Martin  
DJ South Infield Gathering LLC  
1600 Broadway Suite 2400  
Denver, CO 80202

**Re: Initial Submission Review**– Cottonwood Creek North Lateral Crude Oil Pipeline No 1 – Site Plan Amendment  
Application Number: **DA-2201-01**  
Case Numbers: **2019-6048-01**

Dear Ms. Martin:

Thank you for your initial submission, which we started to process on Monday, July 19, 2021. 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 remain, you will need to make another submission. Please revise your previous work and send us a new submission on or before Tuesday, August 17, 2021. Your administrative decision date is tentatively set for Wednesday, September 1, 2021.

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 contact me. I can be reached at [cmbrown@auroragov.org](mailto:cmbrown@auroragov.org) or 303-739-6824.

Sincerely,

Colin Brown, Senior Planner  
Oil and Gas Division - City of Aurora

cc: Melinda Lundquist, CVL Consultants of Colorado Inc 10333 E Dry Creek Rd Ste 240 Englewood CO 80112  
Scott Campbell, Neighborhood Liaison  
Laura Rickhoff, ODA  
Filed: K:\\$DA\2201-01rev1.rtf



# **DJ SOUTH INFIELD GATHERING COTTONWOOD CREEK NORTH LATERAL & SPINE G ADJUSTMENT AMENDMENT OIL AND GAS PERMIT REVIEW**

## *Initial Submittal Review*

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

- Make necessary revisions to Plan Set
- Make necessary revisions to the Letter of Introduction
- Make necessary revisions to the Application Checklist
- Upload site specific PHA-HAZOP letter with next submittal
- 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](mailto:CADGIS@auroragov.org) for questions or more detailed instructions.
- Respond to additional redline comments

### **REVIEWERS**

- Planning – Colin Brown / 303-739-6824 / [cmbrown@auroragov.org](mailto:cmbrown@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) – Curtis Bish / 303-739-7131 / [cbish@auroragov.org](mailto:cbish@auroragov.org) / Comments in purple

### **PLAN SET COMMENTS**

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

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

- “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.”
- “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.”

##### **1B. Sheet 7 (Planning)**

- Update parcel numbers to reflect current Arapahoe County parcel numbers.
- See Traffic's comments on Site Plan redline document.



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

2A. 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.

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

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

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

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

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

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

**6. Lighting Plan (Planning)**

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

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

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

**LETTER OF INTRODUCTION COMMENTS**

**8. Project Summary (Planning)**

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

8B. 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).

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

9A. 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).

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

10A. The Neighborhood Meeting requirement was waived during the Pre-Application meeting on 3/4/2021.

10B. Additional Electronic Comments received by the City:

- 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: Annemarie Heinrich Fortune  
Organization: Tri-County Health Department, 6162 S. Willow Drive, Suite 100, Greenwood Village CO 80111 (aheinrich@tchd.org)  
Comment: Please see the attached letter.
- Name: Donna George  
Organization: Public Service Company of Colorado, 1123 W. 3<sup>rd</sup> 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@arapahoegov.com](mailto:referrals@arapahoegov.com))  
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.

#### **11. Response to Pre-Application Comments (Planning)**

11A. This requirement is acceptable as submitted.

#### **OPERATIONS PLAN COMMENTS**

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

###### **Integrity Management Plan**

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

###### **Operations Plan**

12B. This requirement was waived during the Pre-Application meeting on 3/4/2021.

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

13A. This requirement is acceptable as submitted.

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

14A. The Security Plan requirement was waived during the Pre-Application meeting on 3/4/2021.

##### **15. Decommissioning / Final Reclamation Plan (Planning)**

15A. This requirement is acceptable as submitted.

#### **EMERGENCY RESPONSE PLAN COMMENTS**

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

###### **Field-Wide Plan**

16A. This requirement was satisfied with the approved DJSI Field Wide ERP Version 2021.07.13.

###### **Site-Specific Plan**

16B. This requirement is acceptable as submitted.

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

###### **Field-Wide Plan**

17A. This requirement was satisfied with the approved DJSI Field Wide Surge Study Report Version 2021.07.13.

###### **Site-Specific Plan**

17B. 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.

#### **COMMENTS ON OTHER REQUIRED ITEMS**

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

18A. The Traffic Letter/Plan requirement was waived during the Pre-Application meeting on 3/4/2021.

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

19A. 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.



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

20A. Submitted as Property Owner Authorization.

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

21A. This requirement is acceptable as submitted.

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

**Water Delivery Agreement**

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

**Water Supply Plan**

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

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

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

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

24A. This requirement is acceptable as submitted.

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

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

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

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

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

27A. This requirement was satisfied with the approved DJSI Field Wide Weed Control Plan Version 2021.06.23.

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

**Field-Wide Plan**

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

**Site Specific Plan**

28B. This requirement is acceptable as submitted.

**29. Stormwater Management Plan**

29A. These Civil documents will be reviewed and commented on by the standard SWMP Review team via upload through the separate Public Works portal; please contact Public Works at 303-739-7457 to set up a Pre-Submittal meeting.

29B. *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)

29C. *FYI:* Profiles for gathering lateral pipelines crossing any Aurora Water utilities, ROWs, and floodplains will be required as part of the SWMP plan. (Water)

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

29E. *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.

**30. Preliminary Drainage Report**

30A. The Preliminary Drainage Report requirement was waived during the Pre-Application meeting on 3/4/2021.



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

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

**32. Air Quality Plan (Planning)**

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

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

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

**34. Application Form (Planning)**

**Checklist**

34A. Please update the Checklist with the version numbers for all approved Field Wide plans.

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

35A. This requirement is acceptable as submitted.

**36. DOT/PHMSA Forms (Planning)**

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

**37. Insurance Forms (Planning)**

37A. This requirement is acceptable as submitted.



## **Engineering Services Division Referral Comments**

July 28, 2021

City of Aurora Planning & Development Services  
15151 E Alameda Parkway, Ste 2300  
Aurora, CO 80012  
Attn: Colin Brown, Planning Case Manager

RE: COTTONWOOD CREEK NORTH LATERAL CRUDE OIL PIPELINE NO. 1  
DA-2201-01

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.

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

If you have any questions, please feel free to contact our offices at 720-874-6500.

Sincerely,

Sue Liu, P.E.  
Public Works and Development  
Engineering Services Division  
County Case # O21-178





August 3, 2021

Colin Brown  
City of Aurora Planning and Development Services  
15151 E. Alameda Parkway  
Aurora, CO 80012

RE: Cottonwood Creek North Lateral Crude Oil Pipeline No. 1, DA-2201-01  
TCHD Case No. 7135

Dear Mr. Brown,

Thank you for the opportunity to review and comment on the Site Plan Amendment to add a 300-foot long steel oil pipeline lateral from the proposed DJ South Infield Gathering System to the Crestone Peak Resources Cottonwood Creek North well pad. 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 the following comments.

**Groundwater Quality Protection**

If the pipeline cross over streams and/or wetlands, alluvial groundwater flow could be impacted if trenching intersects the shallow groundwater. If trench dewatering is necessary, the water will be pumped and discharged to alluvia/colluvial sediments close to the stream channel. If discharge of groundwater is necessary during construction, a discharge permit from the Colorado Department of Public Health and Environment (CDPHE), Water Quality Control Division will be necessary, as referenced in the application materials.

**Sanitary Waste Disposal**

The application does not specify how sanitary waste disposal will be provided during the construction for construction workers. We anticipate that 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.

Please feel free to contact me at 720-200-1585 or [aheinrich@tchd.org](mailto:aheinrich@tchd.org) if you have any questions on TCHD's comments.

Sincerely,

A handwritten signature in dark ink, appearing to read "AHF", is written over a light blue horizontal line.

Annemarie Heinrich Fortune, MPH/MURP  
Land Use and Built Environment Specialist

cc: Sheila Lynch, Dylan Garrison, TCHD





**Right of Way & Permits**

1123 West 3<sup>rd</sup> Avenue  
Denver, Colorado 80223  
Telephone: **303.571.3306**  
Facsimile: 303. 571. 3284  
donna.l.george@xcelenergy.com

August 8, 2021

City of Aurora Planning and Development Services  
15151 E. Alameda Parkway, 2<sup>nd</sup> Floor  
Aurora, CO 80012

Attn: Colin Brown

**Re: Cottonwood Creek North Lateral Crude Oil Pipeline No. 1  
Case # DA-2201-01**

Public Service Company of Colorado's (PSCo) Right of Way & Permits Referral Desk has reviewed the site plan amendment for **Cottonwood Creek North Lateral Crude Oil Pipeline No. 1**. Please be aware PSCo owns and operates existing overhead and underground electric distribution facilities crossing the proposed pipeline in several areas. 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.

Please note that any grading changes may require the raising or lowering of underground facilities in order to maintain PSCo's minimum coverage requirements; therefore, existing grading must not be diminished. However, be advised the installation depth may have changed over time, rendering this depth incorrect and potholing may be necessary.

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. Use caution and hand dig when excavating within 18-inches of each side of the marked facilities. Please be aware that all risk and responsibility for this request are unilaterally that of the Applicant/Requestor.

Donna George  
Right of Way and Permits  
Public Service Company of Colorado dba Xcel Energy  
Office: 303-571-3306 – Email: donna.l.george@xcelenergy.com