



Planning Division  
15151 E. Alameda Parkway, Ste. 2300  
Aurora, Colorado 80012  
303.739.7250

January 27, 2021

Nancy Floyd  
Crestone Peak Resources  
34501 E Quincy Ave, Bldg #1  
Watkins, CO 80137

**Re: Initial Submission Review**– Rush North Lateral Natural Gas Pipeline No 1 – Site Plan Amendment  
Application Number: **DA-2235-01**  
Case Number: **2020-6017-01**

Dear Ms. Floyd:

Thank you for your initial submission, which we started to process on Monday, January 4, 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, February 16, 2021. Your administrative decision date is tentatively set for Wednesday, March 17, 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\2235-01rev1.rtf



# **CPRM RUSH NORTH LATERAL 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
- 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:

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

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

- Add date of amendment to Page 9 and Page 27 labels in the Sheet Index.
- Add Signature Block for Amendment Site Plans.

##### 1C. Sheet 4 (Planning)

- Add floodplain shown on map to Legend.

##### 1D. Sheet 9 (Planning)

- Show and label well locations on Rush South well pad.
  - Update Legend as needed.



- Show facilities on Rush South well pad.
    - Update Legend as needed.
  - Show and label proposed bore hole locations (if applicable).
  - Add Legend to map/sheet.
- 1E. Sheet 27 (Planning)
- Show and label proposed well locations on Rush North well pad.
    - Update Legend as needed.
  - Show proposed facilities on Rush North well pad.
    - Update Legend as needed.
  - Show and label proposed bore hole locations (if applicable).
  - Add Legend to map/sheet.
  - Update parcel numbers to reflect current Arapahoe County parcel numbers.

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

8B. In the 'RE:' section at the top of the letter, add TRS, parcel number, and 26640 E. Jewell Ave as the address.

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

8D. Will VTC (Vehicle Tracking Control) be utilized for this project? If so, please add to the project summary.

8E. Add a paragraph that outlines the planned construction timeline, including startup and commissioning schedule.

This can be a general timeframe for planned construction (i.e. construction in Q3 2021, startup and product flowing in Q4 2021).

8F. In the 'General Pipeline Information' section, add more details related to potential hazards to the health, safety and welfare of the operator's employees and the public.

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

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

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

9A. Provide more details for the following BMPs:

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

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

- Air Quality Plan
- Emergency Response Plan
- Integrity Management Plan
- HAZOP Plan
- Road Maintenance Agreement

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

10A. The Neighborhood Meeting requirement was waived during the Pre-Application meeting on 11/12/2020.

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

- Name: 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: Sue Liu  
Organization: Arapahoe County Public Works Department, 6924 S. Lima Street, Centennial CO 80112 (sliu@arapahoe.gov.com)  
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: No conflict.
- Name: Terri Maulik  
Organization: Arapahoe County Planning Division, 6924 S. Lima Street, Centennial CO 80112 (referrals@arapahoe.gov.com)  
Comment: Thank you for the opportunity to review and comment on this project. The Arapahoe County Planning Division has no comments; however, other department and/or divisions may submit comments.

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

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

**OPERATIONS PLAN COMMENTS****12. Operations Plan (Planning)**

*Integrity Management Plan*

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

*Operations Plan*

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

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

13A. Refer to comment 8F, listed above in Section #8.

**14. Security Plan (Planning)**

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

**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 Crestone Peak Midstream Field Wide ERP Version 2020.09.29.

**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 Crestone Peak Midstream Field Wide PHA-HAZOP Version 2020.09.29.

**Site-Specific Plan**

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

**COMMENTS ON OTHER REQUIRED ITEMS****18. Traffic Letter / Plan (Traffic)**

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

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

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

**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 is acceptable as submitted.

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

28A. 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 11/12/2020.

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

31A. This requirement is acceptable as submitted.

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

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

**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. This requirement is acceptable as submitted.

**35. 350 Foot 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.



January 13, 2021

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

RE: Rush North Lateral Natural Gas Pipeline No 1, DA-2235-01  
TCHD Case No. 6714

Dear Mr. Brown,

Thank you for the opportunity to review and comment on the Site Plan Amendment to add a 1500-foot-long steel gas pipeline from the existing Crestone Peak Resources Midstream Pipeline connecting to the Rush North Well Pad located in Section 28, Township 4 South, Range 65 West. 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.

**Protection of Above-Ground Valves**

Above-ground valves may be damaged or vandalized once they are installed and placed into use. If above ground valves are to be utilized, the applicant should consider methods for ensuring the valve site is secure.

**Sanitary and Solid Waste Disposal**

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.

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 black ink that reads "A.H.F." in a cursive, slightly stylized font.

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

cc: Sheila Lynch, Dylan Garrison, TCHD



## Public Works and Development

6924 South Lima Street  
Centennial, CO 80112-3853  
Phone: 720-874-6500  
Fax: 720-874-6611  
Relay Colorado: 711  
[www.arapahoegov.com](http://www.arapahoegov.com)

**BRYAN D. WEIMER, PWLF**  
Director

January 15, 2021

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

Re: Rush North Lateral Natural Gas Pipeline No 1  
Site Plan Amendment  
Application Number: DA-2235-01

Arapahoe County Engineering thanks you for giving us the opportunity to the review Rush North Lateral Natural Gas Pipeline No 1 - Site Plan Amendment. Engineering Staff has reviewed the proposed Site Plan. The Engineering Division 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  
Cc Arapahoe County Case #O21-008