



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

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January 17, 2020

Kathy Denzer  
ConocoPhillips Company  
34501 E Quincy Ave, Building 1  
Watkins, CO 80137

**Re: Second Submission Review - Grande South (Phase 2) - Oil and Gas Well Permit**  
Application Number: **DA-2010-05**  
Case Number(s): **2019-6024-03**

Dear Ms. Denzer:

Thank you for your second submission, which we started to process on Friday, January 3, 2020. 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 after Friday, January 24, 2020.

Note that all our comments are numbered. When you resubmit, include a cover letter specifically responding to each item marked with an asterisk. 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 303.739-7186.

Sincerely,

Stephen Rodriguez, Planning Supervisor  
City of Aurora Planning Department

cc: Melinda Lundquist, CVL Consultants Of Colorado Inc, 10333 E Dry Creek Rd. Ste 240, Englewood CO 80112  
Scott Campbell, Neighborhood Liaison  
Mark Geyer, ODA  
Filed: K:\SDA\2010-05rev2.rtf



## **GRANDE SOUTH (PHASE 2) OIL AND GAS PERMIT REVIEW**

### *Second Submittal Review*

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

- See the comment redlines from Planning on the Site Plan and other listed Items. (See Item 1,10, 31, 32, 34 and 36)
- See the comment redlines for the Site Plan from Real Property. (See Items 1,19 and 20)
- See the comment redlines from Engineering/Public Works. (See Items 1, 29 and 30)
- See the comment redlines from Life Safety. (See Items 16 and 17)
- See the comment redlines from Aurora Water. (See Items 1, 22,23,24,25 and 27)
- See the comment redlines from PROS. (See Items 27 and 28)
- See the comments from Arapahoe County and Xcel Energy (See Item 10)
- 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 comments if applicable.
- Respond in your resubmittal to all summary comments and redlines in a separate comment response letter.

#### **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) – Curtis Bish / 303-739-7131 / [cbish@auroragov.org](mailto:cbish@auroragov.org) / Comments in purple
- Tri-County Health Department – Kathy Boyer
- Arapahoe County – Sue Liu and Terri Maulik
- Xcel Energy – Donna George

Reviewers: Please list your comments, including summarization of PDF red-lines, under each pertinent document category below. This will be the only comment document provided and must be utilized to encapsulate all substantive review remarks from each individual department.



## **SITE PLAN COMMENTS**

### **1. Site Plan Set (Multiple departments)**

1A. *FYI*: An I&M plan for maintenance of all sediment and detention basins, as well as other water quality appurtenances, is required to be submitted with SWMP plans. (Water)

1B. Please ensure that physical drainage-related features, including noise mitigation berms and sediment basin dimensions, are reflected on the plan set. (Public Works and Planning)

1C. Ensure that the total disturbed area acreage match across the Plan Set Sheet 1, Data Block, Letter of Introduction, and Form 2A. (Planning)

\*1D. Previously omitted from the initial review was tree mitigation comments from the City Forester. Please refer to those redlines which were included in the initial review redlines for the Plan Set. Incorporate changes as applicable and add your response to tree mitigation redlines at the end of your comment response letter. (Planning)

1E. On the cover sheet, please add to Site Plan Notes 5 the effective approval date for the amended Road maintenance Agreement. (Planning)

1F. A License Agreement will be required for Outlet Structures if a Drainage Easement is required.

1G. A License Agreement may be required for the culvert should it encroach City roads or easements

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

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

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

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

### **4. Visual Mitigation Plan**

4A. N/A

### **5. Landscape Plan**

5A. Please continue to incorporate into the overall Plan Set.

### **6. Lighting Plan (Planning)**

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

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

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

## **LETTER OF INTRODUCTION COMMENTS**

### **8. Project Summary (Planning)**

8A. Ensure that the total disturbed area acreage match across the Plan Set Sheet 1, Data Block, Letter of Introduction, and Form 2A. (Planning)

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

9A. **Reclamation**- Refine the land cover description to match the Form 2A.

9B. Add in details from the final submission of Rush North for the following BMPs:

- Road Repairs
- Transportation and Circulation

### **10. Neighborhood Meeting Schedule / Results/Comments (Planning)**

10A. See the following comments from Arapahoe County (Sue Liu/Public Works) - The Arapahoe County Public Works and Development – Engineering Services Division appreciates the opportunity to review and comment on the Grande South 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 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.

10B. See the comments from Arapahoe County (Terri Maulik/Public Works) - An Arapahoe County road impact fee will be required if any County roads are used for construction, drilling, completion, or production. Please also provide dust control during Phase 2 of this project. We received complaints from a resident during the first phase of this project.

10C. See the comments from Xcel Energy (Donna George) - Public Service Company of Colorado's (PSCo) Right of Way & Permits Referral Desk has reviewed the plans for **Grande South Phase 2** and has **no apparent conflict**. Please be aware PSCo owns and operates existing electric distribution facilities within the proposed project area. The property owner/developer/contractor must complete the application process for any new electric service, or modification to existing facilities via [xcelenergy.com/InstallAndConnect](http://xcelenergy.com/InstallAndConnect). It is then the responsibility of the developer to contact the Designer assigned to the project for approval of design details. Additional easements may need to be acquired by separate document for new facilities.

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.

10D. No comments were received from neighbors.

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

11A. Please provide this with your resubmittal.

#### **OPERATIONS PLAN COMMENTS**

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

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

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

13A. Upload the Project Development Schedule for Grande South with the next submission. The current document is titled *Lone Tree North*.

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

14A. The field-wide Operations Plan has been previously accepted by the City.

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

15A. The field-wide Operations Plan has been previously accepted by the City

#### **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.

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

16B. This requirement is acceptable as submitted.



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

Field-Wide

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

Site-Specific

17B. This requirement was satisfied at initial submittal.

**COMMENTS ON OTHER REQUIRED ITEMS**

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

18A. This requirement was satisfied at initial submittal.

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

19A. Work with Real Property to obtain License Agreements related to lay-flat lines.

19B. Should a proposed culvert encroach into City ROW's or easements, a License will be required.

19C. If a drainage easement is required for outlet structures, then a License Agreement will be required.

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

20A. This requirement is acceptable as submitted.

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

21A. This requirement is acceptable as submitted.

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

22A. The field-wide Water Delivery Agreement has been previously accepted by the City.

Water Supply Plan

22B. This requirement is acceptable as submitted.

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

23A. A variance requested included in this submittal was denied.

23B. 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.

23C. If applicable and as noted in the field-wide submittal, COPC will notify, in writing, 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.

23D. If applicable and as noted in this second submittal, COPC will notify the City immediately of any delays outside of COPC's control in an email specifically addressing the cause of the delays.

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

24A. The field-wide Fugitive Dust Suppression Plan has been accepted by the City.

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

25A. The field-wide Fluid Disposal Plan has been previously accepted by the City.

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

26A. N/A

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

27A. The field-wide Weed Control Plan has been previously accepted by the City.

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

28A. This requirement was satisfied at initial submittal.



### **29. Stormwater Management Plan (Public Works)**

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.

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

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

### **30. Preliminary Drainage Report / Letter (Public Works)**

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.

30B. If there was a previously-approved Preliminary Drainage Letter (PDL), and there have been no changes to the Site, please submit a drainage conformance letter asserting such and attach the previously-approved PDL to it. If there have been changes to the Site since the previously-approved PDL, explain those changes in a conformance letter and any impact on drainage patterns, flows, or drainage features and attached the previously-approved PDL to it.

### **31. Road Maintenance / Construction (Planning)**

31A. Please provide the revised, *approved*, and fully executed Road Maintenance Agreement as part of the third submission

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

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

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

#### **Site Specific Plan**

32B. Submit a complete Plan, including 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.

32C. The Plan should reference how the reports will include trend identification related to increases / decreases / spikes in concentration or emissions as related to the health-based criteria.

32D. Pre-construction baseline air monitoring (under Monitoring Strategy) is still missing language about prior notification to the City (please reference Rush North's final submission for the preferred language, as previously agreed-upon between the City and the applicant).

32E. #5 on page 3 is meant to be an asterisk instead. Please amend.

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

33A. The document is acceptable as submitted.

### **34. Application Form (Planning)**

#### **Checklist**

34A. License Agreements will be required; revise and check off accordingly.

34B. There has been no field-wide Wildlife Impact Mitigation Plan submitted or accepted by the City previously; please revise accordingly.

34C. Remove the check from Visual Mitigation Plan under Plan Set and Response to Pre-Application Notes/Review(s) under letter of Introduction as they are not applicable.

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

35A. This requirement is acceptable as submitted.

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

36A. Please provide the *final* version at the next submission and ensure that the timeline matches the Project Development Schedule (or vice versa).

36B. Ensure that the total disturbed area acreage match across the Form 2A, Plan Set 1 Data Block, and Letter of Introduction.