



June 23, 2021

Colin Brown, Senior Planner
Oil and Gas Division – City of Aurora
15151 E. Alameda Parkway, Ste. 2300
Aurora, CO 80012

RE: Technical Submission Review – Mustang Station Lateral and Spine North Waterline No 3 – Site Plan Amendment
Application Number: **DA-2235-03**
Case Number: **2020-6017-03**

Dear Mr. Brown:

CVL, a Westwood Team has received comments from the City of Aurora Planning and Development Services for the above referenced project. We have restated the comments below and addressed them per the bold, italicized responses.

PLAN SET COMMENTS

1. Plan Set

1A. Comment: On Sheet 28, please add the parcel owner and parcel number information for each parcel shown on the sheet.

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: There do not appear to be any impacts to future landscaping requirements with the installation of the gas lines or easements associated with the future water lines. (Kelly K. Bish, PLA, LEED AP/ (303) 739-7189)

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: Add a paragraph that outlines the planned construction timeline, including startup and commissioning schedule for the Mustang Station laterals and the Spine G Waterline. This can be a general timeframe for planned construction (i.e. Construction will begin in Q4 2021, startup and product flowing in Q1 2022).

Response: Completed.

8B. Comment: Add in a sentence that says requirement for Neighborhood Meeting was waived during the Pre-Application meeting on 4/13/2021.

Response: Completed.

8C. Comment: Add in a sentence that explains why the requirement for soils reports is not applicable.

Response: Completed.

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

9A. Comment: This requirement is acceptable as submitted.

Response: Acknowledged.

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

10A. Comment: The Neighborhood Meeting requirement was waived during the Pre-Application meeting on 4/13/2021.

Response: Acknowledged.

10B. Additional Electronic Comments received by the City:

- Name: Teresa Patterson

Organization: Mile High Flood District, 2480 W. 26th Avenue Suite 156-B, Denver, CO 80211
(tpatterson@udfcd.org)

Please see the attached letter.

- Name: Donna George

Organization: Xcel Energy, 1123 W. 3rd Ave, Denver CO 80223
(donna.l.george@xcelenergy.com)

Please see the attached letter.

- Name: Kathy Boyer

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

Please see the attached letter.

- Name: Nick Eagelson

Organization: Adams County Community and Economic Development, 4430 S. Adams
County Parkway, Brighton, CO 80601 (NEagleson@adcogov.org)

Please see the attached letter.

- Name: Robert Williams

Organization: Colorado Department of Transportation, 2829 W. Howard Place, Denver, CO
80204 (Robert.williams@state.co.us)

Comment: If any work is proposed in the State Highway Right-of-Way, a permit from our office is required. Utility permits are applied for online at the following link:

<https://cdotpermits.force.com/portal/s/login/> Contact for utility permitting is Robert Williams who can be reached at robert.williams@state.co.us

Response: Acknowledged. The permit for the State Highway Right-of-Way has been obtained (permit #1201149 & #1201150)

11. Response to Pre-Application Comments (Planning)

11A. Comment: Page 7, Traffic Division Comments, 3rd Comment Response – update ‘existing’ to ‘existing’

Response: Completed.

12. Operations Plan (Planning)

Integrity Management Plan

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

Response: Acknowledged.

Operations Plan

12B. Comment: This requirement was waived during the Pre-Application meeting on 4/13/2021.

Response: Acknowledged.

13. Project Development Schedule (Planning)

13A. Comment: Add a paragraph that outlines the planned construction timeline, including startup and commissioning schedule for the Mustang Station laterals and the Spine G Waterline. This can be a general timeframe for planned construction (i.e. Construction will begin in Q4 2021, startup and product flowing in Q1 2022).

Response: Completed.

14. Security Plan (Planning)

14A. Comment: The Security Plan requirement was waived during the Pre-Application meeting on 4/13/2021.

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 Crestone Peak Midstream Field Wide ERP Version 2020.09.29.

Response: Acknowledged.

16B. Comment: Please continue providing status updates about establishing a foam concentrate cache for emergency response by AFR to a hazmat/ fire scenario. Also, as discussed on January 24th, 2019, provide additional information that addresses the water supply for emergency incidents supplied by a third party (Northern Plain Trucking, per Dan Knustsen). Crestone shall provide water supply for emergency incidents that occur in areas without on-site water infrastructure. Please add water supply and logistical information to the field-wide and site-specific ERPs. Please feel free to contact me with any questions about the water supply questions. Once finalized, submit a revision of the field-wide ERP indicating the resources and logistics. The updated field-wide ERP will be kept on file and used for future application submittals.

Response: It appears that this comment is in regards to the Well Pad Emergency Response Plan (Crestone Peak Resources Operating LLC). The Fieldwide Pipeline Emergency Response Plan (Crestone Peak Resources Midstream LLC) has been approved (Crestone Peak Midstream Field Wide ERP Version 2020.09.29.)

Site-Specific Plan

16C. Comment: The only site-specific ERP plan included is for the Spine G North waterline, but there is not one for the Mustang Station laterals. Please upload a site-specific ERP plan for the Mustang Station laterals, in addition to the Spine G North waterline ERP.

Response: The Site Specific ERP has been updated to include the Mustang Station Laterals.

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

Field-Wide Plan

17A. Comment: This requirement was satisfied with the approved Crestone Peak Midstream Field Wide PHA-HAZOP Version 2020.09.29.

Response: Acknowledged.

Site-Specific Plan

17B. Comment: Please include the certification for Dawn Keeler as a second page with the site-specific PHA-HAZOP letter.

Response: Completed.

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 4/13/2021.

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. MLAs for ROW crossings will be submitted to Real Property for review.

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. ***Acknowledged.***

Response:

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. ***Acknowledged.***

Response:

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 Crestone Peak Midstream Field Wide Weed Control Plan Version 2021.03.17.

Response: Acknowledged.

28. Wildlife Impact Mitigation Plan (PROS)

28A. 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. A Pre-Submittal Meeting will be set up with Public Works.

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 ponds or water storage structures are proposed with this application.

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. No gathering lateral pipelines are proposed to cross any Aurora Water utilities, ROWs, and floodplains for this project. The 24" waterline will cross city ROW and a MHFD Floodplain. Profiles will be included in the SWMP.

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

Response: No ponds or water storage structures are proposed with this application, therefore an I&M Plan is not required.

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 ponds or water storage structures are proposed with this application.

30. Preliminary Drainage Report

30A. Comment: The Preliminary Drainage Report requirement was waived during the Pre-Application meeting on April 13, 2021.

Response: Acknowledged.

31. Road Maintenance / Construction (Public Works)

31A. Comment: This requirement was satisfied with the approved Crestone Peak Resources Road Maintenance Agreement Version 2018.01.03.

Response: Acknowledged.

32. Air Quality Plan (Planning)

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

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: This requirement is acceptable as submitted.

Response: Acknowledged.

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. Certificate of Liability Insurance Form (Planning)

37A. Comment: Please update the 'Description of Operations' to reflect the Mustang Station and Spine G Waterline project area.

Response: Completed.

ADAMS COUNTY COMMUNITY & ECONOMIC DEVELOPMENT, Nick Eagleson, Senior Strategic Planner / neagleson@adcogov.org

1. Comment: Staff is recommending approval for the water storage pond within unincorporated Adams county, which is associated with the proposed pipeline. The request will be heard by the Board of County Commissioners on June 22nd, 2021.

Response: Acknowledged.

MILE HIGH FLOOD DISTRICT, Teresa Patterson, PE / Watershed Manager, CFM

1) Comment: Please include the following construction note on all plan sheets that pertain to MEP features: *The Mile High Flood District will conduct site visits during the project construction within or near the channel to observe construction for conformance with the approved plans and specifications. Please contact MHFD (303-455-6277) to schedule a preconstruction meeting. All structural and grouted boulder work require 48-hours prior notice to any construction or concrete placement. Standards and specifications for all outfall and channel work can be accessed at www.MHFD.org under the References section. Failure to notify may result in project ineligibility.*

Response: Completed. This note has been added to the cover sheet. Please note that there is no boulder work or concrete work planned for this project

2) Comment: The Letter of Introduction indicates a new SWMP will be prepared for civil review. We would like to review those plans when available.

Response: Acknowledged. The city should provide the SWMP to MHFD during its Civil Plan Review.

3) Comment: We understand this is an amendment to the original approved plans. We were not involved in previous reviews of this project. We would like to be involved in the construction efforts of any crossing of a major drainageway or disturbance within a FEMA or MHFD mapped floodplain.

Response: Acknowledged.

4) Comment: What is the plan to protect the drainageway if an unexpected storm event occurs during construction? What is the plan to get the temporary diversion installed in this scenario?

Response: Stockpiles from the trench spoils and stripped vegetation will be placed on the downhill side of the trench and sediment control logs (SCL) will be utilized as indicated on the SWMP. Within the floodplain limits SCL will be placed on both the upstream and downstream side of the easement.

5) Comment: We recommend limiting the amount of trenched opening within the floodplain at any given time and to phase the construction in this area.

Response: Acknowledged..

6) Comment: What is the plan to achieve adequate revegetation within the disturbed areas? We will be monitoring this area post construction to ensure proper revegetation is achieved.

Response: Disturbance of the pipeline easement includes the trench and stockpiles for both the stripped vegetation and the trench spoils. Daily installation interim BMPs will be utilized to insure stabilization of backfilled trenches. The remainder of the pipeline easement and temporary workspaces will be mowed and used for other construction activities, such as stringing and assembling the pipe. It is not anticipated that these outside construction activities will devoid the existing vegetation. All disturbed areas will be stabilized via seed and mulch within 14 days unless construction disturbance is ongoing in these areas. The stripped topsoil will be utilized on disturbed ground to promote revegetation.

TRI-COUNTY HEALTH DEPARTMENT, Kathy Boyer, REHS / kboyer@tchd.org

Protection of Above-Ground Valves

Comment: 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.

Response: Appurtenance sites will be protected with a security fence that limits access to authorized personnel. Valves will be blinded (where necessary) and locked. This application does not propose any new appurtenance sites.

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 Ways & Permits / 303-571-3306 /
donna.l.george@xcelenergy.com

Comment: Public Service Company of Colorado's (PSCo) Right of Way and Permits Referral Desk has determined there are **conflicts** with the above captioned project. Public Service Company has an existing *electric transmission* line and an existing *high-pressure natural gas transmission* pipeline with associated land rights as shown within this property. Any activity including grading, proposed landscaping, erosion control or similar activities involving our existing right-of-way will require Public Service Company approval. Encroachments across Public Service Company's easements must be reviewed for safety standards, operational and maintenance clearances, liability issues, and acknowledged with a Public Service Company License Agreement to be executed with the property owner. PSCo is requesting that, prior to any final approval of the development plan, it is the responsibility of the property owner/developer/contractor to contact the following for development plan review and execution of License Agreements:

- **for Electric Transmission:** email coloradorightofway@xcelenergy.com or website www.xcelenergy.com/rightofway

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

- **for High Pressure Natural Gas Transmission:**

https://www.xcelenergy.com/working_with_us/builders/encroachment_requests - click on Colorado if necessary; an engineer will then be in contact to request specific plan sheets.

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

Comment: PSCo also owns and operates existing overhead and underground electric **distribution** facilities along the proposed pipeline. Should the project require any modification to existing facilities, the property owner/developer/contractor must complete the application process via xcelenergy.com/InstallAndConnect.

Response: No disturbance within any Xcel Right-of-Way or any modifications to existing facilities are proposed 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.

Thank you for providing these comments. If you have any questions regarding our application, please do not hesitate to contact me at 720.249.3539.

Sincerely,



Melinda Lundquist, PE
Director, Private Development Colorado