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June 29, 2021

City of Aurora
Office of Development Assistance

Attn: Laura Rickhoff, Project Manager
15151 E. Alameda Parkway, Suite 5200
Aurora, CO 80012

Re: Response to Pre-Application Comments
Crestone Peak Resources Operating, LLC
Blue 3-65 33-32-31 (FKA Blue 3-65 32-33 South)
Ref: Project No. 1506178

Dear Ms. Rickhoff,

The intent of this letter is to provide a Response to the Pre-Application Comments received for the Blue 3-65 33-32-31 (FKA Blue 3-65 32-33 South), dated December 31, 2020. Below are the comments that were received with the associated response to those comments from Crestone Peak Resources Operating, LLC and Uintah Engineering & Land Surveying (UELS).

Cover Letter

Key Issues:

- ▶ **Best Management Practices (BMPs):** Per Oil and Gas Planning comments, please address all BMPs with a site-specific narrative to be submitted with your Oil and Gas Permit application/plan set.

Response – [The Letter of Introduction including site specific narratives for each BMP is included with this initial submittal.](#)

- ▶ **Wildlife Impact Mitigation:** Per Parks' comments on page nine, please investigate area wildlife habitats and provide a Wildlife Impact Mitigation Plan as applicable.

Response – [A Wildlife Impact Mitigation Plan is included with this initial submittal.](#)

- ▶ **Drainage Requirements:** Please be aware that a memo has been issued (from the Deputy Director of Public Works, dated December 2019) stating there must be a permanent BMP in place, in addition to the sediment basin functioning while operations are active on the site. Please verify that all flows are directed to the water quality/detention area in the ultimate condition.

Response – [As depicted in our SWMP and Drainage Letter, we will be installing a temporary sediment basin at initial construction that will be replaced by a more permanent extended detention basin that will be in place for the life of the wellsite.](#)

- ▶ **Water Delivery Agreement:** Along with the required site plan documents, please upload a copy of the executed water delivery agreement for verification by Aurora Water.

Response – [The executed water delivery agreement along with a site-specific plan are included with this initial submittal.](#)

- ▶ **Roadway Maintenance:** An approved Roadway Maintenance Agreement is required prior to site plan approval and the start of construction on this site.

Response – [The Field Wide Road Damage Agreement last amended 12/18/19 includes the haul route to be used for this location.](#)

- **Traffic Management:** A traffic management plan and traffic letter are required. Please see more details on pages 10 and 11.

Response – [A traffic impact study is included with this initial submittal.](#)

- **Fire/Life Safety:** Please carefully review the Fire/Life Safety comments beginning on page 12 regarding emergency access, gating system requirements, surfacing material and addressing requirements. This site must be addressed so our Fire Department can locate and serve the site.

Response – [All comments regarding Fire/Life Safety have been addressed, and pursuant to the terms of the OA the Applicants haul route and access road will be suitable for all necessary emergency access.](#)

City of Aurora Development Process

Step III – Construction Phase

Inspections: The City may access the Oil and Gas Well Site to inspect and ensure compliance with the Crestone Peak Resources Operator Agreement, pursuant to the terms laid out in that agreement.

Response – [Acknowledged.](#)

STAFF COMMENTS – PRE-APPLICATION MEETING

STEP I – PLANNING PHASE

Oil & Gas Division / Planning Department

The Oil & Gas Division and Planning Department comments are numbered. When you submit your application, include a Letter of Introduction responding to each of the numbered comments, including key issues from other departments.

Response – [Pursuant to a discussion with Colin Brown we have included separate numbered responses rather than include numbered responses within the Letter of Introduction since this document is a permanent part of the Applicant's submittal.](#)

We have reviewed the area of your development. There are no known plugged and abandoned (P&A) wells within your site.

Response – [Acknowledged.](#)

Project Overview:

- Zoning: AD (Airport District)
- Proposed Use: Oil and Gas Well Site
- Permitted Use: Yes
- The Oil and Gas Well Site you propose is permitted by the current zoning. The proposal is subject to administrative plan set approval as an Oil and Gas Permit, and to the timelines, best management practices, and requirements set forth in the Crestone Peak Resources Operator Agreement.

Response – [Acknowledged.](#)

Type of Application(s):

- As part of your application, you will need to make the following land use requests:
 - Plan set approval (Oil and Gas Permit)

- Your project can be reviewed and approved administratively.
- Your application will be reviewed in a 12 – 13 week timeframe, measured from the first business day following the date the City deems the submission complete and will be processed electronically through our development review website.

Response – [Acknowledged](#).

Standards and Issues:

1. **Land Use - Historic Land Use** – The historic land use for the proposed Blue 3-65 33-32-31 pad location has previously been vacant land or used for agricultural purposes.

Response – [Acknowledged](#).

2. **Best Management Practices (BMPs) for New Wells and Well Sites**

Please see the attached Best Management Practices (BMPs) form for New Wells and Well Sites outlined in the Crestone Peak Resources Operator Agreement. These are the City of Aurora's current standards for this Well Site and include the following components:

Response – [The following BMPs are addressed in the Letter of Introduction on a site specific basis. Any remaining BMPs are addressed in the previously approved Field Wide Plans.](#)

- **General BMPs**
 - Access Roads
 - Air Quality
 - Automatic Safety Protective Systems / Surface Safety Valves
 - Buildings, Structures, Appurtenances – [Elevation Drawings](#)
 - Chemical Disclosure and Storage
 - Color / Paint Color
 - Cultural and Historical Resource Protection
 - Emergency Response / Action Plan
 - Events or Incidents / Events to be Reported
 - Fencing / Security Fencing
 - Fugitive Dust Suppression
 - General Maintenance
 - Insurance
 - Lighting
 - Maintenance of Machinery
 - Mud Tracking
 - Noise Management Plan / Noise Mitigation
 - Notifications to the City Regarding Commencement of Construction at CGF and Pipeline Operations / Notifications to the City
 - Noxious Weed Control
 - PHA-Hazard and Operability Study
 - Removal of Debris
 - Risk Management
 - Spills
 - Stormwater Management
 - Strict Application of BMP Standards
 - Tree Mitigation
 - Visual Mitigation
 - Wastewater and Waste Management
 - Water Quality Monitoring Plan / Groundwater Pollution Mitigation
 - Water Supply

- Wildlife Impact Mitigation Plan – Supplied as individual plan, not BMP.
- **Well Site Specific BMPs**
 - Anchoring
 - Burning
 - Closed-Loop Pitless Systems/Recycling of Drilling Fluids
 - Combustion Devices
 - Containment Berms
 - Discharge Valves
 - Electric Equipment
 - Flammable Material
 - Flowlines
 - Landscaping
 - Lightning Protection
 - Low Profile Equipment / Low Profile Tanks
 - Mitigation Barriers using Berms, Bales, and Sound Walls – Sound study
 - P&A and Decommissioned Well Testing
 - Reclamation
 - Reduced Emission Completions (Green Completions)
 - Removal of Equipment
 - Road Repairs
 - Trailers
 - Transportation and Circulation
 - Water Protection Requirements
 - Wellbore Integrity and Aquifer Protection – Operations Plan

Similarly, attached is an Oil and Gas Submittal Documents Checklist that correspond to the BMPs; the required documents include:

- **Notated Checklist- If an item is not marked, it MUST have a brief note explaining why it is not required, e.g. "N/A – No proposed roads."**
- Plan Set (including all standard City of Aurora site plan requirements)
 - Vicinity/Context Map
 - Interim Reclamation Plan
 - Visual Mitigation Plan
 - Landscape Plan
 - Lighting Plan
 - Building and Structure Elevations
- Letter of Introduction (including variance requests with justifications)
 - Project Summary
 - Applicable BMPs Addressed (Narrative List)
 - Neighborhood Meeting Schedule & Results / Response to Public Comments
 - Response to Pre-Application Notes / Review(s)
- Operations Plan
 - Project Development Schedule
 - Security Plan
 - Decommissioning / Final Reclamation Plan
- Emergency Response Plan
 - PHA-HAZOP Analysis Letter
- Traffic Letter / Plan
- License Agreements (must also be submitted separately to Real Property)
- Recorded Surface Use Agreement (must also be submitted separately to Real Property)
- Property Owner Authorizations

- Water Supply Plan / Delivery Method
- Groundwater Quality Monitoring Plan
- Fugitive Dust Suppression Plan
- Fluid Disposal Plan
- Water Use Plan CDPHE Reg. 84
- Weed Control Plan
- Wildlife Impact Mitigation Plan
- Stormwater Management Plan (Contact Public Works for a separate Pre-Submittal meeting)
- Preliminary Drainage Report
- Road Maintenance / Construction
- Air Quality Plan
- Noise Mitigation Plan
- Application Form
- 1-Mile Radius Abutter List
- COGCC Forms / 2A
- Fee Payment

Provide a site-specific narrative addressing each Pre-Application item and BMP in the Letter of Introduction, including items that you consider not applicable to your project, and indicate the justification for exclusion.

Response – [Acknowledged.](#)

3. FDP / Master Plan / GDP

Not applicable

Response – [Acknowledged.](#)

4. Landscape Design/Land Use Issues

For further information, please feel free to contact our Senior Landscape Architect, Kelly K. Bish. The Landscape Plan must be included in your submittal and approved prior to issuance of an Oil and Gas Permit.

Response – [The landscape plan is included as part of our overall Site Plan. Reference Sheets 14-15 in the Site Plan.](#)

5. Surface Use Agreement / Property Owner Authorizations

This requirement will be fulfilled by submittal of a recorded Surface Use Agreement, as itemized in the attached checklist.

Response – [Response: This parcel is owned by Crestone. At the suggestion of Colin Brown the conveying deeds and a letter of authorization to perform work on the parcel have been included.](#)

6. New CAD Standards

The City of Aurora has developed a CAD Data Submittal Standard for internal and external use to streamline the process of importing AutoCAD information into the City's Enterprise GIS. Digital Submission meeting the CAD Data Submittal Standards are required by consultants on development projects before submitting to the City for signature sets and on capital projects funded by the City. Please review the CAD Data Submittal Standards, including templates and required layer file labeling, at [CAD Data Submittal Standards](#).

Response – [CAD files meeting the city's standards will be submitted to the city prior to signature sets.](#)

7. PDF Requirements

The application will be uploaded through the City's development review website/portal as separate PDFs. Please ensure that all AutoCAD SHX text items are removed from the "Comment" section during the PDF creation process and that the sheets are flattened to reduce ability to select items. PDFs will be rejected during pre-acceptance reviews if they do not comply with this requirement, which could result in delays in application start times if the applicant is asked to re-upload corrected PDFs.

Response – All pdfs will be flattened prior to submittal to the portal.

Pre-Submittal Meeting:

Contact Colin Brown to schedule a pre-submittal meeting at least one week prior to submitting an application. At the pre-submittal meeting, staff will review the submittal requirements, discuss the review timeline, provide a fee estimate, and review the process for uploading files and inputting adjacent property owners.

Response – Response: The pre-submittal meeting was held June 22, 2021, and the portal was opened.

Community Participation:

Please work proactively with registered neighborhood organizations and adjacent property owners. Registered neighborhood organizations within a one-mile radius and adjacent property owners will formally be notified of the application when a submittal has been made to the Planning and Development Services Department.

Response – Acknowledged.

Neighborhood Services Liaison:

- Your Neighborhood Services Liaison is Meg Allen. She has put together a report attached to these notes listing the registered neighborhood organizations within one mile of your proposed project and can assist in scheduling and facilitating meetings with community members. Please work with the organizations that express interest in your project to address comments and mitigate concerns.
- All meetings with registered neighborhood organizations should also include the Oil and Gas Division Case Manager so that questions concerning the Crestone Peak Resources Operator Agreement and procedures can be properly addressed. The Case Manager will record any project-related commitments that are made to the community at these meetings.
- Additional information about the Neighborhood Liaison Program can be found on the Neighborhood Services page of the city website.

Response – Applicant will work with Meg Allen to schedule a meeting with E-470 Neighbors and the adjacent neighbors following the submittal to the portal.

Parks, Recreation & Open Space Department (PROS)

Wildlife Impact Mitigation Plan – Conduct research to conclude whether your proposed project is located in a significant wildlife habitat, as defined by the State Division of Wildlife, or in a natural area or open space, as designated by the City. Consult with Colorado Parks and Wildlife and PROS to make these determinations and, if applicable, submit a wildlife impact mitigation plan that recommends site-specific and cumulative impact mitigation procedures. If not applicable, provide a statement that the investigation concluded that such a plan is not required.

Response – A site-specific Wildlife Impact Mitigation Plan is included with this initial submittal.

Aurora Water

Aurora Water will receive a referral of the Site Plan and Subdivision Plat for review and comment. Please respond to all Water Department comments with your initial submittal.

Key Issues:

- ▶ Please be aware that a memo has been issued stating there must be a permanent BMP in place, in addition to the sediment basin functioning while operations are active on the site. Please verify that all flows are directed to the water quality/detention area in the ultimate condition.

Response – A temporary sediment basin will be installed during initial construction followed by the installation of a permanent extended detention basin to be installed following interim reclamation.

- ▶ Please show existing and proposed pipes on the site plan to verify there will be no future conflicts with our future improvements. Email Daniel Pershing (dpershi@auroragov.org) for a copy of our current infrastructure as well as CIP future improvements.

Response – Existing and proposed pipelines are depicted on the Site Plan.

- ▶ Along with the site plan, please upload the water delivery agreement as backup documentation.

Response – The water delivery agreement has been included with this initial submittal.

- ▶ A domestic allocation agreement will be required for connections 2" and larger.

Response – The well connect will be permitted separately by the Applicant's midstream division.

Utility Service Requirements:

- A Site Plan is required for this project and must show existing and proposed utilities including:
 - Public/Private Mains
 - Service Lines
 - Water Meters
 - Fire Suppression Lines
 - Fire Hydrants necessary to service your development
 - All utility connections in the arterial roadway are required to be bores.

Response – All known current and planned utilities are depicted on the Site Plan included with this initial submittal.

- General utility design criteria can be found in Section 5 of the Standards and Specifications Regarding Water, Sanitary Sewer and Storm Drainage Infrastructure (Utility Manual).

Response – Acknowledged.

Public Works Department

Traffic Engineering will receive a referral of the Site Plan, Subdivision Plat, and Civils for review and comment.

Key Issues:

► A Roadway Maintenance Agreement will be required prior to approval of the Site Plan. It shall cover all City roadways designated to be within the Haul Route.

Response – [The Field Wide Road Damage Agreement last amended 12/18/19 includes the haul route to be used for this location.](#)

► Identify the haul routes proposed on this project.

- Traffic Management Plan only needs to analyze how access road that deviates from previously approved Mustang Compressor Station, but reference Traffic Management Plan that analyzes this roadway.

Response – [The haul route for this project is included in the Site Plan and Traffic Management Plan. A Traffic Management Plan is included with this initial submittal.](#)

- A Traffic Management Plan & Traffic Letter will be required for this site which will include addressing the following specific items:

- 1) Existing, and buildout average daily traffic counts & reference appropriate adjacent Traffic Management Plan
- 2) Include trip generation for all phases of extraction life cycle with a discussion of:
 - a) Time-of-day for both haul and personnel trips
 - b) Extraction water haul vs temporary pipeline
- 3) Include detailed analysis of Haul Routes
- 4) All items identified in 6.03.1 Transportation and Circulation from the City's Oil & Gas Manual, including commentary on each of the items

Response – [The applicant's Oil & Gas applications are governed by the Operator Agreement, not by the City's Oil & Gas Manual. The applicant has included detailed information on all aspects identified above with the exception of those specific to the city's Oil & Gas Manual.](#)

The Traffic Letter shall be prepared in accordance with the [City of Aurora Traffic Impact Study Guidelines](#).

Response – [Acknowledged.](#)

Submitting the Traffic Letter:

- The Traffic Letter shall be sent directly to Brianna Medema at bmedema@auroragov.org as soon as possible.
- The Traffic Letter shall also be uploaded with the rest of the submittal.

Response – [The traffic study will be submitted to Brianna Medema and to the portal.](#)

- Show all adjacent and opposing access points on the Site Plan.

Response – [All relevant adjacent access points are included in the Site Plan.](#)

- A minimum paved access of 100-feet in length must be provided from flowline of the street into the site. Once the access road is connected to an internal Planning Area street, the new connection will be required to be paved for 100-feet in length into the remaining access road.

Response – [At least 100' of paved access will be included in the plan.](#)

- Gates are required to be setback from the street flow line a minimum of 35-feet or one truck length whichever is greater.

Response – [The gate will be located at least 35' or one truck length from the street flow.](#)

- Provide a Turning Template for access point on and off City roadway and all intersections along the Haul Route.

Response – Turning templates are included in the Site Plan for all access point and intersection from city roadways included in the haul route. Reference Sheet 10 of the Site Plan.

- Label the access movements on the Site Plan.

Response – Access movements have been included in the Site Plan. Reference Sheet 10 of the Site Plan.

- Objects and structures shall not impede vision within these sight triangles. Landscaping shall be restricted to less than 26-inches in the sight triangles. Show sight triangles on the site plan and landscaping plan at all access points in accordance with City of Aurora Standard Traffic Detail TE-13. In addition, street trees shall be set back from Stop signs and other Regulatory signs as detailed in City of Aurora Standard Traffic Detail TE-13.3.
Response – Sight triangles are included on the Site Plan in accordance with the City of Aurora Standard Traffic Detail TE-13. No trees are planned near the access from public roads for this site. Reference Sheet 10 of the Site Plan.

Add the following note landscape plans: 'All proposed landscaping within the sight triangle shall be in compliance with COA Roadway Specifications, Section 4.04.2.10'

Response – The note has been included in the Site Plan. Reference Sheet 14 of the Site Plan.

- Show existing stop signs and street name signs or the installation of new stop signs and street name signs by developer at the site access points onto public streets. Add the following note to the Site Plan:
 - The developer is responsible for signing and striping all public streets. Signs shall be furnished and installed per the most current editions of The Manual on Uniform Traffic Control Devices (MUTCD) and City Standards, and shown on the signing and striping plan for the development.

Response – The Applicant has depicted existing and proposed stop signs on the Site Plan, and has identified all relevant streets. Reference Sheet 10 of the Site Plan. The Applicant is not a developer and is not responsible for striping and signing of all public streets and therefore cannot agree to adding this note as stated above.

- Based on our review of the Traffic Documents, additional improvements may be required.

Response – Acknowledged.

Engineering Division

The Engineering Division reviews the drainage and public improvement components of your project plans. Engineering reviews referrals of the Site Plan and Subdivision Plat from the Planning Department.

Key Issues:

- Existing and future right of way shall be shown on the site plan. An approved Roadway Maintenance Agreement is required prior to the start of construction on the site.

Response – Existing and future ROWs are identified on the Site Plan. The Field Wide Road Damage Agreement last amended 12/18/19 includes the haul route to be used for this location.

- ▶ A preliminary drainage report shall be submitted with the site plan. On-site detention and water quality is required. Water quality must be provided for the access road as well as the site.

Response – [A Preliminary Drainage Letter has been included with this initial submittal.](#)

- ▶ Previously approved plans and reports can be found on the City's website. Instructions can be found here: [Getting to Engineering Documents Online](#). Older documents can be provided upon request.

Response – [Acknowledged.](#)

Improvements:

Sections and details referenced in the Improvements section refer to the [City's Roadway Design and Construction Specifications \(Roadway Manual\)](#).

ROW/Easements/Plat:

- Existing and future ROW shall be shown on the site plan

Response – [Existing and future ROW is depicted in the Site Plan.](#)

Drainage:

Drainage design standards can be found in the City's ["Storm Drainage Design and Technical Criteria"](#).

- Per Section [138-367](#) of the Aurora Municipal Code, a Preliminary Drainage plan and report is required prior to Site Plan approval. A Preliminary Drainage Plan and Report shall be submitted at the time of Oil and Gas/Planning Department application submittal. A review fee shall be paid to the City prior to acceptance of the preliminary drainage report. The site plan will not be approved until the preliminary drainage report is approved. Full spectrum detention is required for this project.

Response – [Acknowledged.](#)

- The engineer is responsible for researching and determining if there has been a study by Mile High Flood District (MHFD) proposing improvements within or adjacent to said development. Any such improvements may be required to be constructed with the subject development. Coordination with MHFD and the City shall be initiated in such case at the master plan level or as soon as determined with any proposed development.

Response – [Acknowledged.](#)

- Under the provisions of Colorado Revised Statute 37-92-602(8), any detention or infiltration facility that becomes operational after August 5, 2015, is required to notify downstream water rights holders prior to operation. Mile High Flood District (MHFD) has created a spreadsheet form (called SDI Design Data) for determining compliance with the statute and a web portal that will send a weekly e-mail notification to downstream water rights holders, satisfying the notification requirements. The developer will be responsible for having a professional engineer, licensed in the State of Colorado, complete the SDI Design Data and uploading to the web portal. Public Works Engineering will verify the information matches the final drainage report. Notification must be made before Civil Plans will be approved or Stormwater Permits will be issued.

- **Response –** [Acknowledged.](#)

- Detention of storm drainage is required for this site and shall be incorporated on the site, unless other accommodations are approved by the City Engineer.

Response – [Detention storm drainage is included with this initial submittal.](#)

- Release rate for the detention pond shall be based upon the “Storm Drainage Design and Technical Criteria” Manual, latest revision.

Response – Acknowledged.

- Extend storm sewer through the site, including inlets, pipes, manholes, etc., as needed.

Response – Acknowledged.

- Storm sewer system does not extend to this site.
 - Discharge onto the adjacent property in accordance with the approved master drainage study/preliminary drainage study for this development or based on historic drainage patterns.

Response – Acknowledged.

- Dust free surface. If some other surface is approved for a site that is not improved (concrete or asphalt pavement), it needs to be dust free and maintained in a dust free condition. As part of the site plan approval process, the applicant shall place on the site plan/contextual site plan a complete description of the material proposed to be used, any and all dust control additives or treatments, and the maintenance schedule of the periodic additives or treatments. Additionally, a note shall be added to the site plan/contextual site plan that: “The property owner/developer shall maintain the dust free surface as provided within the site plan/contextual site plan. Otherwise if the property owner/developer fails to maintain the dust free surface as identified within the site plan/contextual site plan and fails to correct the condition after notification of the condition, the property owner/ developer agrees to remove it and replace it with an improved surface such as concrete or asphalt within the specified time of the notification.

Response – Pursuant to the Field Wide Dust Mitigation Plan previously approved, and in accordance with dust mitigation standards above, the Applicant will maintain a dust free surface. The above note has been included on the Site Plan (Reference Note 7, Sheet 1 of the Site Plan).

Fire/Life Safety Comments - Building Division

The Building Division will receive a referral of the Site Plan and Subdivision Plat for review and comment. They will review these documents for Life Safety (Fire Code) and Building Code issues.

Key Issue:

- This site will be reviewed for building and fire/life safety compliance with the approved Operator Agreement, including both the site-specific HAZOP and ERP.

Response – A site-specific PHA-HAZOP letter and a site-specific ERP are included with this initial submittal.

Addressing Requirements:

All buildings or structures, except accessory buildings, shall display the proper building number in the manner provided in this article. It shall be the responsibility of the owner, occupant or any person obtaining a building permit to place such number in the manner provided in the Aurora City Code of Ordinance, Chapter 126 - Article VII - Numbering of Buildings.

Response – There are no planned buildings for this location, but pursuant to signage requirements the address and the Applicants contact information will be clearly displayed at the entrance to the wellsite. For Oil & Gas Permits the building permit is not secured until the installation of electrical tie-ins and facilities. The right to construct is granted by the approved

Site Plan, SWMP, SWMP permit, and the Form 2A approved by the COGCC.

Adopted Codes by the City of Aurora – Setbacks:

The site plan and civil plans must reflect the setback requirements of the 2015 International Building and Fire Code for placement of the structure(s) in relation to adjacent buildings, property lines, public ways, accessible walkways, etc. To view the 2015 International Codes please utilize the following hyperlink; [ICC Codes Online](#).

Response – [The Site Plan reflects 2015 International Building and Fire Code requirements along with setbacks required by the Operator Agreement and COGCC regulation.](#)

Civil Plans:

Based on the discussion within the pre-application meeting the following information must be reflected within the Civil Plan package submitted to Public Works Department.

- [Alternative Fire Lane Surfacing Material](#)
- [Alternative Fire Lane Surface Signs](#)
- [Grading Plan](#)
- [Sign Package](#)
- [Signature Block](#)

Response – [The SWMP reflects the above required information.](#)

Fire Department Access:

Based on the information presented so far, the type(s) of fire apparatus access road(s) needed for this particular site is:

- [Designated Fire Lane](#)
 - Fire access requirements within oil and gas sites are not dedicated as fire lane easements. In compliance with our accepted MOU please provide a 23' fire access road for the entry roadway to the site gating system that will support an 85,000 lb. minimum imposed weight limitation. The fire access roadway requires a 29' inside and 52' outside turning radii. The interior of the site will provide a similar aggregate surface material throughout the interior of the site to support any emergency access to all equipment and structures built within the site.

Response – [All access roads to this location will be designed and constructed in a manner that meets the above emergency/fire apparatus standards.](#)

Fire Hydrants:

- Based on the MOU and Site-Specific ERP no fire hydrants are being required to support this site.

Response – [Acknowledged.](#)

Gated Entry:

The installation of any gating system will require a City of Aurora licensed contractor to obtain a building permit through the Aurora Building Division prior to the start of any work. This would be considered a structural, life safety and electrical review within the Building Division that is conducted on behalf of the Fire Chief.

- If a gating system is to be installed at a site access point, it must be set back from the flow line of the street at least 35 feet or one design vehicle length, whichever is larger, and be approved by the City of Aurora's Fire and Life Safety department. Gating systems located within proximity to public right-of-way (ROW) may also be assessed by the City of Aurora Traffic Manager or designee and could require a traffic analysis to determine the appropriate distance of gating system to said flow line of ROW. Where a

gating system crosses a dedicated or designated fire access roadway please reference the Security Gates section of the latest edition of the International Fire Code (IFC). The installation of security gates across a fire apparatus access road shall be approved by the Fire Chief (designated Fire Chiefs representative).

- A separate building permit is required for the installation of any gating system that may obstruct fire department access to the internal areas of a site. Prior to construction please submit plans and specifications of your proposed gating system to the Aurora Building Division. If you have any questions, please contact a Fire/Life Safety representative by calling 303-739-7420.

Response – We have never been required to obtain a separate building permit for the manual gate at the entrance to our well sites. The gate has historically been reflected on the Site Plan and SWMP, and the applicant has considered the installation of a gate as approved upon approval of the Site Plan. Please clarify if something has changed.

Hazardous Materials:

Per the 2015, IFC Chapter 50 – A permit through the Aurora Building Division is required to for the prevention, control and mitigation of dangerous conditions related to storage, dispensing, use and handling of hazardous materials. To download a copy of the hazardous materials inventory statement checklists please visit our web site by clicking on the hyperlink provided.

Response – Acknowledged.

Knox Hardware:

Where access to or within a structure or an area is restricted because of secured openings or where immediate access is necessary for lifesaving of fire-fighting purposes, the fire code official is authorized to require a key box to be installed in an accessible location.

Response – Acknowledged.

Legend:

The cover sheet must include a “Site Plan Legend” reflecting both existing and/or proposed site elements that are existing or proposed within site.

Response – Legends are included throughout the Site Plan.

Phasing Plans:

A phasing plan must be provided with the Planning Departments Site Plan and the Public Works Departments Civil Plans submittals.

Response – A Phasing Plan is not required under the Operator Agreement, however, a detailed Project Development Schedule is included with this initial submittal.

Site Plan, Civil Plan, Framework and General Development Plan, and Plat Notes:

The notes being provided below must be included on the cover sheet of the indicated submittal type.

- (Site Plan Note) Access Control Gate or Barrier Systems
- (Site Plan Note) Addressing
- (Site Plan Note) Alternative Fire Lane Surfacing Materials.
- (Site Plan Note) Americans with Disabilities Act
- (Site Plan Note) Emergency Ingress and Egress

Response – These notes do not seem applicable to Oil & Gas development. The notes requested on all previous Site Plans have been included.

Site Plan Data Block:

The site plan must include a “Data Block” on the cover sheet that reflects all items indicated within the “link” that apply to your project.

Response – The data block on the cover sheet reflects items required under the Operator Agreement.

Special Design Considerations:

Based on the information presented in the pre-application meeting, these additional Life Safety criteria must be shown on the site plan, plat and civil plans.

- Access to within 150 feet of Each Structure
- Alternative Fire Lane Surfaces
 - Alternative fire lane surfaces other than asphalt or concrete will require a license agreement through Real Property within Public Works.
- Dead-end Fire Apparatus Access Roadways

Response – Historically, the information above has not been required to be included on our Site Plan and Civil Plans. There are no planned Alternative Fire Lanes for this location.

Trash Enclosure:

Per the 2015 International Fire Code, Section 304.3.3, dumpsters and containers with an individual capacity of 1.5 cubic yards or more shall not be stored in buildings or placed within 5 feet of combustible walls, openings, or combustible roof eave lines.

Response – Acknowledged.

Real Property Division

The Real Property Division reviews the Site Plan and processes Subdivision Plats, Easements, and License Agreements that may be necessary for development of property.

Key Issue:

- As long as there are not any pipeline road crossings, City easement, or ROW encroachments or the need for a culvert in the road at the access point then there is not a need for a License Agreement.

Response – There are no planned pipeline road crossings, encroachments on City easements, ROW encroachments, or the need for a culvert in the road at the access point for this location. License agreements will be secured for any lay flat lines wherever necessary.

Site Plans:

A Site Plan will be required by the Planning Department. Real Property has items that need to appear on that site plan above and beyond what other departments may require. These items are listed on the Real Property Subdivision Plat Checklist.

- You may have items that encroach into city-owned property or easements (i.e. retaining walls, medians, stairs, etc.). If allowed, these types of encroachments require a License Agreement. Requirements can be found in the License Agreement Packet. It takes 8-10 weeks to complete the process after submittal. The License Agreement must be completed before the Site Plan is recorded.

Response – Acknowledged.

STEP II – CONSTRUCTION DOCUMENT PHASE

Civil Engineering Plans

- Civil Construction Plans are required for your project as proposed and shall be submitted electronically.

Response – [Acknowledged.](#)

- Use of the Batch Standards Checker Tool is requested for this project.

Response – [CAD files meeting the city's standards will be submitted to the city prior to signature sets.](#)

- Civil Engineering Plan Review (see links below for additional information):

- Process
- Review Schedule
- Fees

Prior to submittal of the electronic Civil Construction Plans, the civil consultant must schedule a pre- submittal meeting with Christopher Eravelly at 303.739.7457. One paper set of Civil Plans and Reports is required for this pre-submittal review. Also bring a copy of the pre-application meeting notes and a copy of the submitted site plan, including the landscape plan. At this meeting the Civil Plans shall be reviewed for completeness. A checklist is used to ascertain completeness. The engineer shall fill out the checklist and bring it to the pre-submittal meeting. A pre-submittal meeting will not be scheduled until there are no outstanding comments remaining on the preliminary drainage report/letter.

Response – [Acknowledged.](#)

- Civil Construction Document Plan Set generally includes the following plans:

- Stormwater Management Plan
- Final Drainage Plan/Report
- Final Grading Plan
- Utility Plan and Profiles

Response – [The civil submittal includes the documents above.](#)

- Phasing shown on the Site Plan shall also be represented on the Civil Plan drawings.

Response – [There is no planned phasing for this project.](#)

Aurora Water

- A Stormwater Quality Discharge Permit and Stormwater Management Plan and Report will be required for this project. See the latest revision of the City of Aurora Rules and Regulations Regarding Stormwater Discharges Associated with Construction Activities Manual (SWMP Manual) for more detailed requirements. A Colorado Discharge Permit System (CDPS) (CDPS) permit may be required by the State Health Department if a City of Aurora Stormwater Quality Discharge Permit is required.

Response – Acknowledged.

- CAD Data Submittal Standard: The City of Aurora has developed a CAD Data Submittal Standard for internal and external use to streamline the process of importing AutoCAD information into the City's Enterprise GIS. Digital Submission meeting the CAD Data Submittal Standard are required by consultants on development projects when submitting to the City for signature sets and on capital projects funded by the City. Details of the CAD Data Submittal Standard can be found on the CAD Standards web page.

Response – Acknowledged.

Public Works Department

Construction documents should reflect all approved Access, Right of Way, Easements, and Public Improvements that were included and approved on the Site Plan and Plat for your project.

Response – Acknowledged.

Traffic Division

- Construction Documents should reflect all approved accesses, and laneage, and right of way and easement dedications.

Response: Acknowledged.

- The Construction Documents shall include a Signing and Striping Plan, Traffic Control Plans. If lane closures are required per the Traffic Control Plans, occupancy fees will apply. The calculation for these fees are available on the City's website or in the Development Handbook.

Response: Acknowledged.

- Place a note on the Construction Site Plan or Grading Plan indicating all construction vehicles (including construction workers' vehicles) shall access the site from designated haul routes and not through the adjacent residential neighborhood(s).

Response: Pursuant to the Site Plan, the Road Damage Agreement, and Operator Agreement, the applicant is required to use the designated haul route for all phases of development. The note has been added to the Site Plan as requested.

Engineering Division

General Requirements:

- All new developments and redevelopments are required to develop and implement a permanent condition Stormwater Management Plan (SWMP) in conjunction with the overall drainage plan for the site. The SWQCP shall be included in and become part of the preliminary and final drainage reports. The SWQCP shall discuss and propose the solutions to permanently enhance the quality of stormwater runoff through the site.

Response: A permanent SWMP will be included with the engineering submittal, along with a Stormwater Quality Control Plan, that will be incorporated in the Preliminary and Final Drainage Reports.

- The SWMP shall be developed by applying the permanent water quality "best management practices" described in Volume 3 of the USDCM. The SWMP shall be shown in a

separate section of the drainage report. Proposed permanent stormwater quality enhancement facilities shall be sized and located on the drainage map (see section 2.42, "Storm Drainage Design and Technical Criteria" manual). The development community is encouraged to use multiple BMPs in creative and non-traditional site design to achieve the water quality objectives.
Response: [Acknowledged.](#)

- The civil plans will not be approved until the preliminary drainage report is approved and the plat is ready for recordation.
Response: [Acknowledged.](#)

Roadway Design and Construction Specifications:

- All road cuts or other roadway disturbances within the City of Aurora's public right-of-way shall be repaired and restored according to the standards specified in Section 36 of the City's Roadway Design and Construction Specifications, and any other requirements specified elsewhere. If more than 500 square feet of existing roadway is disturbed within one block, the construction area shall be milled and overlaid prior to the end of the project or as directed by the City Engineer.
Response: [Acknowledged.](#)

- Fire lanes. Secondary accesses in landscaping and other areas, need to be designed in accordance with the City's adopted Fire Code requirements, but may be permitted to utilize other materials and options. The proposed secondary access materials shall be approved by both Life Safety (Fire Marshal) and the City Engineer.
Response: [No secondary access is planned for this location.](#)

Building Division Comments:

Building Plan Review

- Process
- Review Schedule
- Fees

The comments made during the meeting address large-scale issues. We strongly recommend that a code consultation meeting be scheduled to discuss more detailed concerns.
Response: [Acknowledged.](#)

During the development review process, you will not need to submit any documentation to the Fire Department for review. The Life Safety group within the Aurora Building Division conducts all site development and construction plan reviews on behalf of the Aurora Fire Department.
Response: [Acknowledged.](#)

The links below contain additional information and requirements for completion, submittal, and permitting of your building plans.

Permit Types:

- Based on the information provided during the pre-application meeting, the Building Division would classify your proposed scope of work under the following permit type.

Oil and Gas Well Sites:

- Per Ordinance No. 2014-44, Sections 146-1207 and 146-1711 do not require operators to obtain a city issued building permit for oil and gas related production equipment or structures. The responsibility of permitting and inspections well sites falls upon the State of Colorado.

Response: [Acknowledged.](#)

Additional Building Construction Plan Checklists: Based on the information provided, you may also need the following Checklists:

- Modular, Construction Trailer, Mobile Home Modular School Checklist

Response: [Acknowledged.](#)

Fire (click on this link to find checklist below)

- Knox Box
- Knox Box Rapid Entry

Response: [Acknowledged.](#)

Key Issues:

- This site will be reviewed for compliance with the approved Operator Agreement, including both the site-specific HAZOP and ERP.

Response: [Acknowledged.](#)

Adopted Codes by the City of Aurora:

This "link" will provide a current listing of all adopted building codes and ordinances utilized by the Aurora Building Division. To view the 2015 International Codes please utilize the following hyperlink; ICC Codes Online.

- The Aurora Building Division currently utilizes the adopted 2015 International Codes Series except for the 2020 NEC. Our next code adoption cycle will be for the 2021 International Code Series.

Response: [Acknowledged.](#)

Geographic Design Criteria:

New construction must adhere to the climatic and geographic design criteria provided using the hyperlink above.

Response: [Acknowledged.](#)

Occupancy Specific Building Code Requirements:

Based on the information provided, your building occupancy or occupancies are as follows.

- B Occupancy - A building or structure or portion thereof, for office, professional or service-type transactions, including storage of records and accounts. Building or tenant space used for assembly purposes by fewer than 50 persons may be considered a Group B occupancy.

Response: [Acknowledged.](#)

Oil and Gas Well Sites:

- Per Ordinance No. 2014-44, Sections 146-1207 and 146-1711 do not require operators to obtain a city issued building permit for oil and gas related production equipment or structures. The responsibility of permitting and inspections well sites falls upon the State of Colorado.

Response: [Acknowledged.](#)

Real Property Division

Reminder – Prior to civil plans submittal, processing of any/all required separate documents should be started so that this process does not interfere with permit issuance.

Response: [The Applicant does not anticipate the need for any separate Real Property documents. Any necessary license agreements for lay flat lines will be secured.](#)

STEP III – CONSTRUCTION PHASE

Public Works Department

Engineering Division

- A geotechnical and pavement design report is not required for paving of new or existing private parking lots, fire lanes, driveways, and private streets (other than TODs and Urban Centers). The civil plans shall have the default pavement thickness, obtained from the Roadway Manual, labeled on the plans and a note indicating the type of soils within the project, unless the developer submits a pavement design for review and approval. A paving permit for this private infrastructure is not required. A Private Development Pavement certification shall be required to be submitted prior to issuing a Certificate of Occupancy. See Section 5.01.2.02 for more information. The developer/contractor is responsible for the required testing, backfill, and compaction for all wet utilities prior to paving. It is the developer/contractor's risk to begin paving without the initial acceptance of the wet utilities.

Response: [Acknowledged, a Certificate of Occupancy is not required for this site.](#)

- Public improvements shall mean and include, but not by way of limitation, the construction, reconstruction, and improvement of the following:
 - fire lanes
 - storm drainage
 - detention and water quality facilities, including necessary structures
 - tree plantings and landscaping
 - repairs and replacements thereof necessitated by construction activity pursuant to issuance of a City of Aurora certificate of occupancy.

Response: [Acknowledged.](#)

Building Division

Notice to Proceed:



85 South 200 East
Vernal, Utah 84078
O: 435.789.1017.
X: 435.789.1813
www.uintahgroup.com

Before any installation of equipment and drilling activities may commence at an Oil and Gas Well Site, the Operator must receive a Notice to Proceed (NTP) from the City. An NTP is issued after satisfaction of all required conditions of an Oil and Gas Permit and the approval and execution of all required agreements. Site Preparation and Grading may commence after the Operator has received an approved Stormwater Quality Discharge Permit and all relevant license agreements.

Response: [Acknowledged](#)

Construction Permits:

Please click on the link provided for a listing of required construction permits.

Fire Safety during Construction, Alteration or Demolition of a Building:

Utilize the requirements of the 2015 IFC, Chapter 33 for both construction and demolition of any structure within your site. To obtain a full copy for fire department access and water supplies to a construction site, please call the Building Department at 303.739.7420.

Response: [Acknowledged](#).

Access Roadways during Construction:

Please click on the "link" provided for requirements for fire department access during construction.

Response: [Acknowledged](#).

Attachments

Pre-Application Conference eMail

From: Meg Allen – Neighborhood Liaisons

To: Kathy Denzer – Crestone Peak Resources

Date: December 17, 2020

[In short](#) "Listed below are the neighborhood associations that are currently registered with the Neighborhood Liaisons within one mile of your proposed project. Once your application has been formally submitted..."

Response: Pursuant to the terms of the Operator Agreement a 1 Mile Abutters list is included with this submittal. Following the submittal to the portal the Applicant will schedule a neighborhood meeting for the Neighborhood Association and residents within 1 mile. The Applicant will coordinate with Meg Allen. Public hearings are not required for our applications under the terms of the Operator Agreement.

This concludes the Response to the Pre-Application Comments received for the Blue 3-65 33-32-31 (FKA Blue 3-65 32-33 South), dated December 31, 2020. Please feel free to contact me directly at (435) 789-1017 if you have any concerns or additional comments.

Sincerely,

A handwritten signature in black ink that reads "Chris J. Clark".

Christopher J. Clark, PE
Project Engineer
CDC/cjc