

October 25, 2021

Mr. Colin Brown  
Oil & Gas Division, City of Aurora  
15151 E. Alameda Pkwy, Suite 5900  
Aurora, CO 80012

**RE: Initial Submission Review** – Eastern Hills South Lateral Gas Pipeline No 5 – Site Plan Amendment  
Application Number: **DA-2235-05**  
Case Number: **2020-6017-05**

Dear Mr. Brown:

Westwood Professional Services, Inc. (Westwood) has received comments, dated October 12, 2021 from the City of Aurora Oil & Gas Division, Arapahoe County Public Works and Development, and the Mile High Flood District for the above referenced project. We have restated the comments below and addressed them per the bold, italicized responses.

## **CITY OF AURORA OIL AND GAS, Colin Brown**

### **1. Plan Set**

#### 1A. Sheet 11

- Comment: Add ‘COA Approval #219055’ to Eastern Hills South pad label.

***Response: Completed.***

- Comment: Add property owner/parcel number labels for parcels shown on sheet.

***Response: Acknowledged.***

### **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: This requirement is acceptable as submitted.

***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: This requirement is acceptable as submitted.

***Response: Acknowledged.***

**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 8/19/2021.

***Response: Acknowledged.***

**10B. Additional Electronic Comments received by the City**

- Name: Joseph Boateng

Organization: Arapahoe County Public Works and Development 6924 South Lima Street, Centennial CO 80112 (publicworks@arapahoegov.com, 720-874-6500)

Comment: Please see the attached letter.

***Response: Acknowledged. Responses are included in this letter.***

- Name: Charlie A. Pajares, PE

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

Comment: Good afternoon - we've completed our review of the referenced site plan amendment and have no comments as the proposed features are not eligible for the District's MEP program or impact any floodplains or drainageways as noted in the letter of introduction provided with the submittal. Please contact me at cpajares@mhfd.org with any questions/concerns.

***Response: Acknowledged.***

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

11A. Comment: This requirement is acceptable as submitted.

***Response: Acknowledged.***

**OPERATIONS PLAN COMMENTS**

**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 8/19/2021.

***Response: Acknowledged.***

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

13A. Comment: This requirement is acceptable as submitted.

***Response: Acknowledged.***

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

14A. Comment: The Security Plan requirement was waived during the Pre-Application meeting on 8/19/2021.

***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.***

#### *Site-Specific Plan*

16C. Site Emergency Response (Page 9) -

- Comment: Please revise the phone number listed under ‘City of Aurora OEM’ to reflect Office Emergency Management number - 303-627-3100 (Fire Life Safety -William Polk/ 303-739-7371 / wpolk@auroragov.org).

***Response: Completed.***

### **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.

#### *Site-Specific Plan*

***Response: Acknowledged.***

17B. Comment: This requirement is acceptable as submitted.

***Response: Acknowledged.***

## **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 8/19/2021.

***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. No license agreements are required for this application.***

19B. Comment: Start and complete License Agreements for all crossings. Upload all completed License Agreements with next submission.

***Response: Acknowledged. No license agreements are required for this application.***

**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.

***Response: Acknowledged.***

**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.

***Response: Acknowledged.***

**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.***

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 features of any extended detention basins are included in 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 profiles are required for this application.***

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

***Response: Acknowledged. No detention basins are included in this application.***

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 sediment and detention basins or private stormwater infrastructure are included in this application.***

### **30. Preliminary Drainage Report**

30A. Comment: The Preliminary Drainage Report requirement was waived during the Pre-Application meeting on 8/19/2021.

***Response: Acknowledged.***

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

31A. Comment: This requirement was satisfied with the approved Crestone Peak Midstream 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: Per the City of Aurora Oil and Gas Manual, effective as of 7/17/2021, the Commercial General Liability Insurance requirement is a minimum of two million dollars (\$2,000,000) per occurrence and four million dollars (\$4,000,000) general aggregate. See Section 135-33 – Security and Insurance. Please contact your insurance company about increasing the Commercial General Liability Insurance amounts and upload an update Certificate of Liability Insurance Form.

***Response: Per the discussions with city staff on 10/20/21, the Certificate of Liability Insurance Form (COI) included with the initial submittal package meets the requirements of the City of Aurora Oil and Gas Manual. Once the one million and two million dollar amounts included on the COI are met, the Umbrella Insurance Policy Crestone Peak Resources has with the City will kick in and will meet the two million and four million dollar thresholds that are required.***

**ARAPAHOE COUNTY PUBLIC WORKS AND DEVELOPMENT, Joseph Boateng, Engineering Services**

Comment: Arapahoe County Engineering thanks you for giving us the opportunity to review the Site Plan for the EASTERN HILLS SOUTH LATERAL NATURAL GAS PIPELINE NO 5. 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.

***Response: Acknowledged.***

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

***Response: Acknowledged.***

If you have any questions, please feel free to contact me at 720-249-3539.

Sincerely,



Melinda Lundquist, PE  
Director, Private Development Colorado