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AuroraGov.org

March 7, 2025

Erin Jennings
Magellan Midstream Partners
One Williams Center OTC-9
Tulsa, OK 74172

RE: INITIAL SUBMISSION REVIEW

Application Name: Denver Expansion Scott City to DIA Pipeline - Site Plan
Application Number: DA-2403-00
Case Numbers: 2025-6002-00

Erin Jennings:

Thank you for your initial submission, which we started to process on Monday, February 10, 2025. 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.

Please revise your previous work and send us a new submission on or before Friday, March 28, 2025. Your administrative decision (AD) date is tentatively set for Wednesday, May 7, 2025.

Note that all our comments are numbered. When you resubmit, include a cover letter specifically responding to each item. The Planning Department reserves the right to reject any resubmissions that fail to address these items. If you have made any other changes to your documents other than those requested, be sure to also specifically list them in your letter.

As always, if you have any comments or concerns, please contact me. I can be reached at 303-739-6824 or malvarez@auroragov.org.

Sincerely,


Maria Alvarez, MURP
Senior Oil and Gas Planner
Energy & Environment Division
City of Aurora

cc: Laura Johnson, Universal Field Services
Scott Campbell, Neighborhood Liaison
Lorianne Thennes, ODA
Filed: K:\\$DA\2403-00Rev1.rtf



DENVER EXPANSION SCOTT CITY TO DIA PIPELINE SITE PLAN PERMIT REVIEW

INITIAL SUBMITTAL REVIEW

SUMMARY OF KEY COMMENTS FROM ALL DEPARTMENTS

- Make necessary revisions to Plan Set and Letter of Introduction.
- Please submit Private and Redacted Emergency Action Plans
- Coordinate with Aurora Water for Water Supply/Water Delivery Agreement
- See comments from Xcel Energy.
- As a reminder, the City has developed CAD Data Submittal Standards for internal and external use to streamline the process of importing AutoCAD information into the city's Enterprise GIS. Please note that a digital submission meeting the CAD Data Submittal Standards is required before your final Site Plan mylars can be routed for signatures or recorded. Please review the CAD Data Submittal Standards, including templates and required layer file labeling, at <http://tinyurl.com/AuroraCAD>. Email your Case Manager the appropriate Site Plan and Pipeline Easement file before submitting your final Site Plan mylars. Once received, the City's AutoCAD Operator will run an audit report, and your Case Manager will let you know whether the file meets or does not meet the City's CAD Data Submittal Standards. Please email CADGIS@auroragov.org for questions or more detailed instructions.
- Respond to all comments and include with your next submittal response.

REVIEWERS

- Oil and Gas – Maria Alvarez / 303-739-6824 / malvarez@auroragov.org / Comments in dark teal
- Public Works Engineering – Kendra Hanagami / 303-739-7295/ khanagami@auroragov.org / Comments in green
- Building/Life Safety – Mark Apodaca / 303-739-7656/ mapodaca@auroragov.org / Comments in blue
- Aurora Traffic Engineering – Dean Kaiser / 303-739-7336 / djkaiser@auroragov.org / Comments in orange
- Aurora Water – Steve Dekoskie / 303-739-7490 / sdekoski@auroragov.org / Comments in red

PLAN SET COMMENTS

1. Plan Set

1A. Sheet 1 (PW Engineering) - Each submittal shall include a cover sheet with a sheet index on it. The full construction plans shall also have a sheet index on a cover sheet that includes all sheets in the set, regardless of whether or not they were submitted together or in smaller sets. All sheets in the plan set shall be numbered consecutively from the cover sheet (sheet 1) to the last sheet. (Please see 3.B.2 of the [2025 COA Roadway Manual](#)).

1B. Sheet 1 (PW Engineering) - Please ensure all pre-app comments are addressed.

1C. Sheet 1 (PW Engineering) - North shall point towards either the top or the right-hand margin of the sheet only and shall be shown on each sheet and/or each enlargement (as needed). (3.D.3 of the [2025 COA Roadway Manual](#)), typ. all sheets

1D. Sheet 1 (PW Engineering) - Please add these notes on all plan and profile sheets: Any asphalt or concrete work will be restored according to the Roadway Manual, latest edition.

1E. Sheet 1 (PW Engineering) - Please make sure to include a Cover Page, Legal Descriptions, Vicinity Map.

1F. Sheet 1 (PW Engineering) - The ESC plan is not being reviewed at this time and will be reviewed with the civil plan submittal.

1G. Sheet 1 (PW Engineering) - Per the Oil and Gas Manual - pipeline location requirements, there should be a minimum 5' separation for utility crossing. Please review, typ. All.

1H. Sheet 1 (PW Engineering) - Please label adjacent subdivision names and their City of Aurora six digit Engineering Drawing Number (EDN).

1I. Sheet 1 (PW Engineering) - Label/dimension all existing and proposed easements. Or provide documentation allowing the pipeline to cross private or Union Pacific Railroad (UPRR) property, typ. all.

1J. Sheet 1 (PW Engineering) - Location and dimension shall show all above-ground items, including curb, gutter, sidewalks, streetlights, pedestals, equipment cabinets, handholes (including handhole sizes), manholes, fences, trees, etc. within ROW.

1K. Sheet 1 (PW Engineering) - Show all existing utilities, and crossings at a 90-degree angle, typ. All.

1L. Sheet 1 (PW Engineering) - Please include a vicinity map. Minimum scale is 1" = 2000' showing the location and name of all arterial roadways within one mile of the proposed development and all other roadways in the vicinity of the proposed development. The project area shall be indicated by shading. This map is required on the cover sheet or first sheet of all submittals. The map is also required in all drainage reports. (3.F.2 of the [2025 COA Roadway Manual](#)).

1M. Sheet 1 (PW Engineering) - Please include a key map. Minimum scale is 1" = 500' and shall show the location and name of all roadways within and adjacent to the proposed development and all non-existing future roadways. This map should be oriented with the north arrow pointing to the top of the drawing. Large projects may use a minimum scale of 1" = 1,000', at the discretion of the engineering reviewer. This map shall appear in the upper right-hand corner on every sheet



showing proposed roadway, water distribution, sanitary sewer, storm drainage, or grading improvements, with the roadway or area to which the design pertains shaded as shown on the following example. If the proposed improvements are shown on a single plan sheet, no key map is required.(3.F.3 of the [2025 COA Roadway Manual](#)).

1N. Sheet 1 (PW Engineering) - Please ensure all minimum cover depths are met within ROW and floodplains per Table 135-38-1 below, and also bored as required instead of open-trenched, typ. all

1O. Sheet 1 (PW Engineering) - Please show ROW, utility easements, property lines, and recorded easements or public rights-of-way identified within the bore route. ROW, Property Lines and Easements can be exported from Aurora Property Info Map. Please use the following website for more information: <https://data-auroraco.opendata.arcgis.com/>

1P. Sheet 1 (PW Engineering) - Please add street classification and material to all street labels. ON ALL SHEETS.

1Q. Sheet 1 (Building Life Safety) - On the cover sheet add this note: NATURAL AND OTHER GAS BY PIPE This shall constitute a contract that shall guarantee to the governing body that before the issuance of the final building permit the overall site will meet 49 CFR part 192, transportation of natural and other gas by pipeline criteria to determine distance criteria of a pipe line proximity of any private dwelling, industrial building, or place of public assembly in which persons work, congregate, or assemble. A letter from the petroleum or gas line easement owner indicting the minimum distance they allow the buried gas line and easement line to the proposed exterior wall shall be submitted at the time of plan submittal for document recordation.

1R. Sheet 1 - Please include all relevant sheets in this submittal.

1S. Sheet 1 - The Rev1 comments in green were made by Kendra Hanagami. My email is khanagam@auroragov.org.

1T. Sheet 2 (PW Engineering) - Please ensure all minimum cover depths are met within ROW and floodplains per Table 135-38-1, typ. all

1U. Sheet 2 (PW Engineering) – Repeat Comment - Please ensure all minimum cover depths are met within ROW and floodplains per Table 135-38-1, typ. all

1V. Sheet 3 (PW Engineering) – Repeat Comment - Please ensure all minimum cover depths are met within ROW and floodplains per Table 135-38-1, typ. all

1W. Sheet 3 (PW Engineering) – Hayesmount Rd (2-Trac)

1X. Sheet 4 (PW Engineering) – 4 59'-9 3/4"

1Y. Sheet 4 (PW Engineering) - 30'-1 1/2"

1Z. Sheet 4 (PW Engineering) - 2' MIN

1AA. Sheet 4 (PW Engineering) - (4' MIN. COV.)

1BB. Sheet 4 (PW Engineering) – Repeat Comment - Please ensure all minimum cover depths are met within ROW and floodplains per Table 135-38-1, typ. All

1CC. Sheet 5 (PW Engineering) - 2' min of separation of all utility crossing.

1DD. Sheet 6 (PW Engineering) - Watkins ROA

1EE. Sheet 6 (PW Engineering) - 2' MIN

1FF. Sheet 6 (PW Engineering) – Repeat Comment - Please ensure all minimum cover depths are met within ROW and floodplains per Table 135-38-1, typ. all

1GG. Sheet 7 (PW Engineering) – Repeat Comment - Please ensure all minimum cover depths are met within ROW and floodplains per Table 135-38-1, typ. all

1HH. Sheet 7 (PW Engineering) - 2' MIN. SE

1II. Landscaping – Thank you for the submission of the Hudson arterial crossing exhibit. Please make sure to include this with the site plan documents.

2. Vicinity / Context Map

2A. This requirement is not satisfied. Must be included in Site Plan and Letter of Introduction as an exhibit showing extent of project.

LETTER OF INTRODUCTION COMMENTS

3. Project Summary

3A. Page 1 - Please Replace With "DA-2403-00, Case Number 2025-6002-00"

3B. Page 1 – Remember, this application only applies to the City of Aurora. How many miles of pipeline are solely in the City? Also, is the varying size of the pipeline also taking place in the city or is there a specific size? Please make sure to also identify the easement width within the City.

3C. Page 1 - Please replace with "Rupture Mitigation Valve (RMV)"

3D. Page 1 - Please replace with "Rights-of-Way"

3E. Page 1 - Please replace with "zoning is AD -airport district and the current land use in the area is agricultural/cropland.

3F. Page 1 - Please replace project info with City of Aurora, versus Adams County throughout application as this application only applies to the City.

3G. Page 1 - Please confirm these are the same timelines for construction in the City.

3H. Page 2 - Might want to add that this method of transportation also reduces roadway impacts all while mitigating carbon emissions from vehicle transport.

3I. Page 2 - What subpart of the CFR 195 are you citing? Also, may want to include a small comment about PHMSA/DOT regulation since it is an interstate pipeline.



3J. Page 2 - In this paragraph, please include how material (i.e. pipe and associated materials) will be brought into the workspace. Please make sure to include where and how materials will be stored for construction, and where you will be staging on site.

3K. Page 2 – Please add “Colorado 811”.

3L. Please indicate the depth at top of pipe, although this may be included in the Site Plan, please state this information. Please make sure to check with engineering on preferred depth due to other utilities within or adjacent to this easement.

3M. Page 3 - Mile-High Flood District is an external reviewer, however, if you do not hear from them regarding boring under floodplains, please reach out and inquire to make sure your project is in compliance with HDD boring under the floodplain/stream. Their email is submittals@mhfd.org.

3N. Page 3 - Please confirm if the pipe will be pigged before and during operations for maintenance as needed.

3O. Page 4 – Please identify who/what state office issued the permit?

3P. Page 4 - In this paragraph, might want to include revegetation plans. The purpose of this is to prevent erosion by returning the site to pre-construction activities and mitigating these erosion issues by revegetating with native grasses. What is the plan here?

3Q. Page 5 - Please elaborate how these measures help with the mitigate erosion. How do these work? How long will these mitigative measures be in place?

3R. Page 6 - if using layflat lines, you must obtain easement crossing agreements for all crossings. if you are using trucks to bring water, traffic impact report or study may be required You may want to reach out to Aurora Water (AW) to determine if you will need to purchase water from AW.

3S. Page 6 - Please rewrite this paragraph. You can use this link as the Aurora Fire map:

<https://auroraco.maps.arcgis.com/apps/webappviewer/index.html?id=7792a6916fc04cbcaaf4b4bc039ba944>. The provided link will allow you to view in which district Aurora Fire will be available. The report as is, unfortunately is not acceptable since this document is catered to Adams County, not the City of Aurora. This is important when addressing reviewer comment since our Emergency Services are to be used within the City Limits.

3T. Page 7 - Please explain how this will impact local traffic and what measures are being taken during construction for either traffic calming or roadway efficiency.

3U. Page 19 - Please look at the Oil and Gas Manual's list of Best Management Practices. Please review and address each one accordingly in your letter of introduction. This can be found on our website at www.auroragov.org/oilandgas or https://cdnsnm5-hosted.civiclive.com/UserFiles/Servers/Server_1881137/File/Residents/Oil%20and%20Gas%20Drilling/Aurora%20Oil%20&%20Gas%20Manual%202021.07.17.pdf, copy this link into the address bar and it will take you to the manual. The list of BMPs can be found in section 135-1 Section H.

3V. Page 20 – Please take a look at this map, although it is for City Council Wards, it provides clear City boundaries, not to be confused with Adams County, [City Council Wards | City of Aurora, Colorado](https://www.auroragov.org/city-council-wards). Also, please confirm that this is the most current map and route.

4. Applicable BMPs Addressed (Narrative List)

4A. Repeat Comment - Please look at the Oil and Gas Manual's list of Best Management Practices. Please review and address each one accordingly in your letter of introduction. This can be found on our website at www.auroragov.org/oilandgas or click on this [link](#) to access the Oil and Gas Manual. The list of BMPs can be found in section 135-1 Section H.

5. Neighborhood Meeting Schedule & Results / Response to Public Comments

5A. Neighborhood Meetings took place in Adams and Arapahoe Counties. The Meeting in Adams County took place on September 25, 2024, and the meeting in Arapahoe County took place on October 22, 2024. In both instances, the applicant sent out invitations via first class postage to arrive two weeks prior to the meetings.

In Adams County 31 landowners were notified and 12 attended the meeting. In Arapahoe County 121 landowners were notified and 70 attended the meeting. Being that the applicant provided reports for both meetings, it was determined by the Division Manager that the Neighborhood Meeting could be waived and the applicant provided proof of these meeting having taken place.

The applicant provided the City with a list of Abutting Property Owners, these residents and/or landowners received notification of the Site Plan process with the City.

5B. Additional Electronic Comments received by the City:

NAME:	Donna George
ORGANIZATION:	PSCo/Xcel Energy
ADDRESS:	123 West 3rd Ave, Denver, CO 80223
PHONE:	303-571-3306
EMAIL:	donna.l.george@xcelenergy.com
COMMENT:	Please see the attached letter.

**6. Response to Pre-Application Comments**

6A. This requirement is acceptable as submitted.

7. Certificate of Liability Insurance

7A. This requirement is not satisfied. If you choose to self-insure, please submit associated documents

8. Application Form**Checklist**

8A. This requirement is acceptable as submitted. This must be included with every submission for tracking purposes.

COMMENTS ON OTHER REQUIRED DOCUMENTS**Security Operations Plan Comments****9. Western District OSRP**

9A. Thank you for the submission of this document. It is a great asset to your overall application. Please be aware that some items do need to have site-specific information, the document provided does give information, but at a very high level. We at the City of Aurora hold our residents' health, safety and welfare as the most critical part of our mission. Understandably, if something were to happen during the lifetime of the equipment, we want to be assured that at a local level it is something that is being addressed.

At this time, we are going to be needing a site-specific Emergency Action Plan to be included as part of this application. Please take a look at this [link](#) as a guide as to how an EAP should be written and what information is required. There will be 2 versions of this document, a private facing document with specific contact info such as cell phone numbers and a redacted copy, this is public facing, so we ask that the private info (cell phones) be redacted. The link provided is going to be an example of the redacted version.

The EAP should contain: Emergency Manager signature page, site-specific information, associated maps and documents with buffer zones, a full list of emergency contacts, spill response and reporting, reportable storage for materials (if applicable), evacuation information and procedures and last but not least, EMS response contacts, at the local level. Along with these versions of the EAP, please include the following documents as different sections to support the overall application:

- Decommissioning / Final Reclamation Plan
- Incident Security Plan
- Hazard Operations Plan (PHA-HazOP)

10. DOT/PHMSA Forms

10A. There are Department of Transportation (DOT)/PHMSA required forms for this project, please include these with your next submission.

11. Project Development Schedule

11A. In the Letter of Introduction (LOI) stated that the "Applicant intends to begin construction of the Project in August 2025 in order to complete the Project by mid-2026. Construction of the overall Project is anticipated to take 8 to 9 months to complete, while Project construction activities within Adams County are anticipated to take 3 to 4 months to complete. Based on this Project schedule, construction within Adams County is anticipated to begin between late 2025 and early 2026". This addresses Adams County; however, this letter needs to be addressed to the City of Aurora. Are the timelines the same? Please edit this information upon resubmission.

12. Traffic Letter / Plan

12A. Needing a document that identifies vehicular traffic routing. The document will also need a rough timeline of construction and that those routes will be maintained by the project.

12B. A turning template will be needed along the route. The design vehicle will need to be the longest vehicle.

The pipeline should avoid possible impact with future signalization.

12C. Future signalization are planned at the corner of each quarter section. Please resubmit with next submittal.

12D. Construction vehicle traffic routing must be shown on plans, maintain these areas.

13. License Agreements

13A. License agreements are required for all current and future City Rights-of-Way, per email with Land Development Review provided with application, a Master License Agreement (MLA) would been to be done for any encroachments on City ROW.

13B. All crossings will require license agreement (every road crossing).

14. Property Owner Authorizations

14A. This requirement is not satisfied. Please submit with next round of review.



15. 350 Foot Radius Abutters List

15A. This requirement is acceptable as submitted.

16. Water Delivery Method/Water Supply Plan

Water Delivery Agreement

16A. Page 1 (AW Engineering) - Utilize multiple test sections through Aurora, to limit the amount of water used. Explain how hydrostatic testing water is disposed of.

16C. Page 1 (AW Engineering) - The water plan must include the water provider and how water will be transported to the site for this project. The plan must demonstrate that the water used doesn't adversely affect Aurora Water surface and subsurface water rights. **Aurora Water will not be able to provide water for this project.** Water agreement must be approved by Aurora Water's Deputy Director (Vern Adam - Vadam@auroragov.org)

Water Supply Plan

16E. The water plan typically relates to how it will be used and how it will be delivered for construction purposes, good start. needs more info, somewhat vague. Please take a look at [Aurora4Biz](#) for examples of the water plan and how it should be drafted. Please make sure to include pigging process in the hydrostatic test and maintenance processes.

17. Fugitive Dust Suppression Plan

17A. This requirement is not satisfied. Please submit with next round of review.

18. Water Use Plan/CDPHE Reg. 84

18A. You stated that you will be using fresh water. Regulation 84 only applies to reclaimed water. Are you using any reclaimed water during construction or for dust control measures? If you do, please see this link for more information: [Water quality reclaimed water \(reuse\) permits | Colorado Department of Public Health and Environment](#).

19. Weed Control Plan

19A. Please include section or expand worker safety section by including herbicide applicator logs and retention schedule for such logs. Also, include blank herbicide log so we know what all is being recorded for compliance with worker safety, this should include the use of Personal Protective Equipment (PPE).

20. Wildlife Impact Mitigation Plan

20A. Page 1 - Please include Application Number: DA-2403-00, Case Numbers: 2025-6002-00.

20B. Page 4 - Could we please get confirmation on number of miles within the city? We have differing distances on different documents. Need to have all these documents match as much as possible to avoid miscommunication.

20C. Page 4 - again, please match LOI - "located in Sections 01, 12, 13, 14, 23, 26 and 35 of T3S, R65W, Section 36 of T2S, R65W and Sections 18, 19, 30 and 31 of T2S R64W of the sixth principal meridian, City of Aurora And County of Adams, State of Colorado".

20D. Page 4 - How many feet of pipe within this easement?

20E. Page 5 - please discuss where the spoils and reuse dirt will be stored during construction. Do you have a specific place where this is being placed?

21. Stormwater Management Plan (SWMP)

21A. This requirement is not satisfied. A SWMP & report will be required. Profiles of the gas lines crossing ROW & utility easements, and floodplains will be required as part of the SWMP package.

21B. SWMP required to be shown on plan and profile in Civil Plans.

21C. Show utility crossings within profiles.

21D. Provide erosion protection on pipelines.

22. Preliminary Drainage Report

22A. Please continue working with Aurora Water Floodplain Administrator.

23. Road Maintenance / Construction

23A. Refer to [NEATS](#) to determine ultimate ROW. The pipeline must be outside of the ultimate ROW when possible.

23B. Construction vehicle traffic routing must be shown on plans, maintain these areas.

23C. Turning templates for intersections is required.

24. Air Quality Plan

24A. This requirement is not satisfied. Please submit an Air Quality Plan with the next submission.

25. Noise Management Plan

25A. Please confirm distance within the City.

25B. Please provide drawings with distances and buffers from the proposed route to the nearest Residential Building Unit (RBU).

25C. This will be determined for possible variance as requested upon next submittal.