



15151 E. Alameda Parkway, Ste. 5900
Aurora, Colorado 80012
303.739.7010

September 19, 2024

Maxwell Blair
GMT Exploration Company LLC
4949 S Niagara, Suite 250
Denver, CO 80237

RE: Second Submission Review

Invicta 3-65-28 Phase II - Site Plan
Location: QS:01Y - Southwest of E 38th Parkway and Monaghan Road 27300 E 38th Pkwy
Case Number(s): 2023-6050-01

Dear Mr. Blair:

Thank you for your second submission, which we started to process on Tuesday, August 27, 2024. 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.

Minor adjustments are needed during this phase of the application. Please revise your previous work and send final/technical submission by Monday, September 30, 2024. Your administrative decision (AD) date is tentatively set for **Wednesday, October 9, 2024**. 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: Andrea Gross - Upstream Petroleum Management Inc 6494 S Quebec St Centennial Co 80112
Carl Carlson - Uintah Engineering & Land Surveying 85 South 200 East Vernal, UT 84078
Lorianne Thennes, ODA
Filed: K:\\$DA\2371-01Ph2Rev2.rtf



INVICTA 3-65-28 PHASE II - SITE PLAN OIL AND GAS PERMIT REVIEW

SUMMARY OF KEY COMMENTS FROM ALL DEPARTMENTS

- See Site Plan Comment Redlines (page 2).
- See Letter of Introduction Comment Redlines (page 2).
- See Public Works Comment Redlines (page 2).
- See Aurora Water Comment Redlines (page 3).
- See Land Development Comment Redlines (page 3).
- See Other Plan Comments Redlines (page 3).

REVIEWERS

- Energy & Environment – Maria Alvarez / 303-739-6824 / malvarez@auroragov.org / Comments in dark teal
- PW Engineering – Julie Bingham / jbingham@auroragov.org / Comments in green
- Aurora Water – Josh Pacheco / 303-826-8840 / jpachec@auroragov.org / Comments in red

1. SITE PLAN COMMENTS

1.A. General Site Plan – Section 135-2(d)(2)

- 1.A.1. Sheet 1 (PW Engineering) – Identify the centerline radius. **Done. Revised Site Plan Uploaded.**

2. LETTER OF INTRODUCTION COMMENTS

2.A. Letter of Introduction – Section 135-2(d)(1) See Revised LOI Uploaded.

2.A.1. Page 3 –Project Summary and Purpose section, please add “located within the proposed Aurora Highlands Industrial Park. The sloped granular surfaced drill pad will support the proposed (8) eight wells.” **Done.**

2.A.2. Page 3 – Please add “Construction trailers, portable toilets, garbage storage, and extra fuel storage will be located near the edge of the pad site. The portable toilets shall have hand washing facilities which will be readily accessible to employees and contractors and will ensure that employees and contractors wash their hands immediately or as soon as feasible after removal of gloves or other personal protective equipment pursuant to OSHA requirements under Occupational Exposure to Bloodborne Pathogens, 29 CFR 1910.1030, requires in sections (d)(2)(iii) and (v).” **Done.**

2.A.3. Page 3 – Please add “/ Land Development Review” since you’re addressing License Agreement comments. **Done.**

2.A.4. Page 3 - Please remove “GMT will not agree to the requested widening of the intersections” and replace with “pavement widening is not being required due to the \$40k/well fee associated with the Traffic Impact Fees.” **Done.**

2.A.5. Page 4 – Please add “GMT has provided documentation regarding the culverts on the south side of 38th Parkway, which were constructed by the landowner. Land Development Review is in communication with the landowner to obtain license agreement documentation.” **Done.**

2.A.6. Noise Variance Section – Please remove redlined text and replace with “A Noise Variance will not be needed per Energy & Environment Manager since the location does not impact any RBUs, and complies with OGM Section 135-5.D.1.” Applicant was notified of this on February 12, 2024, via email. **Done.**

3. PUBLIC WORKS ENGINEERING PLAN COMMENTS

3.A. Road Maintenance / Construction Agreement (Energy & Environment / Public Works) – Section 135-2(d)(17)

3.A.1. The Road Maintenance Agreement has been received and has been signed by the operator and legal, awaiting PW Engineering signatures. **Acknowledged.**

3.B. Traffic Impact Analysis – Section 135-6(d)

3.B.1. Traffic Impact Statement/Plan - TIS comments not addressed during 2nd Review, reviewer comments must be addressed and needs to be finalized during Technical Review. **Dean Kaiser's comments from Ph1Rev2 were addressed per Carl Carlson. The current site plan that is uploaded depicts those requests.**



4. AURORA WATER PLAN COMMENTS

4.A. Applicable Water Plans - Section 135-2(e)(7)

4.A.1. Water Service Agreement was approved by Aurora City Council on Monday, August 26, 2024. **Acknowledged.**

4.B. Stormwater Management Plan / Civils – Section 135-38(d)

4.B.1. SWMP/Civils (Aurora Water) – Stormwater Management Plan has been approved September 3, 2024. **Acknowledged.**

4.C Groundwater Quality Management Plan

4.C.1. Cover page - Please update "Application DA-2371-01 Case Number 2023-6050-01".

4.C.2. Page 1-2 - The Aurora Oil & Gas Manual section 135.4 (c)(2)b. states, "Operator may rely on existing groundwater sampling data from any water source within the radii described above that was collected in accordance with accepted City standards, provided the data was collected within the twelve (12) months preceding the commencement of the Drilling Phase for such Oil and Gas Location..." so data preceding 12 months would not be acceptable.

4.C.3. Appendix C – Addressing Methane, If the well has been abandoned, please remove from table to prevent conflicting data. **A revised Groundwater Quality Management Plan has been uploaded to address these requests.**

5. LAND DEVELOPMENT REVIEW PLAN COMMENTS

5.A. Real Property / Easement / Right of Way Plans – Section 135-6

5.A.1. GMT has provided documentation regarding the culverts on the south side of 38th Parkway, which were constructed by the landowner. Land Development Review is in communication with the landowner to obtain license agreement documentation. **Acknowledged.**

6. OTHER RERPORTS

6.A. Cumulative Impacts Report

6.A.1. Page 2 – Move "Air" section over to align with document. **Done.**

6.A.2. Page 3 - Move "Public Health" section over to align with document. **Done.**

6.A.3. Page 7 - Notes from Phase2 Rev1 - not addressed: make sure to include in this section of text: There are 3 other contributing midstream facilities that can generate odors. **Done.**

6.A.4. Page 8 - Notes from Phase2 Rev1 - not addressed: Might want to add to this section about mitigation covering all items as described in the OGM. As previously mentioned, this will need to be updated in conformance to the OGM. I will leave sections on info that can be addressed in that section. **Done. Verbiage has been added.**

6.A.5. Page 10 - Notes from Phase2 Rev1 - not addressed: Public Health would have been addressed in Phase I. However, if it wasn't because of the focus on the location, please elaborate on how Public Health will be mitigated. If this is something that was addressed, Health, Safety and Welfare, please take that text and add here. **Done.**

6.A.6. Page 10 - Notes from Phase2 Rev1 not addressed: please include mitigation process for dead animals or nests found on location. **Done.**

6.A.7. Page 10 - Notes from Phase 2 Rev1 not addressed: Bird protectors on any openings where chemicals may accumulate. **Done.**

6.A.8. Page 11 - Notes from Phase2 Rev1 - not addressed: Move Public Welfare section up to be with Public Health Section **Done.**

6.A.9. Page 12 - Notes from phase2 rev1 - not addressed: complete all citations. **Citations have been added.**

6.B. Dust Mitigation Plan

6.B.1. Page 2 – Project Summary section, please add "located within the proposed Aurora Highlands Industrial Park. The sloped granular surfaced drill pad will support the proposed (8) eight wells."

6.B.2. Page 2 – Elbert County? Should that be Adams County? if not applicable to Adams, remove statement. **A revised Dust Mitigation Plan has been uploaded.**

6.C Fieldwide HazOP **A Revised Fieldwide ERP has been uploaded.**

6.C.1. Cover page - Please update "Application DA-2371-01 Case Number 2023-6050-01". **Done.**

6.C.2. Page ii - Clean up, just need COA information. You can bring C9 to below TOC. **Done.**

6.C.3. Page 40 - Please update "Application DA-2371-01 Case Number 2023-6050-01". **Done.**



6.C.4. Page 53 – Description of Equipment - Please make sure to include that all tanks will have NFPA labels identifiable from 100'. **Done.**