



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

*AuroraGov.org*

August 19, 2024

Nancy Floyd  
Crestone Peak Resources Midstream  
1631 Manila Rd.  
Bennett, CO 80102

**RE: Second Submission Review**

**Application Name:** King Lateral Natural Gas and Crude Oil Pipeline Amendment 14 – Site Plan Amendment  
**Application Number:** DA-2201-08  
**Case Numbers:** 2019-6048-09

Dear Ms. Floyd:

Thank you for your submission for Rev1 corrections. We have reviewed your submittal and there are Aurora Water (SWMP) related comments remaining. These need to be addressed before the Notice to Proceed can be issued. The comments were provided in the Letter of Introduction. Once this comment has been satisfied, you may proceed with your mylar submission.

You may now submit full Mylar sets to be recorded with Adams County. This must be finalized prior to issuance of the Notice to Proceed.

- When preparing Mylars, please refer to the attached Mylar Checklist. Include a notated and signed copy of this checklist with the Mylars. Pay close attention to the size requirements and submit one additional Arch-D size Site Plan cover sheet. Ensure all signatures and notary stamps are in black ink and are not smeared- plans with ink that is too light or smeared to remain legible when scanned are often rejected by the County recorders' offices.
- Also, please include flattened PDF files and mylar checklist. These can be sent via email in an effort to reduce waste.
- Please be advised that Aurora Water comments need to be addressed before the Notice to Proceed can be issued.

If you have any comments or concerns, please contact Jeffrey Moore directly at [jmoore@auroragov.org](mailto:jmoore@auroragov.org) or at 303-739-7676.

Sincerely,

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

cc: Kacy Williams, Westwood Team 10333 E Dry Creek Rd Ste 240 Englewood CO 80112  
Scott Campbell, Neighborhood Liaison  
Lorianne Thennes, ODA  
Filed: K:\\$DA\2201-08Tech.rtf

August 15<sup>th</sup>, 2024

City of Aurora  
Planning  
Zoning and Plan Review  
Attn: Maria Alvarez, Sr. Planner  
15151 East Alameda Parkway  
Aurora, CO 80112

**RE: Natural Gas & Crude Oil Pipeline As-Built Site Plan Amendment #14  
King Lateral – Letter of Introduction  
Section 28 Township 3 South, Range 65 West, Parcel 0181928100003  
Crestone Peak Resources Midstream LLC**

To Whom it May Concern:

On behalf of the applicant, the Operator, Crestone Peak Resources Midstream LLC (CPRM), Westwood Professional Services, Inc. (Westwood) presents this amendment to the *Natural Gas & Crude Oil Pipeline Gathering System, As-Built Site Plan* to modify the *King Lateral*. The *Natural Gas & Crude Oil Pipeline Gathering System, As-Built Site Plan* was approved by the City of Aurora (City) on September 29, 2020. This amendment application summarizes the shortening of the pipeline easement for the *King Well Pad*.

### King Lateral

The *King Lateral* easement is located in the City of Aurora, in Section 28, Township 3 South, Range 65 West and runs from the existing *Aspen, Bear, Florida Line* to the expanded *King Well Pad*. The *King Lateral* has been modified to connect to the expanded *King Well Pad*, approved by the City of Aurora in December 2023. The modified *King Lateral* is a seventy-five-foot-wide easement, with a total length of approximately 280 feet long. Less than 0.5 acres of disturbed area is associated with this change.

The easement running from the *King Well Pad* to the *Aspen, Bear, Florida Line* currently contains a gas line (six-inch, steel) permitted in 2019 (#218029/2020-6017-00) and the easement is currently permitted for an oil line (six-inch, steel) permitted in 2020 (#220129/2019-6048-00). Crestone will ultimately install a six-inch, steel gas lift line and a two-inch fiber optic/telecom line.

There are no proposed above ground appurtenances for this lateral. The lateral crosses the City of Aurora Right-of-Way for Monaghan Road, therefore License Agreements will be submitted for all proposed lines. The lateral does not cross any floodplains. The alignment of the *King Lateral* was chosen due to the proximity to the *King Oil & Gas Well Pad*. It is not anticipated that a standalone SWMP will be required for this lateral modification since the disturbed area is less than one acre.

Access to the *King Lateral* will be taken from Monaghan Rd and the *King Well Pad*. Construction traffic will follow routes per the approved Road Maintenance Agreement Version 2018.01.03). The weight of the *King Lateral* is a maximum load of 140,000 lbs.

Disturbance has no bearing on whether or not a SWMP would be required. If approved SWMP already exists please modify and resubmit. For questions, please contact AW Steve Dekoskie at sdekoski@auroragov.org.

The *King Lateral* is anticipated to begin construction in the fourth quarter of 2024, with startup and product flowing in the first quarter of 2025. The existing zoning within and surrounding the proposed *King Lateral*

easement is AD – Airport District. The existing land use for the pipeline easement is crop land. A Neighborhood Meeting and a soils report are assumed to be not necessary for this location, based on the reviews of previous amendments.

### **General Pipeline Information**

Pipelines are the safest method to transport material, reducing the possibilities of hazards such as fires, explosions, spills, or leaks. During normal pipeline operations, there will be minimal emissions and fluids released, and solely related to pigging operations; no dust is produced. Without pipelines, hydrocarbons and produced water would be trucked. The decreased truck traffic due to the pipeline will reduce impact to the lifespan of roadway surfaces.

Pipeline infrastructure is monitored remotely 24/7/365. In the event of an emergency, the operator will initiate its Site-Specific Emergency Response Plan. This plan is included with this application. If a problem arises, the location of concern can be isolated at appurtenance sites, remotely. Refer to the approved Integrity Management Plan (Crestone Peak Midstream Field Wide Integrity Management Plan Version 2022.02.04) and the approved Field Wide Emergency Response Plan (Crestone Peak Midstream Field Wide ERP Version 2022.02.04) for more details regarding methods put in place to remove potential hazards to the health, safety, and welfare of the operator's employees and the public.

There are no proposed above-ground impacts to the landscape, that warrant visual mitigation. There are no lights or noise associated with pipeline infrastructure. Because the pipeline corridor is not fenced, natural wildlife movements are not compromised. After construction, the disturbed land will be re-vegetated with native grasses or returned to agricultural croplands.

If these pipelines are no longer needed, they will either be abandoned in place, flushed, filled with inert gas, and capped, or completely removed in accordance with Colorado Energy And Carbon Management Commission (ECMC), Department of Transportation (DOT) and Pipeline and Hazardous Materials Safety Administration (PHMSA) rules and regulations. Continual maintenance on pipelines that have been de-commissioned is not anticipated. If all the utilities within an easement are de-commissioned, the pipeline easement may be released to the landowner.

The proposed pipelines will not have undue adverse effects on existing and future development of the surrounding area. The design of the proposed pipelines mitigates negative impacts on the surrounding area to the greatest extent feasible. The disturbed area shall be maintained during construction by the applicant or property owner in such a manner to control soil erosion, dust, and the growth of noxious weeds.

If you have any questions during the course of this application process, please do not hesitate to contact me directly at 720.249.3549.

Sincerely,

**Westwood Professional Services, Inc.**

*Kacy R Williams*

Kacy R. Williams, PE  
Project Engineer

**Crestone Peak Resources Midstream, LLC**

*Nathan Bennett*

Nathan Bennett  
Director, Permitting and Compliance

cc: Nancy Floyd, Crestone Peak Resources Midstream, LLC

The *Natural Gas Pipeline Gathering System, As-Built Site Plan* was approved by the City of Aurora on September 29, 2020. That application was subject to the third-party oil and gas operator agreement between the City of Aurora and Elevation Midstream, LLC, finalized in July 2019. The City of Aurora has created an Oil and Gas Manual, effective July 17<sup>th</sup>, 2021 and that this application is subject to the Oil and Gas Manual. The following describes how this application will specifically adhere to the required applicable BMPs or describe how a required BMP is not applicable to this application.

1. Access Roads: No new access roads are proposed with this application. Access roads are typically not proposed for pipeline projects.
2. Air Quality: A Fieldwide Air Quality Plan (Crestone Peak Midstream Field Wide Air Quality Plan Version 2022.02.04) was approved with the original As-Built application. Minimal impacts to air quality in the project area would be short term and temporary during the construction of the pipeline. The equipment used to construct pipelines does produce emissions which are regulated by entities other than the City of Aurora.
3. Automatic Safety Protective Systems/Surface Safety Valves: Please refer to Section 8.2 of the approved Integrity Management Plan (Crestone Peak Midstream Field Wide Integrity Management Plan Version 2022.02.04), which addresses pipeline isolation with isolation valves. This document is a field-wide plan, submitted and approved with the As-Built application.
4. Buildings, Structures, Appurtenances: This application does not propose any new buildings, structures or above ground appurtenance equipment. There are no buildings along the main gathering system pipelines. There are existing buildings on the well pad sites where pipelines connect.
5. Chemical Disclosure and Storage: There are areas where chemicals are stored and/or used which are next to existing pipeline above ground appurtenances. Maximum volume at each of these sites is 330 gallons. Any hazardous chemicals that are to be used for construction or maintenance activities will be reported to the City of Aurora Life Safety Department or SDS Sheets can be provided.
6. Color/Paint Color: All permanent above ground appurtenance equipment shall be painted in a tan or brown matte finish unless a different color is necessary for safety. This application does not propose any new above ground appurtenance equipment.
7. Construction of Gathering System and Flowline: This pipeline application memorializes the construction of the proposed pipeline lateral, thus satisfying the intent of this BMP. In the event that the pipelines described in the original application are temporarily taken out of service, conveyance of the natural gas and crude oil will be accomplished in accordance with the terms of the Oil and Gas Manual.
8. Construction Work Hours: The construction of the pipeline will occur during daylight hours, per the City of Aurora Zoning Code. Pipeline delivery to the construction site will be restricted between 7AM and 8PM.
9. Cultural and Historical Resource Protection: No impacts to City identified cultural or historical structures, sites or districts are anticipated.
10. Discharge Valves: Appurtenance sites will be protected with a security fence that limits access to authorized personnel. Valves will be blinded (where necessary) and locked. This application does not propose any new appurtenance sites.
11. Emergency Response/Action Plan: A Fieldwide Emergency Response Plan (Crestone Peak Midstream Field Wide ERP Version 2022.02.04) was approved with the original As-Built application that is in accordance with the provisions detailed in Section II.16 of the Elevation Midstream, LLC Operator Agreement, including filing it with local emergency responders, providing contact information for CPRM's responsible parties, creating as-built mapping, describing a detailed response to all anticipated emergency scenarios, including evacuation routes and contacts for emergency care facilities, demonstrating operator preparedness relative to personnel, supplies and training, listing Material Safety Data Sheets (MSDS), if applicable, coordinating training with local emergency responders, agreeing to reimbursement to local emergency responders for expenses attributed to CPRM, describing emergency shut-down procedures, including logistics and notifications thereof, and agreeing to use non-toxic foam in mitigating fires. A Site-Specific Emergency Response Plan is included with this application that has specific details for the proposed location.
12. Events or Incidents to be reported: Any ECMC or OSHA reportable injuries, accidents, or natural events shall be reported to the City within twenty-four (24) hours. Once the applicable forms are submitted to the agency, a copy of that form will also be provided to the City. In the event of a fire that is not controllable by Operator personnel, explosion, or need for emergency services response, 911 shall be called.
13. Fencing/Security Fencing: No fencing is proposed with this amendment.
14. Fugitive Dust Suppression: There is no on-going dust generation activity associated with this pipeline project. During construction of the pipeline, dust will be mitigated with practices including but not limited to treating with water and restriction of construction activity during high-wind days. Areas that are voided of vegetation to

facilitate construction, will be seeded and mulched. The approved Fieldwide Air Quality Plan (Crestone Peak Midstream Field Wide Air Quality Plan Version 2022.02.04) discusses dust suppression measures.

15. General Maintenance: CPRM will operate and maintain the pipeline infrastructure pursuant to manufacturer specifications and with the intent to comply with the Best Management Practices.
16. Insurance: CPRM can and will comply with the insurance requirements stipulated in the Oil and Gas Manual.
17. Lighting: There is no permanent lighting planned for this pipeline project. All construction activities will occur during daylight hours. Routine maintenance activities will occur during daylight hours.
18. Maintenance of Machinery: Routine field maintenance of vehicles or mobile machinery shall not be performed within 500 feet of any Waters of the United States, as defined by the Environmental Protection Agency. All fueling shall occur over impervious material and spills shall be cleaned up and properly disposed.
19. Mechanical Integrity Program: The Field Wide Integrity Management Plan (Crestone Peak Midstream Field Wide Integrity Management Plan Version 2022.02.04) was approved with the original As-Built Application.
20. Mud Tracking: Tracking of sediment onto public roads will be mitigated per the Stormwater Management Plan.
21. Noise Management Plan/Noise Mitigation: There is no noise associated with typical pipeline operations. During construction, there is noise associated with the excavation equipment, unloading of pipeline materials, and vehicular traffic. There may be noise at the appurtenance sites during typical maintenance activities. CPRM will comply with the City of Aurora noise regulations.
22. Notifications to the City Regarding Commencement of Operations and Phases of Operations/Notifications to the City regarding Commencement of Construction at CGF and Pipeline Operations/Notifications to the City: Written notice shall be provided thirty days (30) prior to construction commencement of any pipelines. No CGF is planned by CPRM.
23. Noxious Weed Control: The Field Wide Weed Control Plan (Crestone Peak Midstream Field Wide Weed Control Plan Version 2021.03.17) was approved with the approved amendment to the As-Built Application.
24. PHA-Hazard and Operability Study: A Fieldwide Hazards & Operability Study (HAZOP) (Crestone Peak Midstream Field Wide PHA-HAZOP Watkins Version 2022.02.04) was approved with the original As-Built application. A site specific PHA-HAZOP letter is included with this submittal.
25. Reclamation/Decommissioning: After construction, the disturbed land will be re-vegetated with native grasses or returned to agricultural croplands. If these pipelines are no longer needed, they will either be abandoned in place, flushed, filled with inert gas and capped, or completely removed in accordance with City, Colorado Energy and Carbon Management Commission (ECMC), DOT and Pipeline and Hazardous Materials Safety Administration (PHMSA) rules and regulations. Continual maintenance on pipelines that have been de-commissioned is not anticipated. If all the utilities within an easement are de-commissioned, the pipeline easement may be released to the landowner.
26. Removal of Debris: All construction-related debris shall be removed from the pipeline corridor for proper disposal in a timely manner. The pipeline corridor shall be always maintained free of debris and excess materials during operation. Operator shall also not stockpile debris at the pipeline corridor.
27. Risk Management: An FMEA (Failure Mode and Effects Analysis) risk analysis is included in the approved Fieldwide Emergency Response Plan (Crestone Peak Midstream Field Wide ERP Version 2022.02.04)) and some aspects of risk are also addressed in the approved Integrity Management Plan (Crestone Peak Midstream Field Wide Integrity Management Plan Version 2022.02.04).
28. Spills: CPRM shall notify the City of Aurora of any spills of a reportable quantity, as defined by the ECMC.
29. Stormwater Management: The proposed pipelines will be entitled through a separate application, including a site-specific stormwater management plan and stormwater management report.
30. Strict Application of BMP Standards: This application is in accordance with the terms of the Oil and Gas Manual, and no variances are currently being pursued. In the event a variance is needed, the request will be made in accordance with City of Aurora requirements.
31. Tree mitigation: No tree removal is anticipated with this pipeline construction. Future pipeline infrastructure will be planned in a manner that minimizes tree impacts.
32. Visual Mitigation: Visual mitigation is largely not applicable, as the pipeline infrastructure is below grade. No above ground appurtenance sites or fencing are proposed with this amendment.
33. Wastewater and Waste Management: Waste is only produced during pigging operations and is collected in a contained skid at multiple pig receiver locations throughout the gathering system. Any waste collected in the skid(s) is removed via vac-truck and taken to a licensed disposal facility.
34. Water Quality Monitoring Plan/Groundwater Pollution Mitigation: Adverse groundwater impacts are not anticipated with pipeline construction. In the event that groundwater is encountered during construction, the City of Aurora will be notified, further a groundwater discharge permit will be obtained from the Colorado Department

of Public Health and Environment (CDPHE). CPRM will utilize stormwater BMPs, such as silt fencing, construction markers, sediment control logs and seeding and mulching in order to minimize erosion and sediment transport during construction. CPRM will utilize leak detection technology to identify locations of maintenance and/or repair in order to minimize leaching into the groundwater table.

35. Water Supply: CPRM agrees to comply with applicable laws, rules and regulations concerning the source(s) of water used in the operations phases of this pipeline, which would be for hydrostatic testing purposes.
36. Wildlife Impact Mitigation Plan: A Site-Specific Wildlife Impact Plan is included with the submittal documents.