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Aurora, Colorado 80012
303.739.7010

AuroraGov.org

December 16, 2024

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

RE: INITIAL SUBMISSION REVIEW

Application Name: Bijou-Invicta Lateral Site Plan Amendment #17
Application Number: DA-2201-11
Case Numbers: 2019-6048-12

Dear Ms. Floyd:

Thank you for your initial submission, which we started to process on Monday, December 2, 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.

Please revise your previous work and send us a new submission on or before Wednesday, January 8, 2025. Your administrative decision (AD) date is tentatively set for Wednesday, January 29, 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: Kacy Williams, Westwood Team 10333 E Dry Creek Rd Ste 240 Englewood CO 80112
Scott Campbell, Neighborhood Liaison
Lorianne Thennes, ODA
Filed: K:\\$DA\2201-11.rtf



BIJOU-INVICTA LATERAL SITE PLAN AMENDMENT #17 OIL AND GAS PERMIT REVIEW

INITIAL SUBMITTAL REVIEW

SUMMARY OF KEY COMMENTS FROM ALL DEPARTMENTS

- Make necessary revisions to Plan Set.
- Make necessary revisions to Letter of Introduction.
- Coordinate with Aurora Water for SWMP review/submission.
- 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 any additional redline comments.

REVIEWERS

- Energy & Environment – Maria Alvarez / 303-739-6824 / malvarez@auroragov.org / Comments in dark teal
- PW Engineering – Kendra Hanagami / 303-739-7295 / khanagam@auroragov.org / Comments in green
- Land Development – Grace Gray / 303-739-7277 / ggray@auroragov.org / Comments in magenta
- Aurora Water – Craig Perl / 303-739-7532 / cperl@auroragov.org and Steven Dekoskie / 303-739-7490 / sdekoskie@auroragov.org

PLAN SET COMMENTS

1. Plan Set

- 1A. Cover Page - Engineering 1st Review - Kendra Hanagami, COA khanagam@auroragov.org.
- 1B. Page 5 – All easement dedications and vacations by separate document are required to be executed prior to civil plan approval. As of this review, no easement dedications or vacations of existing easements have been accepted by the City for review, and civil plans will be returned. Please submit the required documents to: dedicationproperty@auroragov.org.
- 1C. Page 5 - All license agreements are required to be executed prior to civil plan approval. As of this review, no license agreements have been accepted by the City for review, and civil plans will be returned. Please submit the required documents to: licenseagreement@auroragov.org.
- 1D. Page 5 - Advisory comment: During civil plan submittal, reference trench patch detail for Monaghan Rd.

2. Vicinity / Context Map (Energy & Environment)

- 2A. This requirement is acceptable as submitted.

3. Landscape Plan (Planning/Landscape)

- 3A. This requirement is acceptable as submitted.

LETTER OF INTRODUCTION COMMENTS

4. Project Summary (Energy & Environment)

- 4A. Page 3 - Please reference the newly submitted fieldwide plans. Include that the SAWQP has been submitted and is currently under review.
- 4B. Page 3 - Please reference newly approved Security Operations Plan 2024.11.08.
- 4C. Page 4 – (Repeat Comment) - Please reference newly approved Security Operations Plan 2024.11.08.

**5. Applicable BMPs Addressed (Narrative List) (Energy & Environment)**

5A. This requirement is acceptable as submitted.

6. Application Form (Energy & Environment)

6A. Checklist - Please include this as part of your Letter of Introduction.

7. DOT/PHMSA Forms (Energy & Environment)

7A. This requirement has been waived for this project. There are no DOT/PHMSA required forms for this project.

8. Certificate of Liability Insurance Form (Energy & Environment)

8A. This requirement is acceptable as submitted.

9. Neighborhood Meeting Schedule & Results / Response to Public Comments (Energy & Environment)

9A. The Neighborhood Meeting requirement was waived since there are no impacted RBUs within 350' from the center of the pipeline, this has been waived during Library Time and mentioned in the letter sent by the Office of Development Assistance September 12, 2024.

9B. Additional Electronic Comments received by the City:

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

10. Response to Pre-Application Comments (Energy & Environment)

10A. This requirement is acceptable as submitted.

SECURITY OPERATIONS PLAN COMMENTS**11. Fieldwide Operations Plan (Energy & Environment)**

11A. This has been satisfied. Please reference the 2024 Approved Security Operations Plan 2024.11.18. Completed fieldwide documents are as follow:

- Process Hazard Analysis – Hazard Operations (PHA-HazOp)
- Emergency Response Plan (ERP)
- Integrity Management Plan (IMP)

12. Site-Specific Hazard Operations Comments (Energy & Environment)

12A. Letter and Certification received. This requirement is acceptable as submitted.

12B. Please reference the 2024 Approved Security Operations Plan 2024.11.18. This has been satisfied.

13. Site-Specific Emergency Response Plan Comments (Energy & Environment)

13A. Please replace ALL "Invictus" with "Invicta".

13B. Please add cross streets, 38th Pkwy and Monaghan Rd.

13C. Text can be removed.

13D. Please add: Application Number: DA-2201-11 Case Numbers: 2019-6048-12.

13E. Please add signature.

13F. Please add cross streets, 38th Pkwy and Monaghan Rd.

13G. Please replace with Pkwy.

13H. This has been satisfied. Please reference the 2024 Approved Security Operations Plan 2024.11.18.



14. Site- Specific Integrity Management Plan Comments (Energy & Environment)

14A. This requirement was satisfied with the approved Crestone Peak Midstream Field Wide Integrity Management Plan Version 2024.11.18

15. Project Development Schedule (Energy & Environment)

15A. This requirement is acceptable as submitted.

TRAFFIC COMMENTS

16. Road Maintenance / Construction (Public Works)

16A. This requirement was satisfied with the approved Crestone Aurora Road Maintenance Agreement Version 2018.01.03).

16B. The Traffic Letter/Plan requirement was waived during Library Time and mentioned in the letter sent by the Office of Development Assistance September 12, 2024.

LAND DEVELOPMENT REVIEW COMMENTS

17. License Agreements (Real Property)

17A. License Agreements must be submitted to Real Property. Please have agent contact to get the process started.

18. Property Owner Authorizations (Real Property)

18A. This requirement is acceptable as submitted.

19. 350-Foot Radius Abutters List (Energy & Environment)

19A. This requirement is acceptable as submitted.

SURFACE, AIR, WATER QUALITY COMMENTS

20. Fieldwide Operations Plan (Energy & Environment)

20A. This plan is currently under review. The applicant has submitted a plan that focuses on the Environmental Surface Impacts. Please continue to reference previously submitted fieldwide plans until this plan is approved by the reviewing departments. Completed fieldwide documents are as follow:

- Weed Control plan (WCP)
- Air Quality Plan (AQP)
- Waste Management Plan (WMP)
- Wildlife Management Plan (WiMP)
- Visual, Photometric, and Landscape Plan
- Geotech Soils Report/Plan (GSRP)
- Inspection and Maintenance (I&M)
- Surface Water Quality Plan (SWQ)
- Groundwater Quality Management Plan (GWQMP)
- Floodplain and Drainage Plan (FDP)
- Dust Mitigation Plan (DMP)

21. Site-Specific Wildlife Impact Mitigation Plan (Energy & Environment)

21A. Please remove text.

21B. Please replace text from Oil and Gas to Energy & Environment Division.

21C. Please add "Chapter 135 of Aurora City Code".

21D. Please add "City of Aurora".

21E. Please add this to match Letter of Introduction: add information about the project: "The proposed project is approximately 8,660 feet and is proposed on a fifty-foot-wide easement will ultimately contain a steel natural gas pipeline, six inches in diameter, a steel crude oil pipeline, six inches in diameter, a steel gas lift pipeline, six inches in diameter, and a two-inch fiber optic/telecom line. There are no proposed above ground appurtenances for this lateral, not including the surface appurtenances located on the well pads".



22. Fugitive Dust Suppression Plan (Energy & Environment)

22A. This requirement is acceptable as submitted.

23. Air Quality Plan (Energy & Environment)

23A. This requirement was satisfied with the approved Crestone Peak Midstream Field Wide Air Quality Plan Version 2022.02.04.

AURORA WATER COMMENTS

24. Stormwater Management Plan

24A. Site-Specific SWMP – The applicant should submit a revised SWMP for the additional work in the site plan amendment.

25. Preliminary Drainage

25A. The Preliminary Drainage Letter was submitted and flagged for resubmittal. The preliminary drainage checklist was not included. Please do so at next submittal, if you have any questions regarding this, please contact Aurora Water Reviewer.

25B. Complete, sign and submit a PDR checklist, available at the link below in my signature line. Select “Not Applicable” for items that don’t apply to this project type. Information was provided via email 12.09.2024 from Craig Perl, Floodplain Administrator.

- Address all questions/issues noted in the notes from the library time, dated September 12, 2024.
- Address what, if any, measures are required for water quality and detention,
- Include an exhibit with the letter, at 11x17” or smaller, showing the complete alignment for the proposed pipeline in a single view.
- Include exhibits to support statements made in the letter. These include a FEMA FIRM/FIRMette with the pipeline alignment annotated, and similar exhibits from the MHFD SMC mapping.