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Aurora, Colorado 80012
303.739.7010

AuroraGov.org

September 26, 2024

Scott Farkas
Crestone Peak Resources
555 17th Street, Ste. 3700
Denver, CO 80202

RE: Initial Submission Review

Application Name: Aspen 3-65 15-14 South – Site Plan
Application Number: DA-2394-00
Case Numbers: 2024-6036-00

Dear Mr. Farkas:

Thank you for your initial submission, which we started to process on **Wednesday, August 26, 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 **Thursday, October 17, 2024**. Your administrative decision (AD) date is tentatively set for **Wednesday, November 27, 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: Carl Carlson - Uintah Engineering & Land Surveying 85 South 200 East Vernal, UT 84078
Scott Campbell, Neighborhood Liaison
Lorianne Thennes, ODA
Filed: K:\\$DA\2394-00Rev1.rtf



ASPEN 3-65 15-14 SOUTH – 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 External / Public Comments (page 2-3)
- See Security / Operations Plan Comment Redlines (page 3).
- See Public Works Engineering Comment Redlines (page 3).
- See Aurora Water Comment Redlines (page 3).
- See Land Development Comment Redlines (page 3).
- See Other Required Document Plan Comments Redlines (page 4-5).
- Respond to additional redline comments.

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
- Building/Life Safety – Mark Apodaca / 303-739-7656 / mapodaca@auroragov.org
- Traffic Engineering – Dean Kaiser / 303-739-7584 / djkaiser@auroragov.org / Comments in orange
- Real Property – Grace Gray / 303-739-7277 / ggray@auroragov.org / Comments in magenta
- Aurora Water – Joshua Pacheco / 303.826.8840 / jpachec@auroragov.org / Comments in red

1. SITE PLAN COMMENTS

1.A. General Site Plan

- 1.A.1. Sheet 1 - Should engineering require a culvert at entrance, a license will be required.
- 1.A.2. Sheet 3 - Provide the centerline radius for the access road.
- 1.A.3. Sheet 3 - Drainage easement is required for the EDB. I&M plan required for the EDB.
- 1.A.4. Sheet 8 - Drainage easement required.

2. LETTER OF INTRODUCTION COMMENTS

2.A. Letter of Introduction

- 2.A.1. Page 5 of 47 - Please replace text with "proposed project location is zoned Airport District (AD)."
- 2.A.2. Page 5 of 47 - Please replace with "land use".
- 2.A.3. Page 5 of 47 - Please confirm if this is for 8 wells or 12 wells, or if this is a typo.
- 2.A.4. Page 5 of 47 - Please include a description of the distance and depth of the horizontals will travel. This is in relation to the OGDG map on page 74. Once complete reference the map on page 74 for context.
- 2.A.5. Page 5 of 47 - Please include date of WUA approval, this supports the application.
- 2.A.6. Page 6 of 47 – Please make sure tanks are labeled with the NFPA fire labels so Emergency Services can identify in case of an emergency.

2.B. Project Development Schedule

- 2.B.1. Development Schedule received, acceptable as submitted No further comments remain.

2.C. External / Public Comments

- 2.C.1. External Comments Received via Portal or Email.

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.

Name:	Dennis O'Dell
Organization:	Lumen Plat Review
Address:	5325 Zuni St Denver CO 80221
Phone:	970-290-7037
Email:	platreview@lumen.com / Dennis.Odell@lumen.com



Comment:	Lumen has NORESERVATIONS at the Aspen site and RESERVATIONS along the Haul route. Company/developer will call out for locates (811) before any road improvements and if any Lumen utilities are in way and need attention, Developer will call Lumen for arrangements with relocates with this email, relocations@centurylink.com .
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Name:	William Windler
Organization:	First Creek and William Windler Trust 2007
Address:	8100 E Union Ave Denver CO 80237
Phone:	303-913-6181
Email:	williamwindler@y7mail.com
Comment:	On behalf of First Creek LTD LLLP and the William E Windler Trust, I wholeheartedly support the approval of this application. The applicant in this case has gone above and beyond the call of duty to operate a safe and environmentally sound operation taking into account the health and safety of employees and citizens. The applicant has worked diligently with all stakeholders for numerous years.

3. SECURITY / OPERATIONS PLAN COMMENTS

3.A. PHA-HazOp

- 3.A.1. Site specific Emergency Response Plan (ERP) are in compliance with Fire / Life / Safety. No further comments remain.
- 3.A.2. Consider making the PHA-HazOp Plan and ERP one document.

4. PUBLIC WORKS ENGINEERING PLAN COMMENTS

4.A. Traffic Impact Analysis

- 4.A.1. Page 1 - TIS (discussion required regarding Average Daily Traffic (ADT) Report acceptable, single comment regarding differing ADTs from 2023 report from Bijou should be addressed No Site Plan comments. Ready for Tech Referral.
- 4.A.2. Page 15 - 1,950'
- 4.A.3. Page 15 - 1,200'
- 4.A.4. Page 15 - Had 1,600 for Bijou site study (8/2023)'

5. AURORA WATER PLAN COMMENTS

5.A. Water Plan

- 5.A.1. Cover page – Please add: City of Aurora
- 5.A.2. Please add: Application Name: Aspen 3-65 15-14 South - Site Plan. Application Number: DA-2394-00 and Case Numbers: 2024-6036-005.
- 5.A.3. Please add address: 5000 N Monaghan Rd
- 5.A.4. Please include text of the process that will be taken in order to acquire license agreements for lay-flat line crossing City rights-of-way and/or easements.

5.B. Stormwater Management Plan / Civils

- 5.B.1. No comments available at this moment. The application is in the Preliminary Drainage 1st Review phase.

5.C Groundwater Quality Management Plan

- 5.C.1. Cover page - Please add: Application Name: Aspen 3-65 15-14 South - Site Plan. Application Number: DA-2394-00 and Case Numbers: 2024-6036-00
- 5.C.2. Cover page - Please update address: 5000 N Monaghan Rd
- 5.C.3. Page 2 – Submit a copy of the DWR Intent to Construct form (with estimated aquifer depth details).
- 5.C.4. Page 3 - Add a section with your procedure to develop the wells and reference COGCC(ECMC) SAP requirements, including: "Water samples will be placed in a cooler, with ice or other coolant, immediately following collection unless otherwise indicated by the laboratory. Collected samples will be stored in refrigerated conditions that prevent freezing. If shipping is required, samples will be packed in a cooler with sufficient ice to maintain water temperature until the samples reach the laboratory. The coolers should be clearly labeled in order to expedite delivery to the selected laboratory and transported or shipped in a timely manner (preferably overnight) to minimize the potential for failure to meet method-specified hold times. Laboratory-supplied trip blanks and temperature blanks will be included with each cooler. After the



cooler is properly packed, a signed custody seal will be placed across the opening edge of the cooler, signed over to the laboratory or freight carrier, and a copy of the COC form retained, demonstrating transfer of custody."

- 5.C.5. Page 3 - According to the City of Aurora Oil and Gas Operator Agreement, monitoring wells must be constructed down-gradient on the Well Site to sufficiently test the domestic water supply for the City groundwater source in each aquifer (Denver, Laramie-Fox, and Arapahoe).
- 5.C.6. Page 3 - Provide detailed wellbore diagrams for intent to drill and then provide actual/subsequent wellbore diagrams after completion and submitted to DWR as appropriate. Well screen size should be re-evaluated to reduce turbidity which has been seen in the wells sampled at other Well Sites (i.e., consider 10-slot not 30). In addition: is 40' of screen needed, and does this vary between the 4 wells on the pad? See EPA SEDS Guidance Page 19 of 33 SEDSGUID-101-R0. Design and Installation of Monitoring Wells Design and Installation of Monitoring Wells AF.R0.

Effective Date: February 18, 2008: "The minimum nominal casing size for most permanent monitoring wells will be 2". Where a complete program of installation, monitoring, and abandonment is being designed, smaller wells may be installed if suitable purging and sampling equipment for the smaller diameter wells can be specified and obtained. The length of well screens in permanent monitoring wells should be long enough to effectively monitor the interval or zone of interest. However, well screens designed for long term monitoring purposes should normally not be less than 5 feet in length. Well screens less than 5 feet long are generally only used in temporary monitoring wells where ground water samples are collected for screening purposes. " Sand Pack: See Table 6.6.1 in above referenced document (e.g., 100, 20-24, etc.)

Please review these references Per EPA's SEDS Operating Procedure Groundwater Sampling, SEDSPROC-301-R3 Groundwater Sampling (301) AF.R3 Effective Date: March 6, 2013:

"3.2.1.1.2 Chemical Parameter Stabilization Criteria:

With respect to the ground water chemistry, an adequate purge is achieved when the pH and specific conductance of the ground water have stabilized, and the turbidity has either stabilized or is below 10 Nephelometric Turbidity Units (NTUs) (twice the Primary Drinking Water Standard of 5 NTUs). Although 10 NTUs is normally considered the minimum goal for most ground water sampling objectives, lower turbidity has been shown to be easily achievable in most situations and reasonable attempts should be made to achieve these lower levels. "

"4.5 Micro-Purge or No Purge Sampling Procedures The Micro-Purge or No Purge sampling procedures are usually employed when it necessary to keep purge volumes to an absolute minimum. Among the Micro-Purge or No Purge procedures that might be employed are:

- Low pump rate sampling with peristaltic or submersible pumps (typical Micro-Purge sampling),
- HydraSleeve™ or
- Passive diffusion bag (PDB) sampling"

- 5.C.7. Page 4 - Add DWR requirement to label and lock all permitted monitoring wells.
- 5.C.8. Page 4 - Refer to Section 46.6 and Table 1 in the OA for definition of degradation.
- 5.C.9. Page 6 - Explain why this well is not used. Per DWR permit, "Abandonment required".
- 5.C.10. Page 7 - Wellbore Diagram - Should these be filled with depths?

6. LAND DEVELOPMENT REVIEW PLAN COMMENTS

6.A. Real Property / Easement / Right of Way Plans –

- 6.A.1. General Requirement License / Crossing Agreement (Real Property) – Should engineering require a culvert at entrance, a license will be required.

7. OTHER RERPORTS

7.A. Air Quality Plan

- 7.A.1. Cover page - Please add: Application Name: Aspen 3-65 15-14 South - Site Plan. Application Number: DA-2394-00 and Case Numbers: 2024-6036-00.

7.B. Wildlife Management Plan (WiMP)

- 7.B.1. Cover page - Please add: Application Name: Aspen 3-65 15-14 South - Site Plan. Application Number: DA-2394-00 and Case Numbers: 2024-6036-00.



- 7.B.2. Page 3 - Please add City of Aurora
- 7.B.3. Page 3 - Please update text: The current land use is Cropland/Agricultural (AG) and the zoning is identified as Airport District (AD).