

November 21st, 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 #17
Bijou-Invicta Line – Letter of Introduction
Sections 21, 27, & 28 Township 3 South, Range 65 West, Parcels 0181928100003,
0181900000056 & 0181900000232
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 propose the *Bijou-Invicta Line*. 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 connection of the proposed *Bijou Well Pad* and *Invicta Well Pad* to the existing *Aspen, Bear, Florida Line*.

Bijou-Invicta Line

The *Bijou-Invicta Line* easement is located in the City of Aurora, in Sections 21, 27 & 28, Township 3 South, Range 65 West and runs approximately 240 feet south from the existing *Aspen, Bear, Florida Line* appurtenance site located south of the Bear and Schuh well pads before diverting across Monaghan Rd west to the *Bijou* and *Invicta Well Pads*.

The *Bijou-Invicta Line* has a total length of approximately 8,916 feet. The 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. The lateral crosses City of Aurora Right-of-Ways for E. 38th Avenue and Monaghan Rd., therefore License Agreements will be submitted for all proposed lines. The alignment of the *Bijou-Invicta Line* was chosen due to the proximity to the proposed *Bijou* and *Invicta Oil & Gas Well Pads*, as well as the *Aspen, Bear, Florida Line*. A standalone SWMP will be submitted for review and the Approved Field Wide SWMP Report (220129ES2) will be utilized.

Access to the *Bijou-Invicta Line* will be taken from Monaghan Rd, E. 38th Avenue, and the proposed access road for the *Bijou* and *Invicta Well Pads*. Construction traffic will follow routes per the approved Road Maintenance Agreement (Crestone Aurora Road Maintenance Agreement Version 2018.01.03). The weight of the loads for construction traffic will have a maximum load of 140,000 lbs.

The *Bijou-Invicta Line* is anticipated to begin construction in the first quarter of 2025, with startup and product flowing in the second quarter of 2025. The existing zoning within and surrounding the proposed *Bijou-Invicta Line* 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, PE
Project Engineer

Crestone Peak Resources Midstream, LLC


Nathan Bennett
Director, Permitting and Compliance

cc: Nancy Floyd, Crestone Peak Resources Midstream, LLC

Please reference the newly submitted fieldwide plans. Include that the SAWQP has been submitted and is currently under review.

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 17th, 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 ECOM 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.

RESPONSE TO LIBRARY TIME NOTES, DATED SEPTEMBER 12, 2024

Text from the Pre-Application Notes are shaded. Responses are stated in the ***bold italicized*** text.

Standards and Issues:

1. **Land Use** - The existing land use for the pipeline easement is crop land/agricultural. The Bijou-Invicta is an amendment to the Natural Gas & Crude Oil Pipeline Gathering System was approved by the City of Aurora on September 29, 2020. The proposed line is located in the City of Aurora, in Sections 21, 27 & 28, Township 3 South, Range 65 West and runs from the existing Aspen, Bear, Florida Line to the Bijou and Invicta Well Pads. The Bijou-Invicta Line has a total length of approximately 8,660 feet long and will be placed in a 50-foot easement. The proposed project easement will contain 3 – 6” in diameter pipelines: natural gas, crude oil and a gas lift line, also to include a 2” fiber optic/telecom line. There are no proposed above ground appurtenances for this lateral, not including the surface appurtenances located on the well pads. This will be in City of Aurora Right-of-Ways for E. 38th Avenue and Monaghan Rd., therefore, we anticipate a License Agreements will be submitted for all proposed lines. A standalone SWMP will be submitted for review and the Approved Field Wide SWMP Report (220129ES2) will be utilized.

Response: Acknowledged.

2. Best Management Practices (BMPs) for New Pipelines

Please see the attached Best Management Practices (BMPs) form for Oil and Gas Midstream Locations and Oil and Gas Midstream Facilities as outlined in the Oil & Gas Manual. These are the City of Aurora’s current standards and include the following components:

• **General BMPs:**

- o Access Roads
- o Air Quality
- o Automatic Safety Protective Systems / Surface Safety Valves
- o Buildings, Structures, Appurtenances
- o Chemical Disclosure and Storage
- o Color / Paint Color
- o Cultural and Historical Resource Protection
- o Emergency Response / Action Plan
- o Events or Incidents / Events to be Reported
- o Fencing / Security Fencing
- o Fugitive Dust Suppression
- o General Maintenance
- o Insurance
- o Lighting
- o Maintenance of Machinery
- o Mud Tracking
- o Noise Management Plan / Noise Mitigation
- o Notifications to the City Regarding Commencement of Construction at CGF and Pipeline Operations / Notifications to the City
- o Noxious Weed Control
- o PHA-Hazard and Operability Study
- o Removal of Debris
- o Risk Management
- o Spills
- o Stormwater Management
- o Strict Application of BMP Standards
- o Tree Mitigation
- o Visual Mitigation
- o Wastewater and Waste Management

- o Water Quality Monitoring Plan / Groundwater Pollution Mitigation
- o Water Supply
- o Wildlife Impact Mitigation Plan

The BMPs from this list are individually addressed in this Letter of Introduction.

• **Pipeline Specific BMPs:**

- o Construction of Gathering System and Flowlines
- o Construction Work Hours
- o Discharge Valves
- o Mechanical Integrity Program
- o Reclamation

The BMPs from this list are individually addressed in this Letter of Introduction.

Similarly, attached is an Oil and Gas Submittal Documents Checklist that correspond to the BMPs; the required documents include:

- **Notated Checklist- If an item is not marked, it MUST have a brief note explaining why it is not required, e.g. "N/A – No proposed roads." - Included with submittal.**
- Pipelines - Plan Set (including all standard City of Aurora site plan requirements) - ***Included with submittal.***
 - Vicinity/Context Map - ***Included with Site Plan Amendment submittal.***
 - Interim Reclamation Plan – ***Not applicable to pipeline projects.***
 - Visual Mitigation Plan – ***Not applicable to pipeline projects. Additionally, there are no proposed above ground structures with this application.***
 - Landscape Plan – ***Not applicable to pipeline projects.***
 - Lighting Plan – ***Not applicable to pipeline projects. There is no proposed lighting with this application.***
 - Building and Structure Elevations - ***This application does not propose any new buildings or above ground appurtenance equipment.***
 - Within 1,800 feet of the Flowline, show:
 - Existing Land Use – ***Land use is consistent within 1,800 feet of the flowline. Zoning is shown on Sheet 2 of the Site Plan Amendment.***
 - Approved Plans – ***Existing neighborhoods are shown on Sheet 3 of the Site Plan Amendment, Civil Plan approval numbers are shown for the approved well sites.***
 - Zone Districts and Overlays - ***Zone Districts and Overlays are shown on Sheet 2 of the Site Plan Amendment.***
 - Floodplains and Floodways – ***Floodplains are shown on Sheet 4 of the Site Plan Amendment.***
 - Within 500 feet of the Flowline, show:
 - Existing Land Use – ***Land use is consistent within 500 feet of the flowline. Zoning is shown on Sheet 2 of the Site Plan Amendment.***
 - Approved Plans – ***Existing neighborhoods are shown on Sheet 3 of the Site Plan Amendment, Civil Plan approval numbers are shown for the approved well sites.***
 - Zone Districts and Overlays - ***Zone Districts and Overlays are shown on Sheet 2 of the Site Plan Amendment.***
 - Floodplains and Floodways – ***Floodplains are shown on Sheet 4 of the Site Plan Amendment.***
- Pipelines- Letter of Introduction (including variance requests with justifications) - ***Included with submittal.***
 - Project Summary - including applicant name, applicant address, applicant/representative email, and telephone number - ***Included with the Letter of Introduction submittal.***
 - A description of the Gathering System and Flowline, including the product(s) or substance(s) being transported and its/their source, size, terminus or end of route, and type of Facility, including any support structures involved - ***Included with the Letter of Introduction submittal.***
 - All public utility crossings labeling the diameter and type of utility crossing to include bridges, culverts, water, wastewater, and stormwater infrastructure. Also identify all public utilities

within a 150-foot buffer from Gathering System and Flowline - **Included with the Letter of Introduction submittal.**

- A description of the route or location of the Gathering System and Flowline and reasons for its selection. - **Included with the Letter of Introduction submittal.**
- A description of any haul routes during construction, identifying the roads and bridges involved and the weight of the loads - **Included with the Letter of Introduction submittal.**
- A statement which provides evidence of compliance with the following standards:
 - The Gathering System and Flowline will not have undue adverse effects on existing and future development of the surrounding area. Include standard practices in case future development proposes a vehicular crossing over your pipeline- **Included with the Letter of Introduction submittal.**
 - The design of the proposed Gathering System and Flowline mitigates negative impacts on the surrounding area to the greatest extent feasible - **Included with the Letter of Introduction submittal.**
 - 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 - **Included with the Letter of Introduction submittal.**
- Soils reports required for Gathering System and Flowline crossings or any Gathering System and Flowline encroaching in public right-of-way, if required by the Department of Public Works. – **A Soils Report has not been required by Public Works at this time.**
- Applicable BMPs Addressed (Narrative List) - **Included with the Letter of Introduction submittal**
- Neighborhood Meeting Schedule and Results / Response to Public Comments - **A Neighborhood Meeting was deemed not necessary at this point during the Pre-Application Meeting.**
- Response to Pre-Application Notes / Review(s) - **Included with the Letter of Introduction submittal.**
- Pipelines- Operations Plan – **Please refer to the Integrity Management Plan approved with the original application.**
 - Project Development Schedule (An outline of the planned construction, including startup and commissioning schedule, and include timing of each. The City acknowledges that this outline is subject to change, due to factors including, but not limited to, contractor availability, weather, ability to close ROW tracts, and the timing of third party facility completion.) - **Included with the Letter of Introduction submittal.**
 - Procedures to be employed in mitigating any adverse impacts of the proposed routes or sites of the Gathering System and Flowline– **Refer to the Integrity Management Plan approved with the original application.**
 - Security Plan – **Not applicable to pipeline projects. Refer to the BMP Responses included in the Letter of Introduction Submittal**
 - Decommissioning / Final Reclamation Plan – **Not applicable to pipeline projects. Refer to the BMP Responses included in the Letter of Introduction Submittal**
- Emergency Response Plan – **Fieldwide ERP approved with the original application. Site Specific ERP included with submittal.**
 - PHA-HAZOP Analysis Letter - **Included with submittal.**
 - Traffic Letter / Plan – **Waived – Acknowledged.**
- License Agreements - must also be submitted separately to Real Property, upload all completed - **Acknowledged, license agreement to be submitted separately to Real Property**
- License Agreements (if applicable). - **Acknowledged**
- Recorded Surface Use Agreement (must also be submitted separately to Real Property) – **Acknowledged**
- Property Owner Authorizations - **Included with submittal as Surface Use Agreements.**
 - Operator shall provide either authorization letters or agreements from all impacted property owners to verify application can be accepted. If using a third-party easement, the original easement signed by landowners that allows assignment rights will suffice
- **Included with submittal as Surface Use Agreements.**
 - Easements or rights-of-way for the Gathering System and Flowline from other landowners or a statement that the applicant is currently in good faith negotiations with the owners of surface properties, irrigation ditch companies, and/or affected irrigation ditch easement owners of record at the point crossed by the Gathering System and Flowline - **Acknowledged.**

- Water Supply Plan / Delivery Method – *Refer to the BMP Responses included in the Letter of Introduction Submittal*
- Groundwater Quality Monitoring Plan – *Refer to the BMP Responses included in the Letter of Introduction Submittal*
- Fugitive Dust Suppression Plan– *Refer to the BMP Responses included in the Letter of Introduction Submittal*
- Fluid Disposal Plan– *Refer to the BMP Responses included in the Letter of Introduction Submittal*
- Water Use Plan CDPHE Reg. 84– *Refer to the BMP Responses included in the Letter of Introduction Submittal*
- Weed Control Plan – *Fieldwide Plan approved with original application.*
- Wildlife Impact Mitigation Plan – *a site-specific wildlife impact plan is included with the submittal documents.*
- Stormwater Management Plan - *Acknowledged.*
- Preliminary Drainage Report – *No permanent BMPs are proposed, drainage letter included with this submittal.*
- Road Maintenance / Construction
– *Road Maintenance Agreement previously approved between the City of Aurora and Crestone Peak Resources.*
- Air Quality Plan– *Fieldwide Plan approved with original application.*
- Noise Management Plan - *Not applicable for pipeline projects, refer to the BMP Responses included in the Letter of Introduction Submittal*
- Application Form - *Included with submittal.*
- Abutters List - for above ground appurtenance site and 350 Foot Radius Abutters List for pipeline (Combined list and map) - *Included with submittal.*
- ECMC Forms 2 and 2A/ DOT Registration – *No forms or registrations are required for this application.*
- Fee Payment– *To be paid once available on the portal.*

Provide a site-specific narrative addressing each pre-application item and BMP in the Letter of Introduction, including items that you consider not applicable to your project and indicate justification for exclusion.

3. FDP / Master Plan / GDP

Not applicable. - *Acknowledged.*

4. Landscape Design/Land Use Issues

Not applicable. - *Acknowledged.*

5. Surface Use Agreement / Property Owner Authorizations

This requirement will be fulfilled by submittal of a recorded Surface Use Agreement, as itemized in the attached checklist. For Pipelines, Operator shall provide either authorization letters or agreements from all impacted property owners to verify application can be accepted. If using a third-party easement, the original easement signed by landowners that allows assignment rights will suffice. Easements or rights-of-way for the Gathering System and Flowline from other landowners or a statement that the applicant is currently in good faith negotiations with the owners of surface properties, irrigation ditch companies, and/or affected irrigation ditch easement owners of record at the point crossed by the Gathering System and Flowline.

Surface Use Agreements are included with this submittal.

6. New CAD Standards

The City of Aurora has developed a CAD Data Submittal Standard for internal and external use to streamline the process of importing AutoCAD information into the City's Enterprise GIS. Digital Submission meeting the CAD Data Submittal Standards are required by consultants on development projects before submitting to the City for signature sets and on capital projects funded by the City. Please review the CAD Data Submittal Standards, including templates and required layer file labeling, at CAD Data Submittal Standards.

Acknowledged.

Pre-Submittal Meeting:

Contact Maria Alvarez to schedule a pre-submittal meeting at least one week prior to submitting an application. The pre-submittal meeting can be waived, unless you feel it is necessary. If there are any additional questions, please reach out to your Case Manager.

The Pre-Submittal meeting for this Amendment has been waived by Maria Alvarez.

Community Participation:

The City of Aurora promotes citizen participation in the development review process. One way to promote this participation is through a community meeting. Registered neighborhood organizations within a one been made to the Planning and Development Services Department. Occasionally, it will be necessary to hold a community meeting to discuss the application. Your Planning Case Manager can assist and inform you if a community meeting will be required.

Community Meetings:

- This requirement has been waived and approved by the Energy & Environment Manager, Jeffrey S. Moore since the proposed project is outside 350' radius of the residential building unit (RBU).

Acknowledged.

Parks, Recreation & Open Space Department (PROS)

There are no comments from this department.

Acknowledged.

Aurora Water

Aurora Water will receive a referral of the Site Plan and Subdivision Plat for review and comment. Please respond to all Water Department comments with your initial submittal.

Acknowledged.

Key Issues:

- ▶ A SWMP & report is required. Include profiles of pipelines with the SWMP submittal.

Acknowledged. Pipeline profiles at ROW crossings included with SWMP submittal.

Utility Services Available:

- Water service may be provided from: N/A
- Sanitary sewer service may be provided from: N/A
- Project is located on the following Map Page: 97Z

Acknowledged.

Utility Service Requirements:

- A Site Plan is required for this project and must show existing and proposed utilities including:
 - Public/Private Mains
 - Service Lines
 - Water Meters
 - Fire Suppression Lines
 - Fire Hydrants are necessary to service your development.
 - All utility connections in the arterial roadway are required to be bores.

Acknowledged.

- General utility design criteria can be found in Section 5 of the Standards and Specifications Regarding Water, Sanitary Sewer and Storm Drainage Infrastructure (Utility Manual).

Acknowledged.

- Note that Aurora Water reserves the right to enact certain restrictions that may include curtailment of water taps or usage of non-functional turf as established by City Ordinance.

Acknowledged.

- Please reference Ordinance No. 2022-46 pertaining to the use and restrictions of turf and ornamental water features.

Acknowledged.

Utility Development Fees:

- A partial Storm Drainage Development fee is required prior to the recording of the Subdivision Plat or at the time of building permit approval if a Plat is not required. Additional Storm Drainage fees may be charged and are based on the amount of impervious surface created by this project.

Acknowledged.

- The Water Transmission Development Fee and the Sanitary Sewer Interceptor Fee have been combined into the water connection fee and are required to be paid after issuance of building permit and prior to issuance of the Certificate of Occupancy.

Acknowledged.

- For a full listing of Utility Fees, please see the Aurora Water Fee Schedules. Connection fees should be paid prior to December 31st which are subject to increases as approved by City Council.

Acknowledged.

- Commercial users with meters one and one-half inches and smaller with landscaped areas not served by a separate irrigation system shall be charged an outdoor fee based upon the total landscaped area.

Acknowledged.

Stormwater Management

Aurora Water reviews the drainage and public improvement components of your project plans. Drainage design standards can be found in the city's "Storm Drainage Design and Technical Criteria" and "Standards and Specifications Regarding Water, Sanitary Sewer and Storm Drainage Infrastructure".

Acknowledged.

Key Issues:

▶ A Preliminary Drainage Letter shall be submitted with the site plan. Note that a Final Drainage Letter shall be submitted with the Civil Plans. The Preliminary Drainage Report shall be submitted at the time of Energy & Environment Division application submittal. Refer to Sections 2.4.3 & 2.4.4/2.4.5 for submittal requirements. A review fee shall be paid to the City prior to acceptance of the Preliminary Drainage Letter.

Response: No semi-permanent or permanent erosion control measures proposed as part of this pipeline application. Drainage Letter included within this submittal.

▶ A Drainage Report Review Checklist should be completed and signed by a professional engineer and uploaded with the Report/Letter for the first review. The Checklist can be located at the following link: Design Standards and Checklists

Response: Acknowledged.

► Note that Preliminary Drainage Letter (PDL) review fees will be limited to the first three reviews. If additional reviews are required, fourth and greater, then new fees will be required.

Response: Acknowledged.

► For development projects that add more than 5,000 square feet of new impervious area or disturb 1 acre or more, Full Spectrum Detention (FSD) is required. Refer to Tables 10-1 and 11-1 in the Storm Drainage Design and Technical Criteria (SDDTC). Based on the proposed plans submitted for the Pre-Application process, it is unclear whether the gravel pad shown at the Invicta site is proposed new impervious area or part of the existing gravel pad at the site. If this is a new gravel area not already accounted for in the recently approved Invicta pad plans and associated pond (COA EDN 224207) then Full Spectrum detention is required for the new gravel area.

Response: Acknowledged. There are no new impervious areas proposed with this project. The gravel appurtenance sites located on the well pad sites are part of the well pad applications and approvals.

► When fewer than 2 acres of imperviousness drain to an FSD facility, the water quality component of the FSD facility must be an infiltration- or filtration-based Stormwater Control Measure (SCM) such as bioretention or a sand filter. This is because an extended detention basin (EDB) with a surface release for a site of this scale requires orifice sizing that is highly susceptible to clogging. The SCM shall be in place prior to paving or gravel pad installation and prior to the return of any Fiscal Security Deposit (as well as satisfying other conditions of the Stormwater permit).

Response: Acknowledged. There are no new impervious areas proposed with this project. The gravel appurtenance sites located on the well pad sites are part of the well pad applications and approvals.

► This project's proposed surface improvements are potentially served by an off-site Detention and Water Quality/EURV pond. That pond shall be in place prior to paving or gravel installation and it shall be accepted prior to the return of any Fiscal Security Deposit (as well as satisfying other conditions of the Stormwater permit).

Response: Acknowledged. The associated well pad infrastructure and ponds will be built prior to the pipeline installation disturbance.

► The City of Aurora has an updated Drainage Criteria Manual (August 2024) which should be used for this and all future submittals. You are highly encouraged to read section 1.5 SIGNIFICANT UPDATES BY CHAPTER for a summary of the changes in the City's Criteria. The Manual can be downloaded at the following link: [Aurora Water Design Standards](#)

Response: Acknowledged.

• Important reference materials can be accessed via the City's GIS tools.

Response: Acknowledged.

• Drainage references provided in these notes may not be an exhaustive list or include all potentially relevant existing or under-review documents. Approved reports and plans can be found via the City's Property Map. Please note that approved City documents before approximately the year 2000 are generally not available on the City's website and must be requested by the Design Engineer from Aurora Water. The City can only provide copies of approved Master Drainage, Preliminary Drainage, Final Drainage, and Civil Plan documents. In cases where City review of these documents is on-going and they may have some impact on the project, it is the Design Engineer's responsibility to contact the Designers of the documents under-review and coordinate designs.

Response: Acknowledged.

• Supporting information related to your site.

Filed Wide SWMP Report (COA EDN 22-129ES2)

Invicta 3-65-28 (COA EDN 224207)

Bijou 3-65 19-24 North (COA EDN 224175)

Response: Acknowledged.

► The site is located within 5 miles of Denver International Airport. Pond drain times for sites adjacent to air operations areas are limited by FAA recommendations contained in Advisory Circular 150/5200-33C dated 2/21/2020 and by additional guidance specific to Denver International Airport. These drain time limitations are intended to minimize wildlife attractants and potential interference with air traffic. The drain time limitations preclude pond designers from obtaining the full drain times recommended by the Mile High Flood District (MHFD) for Water Quality Capture Volume (WQCV) and Excess Urban Runoff Volume (EURV). The total drain times for ponds within this area is 48 hours.

Response: Acknowledged. No ponds are proposed as part of this pipeline application.

► Under the provisions of Colorado Revised Statute 37-92-602(8), any detention or infiltration facility that becomes operational after August 5, 2015, is required to notify downstream water rights holders prior to operation. Mile High Flood District (MHFD) has created a spreadsheet form (called SDI Design Data) for determining compliance with the statute and a web portal that will send a weekly e-mail notification to downstream water rights holders, satisfying the notification requirements. The Developer will be responsible for having a Professional Engineer, licensed in the State of Colorado, complete the SDI Design Data and uploading to the State's web portal. Aurora Water will verify the information matches the final drainage report. Notification must be made before Civil Plans will be approved or Stormwater Permits will be issued.

Response: Acknowledged. No detention or infiltration facilities are proposed with this pipeline application.

► Per City of Aurora Storm Drainage Design and Technical Criteria Section 10.11, underground detention may be used only as a last resort and must be approved by variance, when all other alternatives are exhausted. If a development chooses to propose underground detention, they are doing so at-risk of significant redesign if the underground detention is not approved. A variance, with supporting documentation, in the preliminary drainage report for underground detention will be evaluated on a case-by-case basis.

Response: Acknowledged. No detention or infiltration facilities are proposed with this pipeline application.

► Release rate for the detention pond shall be based upon the Storm Drainage Design and Technical Criteria Manual, latest revision, and in conformance with the MHFD's Master Drainage Study (MDP)/Outfall Systems Plan (OSP).

Response: Acknowledged. No detention or infiltration facilities are proposed with this pipeline application.

► See section 3.20 EASEMENTS AND TRACTS for specific information for maintenance access for channels, ponds, and all other storm features.

Response: Acknowledged. No storm features proposed with this pipeline application.

► Stormwater Conveyance - Notification of Adjacent Property Owners link: Stormwater Conveyance - Notification of Adjacent Property Owners.

Response: Acknowledged. No stormwater conveyance proposed with this pipeline application.

► Digital files supporting this submittal should be uploaded at the time of first review, examples are CUHP, SWMM, HEC-RAS, and MHFD Detention files.

Response: Acknowledged.

Public Works Department

Traffic Engineering will receive a referral of the Site Plan, Subdivision Plat, and Civils for review and comment.
Acknowledged.

Key Issues:

► Pending something unforeseen, such as public comment, Traffic Engineering will not require a Traffic Study at this time.

Acknowledged.

► All components of the City's Oil & Gas Manual shall be reviewed.

Acknowledged.

▶ Applicant shall use and maintain previously approved haul and construction traffic routes for this project and construction/maintenance access points.

Acknowledged.

▶ Ensure all above ground appurtenances are out of sight triangles.

No above ground appurtenances are proposed with this site plan amendment application.

• Objects and structures shall not impede vision within the sight triangles. Show sight triangles on the site plan and landscaping plan at all access points in accordance with City of Aurora Standard Traffic Detail TE-13. In addition, street trees shall be set back from Stop signs and other Regulatory signs as detailed in City of Aurora Standard Traffic Detail TE-13.3.

Acknowledged. No above ground appurtenances or structures are proposed with this site plan amendment application.

Add the following note landscape plans: 'All proposed landscaping within the sight triangle shall be in compliance with COA Roadway Specifications, Section 4.04.2.10'

Acknowledged. Landscape Plans are not required with this site plan amendment application per city staff.

• Show existing stop signs and street name signs or the installation of new stop signs and street name signs by developer at the site access points onto public streets. Add the following note to the Site Plan:
- The developer is responsible for signing and striping all public streets. The developer is required to place traffic control, street name, and guide signs on all public streets and private streets approaching an intersection with a public street. Signs shall be furnished and installed per the most current editions of The Manual on Uniform Traffic Control Devices (MUTCD) and City Standards, and shown on the signing and striping plan for the development.

Street signs and street name signs will not be impacted by this site plan amendment application.

ROW/Plat:

• Designate a Public Access Easement along private drives/roads

Response: Acknowledged. No private roads proposed with this pipeline application – any private roads were proposed and built with the well pad.

Engineering Division

The Engineering Division reviews the drainage and public improvement components of your project plans. Engineering reviews referrals of the Site Plan and Subdivision Plat from the Planning Department.

Acknowledged.

Key Issues:

▶ Civil plans are required for this application.

Acknowledged.

▶ The 2023 Roadway Manual has been adopted as of February 1, 2023. The link to the updated Roadway Manual can be found below. Should your civil plans be submitted after January 1, 2025, they must meet the criteria of the 2025 Roadway Manual, which will be adopted on January 1, 2025.

Acknowledged.

▶ The City has updated its civil plan submittal intake process which became effective June 26, 2023. A civil plan pre-submittal is no longer required. Please review the new submittal instructions here.

Acknowledged.

▶ Previously approved plans and reports can be found on the City's website. Instructions can be found here: Getting to Engineering Documents Online. Older documents can be provided upon request.

Acknowledged.

ROW/Easements/Plat:

Please coordinate with the Real Property Division of Public Works for the dedication of any required easements. If a plat will be prepared for this development, the plat can cover the required easements.

- Sidewalk easements may be required for new sidewalk installed.

Acknowledged.

- A drainage easement shall be required for any detention/water quality facilities on site. This drainage easement shall tie to a public way. Please coordinate with Aurora Water for their alignment.

Acknowledged. No detention or water quality features proposed with this site plan application.

- Utility easements shall be required for any proposed water/sanitary sewer/public storm sewer located outside of public right-of-way. Please coordinate with Aurora Water for their alignment.

Acknowledged. No water/sanitary sewer/public storm is proposed with this site plan application.

- Public access/fire lane easement shall be required for fire lanes outside of public right-of-way. Please coordinate with Life Safety for their alignment.

Acknowledged

Fire/Life Safety Comments - Building Division

The Building Division will receive a referral of the Site Plan and Subdivision Plat for review and comment. They will review these documents for Life Safety (Fire Code) and Building Code issues.

Acknowledged.

Addressing Requirements:

All buildings or structures, except accessory buildings, shall display the proper building number in the manner provided in this article. It shall be the responsibility of the owner, occupant or any person obtaining a building permit to place such numbers in the manner provided in the Aurora City Code of Ordinance, Chapter 126 - Article VII - Numbering of Buildings.

Acknowledged – no buildings proposed as part of this pipeline application.

Adopted Codes by the City of Aurora – Setbacks:

The site plan and civil plans must reflect the setback requirements of the 2021 International Building and Fire Code for placement of the structure(s) in relation to adjacent buildings, property lines, public ways, accessible walkways, etc. To view the 2021 International Codes please utilize the following hyperlink: ICC Codes Online.

- As of January 8, 2022, the City of Aurora has adopted the 2021 International Codes and the 2023 National Electrical Code.

Acknowledged.

Civil Plans:

Based on the discussion within the pre-application meeting the following information must be reflected within the Civil Plan package submitted to Public Works Department.

- Grading Plan
- Signature Block

Acknowledged.

Gated Entry:

The installation of any gating system will require a City of Aurora licensed contractor to obtain a building permit through the Aurora Building Division prior to the start of any work. This would be considered a structural, life safety and electrical review within the Building Division that is conducted on behalf of the Fire Chief.

- (Oil & Gas Sites) Gating systems shall be labeled on the site plan by using one of the following examples:
 - (2) 11'- 6" Swinging Gate's with Approved Knox Hardware.
 - 23' Manual Swinging Gate with Approved Knox Hardware.

No gates are proposed with this application.

Legend:

The cover sheet must include a "Site Plan Legend" reflecting both existing and/or proposed site elements that are existing or proposed within site.

- (E-Stops) in accordance with the 2021 IFC, Section 2303.2 - Emergency disconnect switches.

Acknowledged.

Oil and Gas:

▶ Along with the standard requirements of the comprehensive Emergency Response Plan (ERP) the site plan submittal must include “freshwater resources” to establish an onsite water supply for emergency purposes. This is typically provided in the form of an approved aboveground water storage system and onsite Aqueous Film Forming Foam (AFFF) supply. Sizing of the water storage tank and the amount of AFFF will be assessed by your fire protection engineer based on actual fire events that have occurred on well sites and approved by the City of Aurora.

A site-specific Emergency Response Plan is included with the initial submittal of the site plan amendment application.

▶ The site plan must reflect the location of all hazardous materials on site. A separate hazardous materials inventory statement must be submitted with your site plan. Once finalized, this information will be placed on a USB flash drive and the flash drive placed in the Knox Box needed at the primary entry gate to the site.

A site specific PHA-HAZOP letter is included with the initial submittal of the site plan amendment application.

- Per Ordinance No. 2014-44, Sections 146-1207 and 146-1711 do not require operators to obtain a city issued building permit for oil and gas related production equipment or structures. The responsibility of permitting and inspecting sites falls upon the State of Colorado.

Acknowledged.

- Cover Sheet, Site Plan Notes:

ACCESS ROAD AND PAD CONSTRUCTION SHALL BE DESIGNED AND MAINTAINED TO SUPPORT THE IMPOSED LOADS OF FIRE APPARATUS (85,000 LBS) UTILIZING THE CDOT ROAD-BASE #6 SPECIFICATION TO PROVIDE FOR ALL WEATHER DRIVING CAPABILITIES, ACCESS ROAD SHALL BE 23' WIDE WITH A 29' INSIDE TURNING RADIUS. WHILE CDOT #6 IS SPECIFIED, THE MATERIAL USED TO CONSTRUCT THESE SURFACES MAY BE OF ANY ONE OF, OR A COMBINATION OF, SEVERAL AGGREGATE MATERIALS AVAILABLE. APPROVED MATERIALS INCLUDE PREMIXED ROAD BASE MATERIAL, 1-1.5 ANGULAR INCH RIVER ROCK, CRUSHED GRANITE OR OTHER AGGREGATE WITH NOT LESS THAN ONE-INCH NOMINAL SIZE DESIGNATION AND CDOT ROAD BASE CLASS 6.

No access roads or well pads are proposed with this application. This application is specific to pipeline installation only and will utilize the access roads provided with the individual well pads.

- Gating systems shall be labeled on the site plan by using one of the following examples:

- o (2) 11' - 6" Swinging Gate's with Approved Knox Hardware.
- o 23' Manual Swinging Gate with Approved Knox Hardware.

No gating systems are proposed with this application.

- Emergency Response: A comprehensive Emergency Response Plan (ERP) is required to be submitted with your application package. Please find Life Safety requirements for this plan beginning on page (?).

A site-specific Emergency Response Plan is included with the initial submittal of the site plan amendment application.

- Operator Agreement: As written in the City Council-approved Operator Agreement, Best Management Practices for pipelines shall be followed.

BMPs are individually addressed in this Letter of Introduction

- Notices to Proceed: Notices to Proceed with construction activities will only be issued after site plans and civil plans are approved, permits are issued, and license agreements are executed.

Acknowledged.

- A comprehensive Emergency Response Plan (ERP) is required to be submitted with your application package. The ERP shall specifically define how various potential events will be handled. The plan should cover emergencies that are larger in scope or duration and extend

beyond a simple operational set-up handled by operations personnel. The plan will be required to include an Executive Summary that indicates the specific measures to be taken according to the ERP which will aid in the response to the emergency. Examples of what should be included in the response plan include, but are not limited to:

- o Operations
- o Completion and Production Operations
- o Fresh water sources
- o Water disposal
- o Governing Regulations
- o Notifications (local, city, county, state, and agencies) Keep in mind the local notifications shall include property owners.
- o Vicinity Maps.
- o Traffic generation
- o Emergency Response Plan
- o Best Management Practices
- o Typical Photos
- o Signage
- o Project location
- o Road Construction

A site-specific Emergency Response Plan is included with the initial submittal of the site plan amendment application.

- The documents submitted must reflect the credentials of the individuals who are either compiling the data, conducting the analysis; the engineer of record and the third-party facilitator who will be submitting the letter.

Acknowledged.

- The applicant shall work with the fire department, Office of Emergency Management, and emergency responders concerning emergency response plans for the facilities and respective pipelines. Following start-up and operation of the project, the applicant will need to address periodic training drills, as required.

Acknowledged.

- Add the following note to the site and civil plan submittals.

EMERGENCY INGRESS AND EGRESS - RIGHT-OF-WAY FOR INGRESS AND EGRESS FOR SERVICE AND EMERGENCY VEHICLES IS GRANTED OVER, ACROSS, ON AND THROUGH ANY AND ALL PRIVATE ROADS AND WAYS NOW OR HEREAFTER ESTABLISHED ON THE DESCRIBED PROPERTY.

This note is not applicable for this application.

Site Plan, Civil Plan, Framework and General Development Plan, and Plat Notes:

The notes being provided below must be included on the cover sheet of the indicated submittal type.

Acknowledged.

Site Plan Data Block:

The site plan must include a "Data Block" on the cover sheet that reflects all items indicated within the "link" that apply to your project.

Site Plan Data Block is not applicable for this application.

Land Development Review Services Division

The Land Development Review Services Division reviews the Site Plan and processes Subdivision Plats, Easements, and License Agreements that may be necessary for development of property.

Subdivision Plats:

NA

Acknowledged.

Separate Documents:

- A separate document refers to a process to describe and record an encumbrance (easement, license etc.) or release of such on property when a subdivision plat already exists. The document usually consists of a legal description and drawing. Each are reviewed and approved by the city, signed by the property owner as well as the appropriate city officials and recorded with the county.

Acknowledged.