



August 8, 2024

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

RE: Initial Submission Review

Application Name: King Lateral Site Plan Amendment #14
Application Number: DA-2201-08
Case Numbers: 2019-6048-09

Dear Ms. Floyd:

Thank you for your initial submission, which we started to process on Monday, July 15, 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, August 29, 2024. Your administrative decision (AD) date is tentatively set for Wednesday, October 9, 2024.

Please be advised that this is a minor amendment to the already approved gathering line, which was approved September 2020, this application will only focus on several items and has taken the FieldWide Plans into consideration.

Regarding FieldWide Plans, these are also being sent to you with comments, to confirm the information is up to date and to make any adjustments as necessary. These will be required to be updated every 2 years moving forward.

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\2201-08.rtf



CHICO-WATKINS LATERAL SITE PLAN AMENDMENT #12 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 Land Development Comment Redlines (page 2).
- See FieldWide Plan Updates/Review Comments (page 3-5).
- Respond to additional redline comments.

REVIEWERS

- Energy & Environment – Maria Alvarez / 303-739-6824 / malvarez@auroragov.org / Comments in dark teal
- PW Engineering – Richard Horstmann / 303-739-7319 / rhorstma@auroragov.org / Comments in green
- Real Property – Grace Gray / 303-739-7277 / ggray@auroragov.org / Comments in magenta

1. Site Plan Review Comments

- 1A. Sheet 1 – (Land Development Review) – Pipelines crossing city roads or row require a license agreement.
- 1B. Sheet 16 – (PW Engineering) - Comments in green were made by Development Services Civil/Site Plan reviewer Rich Horstmann. Please reach out to him at rhorstma@auroragov.org for any comments or questions.
- 1C. Sheet 16 – (PW Engineering) - it seems like the clouding should also be around the actual crossing.

2. Letter of Introduction Review Comments

- 2A. Page 1 – (Energy & Environment) – Please include BMPs as an attachment with this letter.
- 2B. Page 2 – (Energy & Environment) – Please update LOI text to reflect “Colorado Energy Carbon Management Commission (ECMC)”.
- 2C. Page 2 – (Energy & Environment) – Neighborhood meeting is being waived since proposed project location is outside 5,280ft (1.0 mile).
- 2D. Page 3 - 4 – (Energy & Environment) – Please include BMPs as an attachment with this letter. Also, please make sure to include a vicinity map with the Letter of Introduction.

3. Land Development Review Comments

- 3A. (Land Development Review) – Pipelines crossing city roads or row require a license agreement.

4. Neighborhood Meeting Schedule & Results / Response to Public Comments

- 4A. The Neighborhood Meeting requirement was waived during the Pre-Application meeting on 7/10/2024.
- 4B. Additional Electronic Comments received by the City:
 - Name: Donna George
 - Organization: Xcel Energy/PSCo, 1123 W. 3rd Ave, Denver CO 80223
 - Contact Info: donna.l.george@xcelenergy.com, 303.571.3306
 - Comment: Please see the Attached Letter.

End of Rev1 Comments



FieldWide Plan Updates/Review Comments - (Energy & Environment) - Please be advised that none of these items are contingent of your application being approved or denied, These documents, since they support your application, need to be updated to reflect your current processes and / or these individual items need to be incorporated into your permitting application process.

5. **Security Operations Plan** - Need to incorporate a Security and Operations Plan (SOP) to your Fieldwide Plans to meet your BMPs. As stated in the Oil and Gas Manual (**Section 135-33**). Please bundle these documents as: **Security Operations Plan**.

5A. PHA-HazOp – (PHA-HazOp)

- 5.A.1. Cover page - Certification needs to be updated, unless it is currently still active.
- 5.A.2. Fieldwide HazOp Plan was last updated 6.23.2020. This plan needs to be updated with current information. Please review and revise.
- 5.A.3. Page 22 of 57 - Please get this updated. We are post-pandemic. This can be updated with electronic signatures.
- 5.A.4. Page 94 of 126 - Add foam discussion and application protocol.
- 5.A.5. Page 108 of 126 - Please fix spelling errors throughout.
- 5.A.6. Page 111 of 126 - Please update all COGCC to reflect Energy and Carbon Management Commission (ECMC) throughout document.

5B. Emergency Response Plan/Emergency Action Plan (ERP/EAP)

- 5.B.1. Emergency Notification Chart (Private) - Per document notes, this document was created: 12/10/2021 and revised: 01/07/2022. Needs thorough review and update.
- 5.B.2. Emergency Notification Chart (Public) - per document notes, this document was created: 12/10/2021 and revised: 01/07/2022. Needs thorough review and update.
- 5.B.3. Page 1 - Fieldwide ERP/EAP - Please add cover to this document.
- 5.B.4. Page 2 - Are these signatures still active within Crestone/Civitas? Please update as needed.
- 5.B.5. Page 2 - Please add date line.
- 5.B.6. Page i - Review and modify as needed. Per document last revised date is 2020.

5C. Integrity Management Plan (IMP) –

- 5.C.1. Cover page - Please update to most current information. Last updated was 2022.
- 5.C.2. Page 4 of 28 - Please update to Colorado Energy And Carbon Management Commission (ECMC).
- 5.C.3. Page 18 of 28 - Please update as necessary with any events that have taken place since 2021.
- 5.C.4. Page 23 of 28 - Please discuss when these specifically take place and where these inspection logs can be obtained.
- 5.C.5. Page 27 of 28 – Appendix 6 – HazOp Study – Please include a short summary of what is contained in the HazOp Study, where to find it and how it is executed. Please make sure to include that for different areas on a case-by-case basis, Aurora Fire/Life/Safety may request a site specific HazOp/EAP/ERP. Even though this is a separate document, explain that in the summary versus sending the reader searching for the doc on their own.

6. **Surface, Air, Water Quality Protection (SAWQP) – Sections 135-34, 135-35, 135-36** - Need to incorporate a Surface Quality Protection (SQP) to your Fieldwide Plans to meet your BMPs. As stated in the Oil and Gas Manual (Section 135-6. See page 96 of the Oil and Gas Manual). Please bundle these documents as: **Surface, Air, Water, Quality Protection Plan**.

6.A. Weed Control Plan (WCP)

- 6.A.1. Page 1 – Please add cover page.
- 6.A.2. Page 1 - Please update to reflect most current information. Plans need to be updated every 2 years.



- 6.A.3. Page 1 - Please confirm if these are still your current pest/weed control contacts or if these have changed since 2020.
- 6.A.4. Page 2 – Summary section - Please discuss in your summary:
 - 1. How these herbicides will be applied,
 - 2. How often will these herbicides be applied,
 - 3. Where they will be applied and please discuss the environmental impacts this might have on surrounding vegetation,
 - 4. During interim reclamation, will the application of these herbicides have an impact on the new vegetation going in?
 - 5. There is a long list of herbicides that will be used, how are these being applied? Are these being used in interim cycles; are they being used together...?
- 6.A.5. Page 3 - Please confirm there is an MSDS herbicide application log for these and they are being maintained for a minimum of 5 years.

6.B. Air Quality Plan (AQP)

- 6.B.1. Cover page - Per document notes, this document was created:12/2021. Needs thorough review and update.
- 6.B.2. Page 2 - Please update text to include "in the City of Aurora within Arapahoe and Adams Counties".
- 6.B.3. Page 3 - Please explain how this will happen and what measures will take place to prevent or eliminate emissions/events from taking place.
- 6.B.4. Page 3 - Please make sure to include info for APENs per CDPHE: Submit APCD-213 (and if necessary APCD-215) to report new/existing emissions from routine or predictable gas venting activities, complete a routine (five-year) Air Pollutant Emission Notice renewal, request permit modifications, or report changes in emissions, activities, or equipment. Routine or predictable gas venting activities include emissions from blowdowns of equipment/ vessels, pigging, well unloading, downhole well maintenance, and other blowdown events. Refer to PS Memo 20-04 for more information on this source and APEN guidance. For more information please visit: <https://cdphe.colorado.gov/oil-gas-apens>.
- 6.B.5. Page 4 - Please discuss/summarize the equipment used, how often the equipment is used, how it will be calibrated. what all is being recorded and where these air quality inspection logs can be found and accessed.
- 6.B.6. Page 4 – Emergency Venting - Please include who you will be contacting and the method of communication.
- 6.B.7. Page 4 - Please include "to avoid the spread of dust during construction operations, speed will be reduced to 5-10 miles per hour/MPH.

6.C. Waste Management Plan (WMP)

- 6.C.1 Need to incorporate a Waste Management Plan (WMP) to your Fieldwide Plans to meet your BMPs. As stated in the Oil and Gas Manual (Section 135-34. B).

6.D. Wildlife Management Plan (WiMP)

- 6.D.1. Need to incorporate a Wildlife Management Plan (WiMP) to your Fieldwide Plans to meet your BMPs. As stated in the Oil and Gas Manual (Section 135-36. G).

6.E. Visual, Photometric and Landscape Plan

- 6.E.1. Please incorporate a **Visual, Photometric and Landscape Plan (VPLP)** to your Fieldwide Plans to meet your BMPs. As stated in the Oil and Gas Manual (Section 135-36. B).

6.F. Geotech Soils Report/Plan (GSRP)

- 6.F.1 Need to incorporate a Geotech Soils Report/Plan (GSRP) to your Fieldwide Plans to meet your BMPs. As stated in the Oil and Gas Manual (Section 135-32).



6.G. Inspection and Maintenance (I&M)

- 6.G.1. Need to incorporate an Inspection and Maintenance (I&M) to your Fieldwide Plans to meet your BMPs. As stated in the Oil and Gas Manual As stated in the Oil and Gas Manual (Section 135-90).

6.H. Surface Water Quality Plan (SWQ)

- 6.H.1. Need to incorporate a Surface Water Quality (SWQ) to your Fieldwide Plans to meet your BMPs. As stated in the Oil and Gas Manual (Section 135-34. B).

6.I. Groundwater Quality Management Plan (GWQMP)

- 6.I.1. Need to incorporate a Groundwater Quality Management Plan (GWQMP) to your Fieldwide Plans to meet your BMPs. As stated in the Oil and Gas Manual (Section 135-34.C).

6.J. Floodplain and Drainage Plan (FDP)

- 6.J.1. Need to incorporate a Floodplain and Drainage Plan (FDP) to your Fieldwide Plans to meet your BMPs. As stated in the Oil and Gas Manual (Section 135-34. F and 135-34. G).

6.K. Dust Mitigation Plan (DMP)

- 6.K.1. Need to incorporate a Dust Mitigation Plan (DMP) to your Fieldwide Plans to meet your BMPs. As stated in the Oil and Gas Manual (Section 135-35).