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Aurora, Colorado 80012
303.739.7010

AuroraGov.org

November 7, 2024

Scott Farkas
Crestone Peak Resources
1801 California St Ste. 3700
Denver, CO 80202

RE: Initial Submission Review

Chico 4 65 26 25 North - Site Plan
Location: QS:13AC – Jewell Ave and Hayesmount Rd
Case Number(s): 2024-6041-00

Dear Mr. Farkas:

Thank you for your initial submission, which we started to process on Thursday, October 17, 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.

Minor adjustments are needed during this phase of the application. Please revise your previous work and send Second Submission by Tuesday, December 3, 2024. Your administrative decision (AD) date is tentatively set for **Wednesday, January 15, 2025**. Note that all our comments are numbered. When you resubmit, include a cover letter specifically responding to each item.

The Planning and Business Development 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
Lorianne Thennes, ODA
Filed: K:\\$DA\2395-00Rev1.rtf



CHICO 4 65 26 25 NORTH - 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 Other Plan Comments Redlines (page 2-4).

REVIEWERS

- Energy & Environment – Maria Alvarez / 303-739-6824 / malvarez@auroragov.org / Comments in dark teal
- PW Engineering – Farhad Sarwari / fsarwari@auroragov.org / Comments in green
- Traffic Engineering – Dean Kaiser / 303-739-7584 / djkaiser@auroragov.org / Comments in orange
- Aurora Water – Josh Pacheco / 303-826-8840 / jpachec@auroragov.org / Comments in red

1. SITE PLAN COMMENTS

1.A. Sheet 1 (PW Engineering) – 1st Review Comments in green were made by PW/Development Services, Engineering reviewer Farhad Sarwari and can be contacted at fsarwari@auroragov.org. Ready for Technical Referral, Minor comments, Benchmark, street names.

1.B. Sheet 1 (PW Engineering) – Not found in Aurora Survey Control Map. This is the closest Benchmark.

1.C. Sheet 1 (PW Engineering) – Engineering discussed with Oil and Gas Division and agreed that VTC (Vehicle Tracking Control) pads shall be installed at the entrance of access road to Jewel Ave instead of paving these streets. First 100' of the access roads shall be paved when Jewel Ave is paved in this area. Please reach out to Jeffrey Moore at jmoore@auroragov.org and cc Brianna Medema at bmedema@auroragov.org to execute a minor change agreement before your next submittal and provide a brief summary of this agreement as a note on this plan set.

1.D. Sheet 1 (PW Engineering) – Please label these streets.

1.E. Sheet 4 (Traffic Engineering) - Ensure cattle guard can handle weight of construction and tanker truck traffic

2. LETTER OF INTRODUCTION COMMENTS

2.A. (Energy & Environment) – Letter of Introduction acceptable as submitted. Please advise when you are having the Neighborhood Meeting for this location, you are welcome to have a virtual meeting to meet with the requirements of this application.

3. PRE-APPLICATION RESPONSE TO COMMENTS

3.A. (Energy & Environment) – Response to Comments acceptable as submitted.

4. WILDLIFE MITIGATION PLAN (WiMP) COMMENTS

4.A. (Energy & Environment) – Please add DA-2395-00.

4.B. (Energy & Environment) – Please add City of Aurora.

5. NOISE MITIGATION PLAN COMMENTS

5.A. (Energy & Environment) – Please add DA-2395-00.

6. PHA-HAZOP COMMENTS

6.A. Cover Page (Energy & Environment) – Please add: DA-2395-00, Case Number: 2024-6041-00 and Address: 29860 E Jewell Ave

6.B. Page 2 (Energy & Environment) – Per the Operator Agreement, this site can have a max of 8 wells. This includes the 4 wells that are already in place. Please review and modify to meet OA standards.

6.C. Page 2 (Energy & Environment) – Please add: DA-2395-00, Case Number: 2024-6041-00

7. GROUNDWATER QUALITY MONITORING PLAN COMMENTS

7.A. Page 1 (Energy & Environment) – Please add City of Aurora



7.B. Page 1 (Energy & Environment) – This statement applies to ECMC rules but should include Aurora's requirements too.

7.C. Page 1 (Aurora Water) - According to section 46.2.5 of the Operator Agreement, "the City may request that Operator drill and construct a monitoring well sufficient to test the domestic groundwater source near the New Well ("Requested Well"). The Requested Well should be on or near the Well Site and down gradient from the New Well. Operator and the City shall agree on the location and design of the Requested Well. The Requested Well must be drilled to adequate depths in order to allow for testing all available aquifers down to and including the Laramie Fox-Hill." This must be constructed as none of the already constructed wells near the well site reach the adequate depth for monitoring.

7.D. Page 1 (Energy & Environment) – Please add "and Aurora's requirements"

7.E. Page 1 (Energy & Environment) – Please add "and/or drilled monitoring wells per Aurora"

7.F. Page 2 (Energy & Environment) – Please add "Aurora"

7.G. Page 2 (Energy & Environment) – Please confirm what well is it, upgradient, downgradient, what aquifer is it, what well ID is it?

7.H. Page 2 (Energy & Environment) – Please add "Aurora."

7.I. Page 2 (Energy & Environment) – For future submissions, you are welcome to use the Invicta plan as a template for future submissions on any water plans.

7.J. Page 4 (Aurora Water) –According to Section 46.1.5 of the Operator Agreement, the "Operator shall provide copies of all test results described above to the City, the COGCC, and the water source owners within 30 days after receiving the analytical results."

8. WATER PLAN COMMENTS

8.A. Cover Page (Energy & Environment) – if you are crossing any City ROW, easement or utility crossing with layflat lines, you MUST apply for a license agreement.

8.B. Cover Page (Energy & Environment) – Please add: DA-2395-00, Case Number: 2024-6041-00 and Address: 29860 E Jewell Ave

8.C. (Energy & Environment) – Please replace with Energy & Carbon Management Commission (ECMC).

8.D Page 3 (Energy & Environment) - Please include the word barrels (bbls) for any abbreviations, please use word with abbreviations.

9. AIR QUALITY PLAN COMMENTS

9.A. Cover Page (Energy & Environment) – Please add: DA-2395-00, Case Number: 2024-6041-00 and Address: 29860 E Jewell Ave

9.B. (Energy & Environment) – Please include BMPs as mentioned in the Operator Agreement

9.C. (Energy & Environment) - What are the CDPHE requirements that apply to O&G operations?

9.D Page 7 (Energy & Environment) - Is the FWP the only thing that is being referenced? Are you looking into CDPHE and their requirements? Are you following any of the BMPs stated in the Operator Agreement?

10. TRAFFIC IMPACT STUDY COMMENTS

10.A. Page 1 (Traffic Engineering) - 2024-10-30 (DJK) reviewed, Minor edit required, 11 phases identified in list and Table 1, revise text

10.B. Page 2 (Traffic Engineering) – Land Use Access states "12 phases as follows" however, only 11 identified.

11. EMERGENCY ACTION PLAN COMMENTS

11.A. Cover Page (Energy & Environment) – Please add: DA-2395-00, Case Number: 2024-6041-00 and Address: 29860 E Jewell Ave.

11.B. Cover Page (Energy & Environment) – Please add: City of Aurora

11.C. Table of Contents (Energy & Environment) – Please add inspection information

11.D. Page 2 (Energy & Environment) - Please add dates and signatures

11.E. Page 3 (Energy & Environment) - What is your secondary muster point?

11.F. Page 3 (Energy & Environment) - Please update Address: 29860 E Jewell Ave

11.G. Page 3 (Energy & Environment) - Please include the word barrels (bbls) for any abbreviations

11.H. Page 4 (Energy & Environment) - Please add" access road is located on Hayesmount south of Jewell Ave.



11.I. Page 5 (Energy & Environment) - Please send a redacted copy of this with your next submission for public access.

11.J. Page 11 (Energy & Environment) - Please include inspection information.

11.K. Page 15 (Energy & Environment) - Please include information on NFPA labels on tanks for crews and First Responder safety.