

January 9<sup>th</sup>, 2025

City of Aurora Planning  
Zoning and Plan Review  
Attn: Maria Alvarez, Sr. Planner  
15151 East Alameda Parkway  
Aurora, CO 80112

**RE: Bijou-Invicta Line Site Plan Amendment #17  
Initial Submission Review - Response to Comments  
Crestone Peak Resources Midstream LLC**

To Whom it May Concern:

Westwood Professional Services, Inc. (Westwood) has considered comments from City of Aurora for the referenced project. We have restated the comments below and addressed them per the italicized responses.

## **PLAN SET COMMENTS**

### **Plan Set**

#### **1. Site Plan Review**

Comment: 1A. Cover Page - Engineering 1st Review - Kendra Hanagami, COA [khanagam@auroragov.org](mailto:khanagam@auroragov.org).

***Response: Acknowledged.***

Comment: 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](mailto:dedicationproperty@auroragov.org).

***Response: Acknowledged.***

Comment: 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](mailto:licenseagreement@auroragov.org).

***Response: Acknowledged.***

Comment: 1D. Page 5 - Advisory comment: During civil plan submittal, reference trench patch detail for Monaghan Rd.

***Response: Acknowledged. There will be no surface disturbance within the Monaghan RD future ROW; this section will be bored.***

#### **2. Vicinity / Context Map (Energy & Environment)**

Comment: 2A. This requirement is acceptable as submitted.

***Response: Acknowledged.***

### **3. Landscape Plan (Planning/Landscape)**

Comment: 3A. This requirement is acceptable as submitted.

***Response: Acknowledged.***

## **LETTER OF INTRODUCTION COMMENTS**

### **4. Project Summary (Energy & Environment)**

Comment: 4A. Page 3 - Please reference the newly submitted fieldwide plans. Include that the SAWQP has been submitted and is currently under review.

***Response: Acknowledged.***

Comment: 4B. Page 3 - Please reference newly approved Security Operations Plan 2024.11.08.

***Response: Acknowledged.***

Comment: 4C. Page 4 – (Repeat Comment) - Please reference newly approved Security Operations Plan 2024.11.08.

***Response: Acknowledged.***

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

Comment: 5A. This requirement is acceptable as submitted.

***Response: Acknowledged.***

### **6. Application Form (Energy & Environment)**

Comment: 6A. Checklist – Please include this as part of your Letter of Introduction.

***Response: Included within the Letter of Introduction with this submittal.***

### **7. DOT/PHSMA (Energy & Environment)**

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

***Response: Acknowledged.***

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

Comment: 8A. This requirement is acceptable as submitted.

***Response: Acknowledged.***

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

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

***Response: Acknowledged.***

Comment: 9B. Additional Electronic Comments received by the City:

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

***Response: Acknowledged.***

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

Comment: 10A. This requirement is acceptable as submitted.

***Response: Acknowledged.***

**SECURITY OPERATIONS PLAN COMMENTS**

**11. Fieldwide Operations Plan (Energy & Environment)**

Comment: 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)

***Response: Acknowledged.***

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

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

***Response: Acknowledged.***

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

***Response: Acknowledged.***

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

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

***Response: Acknowledged.***

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

***Response: Acknowledged.***

Comment: 13C. Text can be removed.

***Response: Acknowledged.***

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

***Response: Acknowledged.***

Comment: 13E. Please add signature.

***Response: Acknowledged.***

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

***Response: Acknowledged.***

Comment: 13G. Please replace with Pkwy.

***Response: Acknowledged.***

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

***Response: Acknowledged.***

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

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

***Response: Acknowledged.***

**15. Project Development Schedule (Energy & Environment)**

Comment: 15A. This requirement is acceptable as submitted.

***Response: Acknowledged.***

**TRAFFIC COMMENTS**

**16. Road Maintenance / Construction (Public Works)**

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

***Response: Acknowledged.***

Comment: 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.

***Response: Acknowledged.***

**LAND DEVELOPMENT REVIEW COMMENTS**

**17. License Agreements (Real Property)**

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

***Response: Acknowledged.***

**18. Property Owner Authorizations (Real Property)**

Comment: 18A. This requirement is acceptable as submitted.

***Response: Acknowledged.***

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

Comment: 19A. This requirement is acceptable as submitted.

***Response: Acknowledged.***

**SURFACE, AIR, WATER QUALITY COMMENTS**

**20. Fieldwide Operations Plan (Energy & Environment)**

Comment: 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)

***Response: Acknowledged.***

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

Comment: 21A. Please remove text.

***Response: Completed.***

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

***Response: Completed.***

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

***Response: Completed.***

Comment: 21D. Please add "City of Aurora".

***Response: Completed.***

Comment: 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".

***Response: Completed.***

## **22. Fugitive Dust Suppression Plan (Energy & Environment)**

Comment: 22A. This requirement is acceptable as submitted.

***Response: Acknowledged.***

## **23. Air Quality Plan (Energy & Environment)**

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

***Response: Acknowledged.***

## **AURORA WATER COMMENTS**

### **24. Stormwater Management Plan**

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

***Response: Acknowledged. Site-Specific SWMP will be submitted via the Public Works Portal.***

### **25. Preliminary Drainage Letter**

Comment: 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.

***Response: Acknowledged. PDL to be re-submitted via the Public Works Portal.***

Comment: 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.

***Response: Acknowledged. All required information will be provided via the preliminary drainage letter public works portal.***

## **26. ADDITIONAL COMMENTS**

Comment: 26A. Additional Electronic Comments received by the City:

• Name: Donna George

Organization: Public Service Company of Colorado, 1123 W. 3rd Ave, Denver CO 80223

([donna.l.george@xcelenergy.com](mailto:donna.l.george@xcelenergy.com))

### **XCEL ENERGY, Donna George**

Public Service Company of Colorado's (PSCo) Right of Way & Permits Referral Desk has reviewed the site plan amendment for Bijou-Invicta. Please be aware that the proposed pipeline appears to cross existing PSCo underground electric distribution facilities in several spots. Note that proper clearances must be maintained including ground cover over buried facilities that should not be modified from original depths. In other words, if the original cover is changed (by less or more), PSCo facilities must be raised or lowered to accommodate that change. Contact Colorado 811 for locates before excavating. Use caution and hand dig when excavating within 18-inches of each side of the marked facilities. Please be aware that all risk and responsibility for this request are unilaterally that of the Applicant/Requestor.

The property owner/developer/contractor must complete the application process for any new electric service or modification to any of the existing facilities via [xcelenergy.com/InstallAndConnect](http://xcelenergy.com/InstallAndConnect). It is then the responsibility of the developer to contact the Designer assigned to the project for approval of design details.

Donna George

Right of Way and Permits

Public Service Company of Colorado dba Xcel Energy

Office: 303-571-3306 – Email: [donna.l.george@xcelenergy.com](mailto:donna.l.george@xcelenergy.com)

***Response: Acknowledged***

If you have any additional questions, please do not hesitate to contact me directly at 720.249.3539.

Sincerely,

**Westwood Professional Services, Inc.**



Kacy R. Williams, PE

*Project Engineer*