



July 30, 2015

Mr. Mark Geyer
City of Aurora
Office of Development Assistance
15151 East Alameda Parkway
Aurora, CO

**RE: Grande 4-65 20-19 1DH-1AH Oil and Gas Well
Pre-application Meeting Comment Response**

Dear Mr. Geyer:

We have received the pre-application meeting notes, from the meeting on July 2, 2015. The following is a response to those comments, in red text.

***1. Zoning and Land Use Issues**

1A. Please comply with the amended Oil and Gas regulations (Ord. 2014-44), Section (146-1207). **Acknowledged.**

1B. To access the multi-well pad, the proposed haul route identifies Powhaton Road by way of the CDOT frontage road along I-70 as the main route to access the site. Staff is concerned that this route with its proximity to Adonea Subdivision on their eastern boundary, could negatively impact the surrounding neighbors with the increase in truck traffic. To avoid this problem, please explore the option of using the Watkins Road to Jewell Avenue and then west to Powhaton Road haul route alternative, as was used for the Cottonwood Creek and Sunset Grimm Well sites. **The access route along Powhaton is the most direct alignment to the location. Arapahoe County has voiced concern regarding using their roadways to avoid City roadways.**

1C. A road repair agreement will be required as part of the permit application and will be required to be fully executed prior to recordation of the oil and gas permit. **Acknowledged.**

1D. Staff recommends holding a neighborhood meeting to address neighborhood concerns regarding the project. Please note we have had considerable inquiries regarding this site. **Acknowledged.**

1E. Please adhere to Rule 609 of the COGCC regulations regarding baseline water quality sampling and testing, and Rule 604 of the COGCC regulations for setback and mitigation measures for oil and gas facilities. **Acknowledged. See BMP note #8 on sheet 2 of the Site Plan.**

1F. Staff will work with the applicant regarding the access road being located in the planned right-of-way (of 72 feet) for Powhaton Road. A note will be required on the site plan/permit requesting that the road will be relocated if Powhaton Road is improved to its ultimate right-of-way while the well is in operation. **A note to that affect is on the Site Plan.**

1G. For the multi-well pad, please make sure that all accessory equipment is located within a central battery area, and that production tanks are located within a containment berm. **All**

equipment will be located within the graveled pad area identified. Storage tanks will be located within a containment berm, as identified on the Site Plan. See also note #2 on sheet 1 of the Site Plan.

1H. Notice of the application is required to be mailed by the applicant to property owners within one-half mile, to registered neighborhood groups within one mile, and to the subject site's surface owners at least ten days prior to a decision by the Director of Planning. **Acknowledged.**

***2. Traffic and Street Layout Issues**

2A. Pending neighborhood comments, a Traffic Impact Study is not required at this time with the application submittal. **Acknowledged.**

***3. Environmental Issues**

3A. The proposed site is located in proximity to a wildlife habitat and the planned Triple Creek Trail Corridor. Staff and Parks have concerns regarding the sensitive wildlife species and habitat, and how the proposal would impact the aforementioned. The Sensitive Species Analysis states that you will undertake all appropriate sensitive species surveys if the operation disturbs the existing sensitive wildlife habitat. Parks has also requested a *migratory bird study* to help in analysis of the proposed site. Staff is in the process of examining the information provided by Conoco Phillips to determine what modifications need to be made to the Grande site. Results of our analysis will be forwarded to Conoco Phillips. **As discussed in the meeting on 7-28-15 with the City, COP and CVL, an environmental report was supplied to the City. There are no existing nests closer than a ½ mile of the site. Another evaluation will be conducted by COP days prior to pad construction. The results of which will be submitted to the City if acceptable to the landowner.**

***4. Site Design Issues**

4A. *Site Lighting.* Permanent or temporary lighting on-site shall be downcast and shall not shine beyond the boundaries of the drilling operation or the Oil and Gas facility. **Acknowledged. See note #1 on sheet 1 of the Site Plan.**

***5. Landscape Design Issues**

5A. Landscaping is *not* required with this multi-well pad site although the PROS (Parks) department is concerned about the visibility of the site from their planned Triple Creek corridor. **Acknowledged.**

***6. Signage**

6A. Signs 3-6 square feet in size with operator information and safety hazard warnings are required to be posted on the site. **Acknowledged.**

***7. Waivers**

From the material you supplied us, it appears that [no waivers of development standards are involved. If you decide to request any waivers, you must clearly list them in your *Letter of Introduction* and justify them according to the criteria listed in [Section 405](#) of the Zoning

Code. You must also list them on the cover sheet of your Site Plan or other drawings on which they occur. **Acknowledged.**

Pre-submittal Meeting:

At least one week prior to submitting an application, you will be required to hold a Pre-submittal meeting with your assigned Case Manager to ensure that your entire application package is complete and determine your application fee. Please contact your Case Manager in advance to schedule. **As discussed with Stephen Rodriguez, a presubmittal meeting is not necessary for this application.**

Community Participation:

You are encouraged to work proactively with neighborhood groups and adjacent property owners. Neighborhood groups within a mile radius will formally be notified of this project when submittal has been made to the Planning Department. **Acknowledged.**

Neighborhood Services Liaison: Acknowledged.

- Your Neighborhood Services Liaison is *Marsha Osborn*. She has put together a report attached to these notes listing the registered groups within one mile of your proposed project and can assist in scheduling and facilitating meetings with community members. It is recommended that you work with the neighborhood organizations that express interest in your project to mediate and mitigate concerns.
- All meetings with neighborhood associations should also include your Planning Department Case Manager so that questions concerning City Code or policies and procedures can be properly addressed. We will record any project-related commitments that you make to the community at these meetings.
- Additional information about the Neighborhood Liaison Program can be found on the [Neighborhood Services](#) page of the city website.

Parks, Recreation & Open Space Department (PROS)

Current FDP:

The provided plan indicates that the corner of the well site is located within an area designated as OS-2 (Open Space) in the Eastern Hills Framework Development Plan. This area contains a proposed regional trail on the south side of the creek and a proposed local trail on the north side. Within the Triple Creek Greenway Corridor Study, this boundary also serves as the limits of the Triple Creek Greenway which contains a 17-mile long regional trail connecting the Sand Creek Greenway Trail to the Aurora Reservoir. This boundary was established based on the significant natural features (deeply incised drainageways with steep slopes) within the Coal Creek corridor and based on a view boundary created by a natural ridge and high point. The proposed well site should be re-located/re-designed to not lie within the OS-2 area.

Impact to Wildlife:

Wildlife within the Coal Creek floodplain and within the Triple Creek Greenway Corridor could be impacted by the construction and operation of the proposed well site. A wildlife survey conducted as part of the Triple Creek Greenway Corridor Study identified important habitat for the Northern Leopard Frog. These areas are located along the creek, both upstream and downstream of the proposed well site and could potentially be adversely affected by changes in water quality resulting from well site construction and operation. Migratory birds are known to nest and feed within the Coal Creek floodplain. These birds, primarily raptors, are protected by the U.S. Migratory Bird Treaty

Act which requires projects with the potential to impact the birds to take mitigation measures. The applicant should, at a minimum, conduct a migratory bird survey by a qualified consultant to insure compliance with this federal act.

Impact to Natural Features:

Between the proposed well site and Coal Creek, there are several deep drainageways that are unique to the metropolitan area. These natural features could be impacted by construction activities and resulting altered drainage patterns. The runoff from the well site should be dispersed in a manner similar to the existing drainage patterns to reduce the potential for damage to the natural features. The design of detention and water quality facilities should be designed with this concern in mind.

Visual Impact:

The facilities within the well site will be visible from great distances in all directions. This could impact the users of the proposed trails and parks along the Coal Creek/Triple Creek Corridor. Cross sections of the well site and the surrounding areas should be prepared (and provided to the city) to identify specific areas of concern. Mitigation measures, such as berming, could help to reduce visual impacts.

Stockpiles:

The proposed stockpiles will not result in a desirable feature adjacent to the natural landscape of the creek corridor. Grading the piles to look more natural, as achieved on the nearby Xcel substation site, would enhance the area and improve views of the well site. In addition, the topsoil should be spread over the other soil to have greater success with revegetation. The topsoil will lose its natural biological qualities (which make it more suitable for seeding/germination) if stockpiled to a depth of more than 2 feet.

Consultation with PROS:

Following review of these comments and prior to development application submittal, the applicant should meet with the PROS Department to discuss mitigation measures and plan adjustments which will address the issues presented. *As discussed in the meeting on 7-28-15 with the City, COP and CVL, an environmental report was supplied to the City. There are no existing nests closer than a ½ mile of the site. Another evaluation will be conducted by COP days prior to pad construction. The results of which will be submitted to the City if acceptable to the landowner. The Site Plan is being submitted as originally designed, as agreed to in the July 28th meeting. We will address the review comments, including the potential distribution of topsoil, additional water quality ponds, etc., after the formal review.*

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.

Key Issue:

- ▶ A Storm Water Management Plan (SWMP) plan and permit will be required.

Utility Services Available:

- Water service: For this project the City of Aurora will not be providing any water service.
- Sanitary sewer: For this project the City of Aurora will not be providing any sewer service.
- The project is located on Map Page 11X.

Utility Development Fees:

- These fees are not applicable to this project.

Acknowledged.

Public Works Department

Traffic Division

The Traffic Division will receive a referral of the Site Plan and Subdivision Plat for review and comment.

Key Issue:

- ▶ A roadway Maintenance agreement will be required prior to approval of the Site Plan. It shall cover all City roadways designated to be within the Haul Route. Acknowledged.
- A minimum paved access of 100-feet in length must be provided from flowline of the street into the site. Provided.
- Gates are required to be setback from the street flow line a minimum of 35-feet or one truck length whichever is greater. Provided.
- Label the access movements on the Site Plan. The access to Powhaton Road will be permitted as full movement if located 660' from the intersection with Mississippi Ave. Otherwise it will be allowed as full movement until Powhaton Road is improved. Completed. The distance from the Mississippi Avenue section line is dimensioned; it is 645 feet. There's a note on the plan that discusses the potential for modifying the access if and when Powhaton and Mississippi improve. Where the access point is currently located is the optimal for southern sight distance.

Improvements:

- Show the installation of new stop signs by developer at the site access points onto public streets. Signs shall be furnished and installed per the Manual on Uniform Traffic Control Devices (MUTCD). Stop signs are not typically required at driveway entrances. They have not been installed on previous well locations.
- Pending something unforeseen, such as public comment, the Traffic Division will not require a Traffic Study at this time. Acknowledged.

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.

- A drainage letter may be submitted in lieu of a preliminary drainage study. It will need to be signed and stamped by a Professional Engineer licensed in the State of Colorado. The letter shall be submitted to Engineering at the time of the Planning Department application submittal. A review fee shall be paid to Engineering prior to acceptance of the letter. Acknowledged.

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.

Key Issues:

- ▶ There will not be any required Building Permits associated with this well site project.
- ▶ Include Vicinity Map with proposed haul route on the Site Plan submittal document.
- ▶ Provide site address at access road to well site from Powhaton Road and at each gate.
- ▶ Knox Box at each gate shall contain:
 - Flash drive with site layout
 - MSDS for any hazardous materials within the site
 - Keys to gate and any locked structures within the site
- ▶ Minimum 85,000 pound road base required.
- ▶ Access road shall be minimum 16' wide with pullouts minimum 1,000' apart. Minimum pullout dimensions 10' wide x 100' long.

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 number in the manner provided in the Aurora City Code of Ordinance, Chapter 126 - Article VII - Numbering of Buildings. Acknowledged.

Special Design Considerations:

Based on the information presented in the pre-application meeting, these additional Life Safety criteria must be shown on the site plan, plat and civil plans. These notes have been added. See sheet 2 of the Site Plan, and the SWMP under the heading "Life Safety Notes".

- [Fire Apparatus Access Road Specifications](#)
- [Public Street Systems Adjacent to Site](#)

Knox Hardware:

Where access to or within a structure or an area is restricted because of secured openings or where immediate access is necessary for life-saving or fire-fighting purposes, the fire code official is authorized to require a key box to be installed in an accessible location. Acknowledged.

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. Acknowledged.

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.

- [\(Site Plan Note\) Access Control Gate or Barrier Systems](#)
- [\(Site Plan Note\) Addressing](#)
- [Site Plan Cover Sheet Notes](#)

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. This Data Block is not application to Oil and Gas applications.

Real Property Division

The Real Property Division reviews the Site Plan and processes Subdivision Plats, Easements and License Agreements that may be necessary for development of property.

Key Issues:

- ▶ Please provide locations of all your well sites in the city of Aurora. If you have them in a GIS or AutoCad format this would be quite helpful. **Acknowledged.**
- ▶ If you plan on utilizing waterlines that will cross city rights of way then a license agreement will be required for these crossings. **Aurora Water will not be used to serve this location.**

Site Plans:

A site plan will be required by the Planning Department. Real Property has items that need to appear on that site plan above and beyond what other departments may require. These items are listed on the Real Property [Site Plan Checklist](#). **Acknowledged.**

Separate Documents:

- [License Agreement Packet](#)

Civil Engineering Plans

- Civil Construction Plans are required for your project as proposed and shall be submitted electronically.
- Civil Engineering Plan Review (*see links below for additional information*):
 - [Process](#)
 - [Review Schedule](#)
 - [Fees](#)

Prior to submittal of the electronic Civil Construction Plans, the civil consultant must schedule a pre-submittal meeting with Tim Pitts or Duane Launder at 303.739.7300. One paper set of Civil Plans and Reports is required for this pre-submittal review. At this meeting the Civil Plans shall be reviewed for completeness. A [checklist](#) is used to ascertain completeness.

- Civil Construction Document Plan Set generally includes the following plans:
 - Stormwater Management Plan
 - Final Drainage Plan/Report
 - Final Grading Plan

As with previous oil and gas applications, civil engineering drawings will not be submitted. Only a SWMP and Drainage Letter will be submitted to Public Works for review and comment.

Aurora Water

General Requirements:

- Utility Plans will be not be required with the Civil Engineering Plans. **Acknowledged.**

Construction Stormwater Quality Requirements:

A Stormwater Quality Discharge Permit and Stormwater Management Plan and Report will be required for this project. See the latest revision of the City of Aurora [Rules and Regulations Regarding Stormwater Discharges Associated with Construction Activities](#) Manual (SWMP Manual) for more detailed requirements. A [Colorado Discharge Permit System \(CDPS\)](#) (CDPS) permit may be

required by the State Health Department if a City of Aurora Stormwater Quality Discharge Permit is required. **Acknowledged.**

Building Plans

Building Plan Review

Key Issue:

- There will not be any required Building Permits associated with this well site project.

Acknowledged.

Real Property Division

Reminder – Prior to building plans submittal, processing of any/all required separate documents should be started so that this process does not interfere with approval of the Site Plan or Civil Plan.

Acknowledged.

Aurora Water

Utility Connection Fees:

Utility connection fees are not applicable to this project, as the City will not be providing any utility services. **Acknowledged.**

Public Works Department

Engineering Division

Prior to the start of paving of a driveway, fire lane or parking lot, a letter requesting use of the default section must be approved or alternatively, a geotechnical report and a pavement design shall be submitted to the Public Works Department for review and approval (see Section 5 of the “[Roadway Design and Construction Specification](#)” for requirements). Once the civil construction package, the pavement design and compaction testing for private utilities are approved, a paving permit can be obtained from the Building Division Permit Center. **n/a**

Building Division

Key Issue:

- There will not be any required Building Permits associated with this well site project.

Acknowledged.

Thank you for providing these pre-application comments to enhance our initial submittal. If you have any questions regarding our application, please do not hesitate to contact me at 720.249.3539.

Sincerely,

CVL Consultants of Colorado, Inc.

Melinda Lundquist, PE
Vice President