

General Comments:

1. Given that the existing Municipal Code represents the sense of the elected officials of the City of Aurora, and that they were adopted after substantial review and discussion, and that both Public and Operating Companies had opportunity for comment, disregard/waiver of the City's requirements should be supported with strong and factual rationale as to impossibility of compliance, or creation of greater hazard through compliance, or other such compelling reasons.
2. Site grading drawings show prepared by and under seal of a Surveyor/PLS. These should be prepared under a Civil Engineer in Colorado.
3. CVL drawings have no Revision level stated, so that changes can be tracked. Suggest adding revision block with Rev. level and Changes for future submittals. Or alternately, clearly clouding or color demarcation of future changes.
4. CVL drawings are Engineering-produced documents that are apparently developed within Colorado, and should bear PE Seal of responsible Engineer.
5. Ref. Application's request for waiver to landscaping and fencing requirements, Operator needs to consider that this area is likely not low density/rural for the stated 20-year life of the contemplated well. Inspection of a neighboring pad by COP on Watkins road shows high visual impact, little security via the wire fence, and significant runoff to that property's Northern edge from recent rains. Contemplated fencing plan provides no security from unauthorized personnel entry. Adherence to City's laws is required by Council action.
6. Given plan to locate Flare and Combustor adjacent to fence line, what heat radiation levels are predicted for these low heat sources? Will they cause fire risk (such as with sagebrush entangled in fencing), or injury risk to personnel immediately outside of fence line? Suggest confirmation by simulation, such as Zink simulator or other.
7. Given statement that Vapor Recovery is NOT planned, what is the constituency of vapors sent to combustor, and what are products of combustion? For example are any BTX in vapors, any H₂S? What monitoring of vapors will be in place to assure a hazard is not present?
8. COP should justify the requested waiver for equipment over 20 feet height. Has the height been verified as needed by supporting process simulations (Hysys/Prosim, etc.) or manufacture's nomographs or such? Have other vessel configurations been explored such as horizontal, or 2-stage vertical vessels of lower height?
9. The Application only shows a tank berm on the survey drawing related to Operation, but there is no indication of Containment during drilling and completion. For example, what containment is contemplated for acid used in the fracking fluid prep?
10. In General, the application is incomplete and does not address many of the requirements of the Aurora Municipal Code. Suggest Applicant re-formulates the application, after conducting a point review of the city requirements and code so that the application is complete and yields a document that can be readily reviewed against the requirements.