

Bennett D Pad

Oil and Gas Facility - OGF2025-00001

Conceptual Review Meeting (Pre-Application Meeting) Summary

11/06/2024

A Conceptual Review is required by Adams County for Oil and Gas Facility (OGF) permits. The Operator submits all required documents detailing various aspects of the proposed project, including, but not limited to, the location details, operating plans, water use and transportation methods, well count and equipment, estimated timeframes, alternative location analysis (ALA), Best Management Practices, and maps and exhibits. Adams County provided written comments to Crestone prior to the Conceptual Review meeting held on 11/06/2024.

The meeting was held virtually with members of Adams County Staff, Colorado Parks and Wildlife (CPW), Colorado Energy and Carbon Management Commission (ECMC), Colorado Department Public Health and Environment (CDPHE) and Crestone staff in attendance. The following are topics discussed during the Conceptual Review Meeting.

CPW

- Mentioned a concern for burrowing owl potential in the area and recommends surveys prior to operation
- Trees on the property could be suitable for nesting birds.
- Barbed wire fence is a potential wildlife concern.
 - Crestone explained the fence is necessary for the sensitive infrastructure associated with the midstream oil terminal on the property.
- Confirmed location is not in High Priority Habitat (HPH).

ECMC

- 1202.a.(3) waiver will likely be necessary from CPW
- Questioned if sound walls will be installed.
- Asked if tanks were planned on location.
 - At the time of the meeting Crestone mentioned 3-phase takeaway was planned. In the following months Crestone discovered produced water pipeline would not

be feasible. Therefore, this project will have two produced water tanks on location.

- Is use of recycled water possible.
- Due to proximity of Residential Building Units (RBUs) to the east, within 2000' of the Working Pad Surface, informed consent or approval through 604.b.(4) will be necessary.
- Asked Adams County if concurrent permitting is acceptable.

CDPHE

- Discussed plans for the trees serving as a windbreak on the property.
- How will dust be controlled.
- Will the ditch be relocated that is within the location boundary?
- Consider extra stormwater controls toward the highway and wetlands.
- Enviroscreen – on the border between two census blocks. Here: 58.04, adjacent block is a little lower.
- Consider reaching out to folks to the southwest in Arapahoe County.
- Asked about drilling on grid power.

Adams County

- Plan will be required which addresses surface waters / wetlands.
- Conceptual review comments will be submitted with the OGF.
- Adams County's ALA requires two alternatives, Crestone provided three.
- Due to the proximity to NWI wetlands, the OGF cannot be administratively approved. It must go to the Board of County Commissioners for approval.
- Provide layflat map with OGF.
- Need landscape plan and fencing (not chain link). A solid green fence is usually acceptable.
- Neighborhood meeting will be next step prior to submitting OGF permit.
- Layflat generally not allowed in County ROW. Will need ROW permit if in or crossing the ROW.
- If requested, Crestone will provide copies of agreements with landowners for layflat on their properties.
- Site plans will be required.
- Drainage letter from PE is necessary.
- Operations and maintenance for existing pond needed.
 - It was later confirmed this O&M manual is needed for the proposed detention basin.
- Plans for erosion and sediment control and dust are necessary.

- Provide COR 4000 permit.
- Haul route and traffic memo will be necessary.
- Engineering permit (EGR permit) will run concurrent with the OGF.
- Will soil be imported?
- Discussed setbacks to residents and the parcels within 2000' that have RBUs on them and potential for needing informed consent.
- Reiterated 2000' setback to surface waters. No rivers or streams within 2000'.
- Address the oil terminal and this proposed location regarding cumulative impacts.

The following attachment at the end of this summary are the comments provided to Crestone following Adams County's review of the Conceptual Review documents.



Community & Economic Development Department

Case Number PRE2024-00071 as of 11/2/2024

4430 South Adams County Parkway, Suite W2000A
Brighton CO 80601-8216 (720) 523-6800

Case Information

Case Name: Bennett D Pad Concept
Received: 10/14/2024
Location: 1631 MANILLA RD
Parcel(s): 0181700000105
Description: Conceptual Review Request for an Oil and Gas Facility Permit (OGF) for the proposed Bennett D Pad oil and gas location. The application seeks to permit the drilling and completing of up twenty-six (26) horizontal wells and the installation of related surface production equipment on one (1) well pad, that will be serviced by (1) one existing access road.

CASE ASSIGNMENT

Case Manager Gregory Dean
Primary Engineer AGAJDYS
Long Range Planner EGLEASON

EXTERNAL AGENCY REVIEWS

CDOT Review No
Division of Water Resources Review No
Geological Survey Review No
Soil Conservation Review No
Xcel Energy Review No
Adams County Fire Review No
Brighton Fire Review No
Strasburg Fire Review No
North Metro Fire Review No
o Division of Parks and Wildlife Review No
CDPHE Review No

GENERAL

New PRE WF Yes
Type of Project Oil and Gas Facility
Proposed Land Use Other
Received 10/14/2024
Internal Review Deadline 10/28/2024
Referral Agency Deadline Date 10/28/2024
Comments Due Date 10/30/2024
Target 11/06/2024
Conceptual Review Time 8:30 - 9:15
Conceptual Review Meeting Duration 90 min
Application Fee 1100

WIZARD

Wizard Session Key bb92b451e552494483a9a7a5bb6aa031

Workflow Information

Task Name	Task Status	Date
Send Case Manager Introduction	Complete	10/16/2024
Building Safety Review	No Comment	10/29/2024
Plan Distribution	Complete	10/15/2024
Planner Review	Complete	10/29/2024

Alternative Site Analysis:

Applicant Desired Location:

- (+) co-located with existing gas processing/midstream facility, likely more compatible with surrounding land uses
- (+) shortest haul route and pipeline corridor routes that avoid homes
- (+) no high priority wildlife habitats or buffer conservation areas within 2,000-feet
- (+) least new surface disturbance with co-location and not requiring additional facilities to access and development minerals in the area.
- (-) Wetlands in the immediate vicinity
- (-) 5 homes within 2,000-feet, could require informed consent

Alternative Location 1:

- (-) Dense residential development NW of alt location 1, could require informed consent
- (-) Long haul routes and pipeline corridors (2.5 miles)
- (-) proposed haul routes run by residences
- (-) closer to surface waters (Box Elder Creek)
- (-) near HPH for mule deer and aquatic native species conservation waters
- (-) more surface disturbance relative to desire location with co-location of midstream facility

Alternative Location 2:

- (+) Less residential uses within 2,000-feet near alt loc 2 than desired location (3 vs. 5)
- (+) No HPH corridors within the buffer area
- (+) Less wetlands immediately adjacent to alt location compared to desired location, though 3 wetlands occur within the 2,000-foot setback
- (-) Longer haul routes and pipeline corridors needed for alt loc 2
- (-) more surface disturbance required relative to desire location with co-location of midstream facility
- (-) Mineral development not technologically feasible relative to desired location. This could require an additional facility to be built to access minerals fully

Alternative Location 3:

- (+) Less residential uses within 2,000-feet near alt loc 3 than desired location (1 vs. 5)
- (+) No HPH corridors within the buffer
- (-) Longest haul route and pipeline corridor of all alternative sites. 4.2 miles of haul route and 2 miles of pipeline corridor required.
- (-) haul routes would run by homes
- (-) five potential wetlands within 2,000-feet of alt loc 3
- (-) nearest to surface waters (West Sand Creek) of all proposed alternative sites

The applicant's desired location and all 3 of their alternatives each present the potential for adverse impact to public health, safety, welfare, the environment, and wildlife resources. Many of these potential adverse impacts could likely be avoided, minimized, or mitigated with the implementation of BMPs, COAs, and facility design considerations by the applicant. Staff believes the applicant's desired location has the least likelihood of adverse impacts to residents and resources and has the greatest ability to comply with Adams County Development Standards and Regulations of those presented. Of the 3 presented alternatives to the applicant's desired location, Staff feels that alternative location 2 appears least impactful followed by alternative location 3 and then last alternative location 1. While the applicant's desired location appears to be the least impactful overall, there is no guarantee that this location will be successful if a formal OGF application is filed and must demonstrate compliance with AdCo DS&R through the evaluation processes as defined and outlined.

Given the presence of wetlands near this proposed site and within the 2,000-foot setback (designated as environmentally sensitive areas by Adams County) this location will likely require Board of County Commissioner approval rather than being eligible for the administrative approval process, should it comply with the remaining DS&R for OGF applications.

Neighborhood Services Review	Complete	10/30/2024
There are no open violations at this location at this time. No comment.		
Long Range Planner Review	No Comment	10/30/2024
Plan Coordination	Complete	11/01/2024
Development Engineering Review	No Comment	11/01/2024
Closed via script due to Plan Coordination result		
Development Engineering Review	Complete	11/01/2024
--- Items required at the time of application ---		

ENG1: Applicant will be required to submit the following items when they apply for the OGF permit:

1. Site plan
2. Drainage letter signed and stamped by a Professional Engineer licensed in the State of Colorado
3. Operations and Maintenance (O&M) plan for the existing pond
4. Proposed haul routes for BOTH the drill and the routine export traffic
5. Sediment and erosion control (SEC) plans
6. A CDPHE storm water discharge permit for construction activities (COR400000).

ENG2: Any new concrete will require expansion of the existing pond and must be accounted for in the site plan, drainage letter, O&M plans, and SEC plans.

ENG3: Applicant may be required to apply for a building permit for the drill itself at the time of construction.

ENG4: All engineering documents must be submitted through and EGR permit. This will run parallel with the OGF permit.

--- Information only, no response required ---

ENG1: According to the Federal Emergency Management Agency's January 20, 2016 Flood Insurance Rate Map (FIRM Panel #08001C0960H), the project site is NOT located within a regulated 100-yr floodplain. A Floodplain Use Permit is NOT required.

ENG2: Property is NOT in Adams County MS4 Stormwater Permit area. An Adams County Stormwater Quality (SWQ) Permit will NOT be required. Since the proposed improvements disturb more than one (1) acre of land AND are part of a larger development that disturbs over one (1) acre, the applicant will be required to obtain a State Permit COR400000. Builder/developer is responsible for adhering to all the regulations of Adams County Ordinance 11 regarding illicit discharge. Applicant is responsible for installation and maintenance of Erosion and Sediment Control BMPs.

ENG3: No new access is requested. Must use existing access to property. Any modifications to the existing driveway or adding additional driveways will require additional permitting. No additional access to be approved for this lot at this time.

ENG4: If the applicant proposes to import greater than 10 CY of soil to this site, additional permitting is required. Per Section 4-04-02-02, of the Adams County Development Standards and Regulations, a Temporary or Special Use Permit is required to ensure that only clean, inert soil is imported into any site within un-incorporated Adams County. A Conditional Use Permit will be required if the importation exceeds 500,000 CY.

ROW Review	Complete	10/31/2024
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ROW1: The location as proposed, not an alternative site, is possibly the best scenario due to existing detention, access, etc.

ROW2: Any changes to the detention/storm water quality facilities, or new construction will require the dedication of the detention pond and access to same. Exhibits are required for the access and detention for dedication to the county. PW ROW Agent, David Dittmer, will handle these cases.

ROW3: Alternative locations will require traffic studies to determine if additional ROW is required for access and vehicular load on the ROWs. There will be considerable trucking during and after drilling that will affect county roads.

ROW4: CDOT is studying the feasibility to add an off ramp at Quail Run Road due to growth and traffic impacts. Any location abutting this ROW will need to take this into account and must have a 120' offset to any permanent structures due to section line setback regulations. CDOT will require a 60' half width road at a minimum and the off ramp will match that of Bennett's off ramp.

ROW5: Additional comments will be provided once the site is set and we have a clean site map for review.

ROW6: The lay-flat water line, utilized, may not be located in county ROW. All crossings must be permitted by engineering review. this may require the operator to obtain temporary construction easements along the route.

Environmental Analyst Review

Comment

10/31/2024

The following comments apply to Alternative Locations 2 and 3:

BEIR14. A cross-section of the subject parcels is located within the Natural Resource Conservation Overlay (NRCO), corresponding to the 100-year floodplain also transecting the parcels. The NRCO aims to protect important wildlife areas, designated floodplains, riparian corridors, and cultural resources. Refer to Sections 3-43 and 4-14-02 of the Adams County Development Standards and Regulations (ACDSR) for more details.

BEIR15. If disturbance of land not previously developed within the NRCO is greater than one combined (1) acre, then a Resources Review must be completed by a qualified professional consultant prior to application submittal so that it may be taken into consideration. See Adams County Development Standards and Regulations (ACDSR) Section 4-14-02-03 for Resources Review methodology.

BEIR16. All development must comply with the NRCO buffers/setbacks requirements for individual protected resources provided in ACDSR Section 4-14-02-04-02.

BEIR17. Specifically, along rivers and streams, development shall be located out of the riparian plant community, but in no case shall the required setback be less than fifty (50) feet nor more than one hundred-fifty (150) feet.

BEIR18. Specifically, in relation to wetlands, development shall be located out of the hydric zone, but in no case shall the required setback be less than fifty (50) feet (500 feet from the edge of hydric soil perimeter).

Environmental Analyst Review

Comment

10/31/2024

Economic Development Review No Comment 10/31/2024

Parks Review No Comment 10/22/2024

Application Intake Complete 10/14/2024

EMAIL SENT TO: jpiekara@civiresources.com

Thank you for your application.

PRE2024-00071 – Bennett D Pad — The Conceptual Review meeting is scheduled for Wednesday, November 06, 2024, from 8:30am – 10:00am. You will receive more details from the Planner assigned to your case.

Have a good day.

Planner Review Complete 10/31/2024

OGA 1: Alternative Site Analysis:

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- (-) Wetlands in the immediate vicinity
- (-) 5 homes within 2,000-feet

Alternative Location 1:

- (-) Dense residential development NW of alt location 1
- (-) Residential development is classified as a Disproportionately Impacted Community
- (-) Long haul routes and pipeline corridors (2.5 miles)
- (-) proposed haul routes run by residences
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- (-) near HPH for mule deer and aquatic native species conservation waters
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OGA2: The applicant's desired location and all 3 of their alternatives each present the potential for adverse impact to public health, safety, welfare, the environment, and wildlife resources. Many of these potential adverse impacts could likely be mitigated with the implementation of BMPs, COAs, and facility design considerations by the applicant. Staff believes the applicant's desired location has the least likelihood of adverse impacts to residents and resources and has the greatest ability to comply with Adams County Development Standards and Regulations. Of the 3 presented alternatives to the applicant's desired location, Staff feels that alternative location 2 appears least impactful followed by alternative location 3 and then last alternative location 1. While the applicant's desired location appears to be the least impactful overall, there is no guarantee that this location will be successful if a formal OGF application is filed and must demonstrate compliance with DS&R through the evaluation processes as defined and outlined.

OGA3: Given the presence of wetlands near this proposed site and within the 2,000-foot setback (designated as environmentally sensitive areas by Adams County) this location will likely require Board of County Commissioner approval rather than being eligible for the administrative approval process, should it comply with the remaining DS&R for OGF applications.

OGA4: Off-location "well connects" or pipelines will require separate land use approvals.

OGA5: Proposed lay-flat temporary pipeline for bring water to location could require additional land use, access, or ROW approvals. A map of the lay-flat placement including ROWs, landowners, road crossings, ditch placement, etc. will be required.

OGA6: Discussion of source of fresh water and the exact path from source will be required.