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October 4, 2021

Ryan Howser
El Paso County Planning and Community Development Department
2880 International Circle, Suite 110
Colorado Springs, CO 80910
ryanhowser@elpasoco.com

Jerry and Sharon Lomax
11759 Green Acres Lane
Colorado Springs, CO 80908

Joseph Alessi
Alessi & Associates, Inc.
2989 Broadmoor Valley Road
Colorado Springs, CO 80906

Re: Treasured Acres Minor Sub

Dear Mr. Howser:

This firm represents the Upper Black Squirrel Creek Ground Water Management District (“the District”). Applicant, Alessi and Associates, Inc., on behalf of Jerry and Sharon Lomax, provided materials in support of its application to subdivide 15.18 acres into three lots. The District reviewed those materials and provides the following comments for your consideration:

The District’s Regulations on Large Capacity Well Use in Subdivisions

According to the Application, water supply for the three lots will be met using an existing not-nontributary Dawson aquifer formation well and two to-be-constructed not-nontributary Dawson aquifer formation wells. *See* Water Resources Report at 3. These wells must comply with District Rule 17.B, which limits withdrawals from large capacity wells in subdivisions. Specifically, Rule 17.B. requires that the production of all wells supplying the subdivision shall not exceed the product of the number of single family residences, single condominium units, apartment units, single units within a multiple-dwelling unit or equivalent within the subdivision by 0.5 acre feet per year.

Totalizing Flow Meters

The Applicants must comply with all portions of the District's metering and reporting requirements. District Rule 21 requires Applicants to equip any well permitted pursuant to the approved determinations with a totalizing flow meter and to submit monthly readings to the District.

Replacement with Septic Return Flows

Under Applicants' replacement plan, they will rely on replacement water from the return flows derived from in-home use of the not-nontributary Dawson aquifer water through non-evaporative septic systems. Of concern to the District is the potential contamination to the alluvial aquifer that may result from the discharge of wastewater from non-evaporative septic systems and leach fields into the alluvial aquifer. Please see the attached memo from the District's Hydrogeologist, Mr. Mike Wireman, expressing the District's water quality concerns with replacement water from these types of systems.

The District reserves the right to provide additional comments at a later date founded upon information not readily ascertainable from the above-referenced application.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Mirko L. Kruse', with a stylized flourish at the end.

Mirko L. Kruse
for
TROUT RALEY

cc: UBSCGWMD Board of Directors

Encl: Mike Wireman, Technical Memorandum, Issues/Concerns related to use of septic tank effluent as a source of water for replacing depletions related to pumping from the Denver Basin bedrock aquifers within Designated Groundwater Basins (June 19, 2020).