COLORADO
Division of Water Resources
Department of Natural Resources

April 20, 2026

Joe Letke, Project Manager
El Paso County Development Services Department
Transmitted via the EPC EDARP Portal: https://epcdevplanreview.com

RE: Iron Ridge Subdivision
Case No. SP253
Part of the SE ¼, Section 13, T11S, R66W, 6th P.M.
Water Division 1, Water District 8

Dear Joe Letke,

We have reviewed the submittal documents related to Iron Ridge Subdivision, concerning the above reference proposal to subdivide approximately 85.99 acres thirty (30) six single-family residential lots.

Water Supply Demand

Based on the water supply information summary and the Water Supply Plan Report from Monson, Cummins, Shohet & Farr, LLC ("Report") the estimated annual water requirements total 24.086 acre-feet/year for all thirty lots. This amount breaks down to 7.8 acre-feet/year for in-house use for all thirty lots (based on 0.26 acre-feet/year/unit), and 0.5429 acre-feet/year/unit for other uses (16.287 acre-feet/year).

Source of Water Supply

The proposed water source is individual on-lot wells to be constructed in the Dawson aquifer operating pursuant to the augmentation plan decreed in case no. 2025CW3042. The decree entered in water court case no. 2025CW3042 seeks to quantify the amount of water underlying a 120-acre parcel located in the SE ¼ of Section 13, Township 11 South, Range 66 West, 6th P.M. Based on the State Engineer's Determination of Fact filed in this case the following amounts of water were determined to be available underlying the 120-acre parcel:

Aquifer	Annual amount available for 36-acre parcel (acre-feet)		Type
	Based on 100 year allocation approach	Based on 300 year allocation approach	
Dawson	113	37.66	Not-Nontributary
Denver	104	34.66	Nontributary
Arapahoe	52	17.33	Nontributary
Laramie-Fox Hills	37.8	12.6	Nontributary

The pending augmentation plan in case no. 2025CW3042 seeks to withdraw a total annual of 24.09 acre-feet/year (0.783 acre-feet/year/lot) from Iron Ridge Well Nos. 1 through 30, from the not nontributary Dawson aquifer, based on a 300-year allocation approach. The indoor household use for one single-family dwelling will be 0.26 acre-feet/year, for total in-house uses of 7.8 acre-feet annually, with the remaining 16.29 acre-feet/year pumping entitlement available for other uses on the Applicant's Property, including irrigation of lawn and garden, stock water, recreation (including pool and/or hot tub), landscape, ponds, commercial, fire protection, and also for storage and augmentation purposes associated with such uses.

The proposed source of water for this subdivision is a bedrock aquifer in the Denver Basin. The State Engineer's Office does not have evidence regarding the length of time for which this source will be a physically and economically viable source of water. According to 37-90-137(4)(b)(I), C.R.S., "Permits issued pursuant to this subsection (4) shall allow withdrawals on the basis of an aquifer life of one hundred years." Based on this **allocation** approach, the annual amount of water pending in case no. 2025CW3042 in the Dawson aquifer is equal to one percent of the total amount, as determined by rules 8.A and 8.B of the Statewide Nontributary Ground Water Rules, 2 CCR 402-7. Therefore, the water may be withdrawn in that annual pending amount for a maximum of 100 years.

The *El Paso County Land Development Code*, Section 8.4.7.(B)(7)(b) states:

"(7) Finding of Sufficient Quantity

(b) Required Water Supply. The water supply shall be of sufficient quantity to meet the average annual demand of the proposed subdivision for a period of 300 years."

The State Engineer's Office does not have evidence regarding the length of time for which this source will "meet the average annual demand of the proposed subdivision." However, treating El Paso County's requirement as an **allocation** approach based on three hundred years, the proposed annual water demand is equal with the allowed average annual amount of withdrawal of 24.09 acre-feet/year, proposed by the augmentation plan decreed in case no. 2025CW3042. As a result, the water may be withdrawn in that annual amount for a maximum of 300 years.

Additional Comments

The Applicant should be aware that any proposed detention pond for this project must meet the requirements of a "storm water detention and infiltration facility" as defined in section 37-92-602(8), C.R.S., otherwise the structure may be subject to administration by this office. The Applicant should review DWR's *Administrative Statement Regarding the Management of Storm Water Detention Facilities and Post-Wildland Fire Facilities in Colorado*, attached, to ensure that the notification, construction and operation of the proposed structure meets statutory and administrative requirements. The Applicant is encouraged to use *Colorado Stormwater Detention and Infiltration Facility Notification Portal* to meet the notification requirements, located at https://maperture.digitaldataservices.com/gvh/?viewer=cswdif.

State Engineer's Office Opinion

Based on the above and pursuant to section 30-28-136(1)(h)(II), C.R.S., it is our opinion that the proposed water supply is adequate and can be provided without causing injury to decreed water rights.

Our opinion that the water supply is **adequate** is based on our determination that the amount of water required annually to serve the subdivision is currently physically available, based on current estimated aquifer conditions.

Our opinion that the water supply can be **provided without causing injury** is based on our determination that the amount of water that is legally available on an annual basis, according to the statutory allocation approach, for the proposed uses is greater than the annual amount of water required to supply existing water commitments and the demands of the proposed subdivision.

Our opinion is qualified by the following:

The Division 1 Water Court has retained jurisdiction over the final amount of water available pursuant to the above-referenced decree, pending actual geophysical data from the aquifer.

The amounts of water in the Denver Basin aquifer, and identified in this letter, are calculated based on estimated current aquifer conditions. The source of water is from a non-renewable aquifer, the allocations of which are based on a 100-year aquifer life. The county should be aware that the economic life of a water supply based on wells in a given Denver Basin aquifer may be less than the 300 years used for allocation due to anticipated water level declines. We recommend that the county determine whether it is appropriate to require development of renewable water resources for this subdivision to provide for a long-term water supply.

Should you or the Applicant have any questions, please contact me at this office at 303-866-3581 x8265 or javier.vargasjohnson@state.co.us

Sincerely,

Javier Vargas-Johnson, P.E.
Water Resource Engineer

Ec: Subdivision file: 34453