



Montaño • Freeman • Sinor • Thompson P.C.

Mirko L. Kruse, Esq.  
mkruse@troutlaw.com  
303.339.5825

1120 Lincoln Street • Suite 1600  
Denver, Colorado 80203-2141  
303.861.1963  
www.troutlaw.com

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

Jane B. Fredman  
13511 Northgate Estates Drive, Suite 250, Colorado Springs, CO 80921  
jane@fredmanlawco.com

Kevin and Michelle Colvin  
4336 Normandy Court, Royal Oak, MI 48073-2265  
kpsogoian@sbcglobal.net

Re: Colvin Heritage Farms – Minor Subdivision

Dear Mr. Howser,

This firm represents the Upper Black Squirrel Creek Ground Water Management District (“the District”). Applicants, Kevin and Michelle Colvin, provided materials in support of their application for a minor subdivision of a 19.8 acre parcel (“Application”). This parcel is located within the District. The District previously commented on this application in its letter submitted to El Paso County on February 17<sup>th</sup>, 2021. The District reviewed the Applicants’ latest Application materials and submits the following comments:

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

According to the Application, the subdivision will result in two lots, with one residence constructed on each lot. See Water Resources Report for Colvin Heritage Farms Minor Subdivision § 2.1 (Dec. 8, 2020). A domestic well for each residence will provide its water supply, pursuant to well permit nos. 84459-F and 84460-F. Applicants state that the total projected water demand for both of these wells will be 1 acre-foot per year for each well, or a total of 2 acre-feet per year. If these wells withdrew more than 0.5 acre-feet per year each they would violate 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 a 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. Applicants must comply with this rule.

*Geophysical Logging*

The Groundwater Commission's determination 3655-BD requires the entire depth of each well drilled pursuant to the determination to be geophysically logged prior to installing the well casing. This is required to confirm the thickness of the water bearing sandstones and siltstones upon which the determination allocation is based. It is not clear whether or how this requirement has been met for the existing domestic well on the property.

*Replacement Supply*

According to the Application, discharged wastewater will be treated through individual on-site wastewater treatment system ("OWTS"). See Water Resources Report for Colvin Heritage Farms Minor Subdivision § 4.2 (Dec. 8, 2020). Concerns and issues related to discharge from densely spaced OWTSs and using OWTSs as replacement sources is addressed in the attached technical memorandum prepared by the District's hydrologist, Mike Wireman of Granite Ridge Resources. See Mike Wireman, Granite Ridge Resources, Technical Memorandum re Issues/Concerns Related to Discharge of Wastewater Effluent to the Upper Black Squirrel Alluvial Aquifer from Densely Spaced Individual Sewage Disposal Systems (Feb. 16, 2021). In addition to these general concerns relating to OWTSs, Colvin Heritage Farms is located in T12S, R65W, an area where the Upper Black Squirrel alluvial aquifer is shallow or absent. For this reason, there is a high likelihood that replacement water from Applicant's OWTS will not reach the alluvial aquifer.

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

Sincerely,



Mirko L. Kruse  
for  
TROUT RALEY

cc: UBSCGWMD Board of Directors

Encl: Mike Wireman, Granite Ridge Resources, Technical Memorandum re Issues/Concerns Related to Discharge of Wastewater Effluent to the Upper Black Squirrel Alluvial Aquifer from Densely Spaced Individual Sewage Disposal Systems (Feb. 16, 2021).