



Water Supply Plan for the County Line Buc-ee's El Paso County, Colorado

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I INTRODUCTION

This report summarizes key aspects of the water supply plan for the County Line Buc-ee's (the "County Line Buc-ee's"), which is anticipated to be located on land owned by Buc-ee's EPCO, LLC in El Paso County, approximately 2 miles north of the Town of Monument, on the west side of Interstate 25 (the "property" or the "County Line Buc-ee's"). The County Line Buc-ee's will include an approximately 74,000 square-foot building with fuel pumps as shown on the Site Plan. Water demand will be limited to indoor use and a limited amount of outdoor irrigation. The water supply will be provided via on-site wells completed in Denver Basin aquifers, which will withdraw nontributary groundwater pursuant to existing well permits. Buc-ee's owns all of the Denver Basin groundwater underlying the property as well as the Denver Basin groundwater underlying an adjacent parcel owned by CSMS Management, LLC.¹ Water used indoors will be treated onsite before use at the location shown on the Site Plan. Wastewater treatment will be provided offsite by the Monument Sanitation District.

II WATER SUPPLY PLAN CRITERIA

The following sections correspond to the Water Supply Plan Criteria set out in Colorado Revised Statutes Section 29-20-304(1).

(a) *An estimate of the water supply requirements for the proposed development through build-out conditions*

The total water demand for the County Line Buc-ee's is estimated to be 25.47 acre-feet per year. Two independent methods were used to estimate the water supply requirements. The methods include water supply requirements based on 1) the El Paso County "presumptive use values", and 2) recent water use data from comparable Buc-ee's locations.

County Presumptive Use Values. Although not directly applicable to the County Line Buc-ee's Store, an estimate of water demands was calculated based on Presumptive Use Values in the El Paso County Land Development Code Section 8.4.7(B)(7) ("the Code"). The Code provides an average value of 0.1 gallons per day per square-foot of commercial and industrial space for indoor use, and 0.0566 acre feet per 1,000 square feet of landscaping for residential and commercial landscaping. As shown in the following table, the County Line Buc-ee's will consist of 74,000 square-feet of commercial space and 0.94 acres of landscape for irrigation. Use of this data results in an annual demand estimate of 10.61 acre-feet.

¹ On April 2, 2026, Monument Ridge West, LLC conveyed to Buc-ee's EPCO, LLC all water, water rights, and rights to extract and use groundwater, including all rights to use and withdraw nontributary Denver, Arapahoe, and Laramie Fox Hills groundwater and Well Permit Nos. 90715-F and 90716-F, associated with 35.72 acres as more specifically described in the special warranty deed recorded in the records of El Paso County, CO at Reception No. 22603572.

Table 1
Demands Estimate based on El Paso County Presumptive Use Values

Use Category	Indoor Use	Outside Use
	Stores and Shopping Centers	Irrigation
Demand Rate	0.1 gallons per day/square-foot	0.0566 acre-feet per year per 1,000sq. ft.
Quantity	74,000 square-feet	0.94 acres
Daily Demand	7,400 gallons	2,069 gallons
Annual Demand	2,701,000 gallons	755,181 gallons
Annual Demand	8.29 acre-feet	2.32 acre-feet
Annual Total Demand	10.61 acre-feet	

Other Buc-ee's Locations. Indoor use and irrigation water use for the County Line Buc-ee's were also estimated based on review of recent water use data from three existing Buc-ee's locations as follows:

1. Buc-ee's Store #60, Johnstown, Colorado
2. Buc-ee's Store #62, Springfield, MO
3. Buc-ee's Store #66, Amarillo, TX

The listed Buc-ee's locations were identified by Buc-ee's as similar to the County Line Buc-ee's based on characteristics such as traffic, population, and accessibility to similar facilities. The recent water use for these Buc-ee's locations is presented in Table 2. Although the period of use for the Buc-ee's locations differ, all represent approximately one year of recent water use. Based upon the recent water use data from the other Buc-ee's locations listed below, the County Line Buc-ee's indoor water demand is estimated using the maximum recent water use data from Store #66, resulting in annual indoor demand of 23.07 acre-feet per year.

Table 2
Recent Water Use for Other Buc-ee's Locations

Store	Start Date	End Date	Days	Annual Indoor Use (gallons)	Annual Irrigation Use (gallons) ¹	Daily Indoor Use (gallons per day)	Daily Irrigation Use (gallons per day)	Annual Indoor Use (acre-feet)	Annual Irrigation Use (acre-feet) ²	Total Annual Use (acre-feet)	Average Pumping Rate (gallons per minute)
#60 Johnstown, CO	12/20/2024	12/19/2025	364	5,664,519	781,065	15,519	2,140	17.38	2.40	19.78	12.3
#62 Springfield, MO	12/2/2024	12/2/2025	365	6,035,612	781,065	16,536	2,140	18.52	2.40	20.92	13.0
#66 Amarillo, TX	12/5/2024	12/5/2025	365	7,519,000	781,065	20,600	2,140	23.07	2.40	25.47	15.8
Maximum	-	-	-	7,519,000	781,065	20,600	2,140	23.07	2.40	25.47	15.8

¹ Estimated value based on 2.55 acre-feet/acre x 0.94 acres x 325,851 gallons per acre-foot.

² 2.55 acre-feet/acre x 0.94 acres.

In addition, the design plans for the County Line Buc-ee's include limited irrigation on approximately 0.94 acres. The irrigation water use data for the other Buc-ee's locations was not used in this water demand estimate since the climate conditions are different from those at the County Line Buc-ee's location. Irrigation use was estimated at 2.55 acre-feet² per acre for 0.94 acres, which results in an estimated irrigation demand of 2.40 acre-feet per year. **As a result, the total combined water demand for the County Line Buc-ee's is estimated to be 25.47 acre-feet per year.** (This demand estimate is greater than the demand estimate of 10.61 acre-feet per year based on El Paso County's presumptive use values.) The estimated build-out water demand of 25.47 acre-feet per year is 7.33 acre-feet per year less than the combined 32.8 acre-feet per year authorized under the Well Permits. Additional groundwater will be available from the Laramie-Fox Hills Aquifer, even though that potential supply is not necessary to demonstrate adequacy for the project.

(b) A description of the physical source of water supply that will be used to serve the proposed development

Water Supply

Well Permits

Buc-ee's owns and has the legal right to use all of the Denver Basin groundwater underlying the property, as confirmed by Well Permit Nos. 90715-F and 90716-F (attached)(the "Well Permits") pursuant to which Buc-ee's may annually withdraw up to 10.9 acre-feet ("af") from the Denver Aquifer, and 21.9 af from the Arapahoe Aquifer, for a total of 32.8 af for approved uses that include irrigation and commercial purposes. An additional estimated 10.2 af/year is also available for future use, to the extent ever needed, from the Laramie-Fox Hills Aquifer underlying the property. The aquifers and annual appropriation amounts are summarized in the following table.

Table 3
Nontributary Denver Basin Aquifer Annual Appropriations

Aquifer	Annual Appropriation (acre-feet/year)
Denver	10.9
Arapahoe	21.9
Laramie-Fox Hills	10.2 ³
Nontributary Total	43.0

² Landscape irrigation was calculated using the Modified Blaney-Criddle methodology (S.C.S. Technical Release 21) with Pochop growth state coefficients and elevation factors. Precipitation, temperature and the 28°F frost dates are from the Monument 3S Climate Station from 2009 through 2022.

³ It will be unnecessary for Buc-ee's to produce water from this aquifer, since more than sufficient supply is available from the Denver and Arapahoe Aquifers.

The final annual appropriations may be adjusted once the wells are drilled and the actual saturated thickness of the Denver Basin aquifers underlying the property are known. Note that there is a requirement to relinquish 2% of well diversions to the stream system, which will be met via the wastewater treatment services provided by the Monument Sanitation District, since municipal treatments systems typically return 95% of indoor use to the stream system.

Estimated Well Yields

Potential well yields were estimated based on the saturated thicknesses provided for the Denver and Arapahoe Aquifers in the Division of Water Resources (DWR) Hydrogeology Section Consultation Report (used to determine the annual appropriations for the Well Permits) and yields from nearby constructed Denver Basin wells. The Laramie-Fox Hills Aquifer saturated thickness is based on the DWR aquifer analysis tools due to the lack of nearby constructed wells in this aquifer. Yield per foot of saturated thickness values were determined for the Denver and Arapahoe Aquifers using well yields and saturated thickness for wells used in the DWR Hydrogeology Section Consultation Report and other nearby constructed wells. The yield per foot of saturated thickness value for the Laramie-Fox Hills aquifer was determined from the closest well completed in that aquifer, which is for a well located at Latigo Ranch 22 miles ESE of the Buc-ee's well. The estimated well yields shown in the table below are more than adequate to meet the maximum estimated annual water demand at the County Line Buc-ee's, which would require a continuous pumping rate of approximately 15.8 gallons per minute to produce the estimated water demand of 25.47 acre-feet per year.

Table 4
Estimated Well Yields for Buc-ee's Wells

Aquifer	Estimated Aquifer Depths based on elevation of 7,340 feet (USGS) from DWR Hydrogeology Section Consultation		Saturated Thickness	Estimated Potential Well Yield
	Top	Bottom	Feet	Gallons Per Minute
Denver	1,230	1,795	180	80-100
Arapahoe	1,825	2,250	360	190-370
Laramie-Fox Hills	2,500	2,752	192	110

Note that actual yields may be greater or lesser than the estimated potential well yields, based on site specific data from well drilling.

(c) An estimate of the amount of water yield projected from the proposed water supply under various hydrologic conditions

The nontributary groundwater in the Denver Basin aquifers underlying the property is not affected by changing hydrologic conditions. The estimated annual yield from the Denver Basin aquifers is 43.0 acre-feet (Table 3).

(d) Water conservation measures, if any, that may be implemented within the development

Buc-ee's will install low use water fixtures to conserve water. In addition, the limited xeriscape landscaping of 0.94 acres will consume a minimal volume of water.

(e) Water demand management measures, if any, that may be implemented within the development to account for hydrologic variability

As noted above in Section (c) hydrologic variability will not affect the proposed water supply. As such, water demand measures to account for hydrologic variability are not necessary. Also, note that the xeriscape landscaping is well suited to arid conditions.

III Conclusion

The nontributary groundwater in the Denver Basin aquifers underlying Buc-ee's property is both physically and legally available in more than sufficient quantity to reliably support the estimated water demands of the County Line Buc-ee's.

Appendix A

Well Permits



COLORADO

Division of Water Resources

Department of Natural Resources

WELL PERMIT NUMBER 90715-F

RECEIPT NUMBER 10046575

ORIGINAL PERMIT APPLICANT(S)

MONUMENT RIDGE WEST, LLC (CHRIS D. CUMMINS)

APPROVED WELL LOCATION

Water Division: 1 Water District: 8

Designated Basin: N/A

Management District: N/A

County: EL PASO

Parcel Name: N/A

Physical Address: N/A

SW 1/4 NW 1/4 Section 2 Township 11.0 S Range 67.0 W Sixth P.M.

UTM COORDINATES (Meters, Zone:13, NAD83)

Easting: 511635.0 Northing: 4330644.0

PERMIT TO CONSTRUCT A NEW WELL

ISSUANCE OF THIS PERMIT DOES NOT CONFER A WATER RIGHT OR GUARANTEE WATER AVAILABILITY

CONDITIONS OF APPROVAL

- 1) This well shall be used in such a way as to cause no material injury to existing water rights. The issuance of this permit does not ensure that no injury will occur to another vested water right or preclude another owner of a vested water right from seeking relief in a civil court action.
- 2) The construction of this well shall be in compliance with the Water Well Construction Rules 2 CCR 402-2, unless approval of a variance has been granted by the State Board of Examiners of Water Well and Ground Heat Exchanger Contractors in accordance with Rule 18.
- 3) Approved pursuant to CRS 37-90-137(4) and the findings of the State Engineer dated 3/17/2026.
- 4) The use of groundwater from this well is limited to irrigation and commercial purposes.
- 5) Production from this well is restricted to the Arapahoe aquifer, which corresponds to the interval between 1,825 feet and 2,250 feet below the ground surface. This well will be completed in a Type 1 aquifer and must be constructed in accordance with Well Construction Rule 10.4.5 (2 CCR 402-2).
- 6) The pumping rate of this well shall not exceed 150 GPM.
- 7) The average annual amount of groundwater to be withdrawn shall not exceed 21.9 acre-feet and the total volume of groundwater to be withdrawn shall not exceed 2190 acre-feet.
- 8) The entire length of the hole shall be geophysically logged as required by Rule 9 of the Statewide Nontributary Ground Water Rules prior to installing casing.
- 9) The owner shall mark the well in a conspicuous location with well permit number(s), name of the aquifer, and court case number(s) as appropriate. The owner shall take necessary means and precautions to preserve these markings.
- 10) A totalizing flow meter must be installed on this well and maintained in good working order. Permanent records of all diversions must be maintained by the well owner (recorded at least annually) and submitted to the Division Engineer upon request.
- 11) This well shall be located more than 600 feet from any existing well completed in the same aquifer and more than 1/4 mile from any prior geothermal operation utilizing water from the same aquifer that is not owned by the applicant.
- 12) This well shall be located not more than 200 feet from the location specified on this permit.
- 13) Pursuant to CRS 37-90-137(9)(b) and the Denver Basin Rules, no more than 98% of the nontributary groundwater withdrawn annually shall be consumed and the well owner shall demonstrate to the reasonable satisfaction of the State Engineer that no more than 98% of the water withdrawn will be consumed.
- 14) This well is subject to administration by the Division Engineer in accordance with applicable decrees, statutes, rules, and regulations.

NOTE: This well is withdrawing water from a non-renewable aquifer. While the withdrawals from this aquifer are administered based on a 100 year aquifer life, water level declines may prevent this well from diverting the permitted amounts for that 100 years.

NOTE: To ensure a maximum productive life of this well, perforated casing should be set through the entire producing interval of the approved zone or aquifer indicated above.

WELL PERMIT NUMBER 90715-F

RECEIPT NUMBER 10046575

NOTE: This permit will expire on the expiration date unless the well is constructed by that date. A Well Construction and Yield Estimate Report (GWS-31) must be submitted to the Division of Water Resources to verify the well has been constructed. Upon installation of the pump, a Pump Installation and Production Equipment Test Report (GWS-32) must be submitted to the Division of Water Resources. Forms are available at: dwr.colorado.gov

NOTE: A hydrogeologic aquifer evaluation has been completed for this permit and the details of the evaluation can be viewed in the hydrogeologic aquifer evaluation imaged document located in the well permit file.

NOTE: Any well construction, pump installation, repair, testing, or abandonment taking place on or after January 1, 2026 must comply with the Well Construction Rules (2 CCR 402-2, effective 1/1/26, <https://dwr.colorado.gov/services/well-construction-inspection#water-well-construction-rules>).

Christopher L. Eamon

Date Issued: 3/19/2026

Issued By CHRISTOPHER EAMON

Well must be constructed by 3/19/2028



ORIGINAL PERMIT APPLICANT(S)

MONUMENT RIDGE WEST, LLC (CHRIS D. CUMMINS)

APPROVED WELL LOCATION

Water Division: 1 Water District: 8
Designated Basin: N/A
Management District: N/A
County: EL PASO
Parcel Name: N/A
Physical Address: N/A

SW 1/4 NW 1/4 Section 2 Township 11.0 S Range 67.0 W Sixth P.M.

UTM COORDINATES (Meters, Zone:13, NAD83)

Easting: 511635.0 Northing: 4330644.0

PERMIT TO CONSTRUCT A NEW WELL

ISSUANCE OF THIS PERMIT DOES NOT CONFER A WATER RIGHT OR GUARANTEE WATER AVAILABILITY
CONDITIONS OF APPROVAL

- 1) This well shall be used in such a way as to cause no material injury to existing water rights. The issuance of this permit does not ensure that no injury will occur to another vested water right or preclude another owner of a vested water right from seeking relief in a civil court action.
- 2) The construction of this well shall be in compliance with the Water Well Construction Rules 2 CCR 402-2, unless approval of a variance has been granted by the State Board of Examiners of Water Well and Ground Heat Exchanger Contractors in accordance with Rule 18.
- 3) Approved pursuant to CRS 37-90-137(4) and the findings of the State Engineer dated 1/28/2026.
- 4) The use of groundwater from this well is limited to irrigation and commercial purposes.
- 5) Production from this well is restricted to the Denver aquifer, which corresponds to the interval between 1,230 feet and 1,795 feet below the ground surface. This well will be completed in a Type 1 aquifer and must be constructed in accordance with Well Construction Rule 10.4.5 (2 CCR 402-2).
- 6) The pumping rate of this well shall not exceed 150 GPM.
- 7) The average annual amount of groundwater to be withdrawn shall not exceed 10.9 acre-feet and the total volume of groundwater to be withdrawn shall not exceed 1090 acre-feet.
- 8) The entire length of the hole shall be geophysically logged as required by Rule 9 of the Statewide Nontributary Ground Water Rules prior to installing casing.
- 9) The owner shall mark the well in a conspicuous location with well permit number(s), name of the aquifer, and court case number(s) as appropriate. The owner shall take necessary means and precautions to preserve these markings.
- 10) A totalizing flow meter must be installed on this well and maintained in good working order. Permanent records of all diversions must be maintained by the well owner (recorded at least annually) and submitted to the Division Engineer upon request.
- 11) This well shall be located more than 600 feet from any existing well completed in the same aquifer and more than 1/4 mile from any prior geothermal operation utilizing water from the same aquifer that is not owned by the applicant.
- 12) This well shall be located not more than 200 feet from the location specified on this permit.
- 13) Pursuant to CRS 37-90-137(9)(b) and the Denver Basin Rules, no more than 98% of the nontributary groundwater withdrawn annually shall be consumed and the well owner shall demonstrate to the reasonable satisfaction of the State Engineer that no more than 98% of the water withdrawn will be consumed.
- 14) This well is subject to administration by the Division Engineer in accordance with applicable decrees, statutes, rules, and regulations.

NOTE: This well is withdrawing water from a non-renewable aquifer. While the withdrawals from this aquifer are administered based on a 100 year aquifer life, water level declines may prevent this well from diverting the permitted amounts for that 100 years.

NOTE: To ensure a maximum productive life of this well, perforated casing should be set through the entire producing interval of the approved zone or aquifer indicated above.

WELL PERMIT NUMBER 90716-F

RECEIPT NUMBER 10046576

NOTE: This permit will expire on the expiration date unless the well is constructed by that date. A Well Construction and Yield Estimate Report (GWS-31) must be submitted to the Division of Water Resources to verify the well has been constructed. Upon installation of the pump, a Pump Installation and Production Equipment Test Report (GWS-32) must be submitted to the Division of Water Resources. Forms are available at: dwr.colorado.gov

NOTE: A hydrogeologic aquifer evaluation has been completed for this permit and the details of the evaluation can be viewed in the hydrogeologic aquifer evaluation imaged document located in the well permit file.

NOTE: Any well construction, pump installation, repair, testing, or abandonment taking place on or after January 1, 2026 must comply with the Well Construction Rules (2 CCR 402-2, effective 1/1/26, <https://dwr.colorado.gov/services/well-construction-inspection#water-well-construction-rules>).

Christopher L. Eamon

Date Issued: 3/19/2026

Issued By CHRISTOPHER EAMON

Well must be constructed by 3/19/2028