

**ARAPAHOE COUNTY**

Arapahoe County
Public Works and Development
Planning Division
 6924 S. Lima Street
 Centennial, Colorado 80112
 Phone: 720-874-6650
www.arapahoegov.com

Land Development ApplicationThis form must be complete.

Land Development Application materials received after 2pm
 shall be date stamped received the following business day.

APPLICANT NAME: Robert Palmer, PE for Strategic Land Solutions, Inc.	ADDRESS: 2595 Ponderosa Road Franktown, CO 80116 PHONE: 720-384-7661 EMAIL: rpalmer@strategicls.net	CONTACT: Robert Palmer TITLE: President for Strategic Land Solutions
OWNER(S) OF RECORD NAME(S): Messrs. Louis & Jose Munoz for JL Group LLC	ADDRESS: PO Box 470550 Aurora, CO 80047-0550 PHONE: 720-290-9843 EMAIL: jmmunoz436@gmail.com	SIGNATURE(S): <i>Jose Munoz</i>
ENGINEERING FIRM NAME: Strategic Land Solutions, Inc.	ADDRESS: 2595 Ponderosa Road Franktown, CO 80116 PHONE: 720-384-7661 EMAIL: rpalmer@strategicls.net	CONTACT: Robert Palmer, PE TITLE: President for Strategic Land Solutions

Pre-Submittal Case Number: Q 22 - 034 Pre-Submittal Planner: Skinner Pre-Submittal Engineer: Liu

State Parcel ID No. (AIN no.):	PIN 034120289 AIN: 1979-06-1-00-382		
Parcel Address or Cross Streets:	E. Colfax Service Road east of N. Watkins Road & I-70		
Subdivision Name & Filing No:	Proposed: The Ranch at Watkins Farm		

EXISTING		PROPOSED
Zoning:	RR-B	RR-B
Project Name:		The Ranch at Watkins Farm
Site Area (Acres):	37.07 +/-	37.07 +/-
Density (Dwelling Units/Acre):		0.32
Building Square Footage:		TBD
Disturbed Area (Acres):	N/A	7 +/-

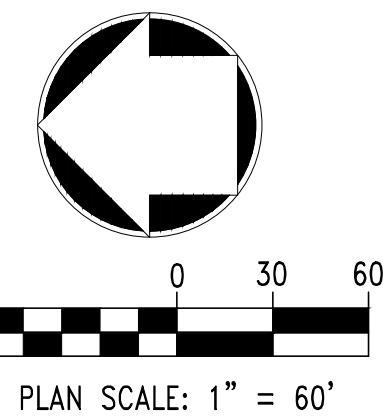
CASE TYPE (S)

Preliminary Plat Final Plat

THIS SECTION IS FOR OFFICE USE ONLY

Case No:		Assigned Planner:		Assigned Engineer:	
TCHD Fee:	\$	Planning Fee(s):	\$	Engineering Fee(s):	\$

This land use application shall be submitted with all required application fees. Incomplete applications will not be accepted. Submittal of this application *does not* establish a vested property right in accordance with C.R.S. 24-68-105(1). Processing and review of this application may require the submittal of additional information, subsequent reviews, and/or meetings, as outlined in the Arapahoe County Land Development Code.



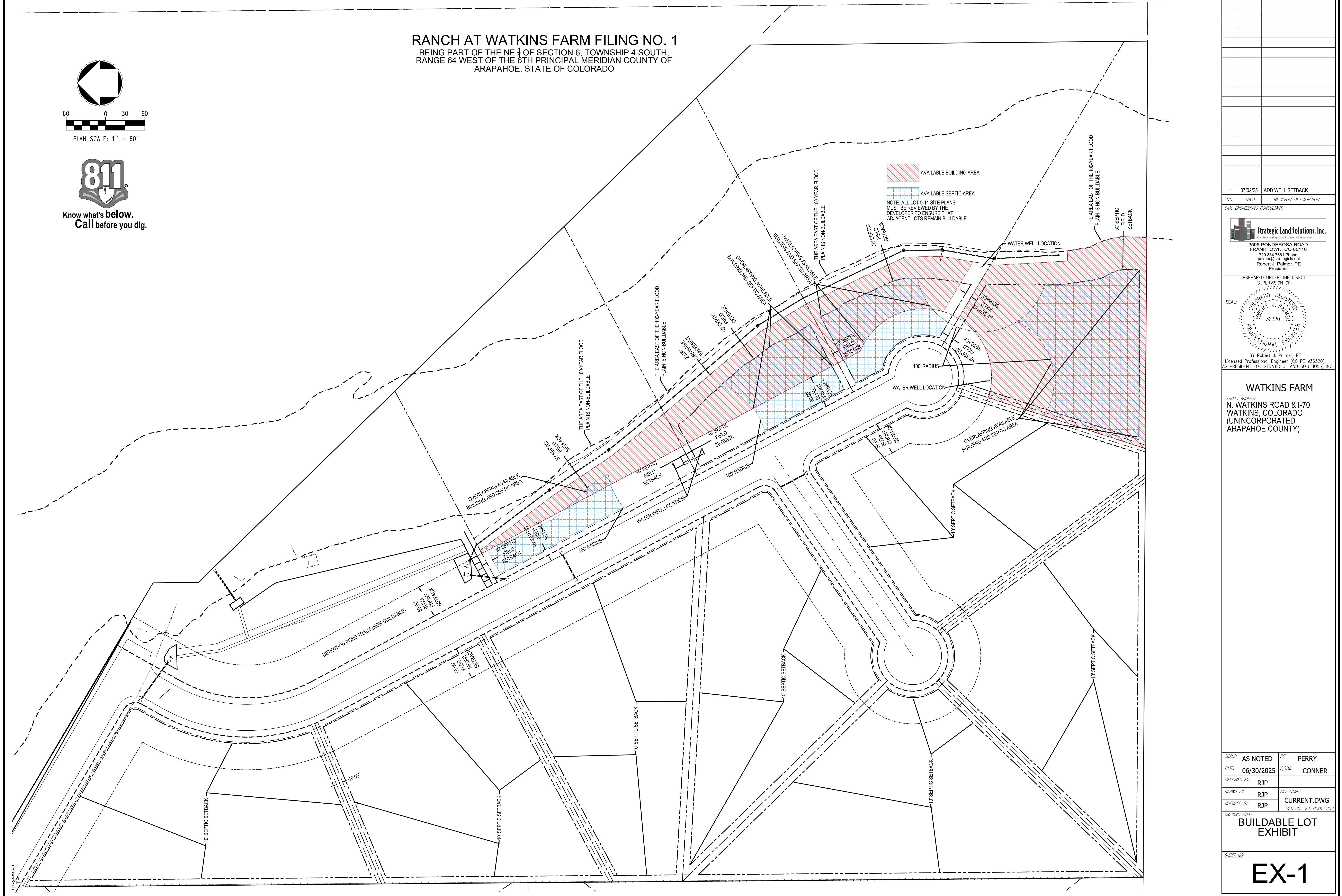
PLAN SCALE: 1" = 60'



Know what's below.
Call before you dig.

RANCH AT WATKINS FARM FILING NO. 1

BEING PART OF THE NE^{1/4} OF SECTION 6, TOWNSHIP 4 SOUTH,
RANGE 64 WEST OF THE 6TH PRINCIPAL MERIDIAN, COUNTY OF
ARAPAHOE, STATE OF COLORADO



SCALE: AS NOTED RE: PERRY
DATE: 06/30/2025 P/C/M CONNER
DESIGNED BY: RJP
DRAWN BY: RJP FILE NAME: CURRENT.DWG
CHECKED BY: RJP SLS INV 24-0001-203
DRAWING TITLE: BUILDABLE LOT EXHIBIT

SHEET NO:

EX-1

CASE NO. 24-0001-203

1 07/02/25 ADD WELL SETBACK
NO. DATE REVISION DESCRIPTION

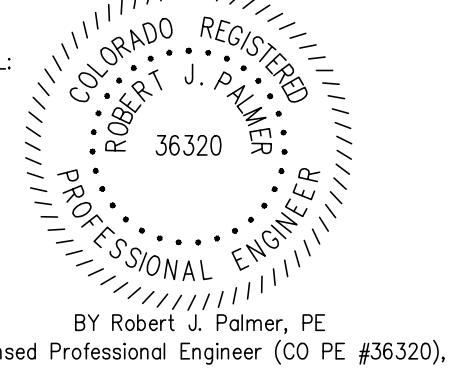
CIVIL ENGINEERING CONSULTANT:



2595 PONDEROSA ROAD
FRANKTOWN, CO 80116
720.384.7681 Phone
rpalmier@strategic-land.com
Robert J. Palmer, PE
President

PREPARED UNDER THE DIRECT
SUPERVISION OF:

SEAL:



BY Robert J. Palmer, PE
Licensed Professional Engineer (CO PE #36320),
AS PRESIDENT FOR STRATEGIC LAND SOLUTIONS, INC.

WATKINS FARM

STREET ADDRESS
N. WATKINS ROAD & I-70
WATKINS, COLORADO
(UNINCORPORATED
ARAPAHOE COUNTY)

From: [Molly Orkild-Larson](#)
To: wenli.dickinson@state.co.us
Subject: RE: PP23-002-The Ranch at Watkin Farms Preliminary Plat
Date: Friday, October 3, 2025 4:02:00 PM
Attachments: [image001.png](#)

Thank you, Wendi, for sending me this update.



Molly Orkild-Larson, RLA, AICP

Principal Planner
Public Works and Development
Planning Division
6924 S. Lima Street, Centennial, CO 80112
Office: 720-874-6658
Email: morkild-larson@arapahoegov.com

From: Wenli Dickinson <wenli.dickinson@state.co.us>
Sent: Tuesday, September 30, 2025 5:40 PM
To: Molly Orkild-Larson <MOrkild-Larson@arapahoegov.com>
Cc: Stacey Rogers <stacey@mastinlaw.com>; TERRY JENSEN <tkj8500@comcast.net>; Ioana Comaniciu - DNR <ioana.comaniciu@state.co.us>
Subject: Re: PP23-002-The Ranch at Watkin Farms Preliminary Plat

Hi Molly,

I received a request for clarification regarding our letter dated May 16, 2024. I have copied the team lead for this area, Ioana Comaniciu, on this email.

The letter provides a favorable opinion on the water supply since the water is legally available, based on having been allocated on the basis of overlying land ownership in case no. 97CW398 and deeded to the Applicant, and expected to be physically available, based on current estimated aquifer conditions.

The request for clarification, from my understanding, came up due to concerns from the community that this development could potentially cause injury to existing water rights. For this office's purposes, so long as the withdrawal of the groundwater subject to the letter is consistent with statute, the decree, and well permits issued by this office, we do not anticipate material injury occurring to existing water rights.

We cannot consider potential concerns of injury without supporting information in our review of these subdivision water supply plans. Additionally, the lowering of groundwater levels alone does not necessarily constitute injury (see CRS 37-90-137(4)(c)). I mention this example because it is often a concern cited by the public as a reason for our office to deny the water supply plan, but that is not consistent

with our standards of review and it is not consistent with statute. To reiterate, the Applicant is entitled to withdraw the water that they have a right to pursuant to statute, their decree, and well permits.

Should someone in the future file a complaint that the pumping or use of this groundwater is causing injury, our office would take appropriate action at that time.

Please let me know if there is anything that can further be clarified or if you have any questions.

Regards,

Wenli Dickinson, P.E.
Water Resource Engineer
Denver Office Team 456 Supervisor

 [1313 Sherman St, Suite 821, Denver, CO 80203](http://1313ShermanStSuite821.Denver.CO80203) | dwr.colorado.gov

Note: I am out of the office every other Friday.

If you are a customer or DWR employee, please feel free to submit feedback for me [here](#).

On Thu, May 16, 2024 at 12:38 PM Dickinson - DNR, Wenli <wenli.dickinson@state.co.us> wrote:

Hi Molly,

Attached are DWR's updated comments on The Ranch at Watkin Farms (PP23-002) approving the water supply plan. Please let me know if you have any questions.

Regards,

Wenli Dickinson, P.E.
Water Resource Engineer


P 303.866.3581 x8206
1313 Sherman St, Suite 821, Denver, CO 80203
wenli.dickinson@state.co.us | dwr.colorado.gov
[DWR Customer Satisfaction Survey](#)

On Tue, May 14, 2024 at 12:37 PM Molly Orkild-Larson <MOrkild-Larson@arapahoegov.com> wrote:



May 16, 2024

Molly Orkild-Larson, Planner
Arapahoe County Public Works and Development Planning Division
Transmission via email: morkild-larson@arapahoegov.com

Re: The Ranch at Watkin Farms Preliminary Plat
Case No. PP23-002, Applicant: JL Group LLC, Luis and Jose Muñoz
Part of the E ½ of the NE ¼ of Sec. 6, Twp. 4 South, Rng. 64 West, 6th P.M.
Water Division 1, Water District 1
CDWR Referral No. 30992 - 3rd Letter

Dear Molly Orkild-Larson:

We have reviewed the above-referenced October 9, 2023 proposal to subdivide a 37-acre parcel located in the E ½ of the NE ¼ of Sec. 6, Twp. 4 South, Rng. 64 West, 6th P.M. into 12 single-family lots and additional information provided by the Applicant on May 14, 2024. According to the referral, each lot will be 2.41± acres. The proposed water supply is individual on-lot wells. The comments in this letter supersede the comments dated February 12, 2024.

Water Supply Demand

According to the updated Water Supply Information Summary, the proposed water uses are household use (0.3 acre-feet/year/residence) and irrigation of 0.09 acre/lot (0.3 acre-feet/year/lot). Therefore, the total water demand for the subdivision is 7.2 acre-feet/year.

Source of Water Supply

The proposed water supply is individual on-lot wells, likely producing from the not-nontributary Denver aquifer. The groundwater in the aquifers underlying the subject property was adjudicated in Division 1 Water Court case no. 97CW398. The proposed water uses are allowed by the decree. The quantity of water determined in each aquifer in case no. 97CW398 is summarized in Table 1.

Table 1. Quantity of Water Determined in Div. 1 Case No. 97CW398.

Aquifer	Type	Annual Withdrawal based on a 100-Aquifer Life	Annual Withdrawal based on a 300-Aquifer Life
Denver	Not-nontributary	115.0	38.33
Upper Arapahoe	Nontributary	88.0	29.33
Lower Arapahoe	Nontributary	37.7	12.56
Laramie-Fox Hills	Nontributary	83.2	27.73
<i>Total</i>		323.9	107.95

The decree in case no. 97CW398 also approved an augmentation plan for up to 51 acre-feet/year from the Denver aquifer to serve 85 single-family residences through individual wells. Each well operating under this augmentation plan is limited to an annual withdrawal of 0.6 acre-feet/year for in-house use and irrigation of 4,000 square-feet, which is consistent with the proposed water uses and water demand for this subdivision. As of the date of this letter, 34.8 acre-feet/year of augmented Denver aquifer water is associated with 58 well permits have been issued to lots in the neighboring subdivision and which were



constructed, operating pursuant to this augmentation plan. (65 well permits have been issued, however 7 were not constructed and the permits are expired).

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 section 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 available pursuant to case no. 97CW398 is equal to one percent of the total amount as shown in column 3 of Table 1, 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 at those rates for a maximum period of 100 years.

According to the deeds and information submitted by the Applicant:

- The original decree holder (Watkins Farms LLC) conveyed 66 acre-feet of Denver aquifer water, of which 38.4 acre-feet is augmented, to Terry K. Jensen in the deed recorded under reception no. B2110526 in 2001 (and corrected in 2002).
- Terry K. Jensen subsequently conveyed 61 acre-feet of Denver aquifer water, of which 35.4 acre-feet was augmented, to Meridian Homes in the deed recorded under reception no. B2110527 in 2002.
- Terry K. Jensen, having retained 5 acre-feet of Denver aquifer water, of which 3 acre-feet is augmented, subsequently conveyed this amount to JL Group LLC in the deed recorded under reception no. E4016144 in 2024.
- The original decree holder (Watkins Farms LLC) conveyed 49 acre-feet of Denver aquifer water, of which 12.6 acre-feet is augmented, to JL Group, LLC in the deed recorded under reception no. E4016151 in 2022.

Therefore, according to these deeds and the information submitted by the Applicant, the Applicant (JL Group LLC) has been conveyed 54 acre-feet/year of Denver aquifer water of which 15.6 acre-feet/year is augmented, as shown in Table 2 below, which exceed the proposed water demand of 7.2 acre-feet/year for this subdivision based on a 100-year supply.

Table 2. Quantity of Water Conveyed to Applicant.

	Decreed Annual Withdrawal based on a 100-Aquifer Life	Owned by Meridian Homes for Watkins Farms Subdivision	Owned by JL Group LLC for The Ranch at Watkins Farms	Total (af/yr based on 100 years)
Total Denver Water	115.0	61.0	54.0	115.0
Augmented Portion	51	35.4	15.6	51.0

Pursuant to Paragraph 11 of the case no. 97CW398, the decree calls for the creation of a Property Owners Association, in which all lot purchasers are required to join. The water rights and the plan for augmentation will be assigned to the Property Owners Association, therefore, if lot owners apply for on lot well permits, they will not be required to provide evidence that the applicant has acquired the right to the portion of the water being requested on the application.

A previous review of our records showed well permit no. 110359 is located on the subject property. However, another review of the permit file indicates the proposed location of the well was 130 feet from the north section line and 1,030 feet from the south section line of Sec. 6, Twp. 4 South, Rng. 64 West, 6th P.M. Additionally, a field search performed by the Applicant which did not find the well, and it was determined that this well is not located on the subject property. Therefore, this office has no concerns regarding this well.

State Engineer's Office Opinion

Based upon the above and pursuant to section 30-28-136(1)(h)(I), 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 100 years (or 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.

300-Year Supply Courtesy Comment

While the county's 2018 *Arapahoe County Comprehensive Plan, As Amended Through January 24, 2020, under Public Facilities And Services* contains "Strategy PFS 2.1(b) - Adopt a 300-year Water Supply Requirement" that states: "The County will require new development to provide a 300-year water supply", the county's current legal requirement is currently 100 years. Therefore, our opinion is based on a 100-year supply. However, using an **allocation** approach based on 300 years (though this period is not required by the county), the allowed average annual amount of withdrawal from case no. 97CW398 owned by the Applicant would be reduced to one third of that amount, or 18 acre-feet/year of Denver aquifer of which 5.2 acre-feet/year is augmented based on a 300-year supply. Based on a demand of 7.2 acre-feet/year, the water from the Denver aquifer is not sufficient to supply the lots for a period of 300 years.

Please contact Wenli Dickinson at 303-866-3581 x8206 or Wenli.Dickinson@state.co.us with any questions.

Sincerely,


Ioana Comaniciu, P.E.
Water Resources Engineer

Ec: Well permit no. 110359