



May 8, 2020

Dear Elbert Creek Water Customer,

Consistent with the notice you are receiving as part of this communication, I wanted to provide you with some additional background information regarding this topic. As set forth in the attached notice and per Colorado Department of Public Health and Environment (“CDPHE”) requirements, Elbert Creek Water Company (“ECWC”) must remove total organic compounds (TOC) from the domestic water supply such that the running annual average TOC removal ratio does not fall below 1.0 over the prior 12 month period.

We recently completed our first quarter (Q1) TOC testing for January, February, and March 2020. Our Q1 TOC removal ratio was 1.2726, which is well above the minimum 1.0 removal ratio threshold. However, the running annual average looks back over the prior 12-month period which includes not only Q1 2020, but also Q4 2019, Q3, 2019, and Q2 2019. As you can tell from the chart below, our running annual average TOC removal ratio was 0.9543, or 4.57% below the 1.0 threshold.

This problem was primarily caused by our 2nd and 3rd 2019 quarter samples which included the unusually heavy snow runoff from the remarkable 2019-2020 snow season. Those 2nd and 3rd quarter samples represent the runoff months when many rivers and streams receive snowmelt from surrounding areas. Last year the runoff continued through August. These runoff waters often contain elevated levels of organic carbon matter. The heavy 2019 runoff was further complicated for our area because of the 416 Fire, which occurred in June, 2018. Given the exceptionally heavy 2019-2020 snowpack, Elbert Creek (a substantial source of water for ECWC) received significant runoff and ash flows from areas directly affected by the 416 Fire. This is a common issue during the runoff with many similar water providers. Notably, ECWC’s TOC removal ratio trend is very positive. As you can see from the chart below, the TOC removal ratios were again compliant throughout Q3 and Q4 2019 (and now also for Q1 2020).

Below are ECWC’s monthly and quarterly TOC removal ratios for the prior 12-month period (from April, 2019 through March, 2020, inclusive):

Month	Monthly TOC Removal Ratio	Running Annual Average at End of Quarter (12-month lookback)
March 2020	1.3571	1.27257 (Q1 2020)
February 2020	1.1327	
January 2020	1.3279	
December 2019	1.2339	1.3603 (Q4 2019)

November 2019	1.5942	
October 2019	1.2528	
September 2019	1.227	0.828167 (Q3 2019)
August 2019	0.6534	
July 2019	0.6041	
June 2019	0.3805	0.3562 (Q2 2019)
May 2019	0.43	
April 2019	0.26	

What we are doing to fix the issue: Currently, ECWC is consulting with Colorado licensed engineers as well as working closely with the CDPHE to remediate the TOC removal ratio issue to minimize the chances of it recurring. Our engineers will provide CDPHE with their evaluation report including all remediation recommendations. Upon CDPHE’s approval of the report and recommendations, ECWC will implement the recommendations this summer/fall.

As well, ECWC has enhanced its Hydrant Flushing Program to clear water main lines of TOCs and keep fresher water in the water lines. We believe this process should also assist ECWC in gaining compliance with the relevant CDPHE requirements.

Also, ECWC is evaluating the blend of source waters (well and surface waters), times throughout the year they are used, and optimizing those sources based upon the time of year. For instance, we are presently relying more on well water during the spring runoff rather than depending upon Elbert Creek. Ground water typically has lower levels of TOCs than snow runoff fed surface waters such as Elbert Creek.

The remediation timeline is ongoing and will be dictated by CDPHE. Nevertheless, we are hopeful that given the smaller anticipated runoff this year, along with using more ground water from ECWC’s wells, ECWC will gain compliance with the CDPHE’s TOC removal ratio requirements by the 2nd or 3rd quarter of 2020. Rest assured that ECWC and our engineers are diligently working to develop permanent solutions so this problem doesn’t recur.

If you have any questions, please contact me at jgoodman@theglacierclub.com or 970.382.6710 and I will be happy to assist you.

Sincerely,



Jim Goodman
Elbert Creek Water Company
Chief Operating Officer