

<p>DISTRICT COURT, WATER DIVISION NO. 5, STATE OF COLORADO Garfield County Courthouse 109 8th Street, Suite 104 Glenwood Springs, CO 81601 970-928-3065</p>	<p>DATE FILED: January 24, 2024 8:47 AM FILING ID: 4B18FD563EC64 CASE NUMBER: 2023CW3183</p>
<p>CONCERNING THE APPLICATION FOR WATER RIGHTS OF</p> <p>PUCKETT LAND COMPANY</p> <p>ON THOMPSON CREEK, TRIBUTARY TO THE CRYSTAL RIVER, TRIBUTARY TO THE ROARING FORK RIVER, TRIBUTARY TO THE COLORADO RIVER IN PITKIN COUNTY COLORADO</p>	<p>Δ COURT USE ONLY Δ</p>
<p>Porzak Law, LLC Glenn E. Porzak (#2793) 1111 Spruce Street, Suite 303 Boulder, Colorado 80302 Tel: 303-589-0909 Email: porzaklaw@gmail.com</p>	<p>Case Number: 23CW3183</p> <p>Division: 5</p>
<p>STATEMENT OF OPPOSITION OF CRYSTAL RIVER RANCH CO., LLC</p>	

1. Name and address of Objector:

Crystal River Ranch Co., LLC
c/o Sue Anschutz-Rodgers, Manager
555 Seventeenth Street, Suite 2400
Denver, CO. 80202

Copies of all pleadings to:
Glenn E. Porzak
Porzak Law, LLC
1111 Spruce Street, Suite 303
Boulder, Colorado 80302

2. Name of Structures: Thompson Creek Reservoir.

3. Statement of facts as to why the Application should not be granted or should only be granted in part or on certain conditions:

- a. Crystal River Ranch Co., LLC (“Objector”) is the owner of land and numerous water rights in the Crystal River, Roaring Fork, and Colorado River watersheds that may be adversely impacted if the subject application is granted.
- b. Applicant must be placed on strict proof as to its claims.
- c. Applicant has not shown that it can and will develop the Thompson Creek Reservoir with reasonable diligence.
- d. The conditional decree for the Thompson Creek Reservoir is over 50 years old. During that period Applicant has failed to obtain the necessary federal, state and local permits required to develop this reservoir. Therefore, this subject conditional water right must be cancelled and abandoned.
- e. The information contained in the application is not sufficient to allow the Objector to identify all grounds of opposition that it may wish to assert in this matter. Therefore, Objector reserves the right to state additional grounds of opposition in the future.
- e. This Statement of Opposition shall continue with respect to any amended or republished application, without the necessity of any future filing by Objector.

Respectfully submitted this 24th day of January, 2024.

PORZAK LAW, LLC

*Filed electronically and the original signature is on file at
Porzak Law, LLC*

/s/ Glenn E. Porzak


Glenn E. Porzak (#2793)

Attorney for Crystal River Ranch Co., LLC

VERIFICATION

STATE OF COLORADO)
) ss.
COUNTY OF Delta)

I, Craig Ullmann, P.E., state under oath that I have read the forgoing Statement of Opposition, know the contents thereof, and that the same are true to the best of my knowledge and belief.

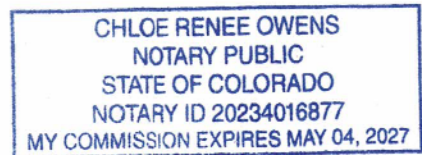



CRAIG ULLMANN, P.E.

Subscribed and sworn to before me this 23rd day of January, 2024 by Craig Ullmann, P.E., for Applicant

Witness my hand and official seal.

My commission expires: May 04, 2027





Notary Public

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of January, 2024, a true and correct copy of the foregoing **STATEMENT OF OPPOSITION OF CRYSTAL RIVER RANCH CO., LLC** in the above-captioned matter was served and filed via Colorado Courts e-filing system to:

Peter D. Nichols
Megan Christensen
Berg Hill Greenleaf Ruscitti, LLP
1712 Pearl Street
Boulder, Colorado 80302
Attorneys for the Applicant

Division 5 Water Engineer
State of Colorado DWR Division 5
Division 5 Engineer
Division Engineer

Colorado Division of Water Resources
State of Colorado – Division of Water Resources
State Engineer
State Engineer

/s/ Robin Hellerich

Robin Hellerich