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August 15, 2025

VIA E-MAIL AND CASE ANYWHERE (SEE ATTACHED SERVICE LIST)

To All Counsel and Unrepresented Parties

Re: Expert Report of Johnson Yeh and Lauren Wicks
Mojave Pistachios, LLC, et al. v. Indian Wells Valley Water District, et
al.; Case No. 30-2021-01187275-CU-OR-CJC

Dear All Counsel and Unrepresented Parties:

Pursuant to the Court's March 18, 2025 First Amended Case Management Order regarding Phase 2 Trial in the above-referenced matter, Defendant, Cross-Defendant, and Cross-Complainant Searles Valley Minerals Inc. hereby produces the report of its retained experts Dr. Johnson Yeh and Ms. Lauren Wicks entitled, "Expert Report of Johnson Yeh, PhD, PG, CHG and Lauren Wicks, PG," which is attached hereto as **Exhibit A**. The curricula vitae of Dr. Yeh and Ms. Wicks are attached as **Exhibits B and C**, respectively. The reliance materials cited in the report are available at the following link, which will remain accessible for sixty (60) days: <https://www.imanageshare.com/pd/6guEQzkuOpv>.

Please let us know if you have any questions.

Sincerely,

Alison K. Toivola
of BEST BEST & KRIEGER LLP

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Attachments

Exhibit A

**MOJAVE PISTACHIOS, LLC; ET AL. V.
INDIAN WELLS VALLEY WATER DISTRICT; ET AL.
(CASE NO. 30-2021-01187275-CU-OR-CJC)**

**Expert Report of
Johnson Yeh, PhD, PG, CHG
and Lauren Wicks, PG**

August 15, 2025

Prepared By:



A handwritten signature in blue ink that reads "Johnson Yeh".

Johnson Yeh, PhD, PG, CHG
Principal Modeler
Geoscience Support Services, Inc.



A handwritten signature in blue ink that reads "Lauren Wicks".

Lauren Wicks, PG
Senior Geohydrologist
Geoscience Support Services, Inc.

**MOJAVE PISTACHIOS, LLC; ET AL. V.
INDIAN WELLS VALLEY WATER DISTRICT; ET AL.
(CASE NO. 30-2021-01187275-CU-OR-CJC)**

**EXPERT REPORT OF JOHNSON YEH, PHD, PG, CHG
AND LAUREN WICKS, PG**

1.0 Summary of Opinions

We have been retained by Best Best & Krieger LLP (BB&K) on behalf of Searles Valley Minerals Inc. to provide expert testimony in the matter of the groundwater rights adjudication of the Indian Wells Valley Groundwater Basin¹ (IWV Basin, or Basin) (*Mojave Pistachios, LLC; et al. v. Indian Wells Valley Water District; et al., Case No. 30-2021-01187275-CU-OR-CJC*). Specifically, we have been tasked with providing technical opinions on the safe yield of the Indian Wells Valley Groundwater Basin, including the use of groundwater models produced in this action, the Basin's hydrogeologic conditions, and historical and recent groundwater level trends.

1.1 Qualifications of Experts

For over 35 years, Dr. Yeh has managed groundwater modeling efforts, hydrogeologic investigations, groundwater basin and water quality studies, and artificial recharge projects. Dr. Yeh has been the lead modeler on many high-profile projects and performs detailed statistical analysis of various types of data. He has worked extensively with MODFLOW and has helped the USGS beta-test software, including GSFLOW, a combined surface and groundwater model based on MODFLOW. Dr. Yeh has provided technical support for numerous groundwater adjudication and legal cases dealing with groundwater hydrology, groundwater modeling, and water rights. Dr. Yeh has a B.S. and M.S. degree from National Taiwan University and a Ph.D. from University of Southern California. He is also a licensed California Professional Geologist and California Certified Hydrogeologist. Previous litigation experience is included in Dr. Yeh's curriculum vitae, provided as Appendix A. Dr. Yeh's rate is \$298 per hour. Dr. Yeh's rate for time under oath is \$566 per hour.

Ms. Wicks is a senior geohydrologist with more than a decade of experience with groundwater investigations performed for numerous municipalities, state agencies, and private clients throughout California. Ms. Wicks has participated in technical working groups for groundwater basins in California, and also supports project management, communication, coordination, and technical assistance for her clients. Ms. Wicks holds two B.S. degrees from Cal Poly Pomona, and a M.S. from University of Idaho. She

¹ California Department of Water Resources (DWR) Basin No. 6-054.

is also a licensed California Professional Geologist. Ms. Wicks' curriculum vitae is provided as Appendix B. Ms. Wicks' rate is \$219 per hour. Ms. Wicks' rate for time under oath is \$416 per hour.

1.2 Summary of Opinions

1. We worked collaboratively with the Indian Wells Valley Technical Working Group (TWG), which has met regularly over the last three years. The TWG has discussed safe yield for the Basin and studied related hydrologic issues. The group experts all agree that the Basin's groundwater in storage and safe yield is greater than the values presented in the Groundwater Sustainability Plan.
2. As part of the TWG we supported the development of white papers², which included a comprehensive and rigorous evaluation of safe yield based on change in groundwater storage from measured water levels, recently updated groundwater pumping information provided by Basin pumpers, appropriate specific yield aquifer parameters, and a representative base period.
3. This safe yield analysis approach in the white papers of using recorded groundwater pumping and observed changes in groundwater elevation is reliable and advantageous because it 1) relies on measured data, such as water level measurements and recorded pumping; and 2) represents a complete accounting of all groundwater inflows and outflows without the uncertainty associated with estimating each individual water budget term.
4. We also support an update to the safe yield component of the white papers, conducted by Luhdorff & Scalmanini Consulting Engineers (LSCE), which used the same analytical approach with updated specific yield values from the Indian Wells Valley Water District's (District's) calibrated groundwater flow model, increased resolution in the Meadowbrook Dairy area, and consideration of potential unobserved losses to evapotranspiration (ET) within the China Lake playa.
 - a. Given uncertainty associated with the large polygon areas and lower water level resolution in the playa area, combined with the understanding that ET is the main hydrologic process occurring in this area, the consideration of additional ET losses not apparent from observed groundwater elevations is logical.
 - b. The base period used for the analysis, January 2014 through December 2023, is particularly appropriate for this specific approach because it considers more accurate water level and pumping data (which has increased in accuracy through time), is representative of long-term hydrologic conditions, includes wet, dry, and average years of precipitation, spans at least ten years, and includes recent cultural conditions.
 - c. The specific yield values from the District's calibrated groundwater model are appropriate for use in this analysis because they are within the typical range for sediments found in IWW Basin, exhibit heterogeneity that corresponds to Basin hydrogeology, and are

² "Assessment of Groundwater Storage for the Indian Wells Valley Groundwater Basin," dated February 23, 2024, and "Assessment of Safe Yield for the Indian Wells Valley Groundwater Basin," dated September 4, 2024, collectively referred to here as "white papers."

supported by a model calibration to observed water levels that is within industry standards.

- d. LSCE's safe yield calculation of 15,400 acre-ft/yr is a reasonable approximation for the IWV Basin.

2.0 Introduction

2.1 General Geohydrology

The IWV Basin is a groundwater basin in the Mojave Desert region of Southern California that is predominantly filled with alluvial, lacustrine, and playa sediments (Ramboll, 2019). Primary groundwater recharge in this arid environment is through percolation of precipitation in surrounding mountain areas, which mainly enters the Basin through recharge from streambed percolation coming from the surrounding mountain ranges (i.e., mountain front recharge) (Berenbrock and Martin, 1991; Kunkel and Chase, 1969; Ramboll, 2019; TWG, 2024a).

Groundwater is present in a shallow unconfined and locally perched aquifer as well as a deeper, regional aquifer that varies from unconfined to confined depending on the presence of fine-grained materials (Ramboll, 2019; TWG, 2024a). These aquifers are the Basin's primary water source. Groundwater generally flows towards China Lake playa, though there are localized water level depressions representing pumping centers (IWVGA, 2025). Groundwater level trends vary within the Basin. Groundwater levels near the pumping centers have historically been declining, with lesser rates of decline or more stable groundwater elevations near recharge areas (IWVGA, 2020 and 2025). Groundwater elevations are also generally stable or slightly increasing in the El Paso area where few groundwater pumping wells are located (IWVGA, 2020 and 2025).

2.2 Technical Working Group

Geoscience Support Services, Inc. (Geoscience, represented by Dr. Yeh and Ms. Wicks) has participated in the IWV Basin TWG since May 2022. The TWG consists of technical representatives of beneficial users of groundwater who collectively represent more than 80 percent of the total groundwater production in WY 2022 in the IWV Basin. These parties include the District represented by Krieger & Stewart Engineering Consultants (K&S), Parker Groundwater, Ramboll, and S.S. Papadopoulos & Associates (SSP&A), Meadowbrook Dairy represented by LSCE, Mojave Pistachios represented by aquilogic, and Searles Valley Minerals represented by Geoscience. The TWG has met routinely to review hydrologic data, evaluate conceptual models, and discuss critical Basin management questions, including the determination of safe yield. Collectively, we also supported the District's development of a groundwater flow model for the IWV Basin by reviewing and providing comments on the proposed approach, model construction, hydrogeologic conceptual model, representation of geologic features, assumptions related to groundwater model input, and model calibration.

In 2024, the TWG published the white papers summarizing this work, including "Assessment of Groundwater Storage for the Indian Wells Valley Groundwater Basin" and "Assessment of Safe Yield for the Indian Wells Valley Groundwater Basin." The group experts all agree that the Basin's groundwater

storage and safe yield is greater than the values presented in the IWV Basin Groundwater Sustainability Plan.

3.0 Indian Wells Valley Groundwater Basin Safe Yield

3.1 Approach

As part of the TWG, we collaborated on a comprehensive and rigorous evaluation of safe yield based on change in groundwater storage from measured water levels, recently updated groundwater pumping information provided by Basin pumpers, appropriate aquifer parameters, and a representative base period (TWG, 2024b). The approach for this safe yield analysis applied the Equation of Hydrologic Equilibrium, which may be expressed as:

$$\text{Inflow} = \text{Outflow} \pm \text{Change in Groundwater Storage} \dots\dots\dots (1)$$

This equation can be further expressed as:

$$\text{Inflow} = \text{Outflow (Excluding Pumping)} + \text{Pumping} \pm \text{Change in Groundwater Storage} \dots\dots (2)$$

By moving Outflow (Excluding Pumping) to the left side of the equation, Equation 2 can be written as:

$$\text{Inflow} - \text{Outflow (Excluding Pumping)} = \text{Pumping} \pm \text{Change in Groundwater Storage} \dots\dots (3)$$

Using the Equation 3, safe yield can be generally expressed as:

$$\text{Safe Yield} = \text{Inflow} - \text{Outflow (Excluding Pumping)} \dots\dots\dots (4)$$

or

$$\text{Safe Yield} = \text{Pumping} \pm \text{Change in Groundwater Storage} \dots\dots\dots (5)$$

In Equation 5, the change in groundwater storage can be calculated using change in groundwater elevations, specific yield³, and basin area:

$$\text{Change in Groundwater Storage} = \text{Change in Water Level} \times \text{Specific Yield} \times \text{Basin Area} \dots\dots (6)$$

The safe yield analysis approach of using recorded groundwater pumping and observed changes in groundwater elevation (i.e., Equation 5) is advantageous because it 1) relies on measured data, such as water level measurements and recorded pumping; and 2) represents a complete accounting of all groundwater inflows and outflows without the uncertainty associated with estimating each individual water budget term.

3.2 Updated Analysis

We also support an update to the TWG safe yield analysis, conducted by LSCE, which used the same analytical approach with updated specific yield values from the District’s calibrated groundwater flow

³ Specific yield, or storage coefficient, refers to the volume of water released from storage by an unconfined aquifer per unit surface area of aquifer per unit decline of the hydraulic head, and is unitless (Freeze and Cherry, 1979).

model, increased resolution in the Brown Road area, and consideration of potentially unobserved losses to ET in the China Lake playa area.

The updated safe yield analysis by LSCE generally uses the Equation of Hydrologic Equilibrium. However, in the playa area, the updated safe yield analysis applied a water balance approach to evaluate ET requirements compared to available precipitation (representing the main groundwater inflows and outflows for that area). This approach is reasonable for the playa area because: 1) less water level measurements are available in the playa area causing the Thiessen polygon areas to generally be larger; and 2) the reduced availability of water level measurements in the playa area means that the water level used for a given polygon may not be representative of the entire area. Without sufficient resolution near the playa area, change in storage occurring from ET processes could easily be missed in the application of observed water level data for change in storage calculations.

Additional assumptions included in the updated LSCE analysis include:

- Use of the base period selected for the TWG safe yield calculations, representing the period from January 2014 through December 2023. This period considers more accurate water level and pumping data (which has increased in accuracy through time), is representative of long-term hydrologic conditions, includes wet, dry, and average years of precipitation, spans at least ten years, and includes recent cultural conditions. Since the safe yield calculation relies so heavily on reported groundwater pumping and observed water level information, selecting a time period with greater confidence in data accuracy is key.
- Use of updated specific yield values from the District's calibrated groundwater flow model, developed by Ramboll. The District's model incorporates the latest understanding of the Basin's hydrogeology and provides an appropriate foundation for basin-wide water balance assessments. Furthermore, the calibrated specific yield values are within the typical range for sediments found in IWV Basin, exhibit heterogeneity that corresponds to Basin hydrogeology, and are supported by a model calibration to observed water levels that is within industry standards.

3.3 Calculated Safe Yield

LSCE's updated calculation resulted in a total safe yield for the IWV Basin of 15,400 acre-ft/yr. Based on our previous participation in the TWG's assessment of safe yield, development of the white papers, support of the District's model, review of other models for the IWV Basin, and our review of LSCE's updated analysis, LSCE's safe yield is a reasonable calculation supported by measured pumping and water level data, a representative base period, and a calibrated groundwater flow model.

4.0 References

- Berenbrock, C., and P. Martin, 1991. The Ground-Water Flow Systems in Indian Wells Valley, Kern, Inyo, and San Bernardino Counties, California. US Geological Survey Water-Resources Investigations Report 89-4191. Prepared in cooperation with the Indian Wells Valley Water District and the US Department of the Navy, China Lake Naval Weapons Center.
- Freeze, R.A., and J.A. Cherry, 1979. Groundwater. Englewood Cliffs, NJ, Prentice-Hall, 604 p. Available at: <https://fc79.gw-project.org/english/>.
- IWVGA (Indian Wells Valley Groundwater Authority), 2020. Groundwater Sustainability Plan for the Indian Wells Valley Groundwater Basin – Bulletin 118 Basin No. 6-054. Prepared by Stetson Engineers, Inc., dated January.
- IWVGA, 2025. Indian Wells Valley Groundwater Basin: Draft GSP Annual Report Water Year 2024 (October 1, 2023 to September 30, 2024), dated March.
- Kunkel, F., and G.H. Chase, 1969. Geology and Ground Water in Indian Wells Valley, California. US Geological Survey Open-File Report 69-329. Prepared in cooperation with the Naval Weapons Center China Lake, CA, dated January 23.
- Ramboll, 2019. Hydrogeologic Conceptual Framework – Indian Wells Valley. Prepared for Indian Wells Valley Water District and the Brackish Groundwater Resources Study Group. June 2019.
- TWG (Technical Working Group), 2024a. Assessment of Groundwater Storage for the Indian Wells Valley Groundwater Basin, dated February 23.
- TWG, 2024b. Assessment of Safe Yield for the Indian Wells Valley Groundwater Basin, dated September 4.

Exhibit B

Johnson Yeh, PhD, PG, CHG

Principal Modeler



EDUCATION AND PROFESSIONAL REGISTRATIONS/ CERTIFICATIONS:

- ◆ BS, Geology, National Taiwan University
- ◆ MS, Geology, National Taiwan University
- ◆ PhD, Sedimentology, University of Southern California
- ◆ California Professional Geologist (No. 6371)
- ◆ California Certified Hydrogeologist (No. 422)

For nearly 35 years, Johnson has managed groundwater modeling efforts, hydrogeologic investigations, groundwater basin and water quality studies, and artificial recharge projects. Johnson performs detailed statistical analysis of various types of data and has been the lead modeler on many high-profile projects—in fact, he was instrumental in helping to resolve one of the largest groundwater rights cases in California and developed models that helped a water district client successfully avoid a costly litigation. Johnson also taught a graduate level groundwater modeling course at the University of Southern California and his experience and knowledge enables him to develop detailed and thorough groundwater models that will help inform future groundwater management strategies and decisions. Johnson has also worked extensively with MODFLOW and has been helping the USGS beta-test GSFLOW, a combined surface and groundwater model based on MODFLOW.

TESTIFYING EXPERIENCE (LAST 5 YEARS):

OPV Coalition, et al. v. Fox Canyon Groundwater Management Agency, et al., Santa Barbara County Superior Court Case No. VENC100555357 (2025): Expert reports

City of Marina, et al. v. RMC Lonestar et al., Superior Court of California, County of Monterey, Case No. 20CV001387 (2022 – 2023): Written testimony, deposition, expert reports, and oral testimony.

PUBLICATIONS AUTHORED (LAST 10 YEARS):

None

SUMMARY OF EXPERIENCE:

Best, Best, & Krieger (BBK): Oxnard/Pleasant Valley Groundwater Basin Adjudication

Johnson is currently serving as Geoscience’s designated technical expert in the groundwater basin adjudication of Oxnard and Pleasant Valley Groundwater Subbasins. During this work, he co-authored an expert report assessing Total Safe Yield and Native Safe Yield of the individual subbasins using groundwater modeling and an evaluation of groundwater budgets. He also conducted follow-up modeling and prepared a rebuttal report addressing opposing expert findings.

Searles Valley Minerals: Indian Wells Valley Groundwater Basin Adjudication, 2020-Present

Johnson is the technical lead for Geoscience’s involvement in the Indian Wells Valley Technical Working Group. The group has worked collaboratively to evaluate basin conditions, groundwater storage, pumping, and a technically defensible estimate of safe yield to support sustainable basin management.

California American Water: Monterey Peninsula Water Supply Project (MPWSP), 2008-Present

The purpose of the Monterey Peninsula Water Supply Project (MPWSP) is to relieve the pressure on the local municipal water supply aquifer, and create new, local water supplies by providing desalinated water

Years of Experience: 34

Years with GEOSCIENCE: 34

Location: San Dimas, CA

KEY QUALIFICATIONS...

- ◆ Specializes in watershed and groundwater modeling
- ◆ Assists USGS in testing GSFLOW model code - helping to keep groundwater models up-to-date
- ◆ Experience supporting more than 30 groundwater-related litigation cases

to northern Monterey County. The MPWSP will also help reduce and remediate seawater intrusion from overdraft conditions, which has been an ongoing water quality issue since the 1930s. Since the start of the project in 2008, Johnson and Geoscience have provided various services including the hydrogeologic characterization of the area, groundwater model development and modeling to create the aquifer testing program, a gap analysis, and exploratory drilling. Johnson was the lead modeler and led the efforts to update the three-dimensional variable density flow and solute transport model for the North Marina Area in 2008 and constructed a focused groundwater model near the CEMEX gravel plant in Marina, CA (NMGWM). Johnson is currently serving as a technical expert for Cal-Am during the City of Marina v. RMC Lonestar lawsuit against the MPWSP. The case has been referred to the California State Water Resources Control Board Administrative Hearings Office. During this process, Johnson has worked collaboratively with other Cal-Am experts to develop a series of expert reports and has led the development of a steady state groundwater flow and solute transport model to answer specific questions posed by the Administrative Hearings Officer and has provided testimony at multiple hearings. He is also supporting final slant well planning for the MPWSP through model analysis.

Western Municipal Water District: Riverside-Arlington Basin Groundwater Sustainability Plan, 2021-2022

Johnson oversaw modeling efforts to develop a GSP for the Riverside-Arlington Basin. The Basin is classified by DWR as a low priority basin and is one of the District's primary sources of local water supply. Johnson worked in conjunction with our team and the District to complete all models necessary to complete a compliant GSP.

Calleguas Municipal Water District: Las Posas Valley Groundwater Basin Adjudication, 2019-2022

Johnson was the lead technical support for Geoscience's collaborative participation in the Las Posas Valley adjudication, which focused on the evaluation of the basin's safe yield.

Yucaipa Valley Water District: Recycled Water Use Evaluation using the Gateway Sub-basin Focused Groundwater Model, 2018-2020

Johnson was the senior modeler overseeing the construction of a groundwater model used to predict the impacts of recycled water spreading on groundwater quality and to downstream municipal wells.

San Bernardino Valley Municipal Water District: Santa Ana River Integrated Model, 2017-2021

Johnson led our team in an effort to use existing groundwater and surface water models to develop an integrated groundwater model using MODFLOW for the upper Santa Ana River. The resulting Upper SAR Integrated Model (or Integrated SAR Model) was used to determine what factors may contribute to declines in SAR flows, and assess cumulative effects on SAR surface flows and groundwater levels.

Los Angeles County Public Works: Antelope Valley Groundwater Basin Adjudication, 2008-2016

Johnson was the lead technical support for Geoscience's participation in Phases 2 through 4 of the Antelope Valley adjudication. Using a USGS MODFLOW model, Johnson analyzed water level elevations and flow vectors in selected years, quantified groundwater underflow from the West Antelope Subbasin to the Lancaster Subbasin and evaluated the impacts of no-flow from the West Antelope area. Subsequently, he updated and recalibrated the model to correct technical deficiencies found during review. Johnson then used the updated model to verify estimates of safe yield, support the development of a physical solution, and evaluate the effect of outside pumping on recharge in the basin.

Santa Ana Watershed Project Authority: Santa Ana River Waste Load Allocation Model Update, 2016-2019

Johnson led efforts to update the Santa Ana River Waste Load Allocation Model, which is used by multiple agencies to assess water quality throughout the watershed. Model scenarios and assumptions were developed as part of the effort to estimate the projected total dissolved solids and nitrate-N concentrations of the Santa Ana River recharge water and discharge at Prado Dam. Once completed, Johnson oversaw the waste load allocation scenario runs and evaluations for major stream segments in the watershed.

Elsinore Valley Municipal Water District: Hydrogeological Investigation of the Warm Springs Subbasin, 2016-2017

Johnson led groundwater modeling efforts to complete a hydrogeologic investigation of the Warm Springs

Subbasin. The modeling was used to help quantify the groundwater storage and safe yield of the Warm Springs Subbasin and estimate yield for future municipal supply wells.

City of Pismo Beach/WSC Inc.: Regional Groundwater Sustainability Project (RGSP), 2016-Present

The RGSP is a regional recycled water project that will help reduce the risk of seawater intrusion and help improve sustainability for the region's water supply. Johnson led efforts to evaluate existing characterization studies, groundwater models, and water quality data. He also constructed and calibrated an expanded MODFLOW groundwater model to evaluate injection and extracting scenarios and conduct an anti-degradation analysis. He is continuing to support the project by running predictive model scenarios.

Rancho California Water District: Surface and Ground Water Model of the Murrieta-Temecula Ground Water Basin, 1995-Present

Johnson was the lead modeler to create an Integrated Ground Water and Streamflow Model. Johnson worked with a technical panel that included, RCWD, USGS, U.S. Marines, Camp Pendleton, Stetson Engineers, Santa Margarita Watermaster, and Geoscience. The technical was formed to avoid litigation between RCWD and the Camp Pendleton Marine Base. Johnson is responsible for preparation of the model and analysis of the results.

City of Oceanside: Mission Basin Model Update and Evaluation of Indirect Potable Reuse, 2015-2016

Johnson oversaw efforts to update and refine a groundwater model used to predict the impacts of recycled water spreading and injection on groundwater quality and to downstream municipal wells. In addition, the updated model was used to evaluate the impacts on threshold water levels in the Mission Basin to stay within permit constraints

San Bernardino Valley Municipal Water District: SBBA Flow Model Update for Artificial Recharge, 2011

Johnson updated the SBBA Refined Basin Flow Model and quantified the maximum amount of artificial recharge the SBBA could accept in water year 2012.

Brownstein Hyatt Farber Schreck, LLP: Cadiz Groundwater Conservation and Storage Project Phase I, 2011

Johnson ran conservation scenarios and helped draft a technical memo outlining the detailed scenarios run with the Cadiz model for their storage project near the Mojave Desert.

City of Riverside: Colton Soil Safe Project, 2011

Johnson provided comments on the EastStar Ground Water Model used for the Colton Soil Safe Project.

West Basin Municipal Water District: West Coast Basin Barrier Project Model Update, Addendum and Project Engineering, 2011

Johnson provided updates to the groundwater model for the West Coast Basin Barrier Project (LARWQCB Order. No. R4 2006 0069). In addition, the project included the drafting of an addendum to the 2010 Model Update Report and the engineering of the injection wells for the project.

Terra-Gen Power, LLC: DBS&A Revised GW Flow Model, 2011

Johnson provided comments on the DBS&A Revised Groundwater Flow Model.

Western Municipal Water District: Impact of Recharge on Contaminant Plumes and Modeling, 2010

Johnson was the project manager and lead ground water modeler to assess and model the area around the Riverside-Corona Feeder, to show the potential future impact of an initial operation scenario on the ground water levels and ground water quality in the San Bernardino Basin Area.

City of Riverside: Groundwater Monitoring for Flume 7 Well Impacts, 2010

Johnson provided groundwater monitoring results for the evaluation of impacts from pumping the proposed Flume 7 well.

Raymond Basin Management Board: Predictive Groundwater Modeling for Potential Storage, 2010

Johnson provided updated results of predictive ground water modeling for the Pasadena Groundwater Storage Program in the Raymond Basin.

Western Municipal Water District / City of Ontario / Jurupa Community Services District: Preliminary Drinking Water Source Assessment, 2009

Johnson was responsible for preparing a preliminary drinking water source assessment and protection documents for the CDA Wells I-16 and I-18 in the Chino Basin.

Western Municipal Water District: Groundwater Modeling, 2009

Johnson was responsible for the groundwater modeling of Riverside-Corona Feeder Project Conjunctive Use Scenarios in San Bernardino Valley.

West Basin Municipal Water District: Groundwater Modeling, 2009

Johnson was involved in the production of a 2008 Model Update Report for the West Coast Basin Barrier Project.

U.S. Army Corps of Engineers: Groundwater Modeling, 2009

Johnson developed a ground water flow model modification for the San Bernardino Lake and Streams Feasibility Study.

Marina Coast Water District: Groundwater Modeling Scenario 4f, 2009

Johnson conducted a North Marina Groundwater Model Evaluation of Regional Project Scenario 4f.

City of San Juan Capistrano: Local Water Supply Analysis, 2009

Johnson assisted in providing the City of San Juan Capistrano with a local water supply analysis.

Atascadero Mutual Water Company / City of Atascadero: Groundwater Flow & Transport Modeling, 2009

Johnson was responsible for the development of a ground water flow and solute transport model for a portion of the Atascadero Subbasin.

San Bernardino Valley Municipal Water District: Remediation Strategies for Ground Water Contamination, 2008-2009

Johnson was the project manager and lead ground water modeler to refine previous USGS models to better understand, analyze, and evaluate remediation alternatives related to ground water contamination problems.

Chino Basin Desalter Authority: Chino Desalter System Projects, 2008

Johnson developed a detailed analysis of the Chino Ground Water Basin that included a three-dimensional numerical ground water flow model (MODFLOW). A separate analysis was also conducted to assess potential water quality changes in project and existing wells as a result of the project.

San Bernardino Valley Municipal Water District: Groundwater Modeling and Regional Water Management Plan, 2008

Johnson assisted in the production of a San Bernardino Basin Area Groundwater Model 2009 Regional Water Management Plan.

Municipal Water District of Orange County: Subsurface Intake Feasibility Assessment, 2008

Johnson assisted in preparing a subsurface intake feasibility assessment for Task 3 for the proposed Dana Point Desalination Facility.

Western Municipal Water District: Groundwater Modeling, 2007-2008

Johnson prepared a ground water flow conceptual model for the Murrieta Valley area to determine conjunctive use scenarios.

SunCal Companies: CIM Wellfield Impact Evaluation, 2007

Johnson was responsible for the evaluation of potential impacts to the CIM Well Field from operation of the Eucalyptus Park Well - College Park Project in Chino, CA.

RBF Consulting and Vista Serena: Groundwater Well Pumping Evaluation, 2007

Johnson analyzed potential ground water drawdown from proposed production wells located on Santa Maria Beach in Cabo San Lucas, Mexico.

Raymond Basin Management Board: Groundwater Modeling, 2007

Johnson provided results of predictive ground water modeling for the Pasadena Groundwater Storage Program in the Raymond Basin.

Jurupa Community Services District: Potential Groundwater Production Evaluation, 2007

Johnson prepared a geohydrologic analysis of potential future ground water production in the Jurupa Community Services District.

Carollo Engineers and Water Replenishment District of Southern CA: Source Water Assessment, 2007

Johnson conducted a source water assessment for the I-105 Dewatering Wells.

Western Municipal Water District: Riverside-Corona Feeder Well Field Siting and Basin Response Study, 2006

Johnson assisted in the modeling for the Riverside-Corona Feeder Well Field Siting and Basin Response Study.

San Bernardino Valley Municipal Water District: Groundwater Model Modifications, 2006

Johnson was responsible for the preparation of proposed data collection and modifications to the USGS Basin Flow Model.

Rancho California Water District: Groundwater Modeling, 2006

Johnson was responsible for modeling the ground water contribution to the Santa Margarita River near Temecula Station (Temecula Gorge) streamflow.

Rancho California Water District, Groundwater Model Update, 2006

Johnson updated the Murrieta-Temecula Surface and Ground Water Model.

Municipal Water District of Orange County: Subsurface System Intake Feasibility Assessment, 2006

Johnson assisted in providing information to complete the Subsurface System Intake Feasibility Assessment - Task 4 Report.

Griffin Industries: Pole Creek Debris Basin - Subdrain System Effectiveness Analysis, 2006

Johnson assisted in providing information to complete the Pole Creek Debris Basin - Subdrain System Effectiveness Analysis.

Confidential: Groundwater Flow and Transport Modeling, 2006

Johnson conducted a geohydrologic evaluation and ground water flow and transport model of potential future impacts associated with a contamination plume and surrounding municipal supply wells.

Arizona Water Company: Groundwater Modeling, 2006

Johnson assisted in conducting a geohydrologic evaluation and ground water flow model near the City of Bisbee, Arizona.

David Evans & Associates / Metropolitan Water District of So. California: Groundwater Modeling, 2005-2006

Johnson was responsible for the development of a ground water model for the proposed East Recreation Lake near Diamond Valley Lake.

Big Bear Area Regional Wastewater Agency: Groundwater Modeling, 2005-2006

Johnson led the analysis of artificial surface recharge-induced ground water flow through finite difference model simulations for the proposed green spot site.

Raymond Basin Management Board: Groundwater Modeling, 2005

Johnson was responsible for running predictive simulations for the Raymond Basin ground water flow model.

Tetra Tech / San Diego County Water Authority: Groundwater Modeling, 2004

Johnson was responsible for reviewing and providing comments for Mission and Bonsall Basins Groundwater Models in Oceanside.

Raymond Basin Management Board: Groundwater Modeling, 2004

Johnson developed, constructed and calibrated a comprehensive ground water flow model for the Raymond Basin. The model was used as a tool to make predictive analyses of potential changes in ground water levels and movement of contaminated ground water under various conjunctive use scenarios.

Carollo Engineers / City of Ontario: San Bernardino County, CA, 2004

Johnson conducted a wellhead treatment study and created separate solute transport models for nitrate, total dissolved solids and perchlorate of a municipal water supply well near Ontario. This also included a ground water flow model which will be used for further assessment of other management issues.

Black & Veatch: Groundwater Modeling, 2004

Johnson was responsible for reviewing and providing comments for the Hayfield Groundwater Model.

Big Bear Area Regional Wastewater Agency: Hydrogeological Services, 2002-2004

Johnson conducted an initial geohydrologic review, prepared a pilot test work plan, and a ground water flow model for an area near Big Bear Lake to assess the feasibility of a potential future full-scale artificial recharge program.

Jurupa Community Services District: Chino Basin Artificial Recharge Evaluation, 2002

Johnson led modeling efforts to modify a previously established groundwater flow model of the Chino Basin to incorporate solute transport and assess the impact of artificial recharge operations planned by the Chino Basin Watermaster on Nitrate and TDS concentrations in the southern Chino Basin.

City of Placentia / Steven Andrews Engineering: Dewatering for the Orangethorpe Rail Corridor Lowering Project, 2000-2003

Johnson conducted a geohydrologic investigation and led groundwater modeling efforts to develop a MODFLOW groundwater model to investigate the effectiveness of dewatering wells in lowering historically high ground water levels near a 5-mile section of lowered railroad tracks.

Metropolitan Water District of Southern California, (Best, Best & Krieger, outside counsel): Riverside County, CA, 1994-2003

Johnson assisted in preparing expert witness evidence to the Metropolitan Water District of Southern California on Ground Water Issues Relating to Land Transfers, Water Supply, and Water Quality in Conjunction with the Diamond Valley Lake Project (formerly Eastside Reservoir). He assisted in the evaluation of the hydrology of the basin, monitored the water levels and water quality of the basin, and advised Metropolitan with respect to issues with private landowners. He also assisted in preparing court exhibits (including a physical ground water model) for a jury trial on ground water recharge and water supply issues with respect to the construction of Diamond Valley Lake.

Jurupa Community Services District: Stringfellow Perchlorate Plume Impact Analysis, 2002

Johnson assisted in the geohydrologic analysis of potential impacts of the Stringfellow Perchlorate Plume on the Proposed Jurupa Community Services District Ion Exchange Facility.

Black & Veatch / City of Downey: Groundwater Modeling and Geohydrologic Analysis, 2002

Johnson conducted a geohydrologic analysis and ground water flow model of a portion of Interstate 105.

Rancho California Water District and Camp Pendleton: Groundwater Modeling, 1995-2002

Johnson developed a three-layer ground water model incorporating ground water/surface water stream interaction.

Caltrans: Devil's Slide Tunnel, Geohydrologic Analysis and Ground Water Flow Model, 2001

Johnson designed, constructed and calibrated steady-state and transient 10-layer MODFLOW flow models in fractured and faulted hard rock terrain to simulate potential tunnel groundwater inflow during construction and at equilibrium of a proposed double-bore tunnel near Devil's Slide. The flow model simulated flow in several different rock types including faulted crystalline rock and folded turbidite sequences.

West Valley Water District (formerly West San Bernardino Co. Water Dist): Wellfield Interference Analysis, 2001

Johnson conducted a geohydrologic study and well field interference analysis for two proposed municipal water supply wells.

Santa Ana Watershed Project Authority / RBF Consulting: Groundwater Modeling, 2001

Johnson conducted a geohydrologic analysis and ground water flow model of the proposed Chino Desalter System Projects Area near Ontario.

Confidential: Groundwater Modeling, 2001

Johnson developed a ground water flow model of a scenario in the Temecula region.

Cadiz, Inc.: Current Model Refinements, 2000

Johnson assisted in the preparation of a Technical Memorandum of Current Model Refinements with Geoscience and Bill Hutchison in Cadiz Valley.

Cadiz, Inc.: Storage and Supply Program Evapotranspiration Estimates, 2000

Johnson assisted in the preparation of Cadiz Groundwater Storage and Dry-Year Supply Program and Dry Lake Evapotranspiration Estimates.

Cadiz, Inc.: Groundwater Modeling, 1995, 1998-2000

Johnson developed a ground water flow, transport and subsidence model of a portion of Fenner, Bristol and Cadiz Basins.

Metropolitan Water District of Southern California: Groundwater Modeling, 1999

Johnson developed ground water model scenarios of the West and East Dam Seepage and pumping requirements necessary to keep proposed recreational lakes dewatered for the Diamond Valley Lake (formerly Eastside Reservoir) Project, near Hemet.

Rancho California Water District: Streamflow Modeling, 1998

Johnson was responsible for the modeling of the streamflow at Temecula Gorge - No Pumping and No Vail Dam.

Metropolitan Transit Authority / JMA: Groundwater Modeling, 1998

Johnson developed an analytical model to determine the effects of construction of the Metropolitan Transit Authority's Hollywood Tunnel on ground water and springs in the area.

RBF Consulting: Groundwater Modeling, 1996-1997

Johnson assisted with the City of Arcadia Water Infrastructure Restoration Study Task 5.7 for the Santa Anita And Sierra Madre Watershed Hydrologic Models.

Orange County Water District: Groundwater Modeling and TCE Contamination Impacts, 1996

Johnson assisted with a review of ground water modeling and potential impacts of TCE contamination – Interim Action Feasibility Study near El Toro.

Black & Veatch: Sensitivity Testing and Groundwater Level Control Plan, 1996

Johnson assisted in performing a sensitivity test for foundation dewatering and ground water level control plan for the Diamond Valley Lake (formerly Eastside Reservoir) Project.

Black & Veatch: Groundwater Modeling, 1996

Johnson assisted in the development of a ground water model for seepage impacts in the East Dam area of the Diamond Valley Lake (formerly Eastside Reservoir) Project.

Best, Best & Krieger LLP: Temecula Groundwater Storage Estimates, 1996

Johnson assisted in the calculation of ground water storage change estimates in Temecula.

Orange County Water District: Groundwater Modeling, 1991-1996

Johnson was responsible for assisting in the development of various ground water basin models for the Orange County Water District, including the Well field interference study of the South Santa Ana Well Field and the computer simulation model of the Talbert Gap Seawater Barrier Project.

City of Big Bear Lake Department of Water and Power: Big Bear Lake Water Quality Technical Information, 1993-1995

Johnson was responsible for assisting in the preparation of technical information for Decuir & Somach

involving relationships between ground water extractions, quality and inflow/outflow from Big Bear Lake.

Metropolitan Water District of Southern California: Groundwater Modeling, 1992-1995

Johnson assisted in the development of a model under a grant from the U.S. EPA. Results of project were used as the standards for Wellhead Protection Program.

Metropolitan Water District of Southern California: Azusa Landfill Litigation Support, 1995

Johnson assisted in the preparation of expert witness testimony and exhibits for the Metropolitan Water District of Southern California in support of the Azusa Landfill Litigation.

San Bernardino Valley Water Conservation District: Bunker Hill Storage Evaluation, 1994

Johnson assisted in the calculation of Bunker Hill Basin storage calculations and construction of a MODFLOW ground water model to determine impacts from lowering ground water levels in a portion of the pressure Zone.

West Valley Water District (formerly West San Bernardino Co. Water Dist): GIS Particle Tracking System, 1993-1994

Johnson assisted in the development of a Geographic Information System incorporating particle tracking capture zone models -- to track water quality and other information in the protection of wells.

County of Riverside: Groundwater Modeling, 1993-1994

Johnson was responsible for assisting in the development of a Ground water basin flow model of the Elsinore Valley Municipal Water District.

Metropolitan Water District of Southern California: Water Contamination Evaluation, 1992-1994

Johnson assisted in the evaluation of potential for ground water and surface water contamination from release of Radionuclides from proposed Ward Valley Low Level Radioactive Waste Disposal Facility, Needles.

Orange County Water District: Groundwater Modeling, 1993

Johnson was responsible for assisting in the development of a Ground Water Model of the Talbert Gap Sea Water Barrier and Extraction Well Field to determine increases in Chloride and TDS.

RANPAC Communities: Groundwater Modeling, 1992

Johnson was responsible for assisting in the development of a ground water flow model for the evaluation of ground water resources in the Liberty Project Area.

City of Big Bear Lake Department of Water and Power / California Regional Water Quality Control Board: Water Quality Evaluation, 1992

Johnson participated in a water quality evaluation for purposes of Basin Plan Amendment in the Big Bear Ground Water Basins.

West Valley Water District (formerly West San Bernardino Co. Water Dist): Geohydrologic Evaluation, 1991

Johnson participated in the geohydrologic and geochemical evaluation and Investigation of Nitrate and TCE problems in the southern service area.

Rancho California Water District: Riverside County, CA, 1991

Johnson was responsible for assisting in the development of a ground water flow and solute transport model of the Lower Pauba and Wolf Valley Areas, in conjunction with the Basin Plan Amendment.

Rancho California Water District: Riverside County, CA, 1991

Johnson was responsible for assisting in the development of the model of present and potential artificial recharge capability of Pauba Valley facilities, near Temecula.

Metropolitan Water District of Southern California, 1991

Johnson participated in the investigation of potential ground water contamination due to Leachate Migration from the Sunshine Canyon Landfill.

City of Big Bear Lake Department of Water and Power: Well Field Groundwater Modeling, 1991

Johnson was responsible for assisting in the development of the Ground water model of the Division and Lakeplant Well Fields.

Exhibit C

Lauren Wicks, PG

Senior Geohydrologist



EDUCATION AND PROFESSIONAL REGISTRATIONS/CERTIFICATIONS:

- ◆ BS, Geology, Cal Poly Pomona
- ◆ BS, Integrated Earth Studies, Cal Poly Pomona
- ◆ MS, Hydrology, University of Idaho
- ◆ California Professional Geologist (No. 9531)

Lauren has more than a decade of experience with groundwater and environmental investigations performed for numerous municipalities, state agencies, and private clients throughout California. She performs groundwater flow and transport modeling, hydrogeologic investigations, groundwater basin and water quality studies, artificial recharge projects, and has experience in GIS mapping, watershed management, database development and management. Lauren can support your team by developing accurate and complete written reports and documents, and by performing quality data review and evaluation.

TESTIFYING EXPERIENCE (LAST 5 YEARS):

None

PUBLICATIONS AUTHORED (LAST 10 YEARS):

None

SUMMARY OF EXPERIENCE:

Best, Best, & Krieger (BBK): Oxnard/Pleasant Valley Groundwater Basin Adjudication

A group of agricultural landowners with properties that overlie the Oxnard Plain and Pleasant Valley Groundwater Basins, filed a comprehensive groundwater adjudication lawsuit to determine the rights of all persons to extract groundwater from these basins. Lauren supported Geoscience’s expert testimony on total and native safe yields relating to the Oxnard and Pleasant Valley Subbasins. Lauren’s technical duties have included review of previous studies, and collaborative development of a safe yield estimate for the subbasins. Lauren also supported rebuttal analyses and reporting addressing opposing expert findings.

Searles Valley Minerals: Indian Wells Valley Groundwater Basin Adjudication

Lauren is currently participating in a Technical Working Group (TWG) on issues relating to sustainable management of the Indian Wells Valley Groundwater Basin. Lauren’s technical duties have included review of previous studies, including the area’s GSP, and collaborative development of a safe yield estimate for the Basin. Lauren also supports project management, communication, and coordination with TWG members and provides technical assistance for our client on other related issues.

California American Water: City of Marina v. RMC Lonestar, Monterey County Superior Court

Lauren is part of a team of hydrogeologists providing technical support for a lawsuit against California American Water Company’s Monterey Peninsula Water Supply Project, a proposed desalination project that would draw water from slant wells drilled under the ocean. Lauren has participated in technical meetings and workshops, assisted with the development of groundwater flow and solute transport models to evaluate potential project impacts, helped draft expert reporting and review technical work

Years of Experience: 14
Years with Geoscience: 13
Location: San Dimas, CA

KEY QUALIFICATIONS...

- ◆ Nearly 15 years of experience supporting groundwater modeling, sustainable yield studies, and calculating water budgets—helping to provide more accurate and thorough models and studies in order to present options to improve basin sustainability
- ◆ Detail-oriented—helping to provide more accurate data and high-quality deliverables

submitted by opposing parties, and assisted with preparation for administrative hearings by the State Water Resources Control Board Administrative Hearings Office.

California American Water: Monterey Peninsula Water Supply Project (MPWSP)

The MPWSP is a proposed ocean desalination project that would provide a much-needed alternative water supply to the Salinas Valley Groundwater Basin, which suffers from legacy seawater intrusion and overdraft. The project involves designing subsurface intakes for the proposed desalination plant, which will consist of a series of slant wells along the coast near Marina, CA. Lauren has been involved with technical support for the MPWSP since 2013. These efforts have included development, recalibration, and scenario runs of multiple generations of groundwater flow and solute transport models, support for the environmental impact review, permitting, operational planning, groundwater monitoring, and associated reporting. Lauren continues to support the project during the final slant well design phase and development of a long-term monitoring plan to satisfy California Coastal Commission's conditional project approval.

South Coast Water District: Doheny Ocean Desalination Project

As part of a planned ocean desalination facility, Geoscience is helping South Coast Water District develop and construct subsurface slant well intakes to provide feedwater to the desalination facility. The slant wells are traditional wells constructed at an angle that draw saline groundwater from beneath the ocean floor, eliminating impacts to marine life. Lauren supported reporting efforts and provided technical assistance during the project's feasibility studies and environmental impact review. She continues to support the project with modeling of anticipated project drawdowns during the well design phase.

Rainbow Municipal Water District: San Luis Rey Valley Groundwater Recovery Project

Lauren acted as Geoscience's project manager on a collaborative groundwater development feasibility study. The goal of the study was to assess the technical, economic, environmental, regulatory, and overall feasibility of an imported water return flow recovery project as a source for reliable water supply. Geoscience supported this effort by developing a surface water and groundwater flow model of the Bonsall Valley Subbasin to evaluate the amount of return flow potentially available for recovery, ran recovery model scenarios, developed a GIS-based site suitability analysis tool to identify parcels within the basin suitable for the proposed project, and provided cost estimates for well infrastructure.

Upper San Luis Rey Groundwater Management Authority: Groundwater Sustainability Plan for the Upper San Luis Rey Valley Groundwater Subbasin

Lauren led a team of geohydrologists to develop a Groundwater Sustainability Plan (GSP) for the Upper San Luis Rey Valley Groundwater Subbasin. She coordinated public outreach and communication between multiple stakeholders, directed the development of a surface water and groundwater flow model for the basin, and took the reporting lead. The GSP was approved by DWR and Lauren continues to provide support to the local GSA through coordination of routine monitoring and publication of annual reports.

Western Municipal Water District: Groundwater Sustainability Plan for Arlington Subbasin

The Arlington Subbasin has been classified as a low priority groundwater basin under the Sustainable Groundwater Management Act (SGMA). Despite this, WMWD reached out to Geoscience to proactively develop a GSP for the subbasin to facilitate ongoing sustainable management. Lauren was part of the team that developed this GSP and took an active role in drafting the GSP document. Since it is a low priority basin, DWR review is ongoing.

Santa Ana Watershed Project Authority: Santa Ana River Waste Load Allocation Model Update

As part of the effort to estimate the projected total dissolved solids and nitrate-N concentrations of the Santa Ana River recharge water and discharge at Prado Dam, Lauren helped develop model scenario assumptions for the HSPF surface water model and evaluate model output. She summarized the results and findings of each project task, directed the creation of supporting figures and tables,

responded to questions and comments from reviewers, and attended meetings to provide project status updates and present results.

San Bernardino Valley Municipal Water District: Santa Ana River (SAR) Integrated Model

This joint effort involved a peer review by the USGS and other consulting firms and sought to understand how potential effects of proposed projects may impact surface flow in the SAR and groundwater levels for the entire Upper SAR Watershed. During this project, Lauren helped develop the Integrated SAR Model. She directed efforts to produce tech memos summarizing the approach, process, and results of each project task, helped develop assumptions for predictive model runs, and prepared meeting minutes. She was a point of contact for project communications with the different agencies involved in the project and presented results and project assumptions at progress meetings and model workshops.

Elsinore Valley Municipal Water District: Hydrogeologic Study of the Warm Springs Groundwater Subbasin

Lauren assumed a primary role in the hydrogeologic investigation of Warm Springs Subbasin to assess feasibility of the development of local groundwater resources to support EVMWD's Integrated Water Resources Plan. This study involved the quantification of groundwater storage and safe yield for the Warm Springs Subbasin, estimation of potential yield for future municipal supply wells, determination of water quality and water treatment needs, identification of potential sites for well development, and consideration of environmental and permitting requirements.

San Bernardino Municipal Water District: Joint GW Model for the Rialto-Colton GW Basin

Lauren prepared a tech memo comparing previous groundwater models covering the Rialto-Colton area to identify the strengths and weaknesses of each model and helped develop subsequent model construction and calibration reports. She aided in compiling a well database with locations, construction information, lithologic information, and water level/water quality data availability. Additional modeling and reporting support included summarizing model construction, calibration, and predictive scenario results.

Calleguas Municipal Water District: Las Posas Valley Groundwater Basin Adjudication

Lauren was involved in the Las Posas Valley Groundwater Basin adjudication, which adjudicated all groundwater rights in the basin and provided for sustainable management pursuant to SGMA. Lauren was part of a technical team of groundwater modelers who evaluated safe yield in the Las Posas Valley Groundwater Basin. In addition to providing technical review and assisting with the development of water budgets and expert reporting, Lauren supported project management, communication, and coordination efforts between our team and attorneys involved in a groundwater basin adjudication.

State of Texas: Texas v. New Mexico

Lauren supported project management, communication, and coordination between our team and attorneys involved in groundwater rights litigation appearing before the United States Supreme Court.

Olivenhain Municipal Water District: San Dieguito Valley Brackish Groundwater Desal Study

OMWD relies almost entirely on imported water from the California and Colorado Aqueducts and is attempting to diversify its supply and produce groundwater locally. Lauren supported efforts to determine the amount of groundwater available in the San Dieguito basin and helped assess the feasibility of an inland desalting system.

Los Angeles County Public Works: Antelope Valley Groundwater Basin Adjudication

Lauren assisted with Phases 3 and 4 of the 15-year adjudication process for the Antelope Valley. During these phases she provided support for expert testimony and the development of a physical solution. This included the update and recalibration of a USGS model to verify the proposed sustainable yield,

development of model scenarios to test the physical solution, and evaluation of the effect of outside pumping on recharge in the basin.

Castaic Lake Water Agency: Salt and Nutrient Management Plan for Santa Clara River Valley East Subbasin

Lauren assisted with the development of a Salt and Nutrient Management Plan (SNMP) to determine ambient water quality conditions in the East Subbasin and to ensure that water management practices are consistent with water quality objectives. This SNMP provided a framework for water management consistent with the Water Quality Control Plan Los Angeles Region (Basin Plan). Development of the SNMP also included development of a surface water and groundwater monitoring plan.

Rancho California Water District: Surface and Groundwater Model of the Murrieta-Temecula Groundwater Basin

Lauren helped conduct GSFLOW, soluble transport, and sustainable yield model runs to prepare a groundwater model plan in support of the Cooperative Water Resource Management Agreement (CWRMA) between the United States, on behalf of Marine Corps Base Camp Pendleton, and RCWD. The purpose of CWRMA is to allow Camp Pendleton and RCWD to effectively manage water resources consistent with prior rights and entitlements while avoiding potential conflicts. Subsequently, Lauren helped evaluate and report on a systematic model update and refinement process.

Western Municipal Water District: TDS and Nitrate Lumped-Parameter Model for the Riverside and Arlington Groundwater Basins

Lauren helped create a lumped-parameter model to meet the groundwater basins' monitoring and reporting requirements and assess compliance under various scenarios. She also helped prepare various technical memoranda throughout the modeling process.

Riverside Public Utilities: North Orange Well Field Evaluation, Well Siting, and Non-Potable Water Supply Assessment

Lauren helped interpret model results and prepared a technical memorandum summarizing the impacts of new potable and non-potable wells on the current North Orange well field wells.

Chino Basin Desalter Authority: Chino Basin Groundwater Model Update

Lauren helped refine the Chino Basin Groundwater Model to evaluate impacts from proposed CDA wells. She also compiled data, updated model files, created model datasets, and calibrated the groundwater model.

Jurupa Community Services District: Geohydrologic Analysis of Future Groundwater Production

Lauren supported efforts to complete a geohydrologic analysis to determine future groundwater production potential.

East Valley Water District: Wastewater Reclamation Plant Engineering Report

Lauren helped produce technical memorandums summarizing the predicted impacts of recharging recycled water at various recharge sites as part of the proposed Sterling Natural Resource Center. The analysis included determining the amount of underflow available as diluent water and calculating travel times for recycled water recharge and recycled water contribution at nearby production wells.

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PROOF OF SERVICE

I, Vanessa Guillen-Becerra, declare:

I am a citizen of the United States and employed in Los Angeles County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 2855 E. Guasti Road, Suite 400, Ontario, California 91761. On August 15, 2025, I served a copy of the within document(s):

LETTER TO ALL COUNSEL AND UNREPRESENTED PARTIES RE:
REPORT OF JOHNSON YEH AND LAUREN WICKS

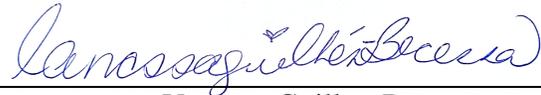
by uploading to the Case Anywhere website pursuant to the Court Order Authorizing Electronic Service, dated December 2, 2022, thereby servicing the parties on the Service List maintained on the Case Anywhere website.

Please see attached Service List.

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on August 15, 2025, at Fontana, California.



Vanessa Guillen-Becerra

Case Anywhere Electronic Service List

Case Name: **Mojave Pistachios, LLC, et al. v. Indian Wells Valley Water District, et al.**

Case Info: **30-2021-01187275 and Related Cases, Orange County Superior Court**

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John Thomas Conaway Trust
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The Service List is compiled from information provided to Case Anywhere and is not independently reviewed for accuracy.

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