

MEMORANDUM

Date: February 25, 2010

To: Mike McLachlan, Law Office of Michael D. McLachlan, APC
Dan O’Leary, Law Office of Daniel M. O’Leary

From: Timothy J. Thompson, Vice President and Senior Consultant

Re: Scope of Technical Support Services for Small Pumper Class,
Antelope Valley Groundwater Adjudication

Task 1. Quantification of Small Pumper Class Water Usage

Services will include:

- A. Review responses to initial questionnaire sent to Small Pumper Class. Apply a set of evaluation criteria to identify responses that are representative and useful for the determination of actual water use of the Class, and which can be used directly or are candidates for follow-up requests for additional information or investigation. Criteria will include evaluations of completeness of response, geographic distribution of parcels, annual volume of reported use, range of property sizes, types of reported land use and other data that may be identified and determined to be relevant and useful. Utilization of the GIS database as prepared by other consultants for this case will be beneficial for this component of the Small Pumper Class water use evaluation. Methodology for selection of responses, reasoning in support of need for verification and other considerations will be provided in summary report.
- B. Conduct follow-up communications with selected Class members to verify existing data or request additional data. Additional beneficial data may include electrical usage records, well pump capacity information, water level measurement records, well repair records, flow meter records, well deepening or other improvements related to changing water levels, written logs of well operations and other data that may be identified and determined to be relevant and useful. Selected site visits may be conducted as necessary and relevant. Any information to be requested will be determined and approved in advance by counsel and/or the Court.
- C. Acquire data from other agencies to support calculation of actual pumping of Class members. Data to be collected may include electrical use records, historical land use information, groundwater water level depths as established by other technical studies, and other data that may be identified and determined to be relevant and useful. Any information to be requested will be determined and approved in advance by counsel and/or the Court. The result of these initial steps (“A” through “C”) will be to identify a

statistically significant pool of responses which are representative of the Small Pumper Class actual water use.

- D. Compile and evaluate the selected responses and data to determine the range of current water use amounts, including annual volumes and historical use periods for representative members of the Class. Work products will include summary report, maps, charts, databases and other technical products.
- E. Provide professional opinion regarding typical groundwater use of Small Pumper Class during deposition and/or trial testimony.

Estimated Range of Costs

Task A: \$14,000-\$16,000

Task B: \$19,000-\$21,000

Task C: \$17,000-\$19,000

Task D: \$22,000-\$24,000

Task E: \$ 9,000-\$11,000

Total: \$81,000-\$91,000