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7  
8 Attorney for Quartz Hill Water District  
9 Defendant/Cross Complainant  
10

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
12 FOR THE COUNTY OF LOS ANGELES-CENTRAL DISTRICT  
13

14 ANTELOPE VALLEY GROUNDWATER  
15 CASES

16 Included Actions:

17 Los Angeles County Waterworks District No.  
18 40 v. Diamond Farming Co.  
19 Superior Court of California, County of Los  
20 Angeles, Case No. BC325201;

21 Los Angeles County Waterworks District  
22 No. 40 v. Diamond Farming Co.  
23 Superior Court of California  
24 County of Kern, Case No. S-1500-CV-254-  
25 348;

26 Wm. Bolthouse Farms, Inc. v. City of  
27 Lancaster  
28 Diamond Farming Co. v. City of Lancaster  
Diamond Farming Co. v. Palmdale Water Dist.  
Superior Court of California  
County of Riverside, consolidated actions  
Case Nos. RIC 353840, RIC 344436,  
RIC 344668.

**Judicial Council Coordination Proceeding No.  
4408**

Santa Clara Case No. 1-05-CV-049053  
Assigned to the Honorable Jack Komar Dept. I

**DECLARATION OF CHAD REED FOR  
PHASE 6 TRIAL**

1 DECLARATION

2 I, Chad Reed, declare:

3 1. I am the general manager for Quartz Hill Water District, a party to this action. I  
4 have personal knowledge regarding all matters contained in this declaration. Quartz Hill Water  
5 District is a public entity, and I am a public employee.

6 2. Quartz Hill Water District is a county water district located in the Quartz Hill area  
7 of the Antelope Valley. Quartz Hill Water District and all of its current and prior wells are within  
8 the boundaries of the Antelope Valley Groundwater Adjudication.

9 3. I have personally visited the sites of past and current wells. I have personally  
10 reviewed the well logs for every past current well.

11 4. All Quartz Hill Water District wells, past and current, are metered. With one  
12 exception, all of the current meters are of the magnetic meter type. The one exception is a  
13 displacement meter. I have personally confirmed the accuracy of Quartz Hill Water District's  
14 meters. I have also supervised employees who have confirmed their accuracy. I believe that every  
15 water meter accurately records the volume of water that passes through it.

16 5. Every meter is read every day of the year by an employee of Quartz Hill Water  
17 District. The employee writes down on a paper log the time of reading, the water meter, the pump  
18 motor hour meter, and if there are any problems. This has been the policy of Quartz Hill Water  
19 District since its inception. Currently, only employees who have a D-2 and a T-1, or higher,  
20 certification from the State of California are allowed to read the meters.

21 6. The daily meter readings are placed in a well report for that well. Every month  
22 every well report for each well is given to me.

23 7. Every month I place the data from this well report into a spreadsheet. From this  
24 spreadsheet I calculate, among other items, the gallons per minute for each well, the amount of  
25 hours each well motor ran, and the amount of acre feet of groundwater that well produced.

26 8. I have been the general manager of Quartz Hill Water District since 2007. I have  
27 inspected the business records prior to this time, and I have observed that the above described  
28

1 procedure regarding daily meter reading, and documenting those reading is logs, was used by  
2 Quartz Hill Water District since its inception in 1955.

3 9. Quartz Hill Water District has been pumping groundwater since 1955. I have made  
4 the well logs available for inspection by all parties to this litigation, and parties have reviewed this  
5 documentation.

6 10. Attached hereto as Exhibit A is the summary for all groundwater produced by  
7 Quartz Hill Water District starting in 1955. This summary also include water purchased from the  
8 Antelope Valley East Kern Water District.

9 11. Exhibit A was prepared by me. It was prepared in the ordinary course of business.  
10 Exhibit A satisfies California Evidence code 1271, because

- 11 a. Exhibits A was made in the regular course of a business  
12 b. Exhibits A was made at or near the time of the act, condition, or event. The  
13 event being my review of the monthly well reports.  
14 c. I am the custodian, and this declaration states the mode of preparation for  
15 Exhibits A.  
16 d. The sources of information and method and time of preparation are  
17 trustworthy because the water meters are read daily by employees who have certification to read  
18 these water meters.

19 12. Exhibit A also satisfy California Evidence code 1280, because

- 20 a. This writings were made by me, within my scope of duty, or made by my  
21 predecessor in the scope of their duty.  
22 b. The writing was made by me, or my predecessor, at or near the time of the  
23 act, condition, or event. The event being the review of the monthly well reports.  
24 c. The sources of information and method and time of preparation were such  
25 as to indicate its trustworthiness because water meters are read daily by employees who have  
26 certification to read these water meters.

27 13. I do not know when the data on the written logs was moved to software, but that  
28 process also was done within the scope duty of the person who prepared it.


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14. Exhibit A states the total groundwater produced by Quartz Hill Water District starting in 1955.

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

Date: September 25, 2015

  
Chad Reed

**EXHIBIT A**  
**QUARTZ HILL WATER DISTRICT HISTORICAL GROUNDWATER PUMPING AND**  
**WATER IMPORTATION**

**Wells and AVEK 2015**

WELL #	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	TOTALS
# 5A	GPM	462	464	460	453	456	444	445	439				452.9
	HRS	24.8	44.1	85.7	170.1	164.4	242	215.9	240.5				1187.5
	A.F.	2.11	3.77	7.26	14.18	13.79	19.8	17.7	19.45				98.1
# 6A	GPM	495	503	513	503	513	547	545	553				522
	HRS	32.2	32.9	31.8	30	27.8	29.3	26.3	26.8				237.1
	A.F.	2.93	3.05	3	2.78	2.62	2.95	2.64	2.73				22.7
# 7A	GPM	679	690	707	703	703	704	623	786				699
	HRS	19.7	40.5	53.2	128.7	157	202.9	253.3	275.5				1130.8
	A.F.	2.46	5.14	6.93	16.65	20.31	26.31	29.04	39.9				146.7
# 8	GPM	802	810	815	808	808	810	811	816				810
	HRS	17.6	31.4	33.9	60.4	88.5	122.5	126.1	172				652.4
	A.F.	2.6	4.83	5.09	8.98	13.18	18.27	18.83	25.84				97.6
# 9	GPM	801	798	793	842	721	772	769	167				708
	HRS	23.4	83.2	66.2	174.7	164.3	218.1	168.2	0.2				898.3
	A.F.	3.45	12.22	9.67	27.08	21.80	31.02	23.82	0.01				129.1
# 12	GPM	485	492	492	484	485	476	483	491				486
	HRS	12.1	36.2	45.9	103.2	152.1	206.9	237.9	306.1				1100.4
	A.F.	1.08	3.28	4.16	9.19	13.57	18.12	21.16	27.66				98.2
# 14	GPM	282	280	277	268	266	261	263	259				270
	HRS	23.6	40.4	45.6	141.3	200.7	170.8	167.5	250.9				1040.8
	A.F.	1.23	2.08	2.33	6.96	9.83	8.21	8.1	11.95				50.7
# 15	GPM	625	620	608	597	593	578	580	695				612
	HRS	23.7	44.1	86.1	190	207.9	264.6	231.5	219.4				1267.3
	A.F.	2.73	5.03	9.63	20.89	22.72	28.17	24.74	28.07				142.0
# 16	GPM	340	391	368	355	353	342	344	333				353
	HRS	23.8	45.6	83.8	190	207.6	271.7	230.6	280				1333.1
	A.F.	1.49	3.28	5.67	20.89	13.49	17.13	14.61	17.18				93.7
# 17	GPM	458	453	438	422	415	399	400	393				422
	HRS	16.2	42.5	70.1	193.6	198.5	253.7	221	265.9				1261.5
	A.F.	1.37	3.54	5.65	15.04	15.19	18.62	16.29	19.26				95.0

TOTAL	A.F.	21.45	46.22	59.39	142.64	146.50	188.60	176.93	192.05	0.00	0.00	0.00	0.00	0.00	973.8
AVEK															
N&50TH	A.F.	52.97	57.37	106.04	93.58	94.46	116.45	105.3	150.38						776.6
M8&70TH	A.F.	92.68	99.74	166.34	132.79	137.52	177.89	129.6	173.66						1110.2
TOTAL	A.F.	145.65	157.11	272.38	226.37	231.98	294.34	234.9	324.04	0	0	0	0	0	1886.8
Combined		167.10	203.33	331.77	369.01	378.48	482.94	411.83	516.09	0.00	0.00	0.00	0.00	0.00	2860.55
goal 36% red		138.89	134.24	241.86	308.73	363.92	502.57	467.53	516.15	398.69	298.02	211.76	130.68	130.68	3713.04
MGD		1.8	2.3	3.5	4.0	4.0	5.2	4.3	5.4	0.0	0.0	0.0	0.0	0.0	3.6
R-GPCD 2015		84.6	102.9	167.9	193.0	191.6	257.7	212.7	266.5	0.0	0.0	0.0	0.0	0.0	
R-GPCd (36% RED)		71.7	69.3	124.9	159.4	188.0	268.2	241.5	266.6	205.9	153.9	109.4	67.5	67.5	

2014		JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	TOTALS
Wells	A.F.	119.16	111.72	65.37	175.11	286.54	244.30	241.73	226.46	214.33	214.77	135.00	57.05	2091.5
AVEK	A.F.	109.46	157.82	260.42	217.59	230.05	511.86	454.77	383.71	282.15	228.68	211.83	114.44	3162.8
Combined		228.62	269.54	325.79	392.70	516.59	756.16	696.50	610.17	496.48	443.45	346.83	171.49	5254.32
R-GPCD		71.6	74.3	39.3	108.7	172.1	151.6	145.2	136.0	133.0	129.0	83.8	34.3	
PCD Corrected		56.9	59.1	31.2	86.5	136.9	120.6	115.5	108.2	105.8	102.6	66.7	27.3	
Previo		-0.91	-0.83	-0.82	-0.64	-0.72	-0.75	-0.75	5.4					

2013		JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	TOTALS
Wells	A.F.	34.84	121.06	244.89	251.32	266.71	271.76	284.34	277.77	262.11	200.44	148.46	85.95	2449.7
AVEK	A.F.	182.17	88.69	133.01	231.07	301.91	513.5	446.18	528.72	360.85	265.22	182.41	118.24	3352.0
Combined		217.01	209.75	377.90	482.39	568.62	785.26	730.52	806.49	622.96	465.66	330.87	204.19	5801.62

2012		JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	TOTALS
Wells	A.F.	102.49	35.29	48.49	89.84	212.11	268.49	235.67	235.57	160.38	83.88	28.96	23.68	1524.9
AVEK	A.F.	124.79	186.98	291.04	267.67	345.12	500.38	482.78	491.42	586.78	397.32	305.66	249.06	4229.0
Combined		227.28	222.27	339.53	357.51	557.23	768.87	718.45	726.99	747.16	481.20	334.62	272.74	5753.85

2011		JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	TOTALS
Wells	A.F.	25.10	15.60	17.55	42.54	152.18	217.37	238.32	256.17	202.54	109.93	110.46	46.07	1433.8
AVEK	A.F.	139.79	246.99	226.28	444.63	338.1	335.57	573.05	428.9	397.5	418.46	158.53	175.57	3883.4
Combined		164.89	262.59	243.83	487.17	490.28	552.94	811.37	685.07	600.04	528.39	268.99	221.64	5317.20

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2010		JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	TOTALS
Wells	A.F.	101.02	84.90	141.75	164.87	234.26	261.32	227.74	209.00	154.11	148.44	139.00	40.64	1907.1
AVEK	A.F.	84.57	75.95	113.29	151.84	260.8	344.91	642.83	699.18	505.05	308.18	185.34	161.98	3666.9
Combined		185.59	160.85	255.04	316.71	495.06	606.23	870.57	908.18	659.16	456.62	324.34	202.62	5440.97

**2009**

Wells	A.F.	144.59	106.66	240.01	281.55	309.26	196.69	217.31	216.19	271.30	213.85	130.47	103.70	2431.6
AVEK	A.F.	0	0	11.58	104.71	266.75	530.16	539.83	538.18	493.17	281.47	227.17	153.26	3146.3
Combined		144.59	106.66	251.59	386.26	576.01	726.85	757.14	754.37	764.47	495.32	357.64	256.96	5577.85

**2008**

Wells	A.F.	127.80	118.36	112.63	141.36	288.70	365.81	375.08	376.48	326.86	263.33	234.25	123.32	2854.0
AVEK	A.F.	85.99	106.27	244.47	488.44	360.81	366.64	610.5	472.59	464.58	290.26	154.23	0	3644.8
Combined		213.79	224.63	357.10	629.80	649.51	732.45	985.58	849.07	791.44	553.59	388.48	123.32	6498.76
MGD		2.2	2.5	3.8	6.8	6.8	8.0	10.4	8.9	8.6	5.8	4.2	1.3	5.8

**2007**

Wells	A.F.	70.36	58.08	120.81	149.80	213.94	270.15	325.48	319.47	146.53	161.63	88.13	148.80	2073.2
AVEK	A.F.	136.47	124.51	210.89	242.19	350.76	803.92	419.77	862.72	853.15	112.8	305.49	116.7	4539.4
Combined		206.83	182.59	331.70	391.99	564.70	1074.07	745.25	1182.19	999.68	274.43	393.62	265.50	6612.55
MGD		2.2	2.1	3.5	4.3	5.9	11.7	7.8	12.4	10.9	2.9	4.3	2.8	5.9

**2006**

Wells	A.F.	88.31	85.16	77.03	71.44	128.02	213.65	201.05	141.68	135.66	117.45	91.4	54.7	1405.55
AVEK	A.F.	149.12	159.35	130.34	178.8	519.8	467.9	616.63	699.26	549.16	285.69	370.5	195.67	4322.22
Combined		237.43	244.51	207.37	250.24	647.82	681.55	817.68	840.94	684.82	403.14	461.9	250.37	5727.77
MGD		2.5	2.7	2.2	2.7	6.8	7.4	8.6	8.8	7.4	4.2	5.0	2.6	5.1

**2005**

Wells	A.F.	29.2	23.14	40.37	124.05	174.11	163.77	169.59	150.95	105.86	89.8	101.47	72.71	1245.02
AVEK	A.F.	144.24	132.84	159.03	297.42	296.35	492.13	719.06	619.14	472.71	405.55	214.47	201.26	4154.2
Combined		173.44	155.98	199.4	421.47	470.46	655.9	888.65	770.09	578.57	495.35	315.94	273.97	5399.22
MGD		1.8	1.8	2.1	4.6	4.9	7.1	9.3	8.1	6.3	5.2	3.4	2.9	4.8

**2004**

Wells	A.F.	44.42	43.56	64.14	49.01	118.71	204.12	238.1	204.99	143.33	108.94	71.64	56.68	1347.64
AVEK	A.F.	179.55	127.97	243.09	355.04	524.05	451.04	599.94	483.54	451.78	345.81	162.63	174.67	4099.11



Combined	223.97	171.53	307.23	404.05	642.76	655.16	638.04	688.53	595.11	454.76	234.27	231.35	5416.75
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MGD 2.4 1.9 3.2 4.4 6.8 7.1 8.8 7.2 6.5 4.8 2.5 2.4 4.8

2003

Wells	A.F.	107.04	91.76	120.45	135.77	190.54	218.72	249.23	187.53	157.51	72.76	11.75	11.62	1554.68
AVEK	A.F.	105.88	78.4	152.01	166.48	238.3	493.56	454.92	572.79	416.13	388.33	317.93	321.76	3706.49
Combined		212.92	170.16	272.46	302.25	428.84	712.28	704.15	760.32	573.64	461.09	329.68	333.38	5261.17

MGD 2.2 1.9 2.9 3.3 4.5 7.7 7.4 8.0 6.2 4.8 3.6 3.5 3.5 4.7

2002

Wells	A.F.	198.00	209.00	253.00	309.00	280.00	280.00	308.00	307.00	200.00	143.00	148.00	166.00	2801.0
AVEK	A.F.	0	0	76	123	198	476	404	418	362	285	160	60	2562.0
Combined		198.00	209.00	329.00	432.00	478.00	756.00	712.00	725.00	562.00	428.00	308.00	226.00	5363.00

MGD 2.1 2.3 3.5 4.7 5.0 8.2 7.5 7.6 6.1 4.5 3.3 2.4 2.4 4.8

2001

Wells	A.F.	118.60	149.00	182.00	277.00	391.00	402.00	373.00	355.00	391.00	206.00	152.00	145.00	3141.6
AVEK	A.F.	65	1	0	83	137	212	318	285	394	248	113	53	1909.0
Combined		183.60	150.00	182.00	360.00	528.00	614.00	691.00	640.00	785.00	454.00	265.00	198.00	5050.60

MGD 1.9 1.7 1.9 3.9 5.5 6.7 7.3 6.7 8.5 4.8 2.9 2.1 2.1 4.5

2000

Wells	A.F.													1413.0
AVEK	A.F.													3354.0
Combined		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	4767.00

MGD 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0

1999

Wells	A.F.													1496.0
AVEK	A.F.	147	119	172	196	366	364	404	516	383	349	101	94	3211.0
Combined		147.00	119.00	172.00	196.00	366.00	364.00	404.00	516.00	383.00	349.00	101.00	94.00	4707.00

MGD 1.5 1.3 1.8 2.1 3.8 4.0 4.2 4.2 5.4 4.2 3.7 1.1 1.0 2.9

1998

Wells	A.F.													1231.0
AVEK	A.F.	76	29	60	160	279	303	365	522	327	243	246	108	2718.0
Combined		76.00	29.00	60.00	160.00	279.00	303.00	365.00	522.00	327.00	243.00	246.00	108.00	3949.00

MGD 0.8 0.3 0.6 1.7 2.9 3.3 3.8 3.8 5.5 3.6 2.6 2.7 1.1 2.4

1997

Wells	A.F.	106	149	198	203	238	243	262	252	185	82	68	40	2026.0
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**PROOF OF SERVICE BY ELECTRONIC MAIL**

STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES

I declare that I am employed with the law firm of Charlton Weeks LLP, whose address is 1031 West Avenue M-14, Suite A, Palmdale, CA 93551. I am not a party to the within cause, and am over the age of eighteen years.

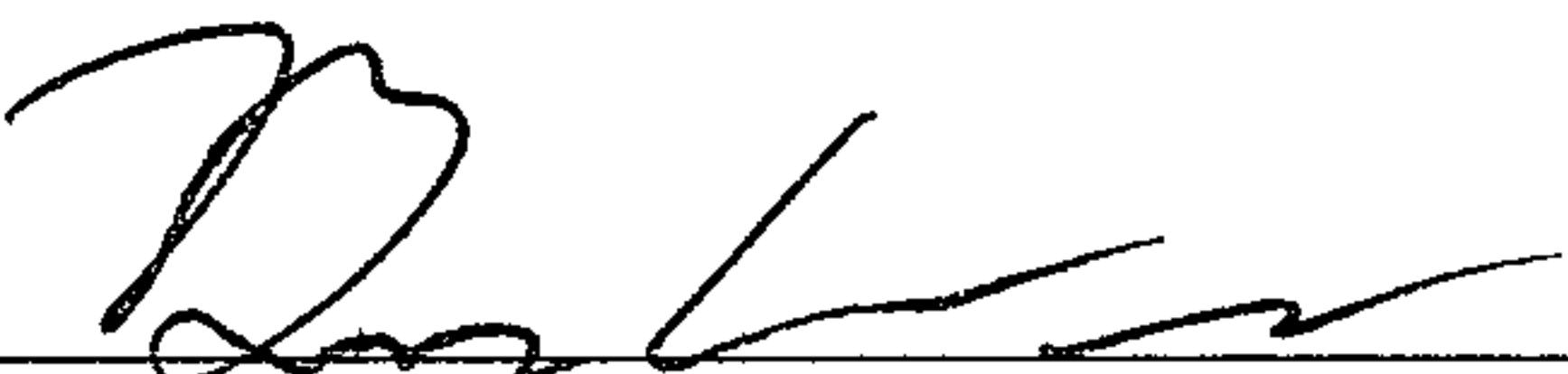
I further declare that On September 28, 2015, I served a copy of the following document(s):

DECLARATION OF CHAD REED FOR PHASE 6 TRIAL

By electronically posting a true copy thereof to Santa Clara County Superior Courts electronic filing website for complex civil litigation cases (Judge Jack Komar, Dept. 17C-<http://www.scefilng.org>) with respect to Judicial Council Coordination Proceeding No. 4408 (Antelope Valley Groundwater Matter):

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

Executed at Palmdale, California, on September 28, 2015

  
\_\_\_\_\_  
Bradley T. Weeks