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7	Copa De Oro Land Company	
8	SUPERIOR COURT OF THE	STATE OF CALIFORNIA
9	COUNTY OF LOS ANGELES	
10	Coordination Proceeding Special Title	JUDICIAL COUNCIL COORDINATION
11	(Rule 1550(b))	PROCEEDING NO. 4408
12		Case No. BC 391869 Assigned to Hon. Jack Komar
13	ANTELOPE VALLEY GROUNDWATER CASES	(Santa Clara Case No. 01-05-CV-049053)
14		(Santa Clara Case No. 01-03-C v -047033)
15	Included Actions: Los Angeles County Waterworks District	SUPPLEMENTAL DECLARATION OF
16	No. 40 v. Diamond Farming Co., Superior	VERA H. NELSON FOR COPA DE ORO LAND COMPANY FOR PHASE 6
17	Court of California, County of Los Angeles, Case No. BC 325 201;	TRIAL
	Los Angeles County Weterweet's District	[Posted Per Phase 6 Amended Case
18	Los Angeles County Waterworks District No. 40 v. Diamond Farming Co., Superior	Management Order]
19	Court of California, County of Kern, Case No. S-1500-CV-254-348;	Date: September 28, 2015 Time: 9:00 a.m.
20	110. 5-1300-C V -234-340,	Dept.: Room 222, 2nd Floor
21	Wm. Bolthouse Farms, Inc. v. City of Lancaster, Diamond Farming Co. v.	Location: Los Angeles Superior Court
22	Lancaster, Diamond Farming Co. v. Lancaster, Diamond Farming Co. v.	111 N. Hill Street
23	Palmdale Water Dist., Superior Court of California, County of Riverside, Case No.	Los Angeles, CA 90012
24	RIC 353 840, RIC 344 436, RIC 344 668	
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DECLARATION OF VERA NELSON

I, Vera H. Nelson, declare:

- 1. I have personal knowledge of the facts stated in this Supplemental Declaration and, if called as a witness, would testify to those facts.
- 2. I am a hydrogeologist and water resources engineer, and a licensed professional engineer, with more than 28 years of experience. I was retained by cross-defendant Copa de Oro Land Company ("Copa de Oro") to provide expert opinion regarding the use of water on Copa de Oro's property, specifically agricultural use of the property and evidence of historical groundwater production. The Copa de Oro property is Section 35, Township 9 North, Range 14 West, San Bernardino Base & Meridian (minus a Los Angeles Department of Water and Power right-of-way running through the property) and has Kern County Assessor's Parcel Nos. 359-032-17 and 359-032-01 (the "Property")
- 3. My testimony in this matter is set forth in this Supplemental Declaration and in my previous expert declaration, expert report, and supplemental report. I signed that previous declaration on January 30, 2013. Those reports are exhibits to the previous declaration. The previous declaration and its exhibits are available on the Court's website at http://www.scefiling.org/document/document.jsp?documentId=76508.
- 4. In March 2013, I performed an investigation of LANDSATLook satellite images from 2002 of the Property. Based on that investigation, I concluded that approximately 220 acres of the Property was irrigated in 2002. Total estimated water use on the Property for 2002 calculated on the basis of this information, crop water duties stated in Beeby et al. 2010, and Property cropping data ranges between 790 acre-feet to 890 acre-feet. This estimate is consistent with the record of surface water deliveries to the Property in 2002 (842 acre-feet) from Antelope Valley-East Kern Water Agency ("AVEK") and is consistent with my prior conclusion that those AVEK deliveries reflect the amount of water used on the Property in 2002.
- 5. Exhibit L to this Declaration is a summary of the investigation and conclusions described in paragraph 4.

I declare under penalty of perjury under the laws of the State of California that the

foregoing is true and correct.

Executed at Burlingame, California on September <u>21</u>, 2015.

Vera H. Nelson

Vem H. Nels

PROOF OF SERVICE

I, Andrew J. Ramos, declare:

I am a citizen of the United States and a resident of Sacramento County. I am over the age of 18, not a party to this action and am employed at Bartkiewicz, Kronick & Shanahan, 1011 Twenty-Second Street, Sacramento, California 95816. On September 21, 2015, I served, in the manner described below, the following document:

SUPPLEMENTAL DECLARATION OF VERA H. NELSON FOR COPA DE ORO LAND COMPANY

I posted this document to the Court's World Wide Website at www.scefiling.org.

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

Executed at Sacramento, California on September 21, 2015.

/s/ Andrew J. Ramos
Andrew J. Ramos