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LOS ANGELES COUNTY WATERWORKS  
DISTRICT NO. 40

EXEMPT FROM FILING FEES  
UNDER GOVERNMENT CODE  
SECTION 6103

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COUNTY WATERWORKS DISTRICT NO. 40

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES

**ANTELOPE VALLEY  
GROUNDWATER CASES**

Included Actions:

Los Angeles County Waterworks District  
No. 40 v. Diamond Farming Co., Superior  
Court of California, County of Los  
Angeles, Case No. BC 325201;

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

Wm. Bolthouse Farms, Inc. v. City of  
Lancaster, Diamond Farming Co. v. City of  
Lancaster, Diamond Farming Co. v.  
Palmdale Water Dist., Superior Court of  
California, County of Riverside, Case Nos.  
RIC 353 840, RIC 344 436, RIC 344 668

Judicial Council Coordination No. 4408

CLASS ACTION

Santa Clara Case No. 1-05-CV-049053  
Assigned to The Honorable Jack Komar

**DECLARATION OF CARLYLE S.  
WORKMAN, P.E. ON BEHALF OF THE  
CITY OF LANCASTER IN LIEU OF  
DEPOSITION TESTIMONY FOR PHASE 4  
TRIAL**

**DECLARATION**

I, Carlyle S. Workman, P.E., declare:

1. I am the Utility Services Manager for the City of Lancaster ("City"), a party to this action. In lieu of deposition testimony for the Phase 4 trial, I am providing this declaration. This declaration applies only to the categories I have filled in. The items left blank or crossed out do not apply to me. I have personal knowledge of each fact herein and would testify competently thereto under oath.

**Property Ownership and Parcel Size**

2. The City owns property that overlies the Antelope Valley Area of Adjudication as decided by this Court. The land is in Los Angeles County and is identified by the following APN/APNs:

The City owns many parcels within its jurisdiction in the Antelope Valley Area of Adjudication. For the purposes of this declaration, the City identifies only those that utilize water from a well owned and operated by the City. The parcels collectively comprise the existing Lancaster National Soccer Center. The APNs associated with the Lancaster National Soccer Center are 3170-009-902, 3170-009-904 and 3170-008-901.

3. The City claims groundwater rights only as to the properties listed in Paragraph 2 and Exhibit A.

4. For each APN/APNs identified above, the total acreage by parcel is as follows:

APN 3170-009-902 – 83.56 Acres

APN 3170-009-904 – 0.50 Acres

APN 3170-008-901 – 74.84 Acres

If additional room is needed, please identify the APN/APNs and parcel size in Exhibit B.]

A true and correct copy of Exhibit B is attached hereto and incorporated herein.

5. For each APN/APNs identified above the City owned the property during the following time period:

APN 3170-009-902 – 1994

APN 3170-009-904 – 2011 (The City acquired the LNSC property from Kaufman and Broad in {00037390.1 }

1 1994, but inadvertently did not include the one half acre parcel. When the oversight was  
2 discovered in 2011, the parcel was transferred to the City.)

3 APN 3170-008-901 - 1996

4 6. The following are all individuals/entities appearing on the title for the above  
5 identified APN/APNS from Jan 1, 2000 to the present:

6 The City

7 7. For each individual/entity identified in paragraph 6 that individual/entity appeared  
8 on the title during the following time:

9 \_\_\_\_\_  
10 Leases (Not applicable.)

11 8. \_\_\_\_\_ (declarant or party affiliated with declarant) leases  
12 property that \_\_\_\_\_ own and that overlies the Antelope Valley Area of  
13 Adjudication as decided by this court and identified by the following APNS:

14 \_\_\_\_\_  
15 9. The total acreage by parcel is:

16 \_\_\_\_\_  
17 10. The property is currently leased to:

18 \_\_\_\_\_  
19 11. The property was leased on the following dates:

20 \_\_\_\_\_  
21 12. The lease provides that \_\_\_\_\_ may claim groundwater rights from the  
22 use of water on the leased property. Attached to this declaration is a true and correct copy of the  
23 lease.

24 [If additional room is needed, please list APN/APNs, acreage by APN, Lessee by APN  
25 and dates for each Lessee by APN for each parcel in Exhibit C.] A true and correct copy of  
26 Exhibit C is attached hereto and incorporated herein.

27 13. \_\_\_\_\_ leases property from \_\_\_\_\_ which  
28 overlies the Antelope Valley Area of Adjudication as decided by this court and is identified by  
{00037390.1 }

1 the following APNS:

2 \_\_\_\_\_  
3 14. The total acreage by parcel is:  
4 \_\_\_\_\_

5 15. The Lease provides that \_\_\_\_\_ may claim groundwater rights from  
6 use of water on leased property. Attached to this declaration is a true and correct copy of the  
7 lease.

8 [If additional room is needed, please attach APN/APNs, Name of the Lessor and acreage  
9 by APN for each parcel list in Exhibit D to this declaration.] A true and correct copy of Exhibit D  
10 is attached hereto and incorporated herein.

11 16. \_\_\_\_\_ claims groundwater rights only as to the leasehold  
12 interests listed in Paragraph 15 and Exhibit D.

13 17. \_\_\_\_\_ claims groundwater rights only as to the properties  
14 listed in Paragraph 2 and Exhibit A and as to the leasehold interests listed in Paragraph 8 and  
15 Exhibit C.

16 18. To the best of my knowledge, only \_\_\_\_\_ claims groundwater rights as  
17 to the leased parcel(s) identified in paragraph 15 and Exhibit D.

18 **Water Meter Records**

19 19. The City measures the groundwater production on the above referenced properties  
20 by water meters. Exhibit E contains the records for these water meters for the following years:

21 2000 to 2012 (through 11/19/12)  
22 \_\_\_\_\_

22 A true and correct copy of Exhibit E is attached hereto and incorporated herein.

23 20. Exhibit E sets forth the total yearly production amounts by metered water well on  
24 the above referenced properties for the years 2000-2004, 2011, and 2012 (through 11/19/12). A  
25 true and correct copy of Exhibit E is attached hereto and incorporated herein.

26 **State Water Project Purchases** (Not applicable.)

27 21. \_\_\_\_\_ purchases State Water Project water from a State Water  
28 Contractor for use by \_\_\_\_\_ on the properties referenced above. Exhibit G  
{00037390.1 }

1 contains true and correct copies of the invoices for delivery of State Water Project Water to the  
2 properties referenced above.

3 22. Exhibit H sets forth the total yearly State Water Project water deliveries to the  
4 properties referenced above for the years 2000-2004, 2011, and 2012. A true and correct copy of  
5 Exhibit H is attached hereto and incorporated herein.

6 **Pump Tests/ Electric Records** (Not applicable.)

7 23. In order to calculate groundwater pumped and used on the properties referenced  
8 above, \_\_\_\_\_ relied on pump tests and electric records. Exhibit I contains true and  
9 correct copies of the pump test records and electrical records for wells on the properties  
10 referenced above. The electric records attached to this declaration as Exhibit I do not include  
11 electric use on the properties referenced above for anything other than pumping groundwater.

12 24. Exhibit J sets forth the amount of total yearly groundwater that \_\_\_\_\_  
13 estimates was pumped and used on the properties referenced above for the years 2000-2004,  
14 2011, and 2012 based on the attached pump test records and electrical records for the wells on the  
15 properties referenced above. A true and correct copy of Exhibit J is attached hereto and  
16 incorporated herein.

17 25. Pump tests were performed on the following dates:  
18 \_\_\_\_\_.

19 26. \_\_\_\_\_ is not producing pump test records for the following  
20 dates \_\_\_\_\_ because:  
21 \_\_\_\_\_.

22 27. I am not aware of any other pump tests having been performed on the properties  
23 referenced above.

24 **Pump Tests/Diesel Records** (Not applicable.)

25 28. In order to calculate groundwater pumped and used on the properties referenced  
26 above, \_\_\_\_\_ relied on pump tests and diesel fuel records. Exhibit K  
27 contains true and correct copies of the records pertaining to pump tests and diesel fuel purchases  
28 for the properties referenced above. The diesel fuel records attached to this declaration as Exhibit

{00037390.1 }

1 K do not include diesel fuel used on the properties referenced above for anything other than  
2 pumping groundwater.

3 29. Exhibit L sets forth the amounts of total yearly groundwater pumped and used on  
4 the properties referenced above for the years 2000-2004, 2011, and 2012. A true and correct copy  
5 of Exhibit L is attached hereto and incorporated herein.

6 30. Pump tests were performed on the following dates:  
7 \_\_\_\_\_.

8 31. \_\_\_\_\_ is not producing pump test records for the following  
9 dates \_\_\_\_\_ because:  
10 \_\_\_\_\_.

11 32. I am not aware of any other pump tests having been performed on the properties  
12 referenced above.

13 **Crop Duties and Irrigated Acres** (Not applicable.)

14 33. In order to calculate water use on the properties referenced above,  
15 \_\_\_\_\_ relies on the amount of acres in irrigation on the properties referenced  
16 above multiplied by the crop duty identified in the Summary Expert Report, Appendix D-3: Table  
17 4, a true and correct copy of which is attached to this declaration as Exhibit M.

18 34. The total amount of irrigated acres and type of crops on the properties referenced  
19 above by APN for the years 2000-2004, 2011 and 2012 are described in Exhibit N. A true and  
20 correct copy of Exhibit N is attached hereto and incorporated herein.

21 **Other Sources of Water** (Not applicable.)

22 35. On the properties referenced above, \_\_\_\_\_ received water from  
23 sources other than groundwater pumped within the Basin or State Water Project Water. Exhibit  
24 O sets forth the source of the water and the amounts received for the years 2000-2004, 2011, and  
25 2012.

26 **Use of Water** (Complete for each APN. If water for used for multiple purposes, identify  
27 the amount of water for each use.)

28 36. The City used 468.72 acre feet of water at the Lancaster National Soccer Complex  
{00037390.1 }

1 in 2000. The water was used for the following:

2 Irrigation of soccer fields, municipal and domestic use.

3 [State the crop type and number of acres of that crop. If not used for irrigation, describe  
4 the use. In lieu of answering this question, a crop map may be attached that shows the date, crop  
5 type, irrigated acreage and parcels.]

6 37. The City used 498.07 acre feet of water at the Lancaster National Soccer Complex  
7 in 2001. The water was used for the following:

8 Irrigation of soccer fields, municipal and domestic use.

9 [State the crop type and number of acres of that crop. If not used for irrigation, describe  
10 the use. In lieu of answering this question, a crop map may be attached that shows the date, crop  
11 type, irrigated acreage and parcels.]

12 38. The City used 517.72 acre feet of water at the Lancaster National Soccer Complex  
13 in 2002. The water was used for the following:

14 Irrigation of soccer fields, municipal and domestic use.

15 39. The City used 501.45 acre feet of water at the Lancaster National Soccer Complex  
16 in 2003. The water was used for the following:

17 Irrigation of soccer fields, municipal and domestic use.

18 [State the crop type and number of acres of that crop. If not used for irrigation, describe  
19 the use. In lieu of answering this question, a crop map may be attached that shows the date, crop  
20 type, irrigated acreage and parcels.]

21 40. The City used 518.23 acre feet of water at the Lancaster National Soccer Complex  
22 in 2004. The water was used for the following:

23 Irrigation of soccer fields, municipal and domestic use.

24 [State the crop type and number of acres of that crop. If not used for irrigation, describe  
25 the use. In lieu of answering this question, a crop map may be attached that shows the date, crop  
26 type, irrigated acreage and parcels.]

27 41. The City used 489.68 acre feet of water at the Lancaster National Soccer Complex  
28 in 2011. The water was used for the following:

{00037390.1 }

1        Irrigation of soccer fields, municipal and domestic use.

2        [State the crop type and number of acres of that crop. If not used for irrigation, describe  
3        the use. In lieu of answering this question, a crop map may be attached that shows the date, crop  
4        type, irrigated acreage and parcels.]

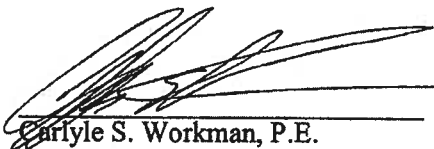
5            42.        The City used 499.00 (through 11/19/12) acre feet of water at the Lancaster  
6        National Soccer Complex in 2012. The water was used for the following:

7        Irrigation of soccer fields, municipal and domestic use.

8        [State the crop type and number of acres of that crop. If not used for irrigation, describe  
9        the use. In lieu of answering this question, a crop map may be attached that shows the date, crop  
10       type, irrigated acreage and parcels.]

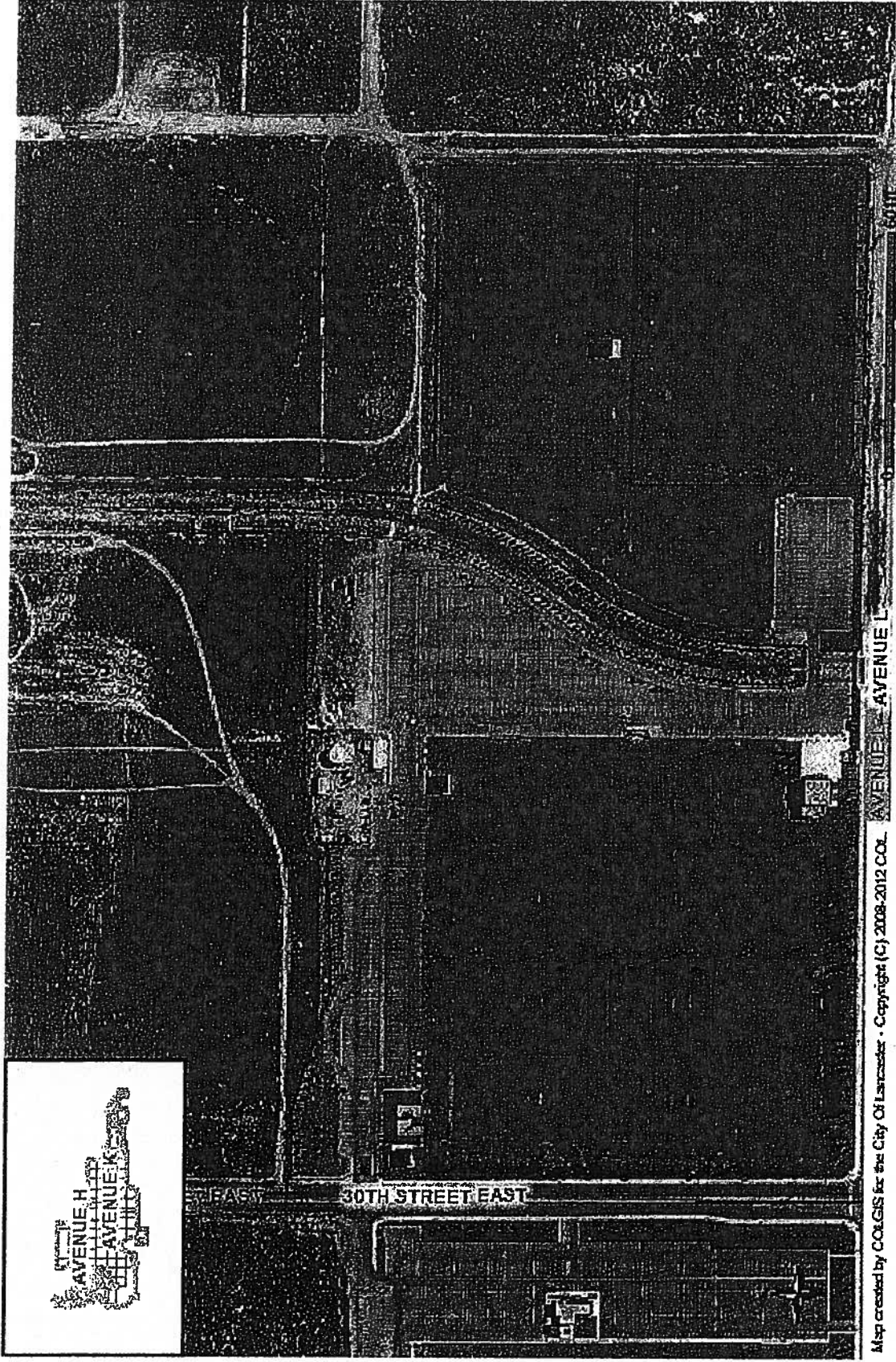
11           43.        Other than what is declared hereinabove, and specifically excluding water utilized  
12       by the City in connection with its recycled water program, the City did not produce or use water  
13       within the Antelope Valley Area of Adjudication for 2000-2004, 2011, and 2012.

14  
15           I declare under penalty of perjury under the laws of the State of California that the  
16       foregoing is true and correct. Executed this 25<sup>TH</sup> day of January 2013, at LANCASTER,  
17       California.

18  
19             
20           Carlyle S. Workman, P.E.



# **EXHIBIT “A”**



CC 365

APN 3100-009-902 & 904

SEC. 29 T7N R11W PM 189-43-44

ROTTMAN DRIVING

SCALE 1" = 800'

32072507001001-A!  
32072507001002-A!  
32072507001003-A!  
3301010400000001-A!  
3301010400000002-A!  
3301010400000003-A!  
3301010400000004-A!  
3301010400000005-A!  
3301010400000006-A!  
3301010400000007-A!  
3301010400000008-A!  
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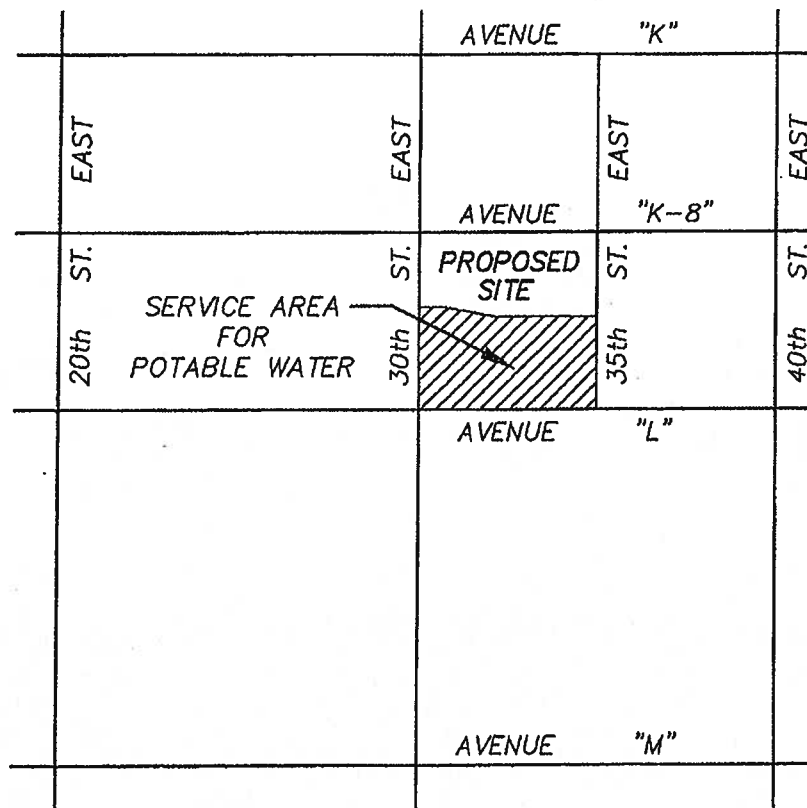


All 900 series parcels on this page are assessed to Lancaster Redevelopment Agency, unless otherwise noted.

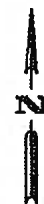
FOR PREV. ASSMT SEE:  
3149-5

T. 7 N., R. 11 W. PARCEL MAP P.M. 189-43-44

ASSESSOR'S MAP  
COUNTY OF LOS ANGELES, CALIF.



CITY OF LANCASTER  
SOCCER COMPLEX  
SERVICE AREA MAP  
N.T.S.



# **EXHIBIT “E”**

LNSC LANCASTER NATIONAL SOCCER CENTER  
Water Meter Readings

Meter Readings - 100's of cubic feet				
Date	SC1 - Secondary	SC2 - Primary	Main	
10/20/1999				304,017
2000				
1/31/2000	157,642			
2/24/2000	157,642	146,722		
3/30/2000	157,642	148,844	2,122	
5/15/2000	157,658			
6/7/2000	157,658	181,004	32,160	
6/27/2000	157,660	204,698	23,694	
9/20/2000	158,663	230,329	25,631	
10/16/2000	158,808	324,228	93,899	
11/6/2000	158,840	340,139	15,911	
12/4/2000	162,114	346,163	6,024	
		346,163	-	
2001				
1/17/2001	162,115			
2/28/2001	162,115	355,447	9,284	
5/2/2001		357,460	2,013	
5/17/2001		378,859	21,399	
6/28/2001	162,268	392,433	13,574	
7/20/2001	162,279	440,117	47,684	
10/19/2001	172,280	463,821	23,704	
		545,311	81,490	

2000	4,472	cu. ft.	20,391,300	ac. ft.	468.17
SC1	199441				
SC2	203913				
2001	10166	cu. ft.	21,652,800	ac. ft.	497.08
SC1	206362				
SC2	216528				

**LNSC**  
**Water Meter Readings**

Date	SC1 - Secondary	SC2 - Primary	Main
<b>2002</b>			
1/16/2002	172,281	1	16,498
2/23/2002	172,281	-	3,781
3/15/2002	172,285	4	9,594
4/12/2002	172,286	1	14,624
5/13/2002	172,493	207	20,615
6/13/2002	172,579	86	30,069
7/15/2002	174,371	1,792	37,131
9/17/2002	174,824	453	72,721
10/8/2002	174,846	22	14,821
10/31/2002	174,850	4	4,307
11/13/2002	174,850	-	9,640
11/21/2002	174,884	14	1,955
12/20/2002	175,014	150	6,263
<b>2003</b>			
1/17/2003	175,114	100	1,386
2/18/2003	178,178	3,064	6,545
3/12/2003	178,184	6	4,572
4/28/2003	178,184	-	18,170
5/23/2003	178,186		16,526
6/27/2003	179,085		878,931
8/6/2003	181,012		928,320
8/20/2003	181,030		945,273
9/17/2003	181,084		972,424
10/16/2003	181,088		994,402
11/19/2003	181,091		1,006,176
12/19/2003	181,094		1,011,419
<b>2004</b>			

2002	2,833	cu. ft.	ac. ft.
SC1	226907	22,552,100	517.72
SC2	225,521		

2003 Main Meter	1167693	cubic ft./yr.
12/19/2003	949262	acre ft./yr.
11/21/2002	21,843,100	501.45
	163,408,231.10	gal./yr.

**LNSC**  
**Water Meter Readings**

Date	SC1 - Secondary	SC2 - Primary	Main	
1/22/2004	181,107	1,015,245	3,826	1,170,700
2/23/2004	181,109	1,019,354	4,109	1,174,505
3/31/2004	181,113	1,032,530	13,176	1,187,114
4/20/2004	181,115	1,045,723	13,193	1,199,931
5/27/2004	181,119	1,081,640	35,917	1,234,954
6/28/2004	181,125	1,119,141	37,501	1,271,652
7/30/2004	181,127	1,160,067	40,926	1,311,768
8/23/2004	181,130	1,191,373	31,306	1,342,493
9/23/2004	181,273	1,219,449	28,076	1,369,768
10/22/2004	181,439	1,235,334	15,885	1,385,323
12/6/2004	181,449	1,240,372	5,038	1,390,189
12/22/2004	181,488	1,242,759	2,387	1,393,434
<b>2004 Main Meter</b>				
				12/22/2004
				12/19/2003
				1,393,434
				1,167,693
				22,574,100
				518.23
				cubic ft./yr.
				acre ft./yr.
				168,876,842
				gal./yr.
<b>2005</b>				
1/20/2005	181,509	1,243,750	991	1,393,491
2/17/2005	181,519	1,245,360	1,610	1,394,702
4/7/2005	181,520	1,253,191	7,831	1,402,134
4/26/2005	181,556	1,268,087	14,896	1,416,633
6/2/2005	181,626	1,302,558	34,471	1,450,569
7/1/2005	181,628	1,338,347	35,789	1,485,778
8/11/2005	181,630	1,360,028	21,681	1,538,706
9/30/2005	181,633	28,847	New Meter	1,581,662
10/31/2005	181,635	42,481	13,634	1,594,833
12/2/2005	181,637	51,049	8,568	1,603,111
12/20/2005	181,639	53,377	2,328	1,605,364
<b>2005 Main Meter</b>				
				1/26/2006
				1/20/2005
				1,611,497
				1,393,491
				218,006
				21,800,600
				500
				cubic ft./yr.
				acre ft./yr.
				163,090,289
				gal./yr.
<b>2006</b>				
1/26/2006	181,643	59,719	6,342	1,611,497
2/22/2006	181,644	65,564	5,845	1,616,983
3/22/2006	181,666	68,722	3,158	1,619,753
5/3/2006	181,671	84,169	15,447	1,634,541
5/23/2006	181,673	103,297	19,128	1,653,053
7/12/2006	181,675	165,465	62,168	1,713,417
<b>2006 Main Meter</b>				
				2/1/2007
				1/26/2006
				1,838,385
				1,611,497
				226,888



**LNSC**  
**Water Meter Readings**

Date	SC1 - Secondary	SC2 - Primary	Primary	Main	
9/25/2006	195,964	237,093	71,628	1,795,443	82,026
11/7/2006	195,967	260,640	23,547	1,817,911	22,468
12/1/2006	195,967	270,278	9,638	1,827,127	9,216
2007					
2/1/2007	195,970	282,050	11,772	1,838,385	11,258
3/6/2007	195,971	292,167	10,117	1,847,932	9,547
4/9/2007	195,973	314,810	22,643	1,869,753	21,821
4/30/2007	195,976	330,874	16,064	1,881,566	11,813
5/29/2007	195,978	362,028	31,154	1,915,426	33,860
6/18/2007	195,983	384,739	22,711	1,937,467	22,041
8/8/2007	195,983	454,395	69,656	2,005,121	67,654
9/19/2007	195,936	497,664	43,269	2,047,065	41,944
11/1/2007	195,992	522,709	25,045	2,070,941	23,876
12/4/2007	195,998	533,814	11,105	2,081,414	10,473
2008					
1/10/2008	197,242	536,898	3,084	2,083,415	2,001
3/25/2008	197,302	552,863	15,965	2,097,649	14,234
4/15/2008	197,304	566,291	13,428	2,109,872	12,223
5/29/2008	197,308	605,176	38,885	2,147,412	37,540
7/11/2008	197,319	658,424	53,248	2,199,246	51,834
9/25/2008	197,321	740,051	81,627	2,276,432	77,186
10/1/2008	197,330	764,943	24,892	2,302,391	25,959
12/1/2008	197,339	774,257	9,314	2,310,575	8,184
2009					
1/1/2009	197,339	776,324	2,067	2,312,137	1,562
2/1/2009	197,342	781,217	4,893	2,316,827	4,690
4/15/2009	197,351	797,528	16,311	2,332,385	15,558
5/21/2009	197,355	836,695	39,167	2,370,300	37,915
7/9/2009	197,359	916,479	79,784	2,447,741	77,441
8/13/2009	197,369	936,082	19,603	2,466,797	19,056
10/7/2009	197,374	983,993	47,911	2,513,044	46,247

22,688,800 cubic ft./yr.  
521 acre ft./yr.  
169,734,913 gal./yr.

520.86

2007 Main Meter  
1/10/2008  
2/1/2007

2,083,415  
1,838,385  
245,030

24,503,000 cubic ft./yr.  
563 acre ft./yr.  
183,306,943 gal./yr.

562.51

2008 Main Meter  
1/1/2009  
1/10/2008

2,312,137  
2,083,415  
228,722

22,872,200 cubic ft./yr.  
525 acre ft./yr.  
171,106,928 gal./yr.

525.07

2009 Main Meter  
1/7/2010  
1/1/2009

2,542,659  
2,312,137  
230,522

23,052,200 cubic ft./yr.  
529 acre ft./yr.

529.2-1

## CSNT

172,453,508 gal./yr

## 2010 Main Meter

1/19/2011  
1/17/2010

20,745,300 cubic ft./yr.  
476 acre ft./yr.  
155,195,589 gal./yr

476.25

## 2011 Main Meter

1/1/2012  
1/19/2011

21,327,000 cubic ft./yr.  
490 acre ft./yr.  
159,547,287 gal./yr

729 56

## LNSC

2012 Main Meter	
11/19/2012	3,180,676
1/1/2012	2,963,382
	<u>217,294</u>

21,729,400 Cubic Feet  
499 Acre Feet  
162,535,912 Gallons

**PROOF OF SERVICE**

**ANTELOPE VALLEY GROUNDWATER CASES**  
Judicial Council Coordination, Proceeding No. 4408

Santa Clara Case No. 1-05-CV 049053  
Assigned to the Honorable Jack Komar  
Los Angeles County Superior Court, Central, Dept. 1

I am a resident of the State of California, over 18 years of age and not a party to this action. I am employed in the County of Orange, State of California. My business address is 650 Town Center Drive, Suite 550, Costa Mesa, California 92626.

On January 30, 2013, I served the within document(s):

**DECLARATION OF CARLYLE S. WORKMAN, P.E. ON BEHALF OF THE CITY OF LANCASTER IN LIEU OF DEPOSITION TESTIMONY FOR PHASE 4 TRIAL**

☒ by posting the document(s) listed above to the website <http://www.scefiling.org>, a dedicated link to the Antelope Valley Groundwater Cases; Santa Clara Case No. 1-05-CV 049053, Assigned to the Honorable Jack Komar, said document(s) is electronically served/distributed therewith.

☐ By transmitting via e-mail the document(s) listed above to the e-mail address(es) and/or fax number(s) set forth below on this date.

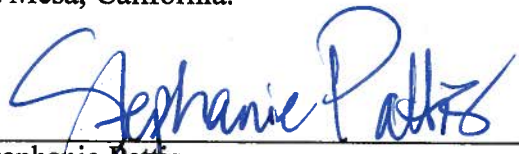
☐ by placing the document(s) listed above in a sealed Overnight Express envelope/package for overnight delivery at Costa Mesa, California addressed as set forth below.

☐ by causing personal delivery by Nationwide Legal of the document(s) listed above, to the person(s) at the address(es) set forth below.

I am readily familiar with Murphy & Evertz, LLP's practice for collecting and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on the same day that the correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

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

Executed on January 30, 2013, at Costa Mesa, California.

  
Stephanie Patis