Exempt from filing fee DOUGLAS J. EVERTZ, SBN 123066 Government Code § 6103 MURPHY & EVERTZ LLP 650 Town Center Drive, Suite 550 2 Costa Mesa, California 92626 Telephone: (714) 277-1700 3 Fax: (714) 277-1777 4 Attorneys for Defendants 5 City of Lancaster and Rosamond Community Services District 7 SUPERIOR COURT OF THE STATE OF CALIFORNIA 8 9 FOR THE COUNTY OF LOS ANGELES 10 11 ANTELOPE VALLEY GROUNDWATER LASC Case No. BC 325201 CASES 12 **Judicial Council Coordination** Proceeding No. 4408 Included Actions: 13 Los Angeles County Waterworks District **CLASS ACTION** No. 40 v. Diamond Farming Co. 14 Superior Court of California, County of Santa Clara Case No. 1-05-CV 049053 15 Los Angeles, Case No. BC325201; Assigned to The Honorable Jack Komar 16 Los Angeles County Waterworks District No. 40 v. Diamond Farming Co. NOTICE OF LODGING DECLARATION 17 Superior Court of California, County of Kern, OF CARLYLE S. WORKMAN, P.E. Case No. S-1500-CV-254-348 ADMITTED INTO EVIDENCE AT PHASE IV TRIAL ON BEHALF OF THE 18 Wm. Bolthouse Farms, Inc. v. City of CITY OF LANCASTER 19 Lancaster, Diamond Farming Co. v. City of Lancaster, Diamond Farming Co. v. Palmdale September 28, 2015 Date: Water Dist., Superior Court of California Time: 10:00 a.m. 20 County of Riverside, consolidated actions; Case Room: 222 21 Nos. RIC 353 840, RIC 344 436, RIC 344 668. 22 23 24 25 26 27 28 {00090837.1 }

NOTICE OF LODGING

PLEASE TAKE NOTICE that the City of Lancaster hereby lodges with the Court the Declaration of Carlyle S. Workman on Behalf of the City of Lancaster ("Declaration"). The Declaration was admitted into evidence during the Phase IV Trial and is being lodged in connection with the Phase VI Prove-Up Trial in the above-captioned action. A true and correct copy of the Declaration is attached hereto as Exhibit "1." DATED: September 25, 2015 MURPHY & EVERTZ LLP Douglas J. Evertz, Attorney for Defendants City of Lancaster and Rosamond Community Services District

NOTICE OF LODGING

{00090837.1 }

EXHIBIT 1

{00037390.1 }

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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:
- 20 APN 3170-009-902 83.56 Acres
- 21 APN 3170-009-904 0.50 Acres
- 22 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:
- 27 APN 3170-009-902 1994
- 28 APN 3170-009-904 2011 (The City acquired the LNSC property from Kaufman and Broad in {00037390.1}

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

Pump Tests/ Electric Records (Not applicable.)

- 23. In order to calculate groundwater pumped and used on the properties referenced above, ______ relied on pump tests and electric records. Exhibit I contains true and correct copies of the pump test records and electrical records for wells on the properties referenced above. The electric records attached to this declaration as Exhibit I do not include electric use on the properties referenced above for anything other than pumping groundwater.
- 24. Exhibit J sets forth the amount of total yearly groundwater that ______ estimates was pumped and used on the properties referenced above for the years 2000-2004, 2011, and 2012 based on the attached pump test records and electrical records for the wells on the properties referenced above. A true and correct copy of Exhibit J is attached hereto and incorporated herein.
 - 25. Pump tests were performed on the following dates:

26. _____ is not producing pump test records for the following dates _____ because:

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

Pump Tests/Diesel Records (Not applicable.)

28. In order to calculate groundwater pumped and used on the properties referenced above, _______ relied on pump tests and diesel fuel records. Exhibit K contains true and correct copies of the records pertaining to pump tests and diesel fuel purchases for the properties referenced above. The diesel fuel records attached to this declaration as Exhibit {00037390.1}

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in 2000. The water was used for the following:

Irrigation of soccer fields, municipal and domestic use.

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

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

Irrigation of soccer fields, municipal and domestic use.

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

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

Irrigation of soccer fields, municipal and domestic use,

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

Irrigation of soccer fields, municipal and domestic use.

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

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

Irrigation of soccer fields, municipal and domestic use.

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

41. The City used 489.68 acre feet of water at the Lancaster National Soccer Complex in 2011. The water was used for the following: {00037390.1} - 6 -

Irrigation of soccer fields, municipal and domestic use.

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

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

Irrigation of soccer fields, municipal and domestic use.

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

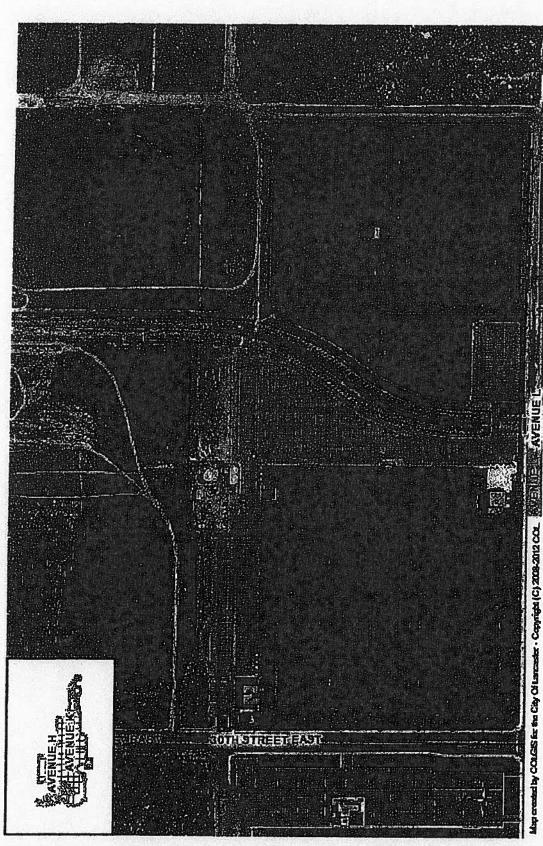
43. Other than what is declared hereinabove, and specifically excluding water utilized by the City in connection with its recycled water program, the City did not produce or use water within the Antelope Valley Area of Adjudication for 2000-2004, 2011, and 2012.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this <u>25m</u> day of January 2013, at <u>LANCASTER</u>
California.

arlyle S. Workman, P.E.

(00037390.1)

EXHIBIT "A"



365 APN 3100-009-902 & 904

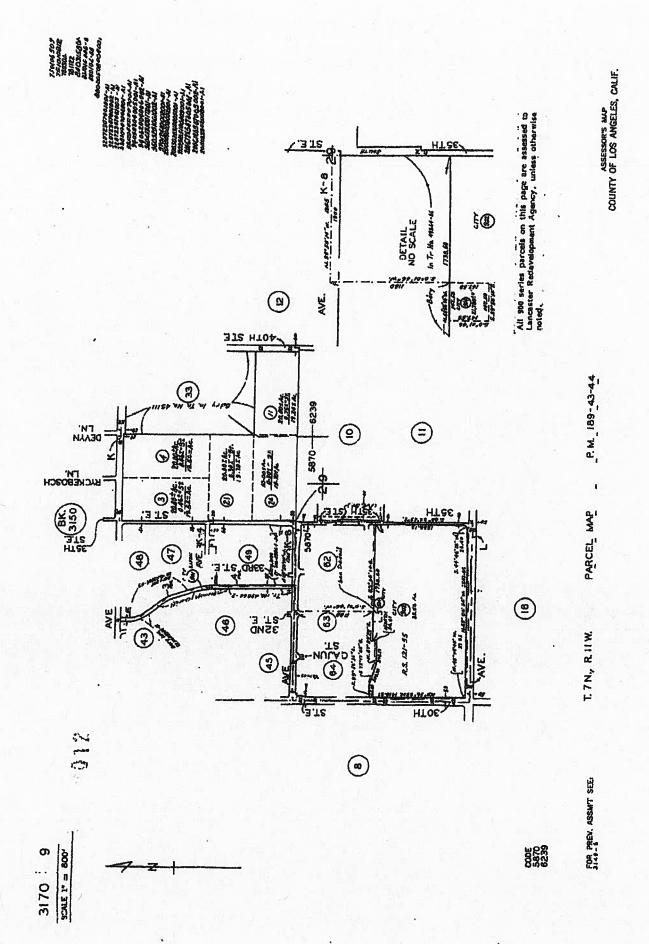
SEC. 29 T7N RIIN PM 189 43 44

DRUING

ROTTMAN

2/29/2012

http://gisapp/PW_Viewer/MapFrame.htm



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	EAST		EAST		EAST	EAST
			Ļ.	AVENUE	"K-8"	+-
	ST.	SERVICE AREA -	ST.	PROPOSED SITE	ST.	ST.
	20th	FOR POTABLE WATER	30th		35th	40th
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	h,,,,	- III	8	AVENUE	"M"	
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CITY OF LANCASTER
SOCCER COMPLEX
SERVICE AREA MAP
N.T.S.



EXHIBIT "E"

LNSC LANCASTER NATIONAL SOCCER CENTER Water Meter Readings

			-							
Date	SC1 - Secondary	ondary		SC2 - Primary	tary 💼	Main				
0/20/1999						304.017	I			
2000							1			
131/2000	157,642		100	146,722			3 5	4477		
2/24/2000	157,642			148,844	2.122		38	190444	4	
3/30/2000	157,642						¥	203043	GL. F.	ac. ft
5/15/2000	157,658	16	100	181,004	32,160			200913	20,337,300	468.17
6/7/2000	157,658		133	204,698	23,694					
6/27/2000	157,660	2		230,329	25,631		I			
9/20/2000	158,663	1,003	884	324,228	93,899					
0/16/2000	158,808	145		340,139	15,911				*	
1/6/2000	158,840	32		346,163	6,024					
12/4/2000	162,114	3,274		346,163						
2001							2004			
117/2001	162,115	-		355,447	9.284		5	10166		
2/28/2001	162,115	•		357,460	2,013		28	206362	4	4
5/2/2001				378,859	21,399		T	216528	24 GE2 900	40. ft.
5/17/2001				392,433	13,574				41,002,000	
6/28/2001	162,268	153	で	440,117	47,684	E S				
720/2001	162,279	11		463,821	23,704					
10/19/2001	172,280	10.001	- 22	545 311	84 AON 88					

				cu.ft. ac.ft.															4462000	040262	207675	21,045,100 cubic ft.lyr.	501.45 acre ft./yr.	162 400 004 40	103,400,231.1U gal.yr.			
	0000		2,833	706977	176'677													2003 Main Motor	12/40/2002	11/21/2002								
												(B) (B)	12 FER	2001			I	Ī		15.884	43.578	50,039	16.393	26.273	20,944	11.169	4.699	
Main											936 696		949 262						978.714	994,598	1,038,176	1,088,215	1.104.608	1.130.881	1,151,825	1.162.994	1,167,693	
ary		16.498	3.781	9,594	14,624	20,615	30,069	37.131	72,721	14,821 編	4,307	9,640	1.955	6.263		1.386	6.545	4,572	18,170	16,526	44,402	49,389	16,953	27,151	21,978	11,774	1	
SC2 - Primary		561,809	565,590	575,184	589,808	610,423	640,492	677,623	750,344	765,165	769,472	779,112	781,067	787,330		788,716	795,261	799,833	818,003	834,529	878,931	928,320	945,273	972,424	994,402	1,006,176	1,011,419	· · · · · · · · · · · · · · · · · · ·
ndary K		-	•	4	-	207	98	1,792	463	22	4 羅	1	14 🕿	150		100	3,064	9	-							2		
SC1 - Secondary		172,281	172,281	172,285	172,286	172,493	172,579	174,371	174,824	174,846	174,850	174,850	174,864	175,014		175,114		178,184	178,184	178,186	179,085	181,012	181,030	181,084	181,088	181,091	181,094	
Date	2002	1/16/2002	2/23/2002	3/15/2002	4/12/2002	5/13/2002	6/13/2002	7/15/2002	9/17/2002	10/8/2002	10/31/2002	11/13/2002	11/21/2002	12/20/2002	2003	1/17/2003	2/18/2003	3/12/2003	4/28/2003	5/23/2003	6/27/2003	8/6/2003	8/20/2003	9/17/2003	10/16/2003	11/19/2003	12/19/2003	2004

Page 2 of 5

LNSC Water Meter Readings

																					Con 60	2 000 5									
								1,383,434	1,167,633	22,574,100 cubic ft.lyr.	318.23 acre ft./yr.	700 000	108,876,842 gal.lyr.			1077	1,611,497	1,383,481	900'812	2000000		our acrett/yr.	163 000 380	too, Usu, zog gal.yr.				100000	1,636,363	184,110,1	770,000
							An 416	12/22/2004 12/40/2003	12 13/2003						2005 Main Motor	100000	1/20/2005	12012000									2006 Main Motor	7/1/2007	1/26/2006		
		2005	12,003	40.047	25,017	20,023	30,000	30.705	27 775	15.555	4.866	3 245	275	257		7.430	14.499	32 036	35,200	50 co	42.956	13.171	8.278	2 263	2400	6 133	5.486	2770	14.788	18,512	20000
Main	1170 700 1	1 174 EAE	1 187 114	4 400 024	1 224 054	1 274 GES	1311788	1.342.493	1.369.76R	1,385,323	1,390,189	1.393.434		1.393,491	1.394.702	1,402,134	1.416.633	1.450.589	1.485.778	1.538.706	1,581,662	1.594.833	1,803,111	1,805,354	i andanai.	1.611.497		1,619,753	1,634,541	1,653,053	1
ary	3.826	4 109	13.176	13 103	35.017	37 501	40 926	31,306	28.076	15,885	5,038	2.387		991	1.610	7.831	14,896	34.471	35,789	21,681	New Meter	13,634	8,568	2.328	ì	6.342	5,845	3,158	15,447	7	
SC2 - Primary	1 4		1.032.530	1.045.723	1.081.840	1 119 141	1.160.067	1,191,373	1.219.449	1,235,334	1,240,372	1,242,759	THE CHIEF WATER	1,243,750	1,245,360	1,253,191	1,268,087	1.302.558	1,338,347	1,360,028		0.27	51,049	53,377		59,719	65,564	68,722	84,169	103,297	165 465
Mary Mary				188					200			新				35				254		100				200		舜			M
SC1 - Secondary	181,107	181,109	181,113	181,115	181,119	181,125	181,127	181,130	181,273	181,439	181,449	181,488	に経過の概念	181,509	181,519	181,520	181,556	181,626	181,628	181,630	181,633	181,635	181,637	181,639		181,643	181,644	181,666	181,671	181,673	181.675
Care	1/22/2004	2/23/2004	3/31/2004	4/20/2004	5/27/2004	6/28/2004	7/30/2004	8/23/2004	9/23/2004	10/22/2004	12/6/2004	12/22/2004	2005	1/20/2005	2/17/2005	4/7/2005	4/26/2005	6/2/2005	7/1/2005	8/11/2005	9/30/2005	10/31/2005	12/2/2005	12/20/2005	2006	1/26/2006	2/22/2006	3/22/2006	5/3/2006	5/23/2006	7/12/2006

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		70.07	250-50				8					612 613	784.2						11		525 07	?	•						2001	17.1.25
				109,734,913 gal.lyr.			177 000 0	2,063,413 4 828 285	1,030,303	745,030	24 503 000 5:4:4			105,500,843 gal.yr.		0.940.497	2,012,137	220 722	771,077	22 872 200 mikin 44-	525 Some & for	174 10¢ 020 mil 4m	11 1, 100,320 gallyr		2 5.42 650	2 342 427	230 522	770,007	23 052 200 cubic fiber	59,002,200 Gubic nyyr.
						2007 Main Mater	1/10/2008	2/1/2007	1997117						2008 Main Mefer	1472009	1/10/2008							1.562 2009 Main Meter	1772010	1/1/2009				
	82 028	22,468	928	2120	11 25R	0 547	21801	11.813	33.860	22.041	67.654	41.944	23.876	10,473	2,001	14.234	12 223	37.540	51,834	77.186	25.959	8.184		1.562	4.690	15.558	37.915	77.441	19,056	46.247
Main	1 795 443	1.817.911	1,827,127		1.838.385	1.847.932	1.869.753	1,881,566	1,915,426	1.937.467	2,005,121	2,047,065	2.070.941	2,081,414	2,083,415	2,097,649	2,109,872	2,147,412	2,199,246	2,276,432	2,302,391	2,310,575		2,312,137	2,316,827	2,332,385	2,370,300	2,447,741	2,466,797	2,513,044
ary	71.628 羅	23,547	9.638	4	11.772	10.117	22,643	16,064	31,154	22,711	69,656	43,269	25.045	11,105	3,084	15,965	13,428	38,885	53,248	81,627	24,892	9,314	W	2,067	4,893	16,311	39,167	79,784	19,603	47,911
SC2 - Primary	237,093	260,640	270,278	District Control of the Control of t	282,050	292,167	314,810	330,874	362,028	384,739	454,395	497,664	522,709	533,814	536,898	552,863	566,291	605,176	658,424	740,051	764,943	774,257		776,324	781,217	797,528	836,695	916,479	936,082	983,993
SC1 - Secondary	195,964	195,967	195,967		195,970	195,971	195,973	92,976	195,978	196,983	195,983	195,936	195,992	195,998	197,242	197,302	197,304	197,308	197,319	197,321	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	197,339		197,339	197,342	197,351				197,374
Date SC	9/25/2006 19		12/1/2006 18	2002	200		7/							2002					7/11/2008 18			2008	2009				6			10/7/2009 18

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			8.906 2010 Main Meter	1/19/2011	1772010											2011 Main Mefer	1/1/2012	1/19/2011					1 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7							
	20,709		8.906	1.057	842	15.288	27.546	24.606	34.225	27.702	47,479	18,684	6.224	2.339		1.461		4.203	13,144	17,863	69,344	31,246	37,282		25,308	7,397		3,992		
Main	2,533,753		2,542,659	2,543,716	2,544,558	2,559,846	2,587,392	2,611,998	2,646,223	2,673,925	2,721,404	2,740,088	2,746,312	2,748,651		2,750,112	2,753,603	2,757,806	2,770,950	2,788,813	2,858,157	2,889,403	2,926,685		2,951,993	2,959,390		2,963,382		
E S	21,638		9,613	1,417	1,126	-	44,694	25,352	35,179	28,525	49,118	19,687 @	6,856	2,720		1,739	3,892	4,624 麗	13,833	18,590	71,552	32,103	38,456	9,572	17,298	8,116				
SC2 - Primary	1,005,631	S THE STATE OF STATE	1,015,244	1,016,861	1,017,787	1,017,787	1,062,481	1,087,833	1,123,012	1,151,537	1,200,655	1,220,342	1,227,198	1,229,918		1,231,657	1,235,549	1,240,173	1,254,006	1,272,596	1,344,148	1,376,251	1,414,707	1,424,279	1,441,577	1,449,693		1,454,172		
dary	200		94	200		000		***************************************			200			83 4							488	1000		20		1838	88	35	100	1
SC1 - Secondary	197,387		197,402	197,402	197,406	197,410	197,414	197,421	197,424	197,424	197,437	197,447	197,457	197,473		197,480	197,488	197,498	197,518	197,522	197,524	197,527	197,540	197,541	197,544	197,546		197,551		S - 0 - 1 1 5 1 5 1 5
Date	11/12/2009	2010	1/7/2010	2/9/2010	3/8/2010	4/19/2010	5/25/2010	6/16/2010	7/12/2010	8/3/2010	9/15/2010	10/21/2010	11/24/2010	12/24/2010	2011	1/19/2011	2/16/2011	3/16/2011	4/1/2011	5//1/2011	7/20/2011	8/1/2011	9/1/2011	10/1/2011	11/1/2011	12/1/2001	2012	1/1/2012		

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Date	SC1 - Secondary	ndary *	SC2 - Primary	lary 🌣	Main	1000000
2012		-				11.000
1/1/2012	197,551	2	1,454,172	4,479	2,963,382	3,992
2/1/2012	197,556	5	1,458,094	3,922	2,966,992	3,610
3/1/2012			1,470,193	12,099	2,978,546	11,554
4/1/2012	197,564	8	1,489,808	19,615	2,996,487	17,941
5/1/2012			1,521,688	31,880	3,028,348	31,861
7/1/2012	197,587	23 :-	1,584,832	63,144 3	3,089,319	60,971
8/1/2012	197,592	5	1,622,700	37,868	3,125,884	36,565
0.00		III a same			3,145,894	20,010
10/31/2012	197,600	 8	1,671,689	48,989 图	3,173,018	27,124
11/19/2012				ž.	3,180,676	7,858
	18 18 18					160 0000
				10 E 25 H 70	DIE OF LIES	

2012 Main Meter 11/19/2012 3,180,676 1/1/2012 2,963,382 217,294 21,729,400 Cubic Feet 162,535,912 Gallons

PROOF OF SERVICE

1	PROOF OF SERVICE
2	ANTELOPE VALLEY GROUNDWATER CASES Judicial Council Coordination, Proceeding No. 4408
3 4	Santa Clara Case No. 1-05-CV 049053 Assigned to the Honorable Jack Komar Los Angeles County Superior Court, Central, Dept. 1
567	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.
8	On September 25, 2015, I served the within document(s):
9 10	NOTICE OF LODGING DECLARATION OF CARLYLE S. WORKMAN, P.E. ADMITTED INTO EVIDENCE AT PHASE IV TRIAL ON BEHALF OF THE CITY OF LANCASTER
11 12 13	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.
14	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.
15 16	by placing the document(s) listed above in a sealed Overnite Express envelope/package for overnight delivery at Costa Mesa, California addressed as set forth below.
17 18	by causing personal delivery by Nationwide Legal of the document(s) listed above, to the person(s) at the address(es) set forth below.
19 20 21	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.
22	I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
24	Executed on September 26, 2015, at Costa Mesa, California.
25 26	Stephanie Pattis
27	Stephanie Pattis
20	{00090837.1}

PROOF OF SERVICE