

1 Robert H. Brumfield, Esq. (SBN 114467)  
2 bob@brumfieldlawgroup.com  
3 LAW OFFICES OF ROBERT H. BRUMFIELD  
4 A Professional Corporation  
5 1810 Westwind Drive, Suite 100  
6 Bakersfield, CA 93301  
7 Telephone: (661) 316-3010  
8 Facsimile: (661) 885-6090

9 Attorneys for Johnny Zamrzla, Pamela Zamrzla,  
10 Johnny Lee Zamrzla and Jeanette Zamrzla (collectively  
11 "Zamrzla's")

12 SUPERIOR COURT OF CALIFORNIA  
13 COUNTY OF LOS ANGELES – CENTRAL DISTRICT

14 Coordinated Proceeding,  
15 Special Title (Rule 1550(b))

16 ANTELOPE VALLEY  
17 GROUNDWATER CASES.

Judicial Council Coordination  
Proceeding No. 4408

LASC Case No. BC 32501

Santa Clara Court Case No. 1-05-CV-049053  
Assigned to the Hon. Jack Komar, Judge of the  
Santa Clara County Superior Court

18 **DECLARATION OF EUGENE B.  
19 NEBEKER RE OPPOSITION BY THE  
20 ZAMRZLA'S TO THE WATERMASTER'S  
21 MOTION FOR MONETARY,  
22 DECLARATORY AND INJUNCTIVE  
23 RELIEF AGAINST ZAMRZLA'S**

24 Date: November 12, 2021  
25 Time: 9:00 a.m.  
26 Dept.: By Court call

27 I, EUGENE B. NEBEKER, declare as follows:

28 1. I am submitting this declaration in support of the Zamrzla's opposition to the  
Watermaster's Motion for Monetary, Declaratory and Injunctive Relief against Zamrzla's.

1           2.       The purpose of my declaration is to respond to the Watermaster's erroneous and  
2 baseless claim regarding the Zamrzla's water production on their various parcels and my request  
3 made in my letter dated September 23, 2020 for the Watermaster's Board to rescind the  
4 assessment reflected in the invoice sent to the Zamrzla's in the amount of \$273,165. That letter  
5 (along with the September 23, 2020 report from Jan H.M. Hendrickx which included a relevant  
6 article) are all collectively attached hereto as Exhibit A.

7           3.       As requested by Johnny Zamrzla, I personally emailed all documents included in  
8 Exhibit A directly to Watermaster attorney, Craig Parton, the Watermaster Board, and the  
9 Watermaster's Engineer (Todd Groundwater) on September 25, 2020. I never received a response  
10 to that emailing.

11          4.       I have read and reviewed the September 5, 2019 Memorandum by Todd  
12 Groundwater (the Watermaster's Engineer) concerning the analysis of the Zamrzla's water usage  
13 and am familiar with the Memorandum.

14          5.       I have further read and reviewed the September 23, 2020 report from Jan H.M.  
15 Hendrickx and am familiar with that report.

16          6.       I am personally familiar with each and every matter stated in this declaration and  
17 could competently testify thereto if called as a witness.

18          7.       Attached as Exhibit B hereto is a true and correct copy of my resume. I can  
19 summarize my resume by stating that I have a Ph.D. in Chemical and Nuclear Engineering. I am  
20 a Licensed Professional Engineer in the Branches of both Agricultural and Chemical Engineering  
21 in the State of California; I have experience in groundwater hydrology; I served as a member of  
22 the Technical Committee for AV Groundwater Adjudication.

23          8.       My September 23, 2020 letter (the first 2 pages of Exhibit A) discusses numerous  
24 issues regarding the Watermaster's treatment of the Zamrzla's, highlights the Watermaster's  
25 errors shown by Dr. Hendrickx's report, my request that the \$273,165 invoice be rescinded by  
26 the Watermaster Board, the fact that the Watermaster Board and Watermaster Engineer continue  
27 to not use "best available science", and that the Watermaster's approach as to the Zamrzla's  
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1 reflects "all sorts of errors." To be more particular, my September 23, 2020 letter states the  
2 following:

3 a. The Watermaster attorney is asking for more than \$273,000 from the  
4 Zamrzla's for a replacement Water Assessment on several parcels for  
5 ground water pumping that never occurred.

6 b. After examining Dr. Hendrickx's memorandum, I noted that the  
7 Watermaster Engineer's analysis of aerial photography of the five parcels  
8 of the Zamrzla property in question had included four serious errors which  
9 include misusing the Crop Coefficient Method, confusion of Russian  
10 Thistle (tumbleweed) and other weeds with alfalfa, using only one image,  
11 and not performing any ground truthing to verify or support their  
12 conclusions.

13 c. In addition, I know that Mr. Zamrzla provided a Southern California  
14 Edison bill to the Watermaster attorney, showing that during the time  
15 period, and for two of the parcels in question, no electricity was used to  
16 pump water. The Watermaster attorney should know that the only way to  
17 obtain water for these two parcels is to use a deep-well turbine groundwater  
18 pump that only uses electrical energy. If electricity is not used, no water  
19 can be pumped. Also, if an inoperable irrigation system is present, such as  
20 unconnected wheel lines, water cannot be applied to the fields. That brings  
21 the total errors up to six.

22 d. In addition, many people are appalled that Mr. Zamrzla is having this sort  
23 of conversation with the Watermaster attorney. They know that no  
24 pumping occurred during the time period in question. They include Mr.  
25 Tim Hays, Agricultural Consultant and Pest Control Advisor and also co-  
26 author of "Crop Water Requirements" assembled by myself; an irrigation  
27 specialist at University of California at Davis, and all of the University of  
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California Extension Farm Advisors assigned to Antelope Valley; and a local farm contractor that does the harvesting (cutting, baling and hauling) for local landowners including Mr. Zamrzla and many neighbors that are quite familiar with the appearance of the Zamrzla property and the lack of irrigation during the time period in question.

e. Based on the information I have, I believe that the Watermaster attorney and the entire Watermaster Board should rescind the Assessment which used the Watermaster attorney's numbers amounting to \$273,165. Dr. Hendrickx's accompanying analysis shows, by using Landsat images, that no water was used on the -002, -003 and -027 parcels, not 570 AF/year as billed. There was yet to be determined water amount used on 2 other parcels but overwhelmingly less than the amount billed by the Watermaster attorney, which was already shown to be an overcharge error by the Watermaster Engineer of at least 570 AF/year.

f. The Landsat analysis presented by Dr. Hendrickx in his attached memorandum is discussed in the attached technical paper authored by Dr. Hendrickx and co-authored by well-known and respected experts. Some of these experts have testified as expert witnesses for State and Federal courts and the United States Supreme Court. These numbers should be confirmed by the Watermaster attorney and the legal representative of the Zamrzla's.

g. From a broader point of view, I am dismayed at the analysis of the Watermaster Engineer and the Watermaster attorney. To help the Engineer, I have furnished them and others many technical papers that would help them. I also proposed that we establish a "Science Advisory Board." This situation would not have happened with the advice of such a Board. The Watermaster attorney should have required some form of Due

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Diligence before allowing the bill to even be sent to the Zamrzla's in the first place.

h. However, what is worse and even more dismaying, is that even after receiving the September 23, 2020 report from Jan H.M. Hendrickx (which detailed the Watermaster Engineer's blatant and obvious errors), and the receipt of my letter dated September 23, 2020 which accompanied the Jan H.M. Hendrickx memorandum, the Watermaster Engineer and the Watermaster attorney did nothing to correct their false findings or to rescind the erroneous invoice billing of \$273,165.

i. Regulations indicate that only "best-available science" should be used. What is going on in this case is not "best," it is an absolute mess with all sorts of errors. Where is the outcry from the members of the Watermaster Board? This situation requires an investigation of the operation of the Watermaster Board in an open and public hearing.

j. The great amount of money the Watermaster attorney wants to extract from the Zamrzla's with no evidence of wrongdoing has been incredibly stressful and caused public embarrassment to prominent and well-liked public figures such as the Zamrzla's.

k. A public apology from the Watermaster attorney is now appropriate.

I declare under the penalty of perjury under the laws of the State of California and the United States of America that this declaration is true and correct and was executed on November 11, 2021 at San Angeles, California.

  
Eugene B. Nebeker

EXHIBIT "A"

Date: September 23, 2020



From: Jan M.H. Hendrickx, Ph.D., Ir.

To whom it may concern

This memorandum is written at the request of Mr. Gene Nebeker who asked for my professional opinion on the Replacement Water Assessment prepared by the Antelope Valley Watermaster Engineer concerning the groundwater production on the Zamrzla parcels in 2018.

I understand that the 2018 Replacement Obligation of the Zamrzla's will pay for the volume of water that they pumped to irrigate five parcels of land in excess of their Production Rights (see Section 3.5.39 of the Judgment). I will comment on the calculations by the Watermaster Engineer that resulted in a Replacement Obligation of 570 AF. These calculations were documented in a memorandum from the Watermaster Engineer to the Antelope Valley Watermaster Legal Counsel on September 5, 2019.

Since the Zamrzla wells are not metered, the Watermaster Engineer made the correct decision to use remote sensing for their analysis because the volume of water pumped for irrigation will be approximately equal to actual crop water use that can be estimated from remote sensing imagery. Specifically, they used one USDA color infrared image of September 2018 in combination with the crop coefficient method to estimate the volume of 2018 actual crop water use on the five parcels. Because the Zamrzla's do not have any Production Rights on this land, the estimate of actual crop water use equals their total Replacement Obligation.

Unfortunately, the Watermaster's analysis for the calculation of the Replacement Obligation for which the Zamrzla's are responsible in 2018 is seriously flawed because (1) they use the crop coefficient method which is the wrong method to estimate actual crop water use; (2) they confuse Russian Thistle and other weeds with alfalfa; and (3) they use only one image of September and, thus, have no information about actual water use on the parcels during the periods of March-August and October-November.

The crop coefficient method is a common approach in California to estimate **potential** crop water use for a wide range of crops grown under optimal conditions of watering and fertilization. In other words, this method estimates maximum crop water use but not **actual** water use that can be considerably less. In addition, this method has the implicit requirements to know (1) what crop is grown; (2) date of planting and harvesting; and (3) dates of irrigation and significant precipitation. If one does not know what crop is grown at what time during the calendar year nor how many irrigations have been applied, it is impossible to calculate actual crop water use with the crop coefficient method. Since the Replacement Obligation is based on the actual volume pumped in excess of Production Rights, it equals actual crop water use rather than potential crop water use.

The Watermaster uses the red or faint red areas observed on the USDA color infrared image of September 2018 through parcels -002, -003 and -027 (Fig. 1) as an indication that alfalfa was grown on these parcels throughout the 2018 growing season from April through October. However, the spotty red-dots pattern seen on this aerial image does not look like alfalfa or any other irrigated crop. Did the Watermaster do any ground truthing as is the standard practice when using remote sensing in areas of uncertainty?

Using Landsat imagery, it is possible to go back in time and check the Watermaster's assertions. Figure 2 shows the Zamrzla parcels as seen on a Landsat 8 image of 16 September 2018. Just as on the USDA image, the spotty red-dots pattern is clearly visible. This pattern is quite different from the homogenous red colors observed on agricultural fields about 5 miles NW from the Zamrzla parcels (Fig. 3). In addition, comparison of these fields with parcels -026 and -028 reveals how weak the parcels' red color is compared to well water agricultural fields.

Figure 4 shows the Zamrzla parcels one year later on a Landsat 8 image of 19 September 2019. Just as in September 2018 live vegetation is observed throughout parcels -002 and -003. On October 22 and 25, 2019 I was able to inspect the fields myself for ground truthing. I found no alfalfa but much Russian Thistle (Fig. 4, lower picture) and other non-agricultural vegetation that resulted in the spotty red-dots pattern. Nor did I find any signs of irrigation other than the unconnected existing wheel line system.

In addition to the misclassification of the vegetation growing on parcels -002, -003 and -027, the Watermaster made another basic mistake. They used only one image in September 2018 to estimate crop water use over the entire growing period from March through November 2018 and made the unwarranted assumption that potential crop water use occurred during the entire growing season. This assumption easily could have been checked using Landsat images for 2018 that are freely available. For example, Fig. 5 shows the relative crop water use on the parcels in the middle of the growing season on July 14, 2018 as shown by Google Earth Engine (<https://eeflux-level1.appspot.com/>). The calculations are performed by EEFLUX which is an automatic implementation of the METRIC algorithms. Although EEFLUX can differ by 5 to 25% from a more accurate METRIC application, the image clearly shows the absence of any irrigation on parcels -002, -003 and -027. In addition, parcels -026 and -028 show a relative crop water use of, respectively, 30-45 and 25% percent which is much lower than potential or maximum water use. These low relative crop water uses are also echoed on the USDA image by the light red to pink colors on parcels -026 and -028 (Figs. 1-2). The Landsat images clearly indicate that water use on parcels -026 and -028 was about 25% and 38% of the potential crop water use calculated by the Watermaster. There are sufficient cloud free Landsat images available in 2018 to make a more accurate estimate of actual annual crop water use on these parcels if need be.

In my professional opinion, the true water use on the Zamrzla parcels is zero on parcels -002, -003 and -027; and a yet to be determined amount used on parcels -026 and -028. Thus, while any water used was a magnitude less than the Watermaster's assessment, an accurate Replacement Obligation can be determined using the methods described in my 2016 award winning paper that is attached.



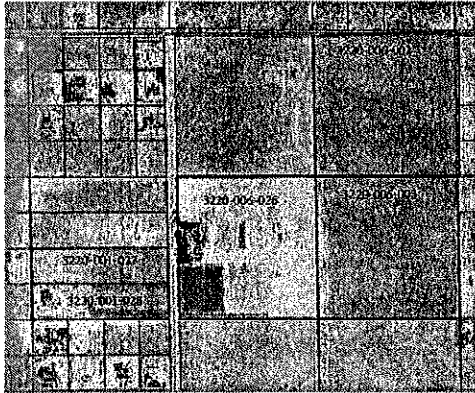


Figure 1. USDA color infrared image of September 2018 that is the only source used by the Watermaster for assessment of water use on the numbered parcels.



Figure 2. Landsat 8 color infrared image of 16 September 2018 covering the same area as shown in Fig. 1.



Figure 3. Landsat 8 color infrared image of 16 September 2018 showing irrigated agricultural fields about 5 miles to the NW of the Zamrzla parcels.

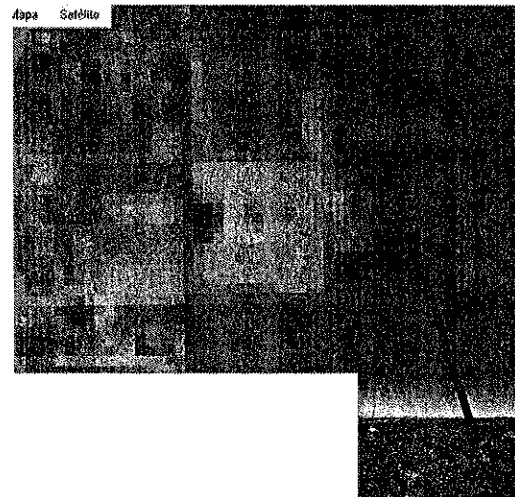


Figure 4. Landsat 8 color infrared image of 19 September 2019 covering the same area as shown in Fig. 1. An inspection visit on 25 October 2019 revealed that the red color coincided with the live vegetation of Russian Thistle; no alfalfa was observed on these parcels nor any sign of irrigation.

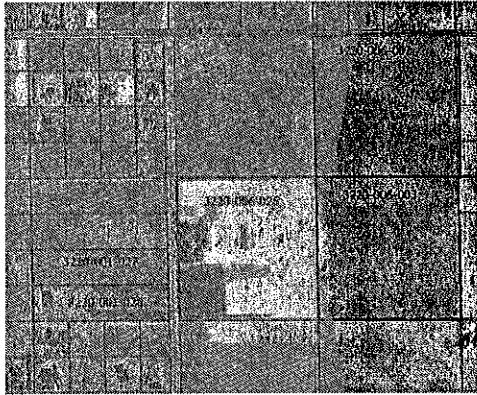


Figure 1. USDA color infrared image of September 2018 that is the only source used by the Watermaster for assessment of water use on the numbered parcels.



Figure 5. Google Earth Engine EEFLUX image overlaying a true color Landsat image of July 14, 2018 covering the same area as shown in Fig. 1. The dark brown color of the EEFLUX image in parcel -002 has a relative ET of about 2%. The light brown color in parcel -028 has a relative ET of about 25% and the light colors in the irrigated part of -026 vary between 30 and 45%. The non-colored areas that only show the true color image have a relative ET of zero.

**EXHIBIT "B"**

## **EUGENE B. NEBEKER, PH.D., P.E.**

### **EDUCATION**

Ph.D., Chemical and Nuclear Engineering, California Institute of Technology  
M.S., Chemical Engineering, California Institute of Technology  
B.S., Chemical Engineering, Stanford University.

### **HONORS/AWARDS**

1993 Outstanding Alfalfa Grower, California Alfalfa Symposium  
1990 Conservation Farmer of the Year  
National Endowment for Soil and Water Conservation  
1987 Goodyear Conservation Award

### **LICENSURE**

Professional Engineer, Branch of Chemical Engineering, States of California and Texas;  
Professional Engineer, Branch of Agricultural Engineering, State of California.

### **EXPERIENCE:**

**NEBEKER RANCH, INC.**

**SCIENTIFIC RESEARCH, INC.**

### **NEBEKER RANCH, INC. , FIELD CROP OPERATIONS**

Dr. Nebeker operated Nebeker Ranch, Inc., in the Antelope Valley of Southern California for many decades. Nebeker Ranch, Inc., a fully working ranch and farm enterprise whose operations included ground water pumping and irrigation of field crop production consisting primarily of alfalfa, oats and barley hay. In order to conserve water, new and more efficient approaches of laser-leveling fields were developed and became a customary part of field preparation.

Dr. Nebeker received the Goodyear Conservation Award in 1987 and was chosen in 1990 as Conservation Farmer of the Year by the National Endowment for Soil and Water Conservation for this work. In 1993, he was chosen as the "Outstanding Alfalfa Grower" in California.

To provide a less costly source of water for the farming, he has worked with the County Sanitation Districts of Los Angeles County over the last 24 years to install a pipeline and pumping station to the ranch to dispose of the secondary effluent water resulting from the sewage treatment of the City of Lancaster.

In addition to production agriculture, Dr. Nebeker has also been involved with agricultural research and development. Dodder is a parasitic weed which attacks alfalfa. He presented a paper on his experiences and control techniques in the Sixteenth California Alfalfa Symposium in 1986. Nebeker Ranch worked in concert for many years with the University of California Farm Advisor on projects in areas of insect and weed control in field crops.

Dr. Nebeker has innovated new agricultural enterprises to complement the field crop program. Most notable is the animal products program which employs 2000 head of sheep and goats in 100,000 square feet of dry lot to produce blood, sera and animal products. Special darkrooms, chemistry/microbiology laboratory, and sterile transfer rooms were created and used at the ranch for this purpose.

Dr. Nebeker served as a member and chairman of the California Regional Water Quality Control Board-Lahontan Region in 1991. During 1990, he was vice-chairman. Industrial Water Use is his appointment category. Areas of particular interest to him are groundwater pumping, toxicity, groundwater pollution, and acid mine drainage.

As a result of his engineering background, he has gained valuable environmental engineering experience. He has evaluated proposals for the National Science Foundation, Department of Energy, and American Society of Mechanical Engineers, and has served on a proposal review panel for the National Heart, Lung, and Blood Institute, National Institutes of Health. He has served as a consultant to Dames & Moore in preparing environmental impact reports. Other chemical engineering consulting clients have included Security Pacific National Bank, Paul-Munroe Hydraulics, Inc., and other industrial organizations.

#### **SCIENTIFIC ASSOCIATES, INC.**

Dr. Nebeker formed Scientific Associates, Inc. in 1969 and has been active in all corporate programs. Starting in 1973, Scientific Associates, Inc. conducted a preliminary investigation of Percussive Jets for the U. S. Army Mobility Equipment Research and Development Center under Contract DAAK02-73-C-0163. The objective of this program was a preliminary assessment of the feasibility of producing Percussive Jets and their potential utility for rock excavation. The general intent was to produce and test Percussive Jets in an expedient manner without attempting to study the process in any detail or to optimize its operation. A modulator design adequate for testing was developed. The modulator frequencies obtained with the drive motor were in the range of 2000 to 5000 cycles/second. Modulated free stream bunching was observed by stroboscopic light. Oscilloscope traces of high-speed percussive impact were obtained by means of a piezoelectric force gauge with high-frequency response.

Three types of rocks were used in testing: granite, limestone, and sandstone. The results obtained with granite appeared to be most significant. The Percussive Jets tore relatively broad pits or cavities into the granite, whereas the ordinary or unmodulated discharge could only affect the granite to the extent of slightly roughening the surface. In the case of limestone, relative effects were less distinctive but the Percussive Jets could cut the stone with several times the efficiency of the ordinary jet, i.e., remove larger volume with a given cutting operation. In

sandstone, the Percussive Jets could also penetrate better than unmodulated jets, but the advantage was still less pronounced.

Scientific Associates, Inc. then completed Department of Energy Contract ET75-C-01-9094 which earlier was Bureau of Mines Contract HO252008. Experimentation on Percussive Jets was limited to small diameter or "kerfing" jets which, in mining or excavation, are intended for producing narrow cuts at short standoff rather than massive breaking at a distance. In this process, the understanding of modulated discharge mechanics was considerably enhanced.

Most of the effort was concentrated on improving the modulator devices which produce Percussive Jets. The modulator design under development basically consisted of a rotor/stator assembly which generates pressure and flow oscillations upstream of the nozzle. The experimental modulators were relatively small hardware, wholly internal to the flow system, and powered by the throughflow. Thus, conversion from ordinary to Percussive Jets amounts simply to insertion of a modulator. Modulation frequencies between 2,000 and 20,000 cycles/second were used.

The superior impact characteristics of Percussive Jets over equivalent conventional jets were observed in direct comparison tests with a variety of materials ranging from concrete to granite. With cut volume, depth, or specific energy as criteria, Percussive Jet performances ranged from two or three times to orders of magnitude better. The Percussive Jets seemed particularly able to exploit brittle fracture or other fragmentation mechanisms.

The Department of Energy then funded Contract DE-AC01-79ET14280 (later becoming Bureau of Mines J0333934) which was directed to applying the Percussive Jets to large-diameter water jets in the one-half-inch range. The objective was to increase the standoff or effective cutting distance for jets used in high-volume mining and many borehole applications. Results showed that the cutting distance of Percussive Jets can be improved over ordinary jets by as much as 60 percent. The reason for these findings is that an entirely new flowfield is set up around the Percussive Jet which resists aerodynamic disruption. Such a result represents a breakthrough in water jet mining as well as the fluid mechanics of water jets.

Scientific Associates, Inc. was awarded U. S. Department of Energy Contract DE-AC03-87ER80528 to develop the Percussive Jet for demolishing large, heavily reinforced concrete structures such as nuclear reactors. In Phase I, at discharge pressure of 10,000 psi, Percussive Jets cut faster and more efficiently in air and underwater than ordinary water jets. In Phase II, the discharge pressure was raised to 30,000 psi and new hardware was developed to drive the modulator with the water supply to the jet. The performance of the Percussive Jet was superior to an ordinary jet.

Experience in other fluid mechanics areas includes the following. Scientific Associates, Inc. completed Grant No. DE-FG03-81SF11618 entitled, "Direct Use of Wind Power for Deep-Well Pumping in Irrigation," from the Department of Energy. This effort included the design, development, and test of a novel hydraulic system which connected a wind turbine to a deep well turbine pump. A hydraulic system not only transferred power from the turbine to the pump but also controlled the turbine and reacted to gusts.

Also, Scientific Associates, Inc. conducted a program for the U. S. Coast Guard entitled, "Free Vortex Recovery of Floating Oil," Contract DOT-CG-00594-A. This effort was for an engineering feasibility study of a Free Vortex for use in recovering oil in high seas oil spills. The program involved the very complex interaction of incompressible, viscous, immiscible liquid phases in both axial and radial flow fields. A later effort, "Concept Development of a Free Vortex Oil Recovery System," Contract DOT-CG-22878-A, was a follow-on activity to this earlier program. A third contract, DOT-CG-42732-A included additional development and analysis and a preliminary design of an ocean-going prototype.

As a result of his engineering background, he has gained valuable environmental engineering experience. He has evaluated proposals for the National Science Foundation, Department of Energy, and American Society of Mechanical Engineers, and has served on a proposal review panel for the National Heart, Lung, and Blood Institute, National Institutes of Health. He has served as a consultant to Dames & Moore in preparing environmental impact reports. Other chemical engineering consulting clients have included Security Pacific National Bank, Paul-Munroe Hydraulics, Inc., and other industrial organizations.

While at the Rockwell Corporation from 1965 – 1969, he worked as a Technical Specialist on air and water pollution problems. Dr. Nebeker was the responsible Project Engineer on several proposal activities. While serving in this capacity, he was involved with the mathematical modeling of several in-house and proposal programs dealing with air pollution studies.

Prior to joining North American Rockwell, he worked for his Ph.D. degree at the California Institute of Technology, having complete responsibility for a theoretical and experimental research project in irreversible thermodynamics. In addition, Dr. Nebeker served as a graduate teaching assistant in thermodynamics, transport phenomena, and chemical kinetics.

#### **PATENTS**

"Apparatus for Producing Percussive Liquid Jets," U. S. Patent applied for.

"Method and Apparatus for Producing and Utilizing Percussive Liquid Jets," U. S. Patent No. 3,924,805, patented December 9, 1975, with S. E. Rodriguez.

"Mechanism and Method for Recovering Material from the Surface of a Liquid Body," U. S. Patent No. 4,142,972, patented March 6, 1979, with S. E. Rodriguez and P. G. Mikolaj.

#### **PUBLICATIONS AND PRESENTATIONS**

"Recycling Municipal Effluent Using Alfalfa to Produce a Profit," Proceedings of the 2001 California Alfalfa & Forage Symposium, University of California, Modesto, CA, December 11-13, 2001.

"Compatibility of Agriculture and Suburban Interests, Agricultural Reuse of Reclaimed Water in Antelope Valley," Proceedings of the 1996 Water Reuse Conference, San Diego, CA, Feb. 25-28, 1996 Water Reuse Conference, San Diego, CA, Feb. 25-28, 1996, with D. B. Lambert.

“How to Produce Hay for the Horse Market,” Proceedings of the 21st California Alfalfa Symposium, 1991, Sacramento, CA.

“Photostress Applications on Concrete,” Society of Experimental Mechanics Conference on Experimental Mechanics, Albuquerque, NM, June 1990.

“Percussive Jets—State-of-the-Art,” Proceedings of the Fourth U. S. Water Jet Conference, August 26-28, 1987, University of California, Berkeley, CA.

“Frustration in the Field: A Grower’s Perspective in Dodder Control,” Proceedings of the Sixteenth California Symposium, December, 1986, Sacramento, CA.

“Potential and Problems of Rapidly Pulsing Water Jets,” Proceedings of the Seventh International Symposium on Jet Cutting Technology, June 1984, Ottawa, Canada.

“Visualization of the Central Core of High-Speed Water Jets—An Infrared Technique,” Proceedings of the Second U. S. Water Jet Symposium, May 1983, Rolla, Missouri, with J. B. Cramer.

“Standoff Distance Improvement Using Percussive Jets,” Proceedings of the Second U. S. Water Jet Symposium, May 1983, Rolla, MO.

“Development of Large-Diameter Percussive Jets,” Proceedings of First U. S. Water Jet Symposium, April 6-9, 1981, Golden, CO.

“Percussive Water Jets for Rock Cutting,” presented at the 3<sup>rd</sup> International Symposium on Jet Cutting Technology, May 11-13, 1976, Chicago, IL, with S. E. Rodriguez.

“Percussive Water Jets for Rock Cutting,” Proceedings of the Research Workshop on the Application of High Pressure Water Jet Cutting Technology, November 10-11, 1975, University of Missouri-Rolla, Rolla, MO, with S. E. Rodriguez.

“The Free Vortex Recovery of Floating Oil,” Proceedings of the 1973 Joint Conference on the Prevention and Control of Oil Spills, API, EPA, and USCG, March 13-15, Washington, D.C., with S. E. Rodriguez and P. G. Mikolaj.

“The First Two Years are Critical,” Presented at Second Joint A.I.Ch.E. – I.I.Q.P.R. Meeting, Tampa, FL, May 1968, and published in Chem. Eng. Prog., 64, 36 (1968).

“Interfacial Energy and Mass Transfer in a Binary Liquid-Vapor System,” presented at Physicochemical Hydrodynamics and Transport Phenomena Symposium at 60<sup>th</sup> Annual Meeting of A.I.Ch.E., New York City, NY, November 1971.

“Experimental Study of Chemical Coupling,” presented at 58<sup>th</sup> Annual Meeting of A.I.Ch.E., Philadelphia, December 1965, and published in I&EC Fund., 5, 310 (1966), with C. J. Pings.



Thermodynamics of Chemical Coupling," presented at 56<sup>th</sup> Annual Meeting of A.I.Ch.E., Houston, TX, December 1963, and published in I&EC Fund., 4, 376 (1965).

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**PROOF OF SERVICE (C.C.P. §1013a, 2015.5)**

I am employed in the County of Kern, State of California. I am over the age of 18 and not a party to the within action; my business address is 1810 Westwind Drive, Bakersfield, CA 93301.

On November 12, 2021, I served the foregoing document(s) entitled:

**DECLARATION OF EUGENE B. NEBEKER RE OPPOSITON BY THE ZAMRZLA'S TO THE WATERMASTER'S MOTION FOR MONETARY, DECLARATORY AND INJUCNTIVE RELIEF AGAINST ZAMRZLA'S**

X by placing    the original, X a true copy thereof on all interested parties.

X **BY ELECTRONIC SERVICE:**  
I posted the document(s) listed above to the Santa Clara Superior Court Website @ [www.scefiling.org](http://www.scefiling.org) and Glotrans website in the action of the Antelope Valley Groundwater Cases.

X (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on November 12, 2021, at Bakersfield, California.

  
SERENA BRAVO