

LAS POSAS BASIN POLICY ADVISORY COMMITTEE MEETING

NOTICE OF MEETING

NOTICE IS HEREBY GIVEN that the Las Posas Basin Policy Advisory Committee (PAC) will hold a REMOTE-ONLY meeting at 3:00 P.M. on Thursday, August 7, 2025.

via ZOOM:

<https://us06web.zoom.us/j/84816327542?pwd=Y-bN4zt674FOphU6wRyxXw9swYTqvA.9bNuXf3yWWBZyrae>

Webinar ID: 848 1632 7542 | Passcode: 400774

AGENDA

A. Call to Order

B. Roll Call

C. Agenda Review

D. Public Comments

E. PAC Member Comments

F. Regular Agenda

1. Approve the Minutes of the July 17, 2025 Regular Meeting

2. Calleguas In-Lieu Program Memo

On February 7, 2025, the PAC addressed a letter to the Watermaster declaring its support for two of the programs listed in the draft Basin Optimization Plan: the Least-Cost Acquisition Program and the Calleguas In-Lieu Program. The PAC recommended that Watermaster staff work with Calleguas and pertinent pumpers to develop proposals for the two programs.

In response, Calleguas has, with input from Zone Mutual Water Company, Ventura County Waterworks Districts Nos. 1 and 19, representatives from agricultural Constituency Groups, and FCGMA/Watermaster staff, prepared the attached memo describing the path to implement an in-lieu replenishment program.

The PAC will discuss the program as described in the memo. No action is required at this meeting; the memo will be brought back at a future PAC meeting for approval and official recommendation.

3. Use of Groundwater by Mutual Water Company Shareholders without a Water Right Allocation

On July 31, Watermaster submitted the attached memo requesting PAC Consultation regarding the use of groundwater by mutual water company shareholders who do not hold a water right allocation.

G. PAC Subcommittee Reports

PAC representatives on subcommittees will provide reports

1. Operations Subcommittee
2. Executive Subcommittee
3. Fiscal Subcommittee
4. TAC Subcommittee

H. Written Communication

None

I. Future Agenda Items

The PAC will consider items for future agendas.

J. Adjourn

Attachments

F-1. PAC 2025-07-17 Meeting Minutes

F-2. Draft Calleguas In-Lieu Program Memo

F-3a. Committee Consultation Request

F-3b. Ex. A – WY2023 Zone Mutual Water Company Groundwater Extraction and Use Report

F-3c. Ex. B – July 2025 Zone Letter

F-3d. Ex. C – March 2025 Warren Email

LAS POSAS VALLEY BASIN POLICY ADVISORY COMMITTEE

Meeting Minutes for July 17, 2025

The Las Posas Valley Basin Policy Advisory Committee (PAC) held a regular hybrid meeting at 3:00 PM on Thursday, July 17, 2025, at Calleguas Municipal Water District, 2100 Olsen Road, Thousand Oaks, CA, and via Zoom.

A. Call to Order: Chair Ian Prichard called the meeting to order at 3:06 PM.

B. Roll Call

The following PAC members were present:

1. Calleguas Municipal Water District – Ian Prichard, Chair
2. West Las Posas Large Agriculture – Rob Grether, Vice-chair (via Zoom)
3. Zone Mutual Water Company – John Menne (via Zoom)
4. Commercial – Art Aseo (via Zoom)
5. East Las Posas Large Agriculture – David Schwabauer (via Zoom)
6. East Las Posas Mutual Water Company – Laurel Servin (via Zoom)
7. West Las Posas Small Agriculture – Richard Cavaletto
8. Watermaster (non-voting) – Farai Kaseke (via Zoom)

The following PAC members were absent:

1. Ventura County Waterworks Districts 1 and 19 – Jeff Palmer
2. East Las Posas Small Agriculture
3. West Las Posas Mutual Water Company – Steven Murata

C. Agenda Review: There were no agenda review items raised by the committee or the public.

D. Public Comments

1) Doug Homze, a local grower, made two comments:

a. Through his research and discussion with an LPV Watermaster staff member, Mr. Homze reported that he determined that water in the Epworth Gravels Aquifer is not included in the LPV Judgment Basin Allocation calculations. Mr. Homze asked the PAC to raise and clarify this issue with the LPV Watermaster/FCGMA Board.

b. During a recent FCGMA board meeting that Mr. Homze attended, he noted that PAC Vice-chair Grether addressed the LPV Watermaster/FCGMA Board regarding a pending issue concerning Del Norte Mutual Water Company. Mr. Homze reported that Mr. Grether asked the Board to re-submit the issue for PAC consultation and recommendation; Mr. Homze expressed regret that Mr. Grether would make this request, as a shareholder in Del Norte Mutual Water Company, when he did not make a similar request for the issue raised by Mr. Homze and others who are seeking allocations post-Adjudication.

2) Reddy Pakala, Calleguas board member and FCGMA alternate board member, greeted the PAC and attendees.

E. PAC Member Comments: There were no PAC member comments.

F. Regular Agenda

1. Approve the Minutes of the May 15, 2025, Regular PAC Meeting

Richard Cavaletto moved to approve the minutes as stated for the May 15, 2025, meeting; Vice-chair Grether seconded the motion. The motion passed with a vote of 7-Ayes; 0-Nays; 0-Abstentions; 3-Absent.

2. Calleguas ASR Project Operations Study Group: Landowner Representative

Section 8.4 of the Judgment provides that “the Calleguas ASR Study Group will be assigned to develop recommendations for the Calleguas ASR Project Operations Plan.” The Study Group consists of equal representation from the FCGMA, Calleguas, and the Landowners. The FCGMA has appointed Rob Hampson as its representative, Calleguas has appointed Bryan Bondy, and the Landowners have appointed Bob Abrams. While the work of the ASR Project Operations Plan will be borne by the FCGMA (20%) and Calleguas (80%), Section 8.4.7 of the Judgment states that “Parties shall bear their own costs for attendance at meetings and analysis of completed work.”

The PAC has determined that the simplest collection method for Landowners to pay required costs for representation on the ASR Study Group is via the Basin Assessment and LPV Watermaster has requested a formal recommendation report to document this proposal. A draft Recommendation Report letter stating as much was reviewed by the PAC.

A discussion ensued about the expected number of hours and associated costs for the Landowners’ representative to attend meetings and to analyze all completed work. LPV Watermaster estimated \$10,000 per FY for their ASR Project Operations Study Group representative, but this number may change once the group begins its work. LPV Watermaster Farai Kaseke agreed to provide the PAC with the number of hours and any other variables that were used to estimate the \$10,000 number for the FY2025-26 budget. Allowing for variance in salary and other requirements, the PAC elected to add a clause to the Recommendation Report stating that the salary for the Landowners’ representative would not exceed \$25,000/FY and this cost should be reflected as a separate line item on the LPV Watermaster annual budget.

Richard Cavaletto made a motion to authorize the agreed upon changes to the Recommendation Report and to submit the report to LPV Watermaster. Laurel Servin seconded the motion which passed with a vote of 7-Ayes; 0-Nays; 0-Abstentions; 3-Absent.

The PAC may consider making a separate policy recommendation to perform a quarterly review of the work performed by the study group and the Landowners’ representative.

3. Watermaster FY2025-26 Budget

Vice-chair Grether attended the LPV Watermaster Fiscal Committee meeting where the updated draft LPV Watermaster budget for FY 2025-26 was reviewed and discussed. The following observations were reported to the PAC:

- a. Chair Prichard complimented LPV Watermaster and FCGMA staff for their great work in preparing this FY2025-26 budget; he stated that the budget is thorough and transparent

and the presentation is clear. He thanked LPV Watermaster for collaborating with the PAC and considering the many requested changes submitted by the PAC.

- b. The FY2025-26 budget is considered conservative and LPV Watermaster and the PAC will continue to look for additional cost reduction opportunities throughout the year.
- c. After deliberation at the Fiscal Committee meeting, it was determined that the LPV Watermaster has collected adequate Basin Assessments to meet operating and reserve needs for the current water year. The Fiscal Committee is expected to recommend cancellation of the fourth quarter Basin Assessment for the LPV Basin in the current water year. This will be presented for adoption to the LPV Watermaster / FCGMA Board at the regular monthly FCGMA Board Meeting on July 23, 2025.
- d. In connection with the revised budget and anticipated reduced costs for the next fiscal year, Vice-chair Grether recommended a reduction in the annual Basin Assessment amount for the 2025-26 water year to \$60.00 per acre-foot of Annual Allocation Basis (from the proposed \$64/AF). This proposal will be presented to the LPV Watermaster / FCGMA Board for ratification at the regular monthly FCGMA Board Meeting on July 23, 2025.

G. PAC Subcommittee Reports

1. Operations Subcommittee: No meeting; nothing to report.
2. Executive Subcommittee: No meeting; nothing to report.
3. Fiscal Subcommittee: Report was given during Agenda item F.3.
4. TAC Subcommittee: No meeting; nothing to report.

H. Written Communication: None.

I. Future Agenda Items

1. Laurel Servin asked to revisit the reporting protocol and enforcement efforts that are being implemented by LPV Watermaster for local landowners who are not registered with FCGMA or paying fees, and are continuing to pump large amounts of water which will affect Basin sustainability.

J. Adjournment

Prior to adjournment, Chair Prichard announced that issues with the automated PAC meeting notification calendar have been fixed and PAC members and panelists should expect new calendar/meeting requests from him which should populate the dates correctly in users' calendars upon acceptance. There are no planned changes to the calendar dates which were adopted on the 2025 PAC meeting schedule.

Chair Prichard adjourned the meeting at 3:56 PM, until the next regular hybrid PAC meeting which is scheduled for August 7, 2025, at 3:00 PM.

RAUL AVILA, PRESIDENT
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REDDY PAKALA, SECRETARY
DIVISION 3

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DIVISION 2



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DIVISION 4

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DIVISION 5

KRISTINE MCCAFFREY
GENERAL MANAGER

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TO: Las Posas Valley Basin Watermaster

DATE: June 25, 2025

FROM: Ian Prichard, Deputy General Manager

RE: DRAFT In-Lieu Programs for the Las Posas Valley Basin Watermaster

On February 7, 2025, the Las Posas Valley Basin Watermaster Policy Advisory Committee (PAC) addressed a letter to the Watermaster declaring its support for two of the programs listed in the draft Basin Optimization Plan (BOP): the Least-Cost Acquisition Program and the Calleguas Municipal Water District (Calleguas) In-Lieu Program. The PAC recommended that Watermaster staff work with Calleguas and pertinent pumpers to develop proposals for the two programs.

In response, Calleguas has, with input from Zone Mutual Water Company (MWC), Ventura County Waterworks Districts (VCWWD) Nos. 1 and 19, and representatives from agricultural Constituency Groups in the East and West Las Posas Management Areas, prepared this memo describing the path to implement a program to replenish the Las Posas Valley Groundwater Basin (LPV Basin) via in-lieu deliveries of imported water. The memo provides pertinent background, describes key constraints and differences from previous in-lieu programs in the area, and recommends solutions.

From a high-level perspective, it is straightforward: Calleguas purveyors in the LPV, who already receive imported water and pump groundwater, would simply receive additional imported water and pump less groundwater. Watermaster would pay the difference between the cost of Calleguas's imported water and a purveyor's pumping costs, with the unpumped allocation staying in the ground as replenishment water.

The infrastructure to accomplish the additional imported water deliveries exists and is currently functional. The Judgment provides the institutional mechanism: Section 5.6 states that, "Watermaster may compel a Water Right Holder to take delivery of In Lieu Water as a substitute for the Use of the Water Right Holder's Annual Allocation... provided that... such substitution will not

adversely and materially affect the quality of the Party's water supply or their cost of operation." The quality of Calleguas's water supply is not an issue. All that remains is an administrative process to render in-lieu deliveries from Calleguas cost-neutral, which would occur through Watermaster's subsidization, with funds generated by the Basin Assessment, of the difference between a Party's cost to pump groundwater and the Tier 1 cost of Calleguas water.

General Background

Calleguas is a wholesale water provider operating in southeastern Ventura County. Calleguas sources water from the Metropolitan Water District of Southern California (Metropolitan) through a connection in Chatsworth. Metropolitan is a State Water Project Contractor. Calleguas's and Metropolitan's boundaries in Ventura County are coterminous.

Calleguas delivers imported water to 19 retail water providers (purveyors). These deliveries are made through 98 "turnouts": large meter stations that can be operated on demand or in automatic "float" mode. All purveyors have points of connection to the Calleguas system.

In the LPV Basin, Calleguas purveyors include Crestview MWC, California-American Water Company, Solano Verde MWC, Zone MWC, and VCWWD-19 in the West Las Posas Management Area (WLPMA); VCWWD-1, VCWWD-19, Zone MWC, and Berylwood Heights MWC in the East Las Posas Management Area (ELPMA). Zone and VCWWD-19 straddle the two management areas.

Because the LPV groundwater adjudication was conducted pursuant to both *in personam* and *in rem* jurisdiction, Calleguas and all its purveyors in the LPV Basin are party to the Judgment. Metropolitan is not.

A number of other mutual water companies and individual landowners who are not Calleguas purveyors produce groundwater from the LPV Basin. These are also party to the Judgment pursuant to the Court's *in rem* jurisdiction.

A portion of the western LPV Basin, approximately 10 percent by land area, is outside Calleguas's service area boundary. Mutual water companies and landowners in this area of the western WLPMA are inside the United Water Conservation District (United) boundary. Properties located within the boundary hold approximately 17 percent of the LPV Annual Allocation, or **6,795.86 AF** of the 40,000 AF in Water Year (WY) 2025. United is within the Ventura County Watershed Protection District State Water Contractor area and recharges the LPV Basin in the western WLPMA, in part with State Water Project water it brings down the Santa Clara River. However, United currently has no means of delivering water directly to any WLPMA property.

Over the last ten years, Calleguas has delivered approximately 8,000 AFY on average to its customers in the LPV Basin. Calleguas's ten-year average deliveries to its entire service area, both within and outside the LPV Basin, are approximately 83,000 AFY. Deliveries peaked at approximately 128,000 AFY in the 2006-2008 period. Barring an extended, extreme dry period, such as the region experienced in 2020-2022, Calleguas anticipates having sufficient supply from Metropolitan to meet the additional demand of the proposed in-lieu program.

ASR Wellfield

Calleguas owns and operates the Las Posas Aquifer Storage and Recovery (ASR) Wellfield in the ELPMA, which provides a mechanism to inject and extract stored imported water as a backup water supply source for Calleguas's customers. Built in the 1990s and early 2000s, the Wellfield consists of 18 injection/extraction wells (plus a 19th for extraction only at a nearby location that will return to service in the next couple years), a disinfection facility, and a 5-million-gallon aboveground reservoir. One hundred percent of the water injected at the Wellfield is imported water. From 1993 to 2022, the Wellfield went through two large storage and recovery phases. As of this writing, Calleguas has approximately 23,000 AF of water stored at the Wellfield. Calleguas's storage account has never gone negative.

The Judgment provides that Calleguas's operation of the Wellfield is intended as a water source for Calleguas customers under four scenarios: a maintenance outage; in response to shortages per Water Code section 10632(a)(3)(A); a catastrophic system outage; and regular Wellfield operation and maintenance. (See Judgment at Section 8.3.) Additional uses of the Wellfield are to be explored in the Calleguas ASR Project Operations Plan required by the Judgment's Section VIII. The Calleguas ASR Project Operations Plan will include, among other subjects, evaluation of the use of in-lieu deliveries "more optimally to achieve Basin management objectives."

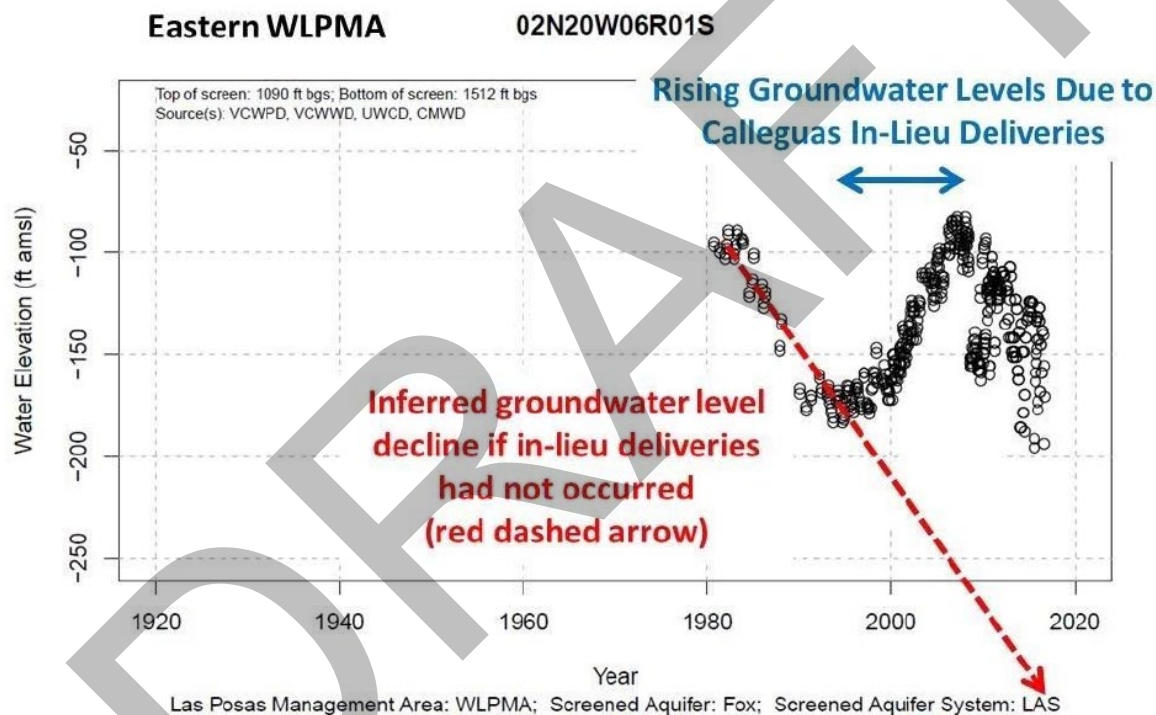
Previous In-Lieu Programs

Between 1994 and 2016, Calleguas and its purveyors across the LPV Basin collaborated on in-lieu programs. Each of these programs was administered by a separate agreement between Calleguas and the purveyor that was approved by the Fox Canyon Groundwater Management Agency (FCGMA). The purveyor would reduce or stop groundwater production, Calleguas would deliver imported water to meet the purveyor's needs, and their unused groundwater would be banked in Calleguas's name.

As of this writing, Calleguas has approximately 31,540 AF of groundwater credits stored in the LPV Basin through these programs. (This is separate from imported water stored through injection at the Wellfield.) Approximately 80% of existing credits are stored in the WLPMA and the majority of those were accumulated through an agreement between Calleguas and VCWWD No. 19. All of

these previous in-lieu programs were straightforward in that only Calleguas and its purveyor were involved (with approval from the FCGMA). Calleguas maintains and reports to the FCGMA its credit account balance. Calleguas has not recovered any of the stored water in the WLPMA (a total of approximately 25,192 AF of credits).

The existing groundwater monitoring network demonstrated positive responses in groundwater levels in areas where groundwater pumping was suspended during these programs. The graph below, which was included in an April 18, 2018 Calleguas comment on the November 2017 preliminary draft of the Las Posas Valley Basin Groundwater Sustainability Plan, demonstrates the positive impact of in-lieu deliveries from the mid-1990s through the late 2000s on groundwater levels in the eastern WLPMA. The groundwater monitoring network continues to function today.



Proposed Watermaster In-Lieu Program

As Calleguas understands the proposal for an in-lieu program described in the Judgment, replenishment fees raised by the LPV Basin assessment would pay for imported deliveries to Calleguas purveyors in the LPV Basin, who also pump groundwater, in lieu of them pumping. Physically, this is the same mechanism as the previous in-lieu programs described above. The purveyor would reduce or stop pumping and Calleguas would deliver additional imported water. Purveyors control when to stop pumping and take in-lieu water and where within their system (if they have more than one turnout) they take deliveries. All the infrastructure that made previous

programs possible still exists and much of it is automatic. Institutionally, however, there are two key differences between these previous programs and the new program proposed here.

First, this in-lieu program is intended to directly offset pumping with a like amount of imported water to permanently conserve that increment of pumping underground.

Second, the arrangements needed for the proposed in-lieu program would change. Instead of an agreement between the purveyor and Calleguas, there would need to be an arrangement between the purveyor and the Watermaster to offset the additional costs of the Calleguas water supply compared with pumped groundwater. All else being equal, the Watermaster would pay the purveyor the difference between the purveyor's cost to pump groundwater and the cost to purchase imported water from Calleguas (for example, currently, the Tier 1 rate in 2025 is \$1,895¹) and divide that cost over the total LPV Basin allocation in that year (40,000 AF in WY 2025). However, Section 7.9 of the Judgment provides that "Watermaster may reduce the amount of the Basin Assessment levied on Water Rights Holders that pay an assessment to UWCD if Watermaster determines, following Committee Consultation, that such a reduction is appropriate as a matter of equity." Water rights holders that pay assessment to UWCD hold 6,795.86 AF of "Allocation Basis" under the Judgment. Any offset of Basin Assessments authorized by Watermaster for these water rights holders would not be a full offset of the Basin Assessment, but rather only a partial offset reflective of the amount of the UWCD assessment that funds UCWD's replenishment activities. That amount cannot be readily determined for the purposes of this memorandum, but the potential for such a reduction is noted. Zone and VCWWD Nos. 1 and 19 are prepared to participate in this initial phase of the program. They are the only purveyors in the Las Posas Valley with wells in the two areas in which the GSA projects minimum threshold exceedances will occur. Recharging with in-lieu deliveries in these service areas would most efficiently maximize basin yield. They have also participated in Calleguas in-lieu programs from 1994-2008, shortening the runway to implementation, and have significant demand (>5,000 AFY from the LPV Basin), allowing for significant impact in any given year. Utilizing Calleguas's and FCGMA's existing groundwater monitoring networks, the impacts of the program on water levels will be measurable.

¹ The Tier 1 cost does not include the Capacity Charge (CC) or the Readiness to Serve (RTS) charge, both of which are a calculated rate charged to retailers based on flow and volume, respectively. The CC is intended to recover the cost of providing peaking capacity within the distribution system and is based on the calculated total average flow rate that occurs between May 1 and September 30. The CC can be significant and it is recommended that the in-lieu program be designed to operate in the low-demand period, between October 1 and April 30, to avoid incurring the CC. The RTS is intended to recover the principal and interest payments on Metropolitan's non-tax-supported debt service issued to fund capital improvements necessary to meet the continuing reliability and water quality needs associated with projected demands and is assessed on a ten-year rolling average of annual water purchases. How the RTS affects the cost of water will be determined on a case-by-case basis in concert with the retailer. Calleguas's rates are adjusted every January 1 and are available at the District website, www.calleguas.com.

Table 1, Replenishment Water Availability and Pumping Cost, includes the Allocation Basis of each of the four identified purveyors as listed in the Judgment’s Exhibit C. The column titled “Available for Replenishment” represents the amount of groundwater, on an annual basis, the purveyor estimates they can offset through in-lieu deliveries from Calleguas and leave in the LPV Basin as replenishment water. For the estimates in the next “Pumping Cost” column, purveyors provided pumping-cost estimates, for the purposes of this memo only, to give a sense of the scale of the program cost and the difference between purveyors. This “Available for Replenishment” column and the next “Pumping Costs” column were provided by VCWWD and Zone in April/May 2025 and should be considered “initial estimates” for demonstration purposes. Finally, the “Replenishment Cost” column simply subtracts the pumping cost from the Calleguas Tier 1 Rate. As Table 1 demonstrates, the higher the purveyor’s costs to pump groundwater, the lower the cost to the Watermaster of conserving that groundwater as replenishment water.

Table 1. Replenishment Water Availability and Pumping Cost					
Calleguas Purveyor	WY2024 Allocation (AF)	Available for Replenishment (AF)	Pumping Cost per AF	Calleguas Tier 1 Rate*	Replenishment Cost per AF*
VCWWD No. 1	2,548.44	2,161.76	\$800	\$1,895	\$1,095
VCWWD No. 19 – ELPMA	478.44	298.87	\$800		\$1,095
VCWWD No. 19 – WLPMA	1,905.72	1,191.05	\$800		\$1,095
Zone **	4,626	2,000	\$300		\$1,595
Total		5,651.68			
* Does not include CC and RTS as described in footnote 1.					
** Zone’s Allocation Basis is the aggregated exclusive shareholder allocations the mutual manages.					

An early draft of the Watermaster FY2025-26 budget included a \$50/AF replenishment fee that could have gone towards purchasing in-lieu water from Calleguas under this program. The fee was left out of the final FY2025-26 budget because the administrative process to collect a Basin Assessment from only a portion of the Water Rights Holders in the basin had not yet been developed. As discussed above, the Water Rights Holders in the western portion of the West Las Posas—representing 6,795.86 AF of Allocation Basis—would not be subject to the replenishment fee, in light of the equitable adjustment framework provided in Section 7.9 of the Judgment. Levying

a \$50/AF replenishment fee on the 33,804.14 AF of “participating” allocations² would provide just shy of \$1.7 million of funding for an “Initial Replenishment Fund.”

Table 2, Potential Replenishment Volumes, demonstrates how much water could be replenished through each participating purveyor. The fourth column, “AF of Replenishment,” divides that estimated “Initial Replenishment Fund” by the “Replenishment Cost” provided by each purveyor to demonstrate how many acre feet could be replenished through each participating purveyor with a \$50/AF replenishment fee.

Increasing the replenishment fee collected as part of the LPV Basin assessment could provide for additional replenishment water. The cost to maximize in-lieu deliveries to VCWWD Nos. 1 and 19 and leave their entire 3,651.68 AF of allocation in the ground in WY25 would be approximately \$3,998,590. Replacing all of Zone’s 2,000 AF would cost approximately \$3,190,000.

Table 2. Potential Replenishment Volumes			
Calleguas Purveyor	Initial Replenishment Fund	Replenishment Cost per AF*	AF of Replenishment
VCWWD No. 1	\$1,690,207	\$1,095	1,544
VCWWD No. 19 – ELPMA		\$1,095	1,544
VCWWD No. 19 – WLPMA		\$1,095	1,544
Zone		\$1,595	1,095
Replenishment Cost per AF = Calleguas Tier 1 (\$1,895 in 2025) minus Pumping Cost per AF			
* Does not include CC and RTS as described in footnote 1.			

Implementation

To put this program into effect, the following series of actions would need to occur.

1. Watermaster staff confirms ability to apply Calleguas In-Lieu Program replenishment fees to only “participating” WMIDs.
2. Watermaster creates “Initial Calleguas In-Lieu Replenishment Fee” line item in Watermaster budget, with the Board establishing an initial target replenishment volume.

² This memo does not consider the administrative mechanism by which Watermaster would need to adjust basin assessment billing to add this replenishment fee to only participating WMIDs.

Watermaster could fund this with surplus FY24-25 funds or collect it as part of the FY25-26 basin assessment. TAC and PAC are available for constituent input on this process, in addition to Watermaster Board and Committee meetings.

3. Watermaster, with TAC input, identifies key monitoring wells to be used to evaluate program impact, establishes baseline conditions, and creates a reporting mechanism, ideally included as a new component in the Groundwater Sustainability Plan Annual Report.
4. Watermaster develops arrangements with Zone and VCWWD Nos. 1 and 19 to offset specific amounts of allocation in WY25. The arrangements would:
 - a. Identify which wells would be used and where pumping would be reduced, with selections reviewed by the TAC;
 - b. Specify the amount of in-lieu deliveries to be debited from the participating pumper's annual allocation available to be pumped and include an acknowledgment that pumping above the remainder would incur an Overuse Assessment and that pumping under the remainder would result in accrual of Carryover
 - c. Specify the cost, per acre foot, of in-lieu imported water deliveries from Calleguas, including any ongoing charges by Calleguas triggered by their participation, to calculate the amount of subsidization necessary to offset the increased cost of using Calleguas water in lieu of groundwater
 - d. Include a mechanism to verify participants' cost to produce water, including power, chemical, and the avoidance of FCGMA extraction fees and Watermaster basin assessments, and assuring that costs not directly applicable to well operation are not included
5. Zone and VCWWD Nos. 1 and 19 increase deliveries from Calleguas to decrease groundwater production.
6. Upon confirmation of groundwater conservation, Watermaster pays the participant for the conserved groundwater.

Conclusion

Replenishing the LPV Basin through a Calleguas In-Lieu Program is a low-risk mechanism to conserve groundwater. While it would be a new Watermaster program, its efficacy has been

demonstrated many times over the last 30 years. The infrastructure is in place. Calleguas, Zone, and VCWWD are standing by.

A Calleguas In-Lieu Program supports sustainable groundwater management in the LPV Basin consistent with the Judgment. It is flexible. Initiate the program whenever it's needed. Ramp it up or down as hydrology demands and funding allows. Calleguas water may not be participants' cheapest source of water, but it is available under all but the most extreme conditions. Taking advantage of it now, or at least establishing the mechanism to do so, when conditions are favorable and the stakes are comparably low, will make it easier to do so again in the future.

Calleguas strives to support the Watermaster in this endeavor and in other efforts to achieve sustainability in the LPV Basin.

DRAFT

FOX CANYON GROUNDWATER MANAGEMENT AGENCY

LAS POSAS VALLEY WATERMASTER



MEMORANDUM

Date: July 31, 2025
To: Las Posas Valley Watermaster Policy Advisory Committee
From: Kudzai F. Kaseke, Assistant Groundwater Manager
Subject: Use of Groundwater by Mutual Water Company Shareholders Without a Water Right Allocation

Dear Las Posas Valley Watermaster Policy Advisory Committee (PAC):

The Las Posas Valley (LPV) Adjudication Judgment (collectively, the Judgment) determines and adjudicates all groundwater rights within the LPV Groundwater Basin (LPV Basin), “whether based on appropriation, overlying right, prescriptive right, or any other possible basis of right.” (Judgment, ¶ A; see also Judgment, ¶ H [“the case presents an adjudication with in personam and in rem jurisdiction, in which any and all groundwater rights as between each and all Parties is determined”]; § 3.4 [“This Judgment, and the Physical Solution decreed herein, comprehensively adjudicates, determines, defines, and allocates all rights to Use Groundwater...Extracted from the Basin”].) The Judgment prohibits all parties and persons “from Using Groundwater...Extracted from the Basin except as pursuant to this Judgment” and requires FCGMA, as the Watermaster for the LPV Basin, “to bring a motion before the Court to enforce this Judgment” if it “becomes aware of any unauthorized Use that is not promptly ceased at Watermaster’s instruction[.]” (Judgment, § 3.4.)

In addition to agricultural, commercial, and domestic water right allocations, the Judgment grants three types of Mutual Water Company Allocations: (1) Mutual Exclusive Shareholder Allocations, granted to shareholders that receive all of their groundwater from the mutual water company (rather than a private well); (2) Mutual Hybrid Shareholder Allocations, granted to shareholders that receive all or some of their groundwater from private wells and also hold shares in the mutual water companies; and (3) Mutual Water Company Allocations, granted to mutual water companies supplying water for agricultural use for water losses due to conveyance, system evaporation, fire flow, and other causes. (Judgment, §§1.65, 1.66, 1.68, 4.1, 4.7.) Nothing in the Judgment expressly grants a water right allocation to each shareholder of each mutual water company in the LPV Basin. Consequently, there are some shareholders that do not have a water right allocation under the Judgment.

The Judgment acknowledges the existence of these shareholders without a water right allocation. For example, the Judgment provides that Overuse occurs when groundwater is used by “a Party...that is not a Mutual Exclusive Shareholder...that either *has no Annual Allocation* or exceeds such Party’s Annual Allocation..., any Carryover, and any Groundwater to which such Party is entitled pursuant to a Subscription Project.” (Judgment, § 4.15.1.1 (emphasis added).) Similarly, when discussing the cure of overuse, the Judgment recognizes: “*In the case of Overuse by a Mutual Water Company’s Mutual Shareholders without an Annual Allocation*, the Overuse may be cured by: (i) acquisition of an Annual Allocation by Transfer; or (ii) the Mutual Water Company and the Mutual Shareholder agreeing to account for the Mutual Shareholder’s use from the Mutual Water Company’s Aggregate Mutual Supply.” (Judgment, § 4.15.2.3 (emphasis added).) So, although it does not grant water right allocations to some shareholders,

the Judgment anticipates – but does not expressly authorize – use of groundwater by these shareholders without an allocation.

In its Water Year (WY) 2023 groundwater extraction and use report, Zone Mutual Water Company (Zone) reported the delivery of water to Jason and Justin Kachan, as joint tenants [WMID 4246] (collectively, the Kachans). (Exhibit A.) Specifically, Zone reported that it delivered 19.590 AF of groundwater to the Kachans during WY2023. (Ibid.) When FCGMA processed Zone’s WY2023 reported extraction and use, it deducted the amount of groundwater delivered to the Kachans from Zone’s Aggregate Mutual Supply.¹ But during preparation of the Groundwater Sustainability Plan 2025 Annual Report Covering Water Year 2024 (October 1, 2023 – September, 30, 2024), Zone objected to the deduction from its Aggregate Mutual Supply and explained that its deliveries to the Kachans should not be deducted from Zone’s Aggregate Mutual Supply. Instead, Zone asserted that the Judgment allowed the Kachans to use groundwater without an allocation so long as the Kachans cured their overuse groundwater either (i) by acquiring water right allocation via the Judgment’s transfer processes or (ii) by Zone and the Kachans entering into an agreement to account for the Kachan’s use from Zone’s Mutual Aggregate Supply. (See Judgment, § 4.15.2.3.) Zone also claimed that its delivery of water to the Kachans did not violate the Judgment and that Watermaster’s only enforcement option was against the Kachans.

The treatment of groundwater extracted and used by “shareholders without an allocation,” as well as by the mutual water companies that deliver them groundwater, raises several issues under the Judgment. Most importantly, the matter raises the question whether there’s a distinction between “unauthorized use” and “overuse.” As explained above, the Kachans do not have a water right allocation under the Judgment, which is the “entitlement granted to a Party to Use Allocated Groundwater from the Basin.” (Judgment, § 1.8.) In the absence of any authority or right to extract and use groundwater, the use of groundwater by the Kachans is unauthorized. In contrast, Zone suggests that the Kachans’ use during WY2023 (October 1, 2023 – September 30, 2024) is overuse, and therefore must be cured in accordance with the Judgment by the Kachans paying an Overuse Assessment (because Zone has indicated that it is not willing to deduct the amount it delivered to the Kachans from its Mutual Aggregate Supply as provided in Section 4.15.2.3). (See Exhibit B.) But Watermaster is required to enforce the Judgment and seek judicial review of any “unauthorized Use that is not promptly ceased at Watermaster’s instruction[.]” (Judgment, § 3.4.) Because the Judgment enjoins and restrains “each and every Person and Party” “from Using Groundwater...Extracted from the Basin except pursuant to this Judgment” and the Kachans did not receive a water right allocation authorizing their “Use [of] Allocated Groundwater from the Basin” (Judgment, § 1.8, 3.4), the Kachans use of groundwater in WY2023 may be interpreted as unauthorized use and enjoined pursuant to Section 3.4 of the Judgment.

The “shareholder without allocation” issue also raises LPV Basin management and Watermaster administration concerns. Shareholders without allocation were not granted a water right allocation under the Judgment. But if shareholders without allocation are allowed to use groundwater, then some amount of groundwater use in excess of the operating yield established in the basin optimization yield study for the applicable water year should always be expected. But because shareholders without allocation did not receive a water right allocation under the Judgment, Watermaster cannot accurately determine the amounts that will be used by these shareholders in a given water year, cannot set annual operating yields that take into account these shareholders’ groundwater use, cannot set annual budgets that account for these shareholders’ water use, and cannot collect annual basin assessments from these shareholders.

¹ Under the Judgment, “Aggregate Mutual Supply” means “ the aggregated amount of Annual Allocation managed by a Mutual Water Company on behalf of its Mutual Exclusive Shareholders.” (Judgment, § 1.3.)

This interpretation of the Judgment affects Watermaster's ability to manage its finances and plan for sustainable management of the LPV Basin by 2040, resulting in all other water right holders paying increased annual basin assessments (because annual Watermaster costs are spread over fewer water right holders and thus fewer acre feet per year). (See Judgment, § 4.9.1.) These issues are exacerbated by Zone's position that the water it delivers to its shareholder without an allocation should not be deducted from Zone's Aggregate Supply. Put another way, if the use of groundwater by shareholders without allocation is not taken out of the Mutual Aggregate Supply of the mutual water company that delivered the groundwater, then mutual water companies may accrue increased amounts of Carryover Allocation for groundwater they extracted and delivered to one of their shareholders, creating or exacerbating Watermaster's ability to sustainably management the LPV Basin – especially in dry years when the exercise of Carryover Allocation is likely to increase stress on the basin.

Finally, Zone asserts that the Judgment was crafted to avoid requiring mutual water companies to amend their corporate organizational documents and bylaws in order to implement the Judgment. (See Exhibit C.) This may be the case. However, under the Judgment, shareholders without an allocation do not have a right to use groundwater and mutual water companies have no authority to assist another party's or person's unauthorized use of groundwater in violation of the Judgment. However, as noted above, under the Judgment, a mutual water company can enter into an agreement with a shareholder without an allocation to account for the shareholder's use of groundwater from the mutual water company's Aggregate Mutual Supply.

CONSULTATION REQUEST

Pursuant to Section 6.3 of the LPV Adjudication judgment, Watermaster requests the PAC provide its recommendations on the following:

1. The Kachans' Use of Groundwater. The Judgment determines and adjudicates all groundwater rights to the LPV Basin, and in turn enjoins and restrains the use of groundwater except as provided in the Judgment. These rights authorize parties to extract and use groundwater from the LPV Basin. The Kachans were not granted a water right allocation, but they used groundwater during WY2023 without a water right allocation. Should the Kachans (and shareholders without an allocation like them) be allowed to use groundwater without a water right allocation? Or should the Kachans (and shareholders like them) be enjoined (legally prohibited) from using groundwater without an allocation?
2. Overuse Assessment. At the June 25, 2025 Fox Canyon Groundwater Management Agency (FCGMA) Board of Directors meeting, the Board, acting as Watermaster for the LPV Basin, adopted Resolution No. 2025-03 to establish the amount of the Overuse Assessment equal to the Calleguas Municipal Water District's Tier 1 water rate (approximately \$2,000/AF). Should Watermaster levy an Overuse Assessment against the Kachans (and other shareholders without an allocation) for their use of groundwater during WY2023 without a water right allocation even if the groundwater was delivered to them as a shareholder of a Mutual Water Company?
3. Zone Mutual Water Company's Delivery of Groundwater. Zone's delivery of water to the Kachans did not violate any express provision of the Judgment. But the Kachans could not have used groundwater but for Zone's delivery. In essence, Zone's delivery is assisting the Kachans' violation of the Judgment. If your committee recommends that the Kachans (and shareholders without an allocation like them) should not be allowed to use groundwater without an allocation, then should

Las Posas Valley Policy Advisory Committee

RE: Use of Groundwater by Mutual Water Company Shareholders Without a Water Right Allocation

July 31, 2025

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Zone (and other mutual water companies with shareholders without an allocation) be enjoined (legally prohibited) from delivering water to the Kachans (and other shareholders without an allocation)?

An item regarding this issue will be included on an upcoming FCGMA Board of Directors (acting as the Watermaster Board) meeting agenda. Watermaster requests your committee's recommendations and feedback via the email below by August 22, 2025.

Please contact me at 805 654 2010 or LPV.Watermaster@venturacounty.gov with any questions or concerns.

Attachments

Exhibit A – WY2023 Zone Mutual Water Company Groundwater Extraction and Use Report

Exhibit B – July 25, 2025 Zone Mutual Water Company Letter

Exhibit C – March 14, 2025 Jeff Warren/Zone Mutual Water Company Counsel Email

Las Posas Valley Watermaster Semi-annual Extraction and Use Report - Due July 3, 2024

1. Background

1. Water Management Identification Number (WMID) as defined in [Exhibit C](#) of the Judgement
Enter numeric of 4 digits

4200

2. Party Name

Zone Mutual Water Company

3. Type of Reporting Party

Mutual Water Company

2. Extraction Reporting - Mutual Water Company

How many wells are owned by shareholder of the WMID indicated in the previous page and supply groundwater to parcels identified in the WMID?

10

3. Well #1 - Extraction and Flow Meter Measurement Data - Mutual Water Company

State Well Number

02N20w09R01

Was a new or refurbished meter installed during this reporting period?

No

Meter Manufacturer

McCrometer

Meter Model

N/A

Meter Serial Number

03-07921-10

Unit of Measure

Acre Feet (AF)

Start Meter Read on 10/1/2023

980.670

End Meter Read on 3/31/2024

986.049

Difference Between Start and End Meter Reads

5.379

Unit Conversion Factor (to AF)

Acre Feet (AF): x1

Total AF Extraction

5.379

Estimated Groundwater Use in AF
For use during meter failure

0

Provide method of computing estimated extractions occurring during meter failure, including dates of meter failure.

N/A

Do you have a photo of the start meter read?

Yes

Upload Photos of Start Meter Read

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your files according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[02N20W09R01\(10\)-0-WM.JPG](#)

Comments:

Upload Photos of End Meter Read

If you do not have photos, please take photos as soon as possible.

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your file according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[02N20W09R01\(10\)-4-WM.JPG](#)

Comments:

4. Well #2 - Extraction and Flow Meter Measurement Data - Mutual Water Company

State Well Number

02N20W09F01

Was a new or refurbished meter installed during this reporting period?

No

Meter Manufacturer

McCrometer

Meter Model

N/A

Meter Serial Number

03-07502-08

Unit of Measure

Acre Feet (AF)

Start Meter Read on 10/1/2023

2326.000

End Meter Read on 3/31/2024

2458.788

Difference Between Start and End Meter Reads

132.788

Unit Conversion Factor (to AF)

Acre Feet (AF): x1

Total AF Extraction

132.788

**Estimated Groundwater Use in AF
For use during meter failure**

0

Provide method of computing estimated extractions occurring during meter failure, including dates of meter failure.

N/A

Do you have a photo of the start meter read?

Yes

Upload Photos of Start Meter Read

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your files according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[02N20W09F01\(12\)-2-WM.JPG](#)

Comments:

Upload Photos of End Meter Read

If you do not have photos, please take photos as soon as possible.

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your file according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[02N20W09F01\(12\)-3-WM.JPG](#)

Comments:

5. Well #3 - Extraction and Flow Meter Measurement Data - Mutual Water Company

State Well Number

02N20W08F01

Was a new or refurbished meter installed during this reporting period?

No

Meter Manufacturer

McCrometer

Meter Model

N/A

Meter Serial Number

06-00623-10

Unit of Measure

Acre Feet (AF)

Start Meter Read on 10/1/2023

7107.441

End Meter Read on 3/31/2024

7416.755

Difference Between Start and End Meter Reads

309.314

Unit Conversion Factor (to AF)

Acre Feet (AF): x1

Total AF Extraction

309.314

Estimated Groundwater Use in AF**For use during meter failure**

0

Provide method of computing estimated extractions occurring during meter failure, including dates of meter failure.

N/A

Do you have a photo of the start meter read?

Yes

Upload Photos of Start Meter Read

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your files according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[02N20W08F01\(13\)-1-WM.JPG](#)

Comments:

Upload Photos of End Meter Read

If you do not have photos, please take photos as soon as possible.

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your file according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[02N20W08F01\(13\)-0-WM.JPG](#)

Comments:

6. Well #4 - Extraction and Flow Meter Measurement Data - Mutual Water Company

State Well Number

02N20W09Q05

Was a new or refurbished meter installed during this reporting period?

No

Meter Manufacturer

Water Specialties

Meter Model

N/A

Meter Serial Number

20081552-06

Unit of Measure

Acre Feet (AF)

Start Meter Read on 10/1/2023

878.937

End Meter Read on 3/31/2024

887.410

Difference Between Start and End Meter Reads

8.473

Unit Conversion Factor (to AF)

Acre Feet (AF): x1

Total AF Extraction

8.473

**Estimated Groundwater Use in AF
For use during meter failure**

0

Provide method of computing estimated extractions occurring during meter failure, including dates of meter failure.

N/A

Do you have a photo of the start meter read?

Yes

Upload Photos of Start Meter Read

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your files according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[02N20W09Q05\(14\)-3-WM.JPG](#)

Comments:

Upload Photos of End Meter Read

If you do not have photos, please take photos as soon as possible.

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your file according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[02N20W09Q05\(14\)-5-WM.JPG](#)

Comments:

7. Well #5 - Extraction and Flow Meter Measurement Data - Mutual Water Company

State Well Number

02N20W08Q01

Was a new or refurbished meter installed during this reporting period?

No

Meter Manufacturer

McCrometer

Meter Model

N/A

Meter Serial Number

17-01412-08

Unit of Measure

Acre Feet (AF)

Start Meter Read on 10/1/2023

645.898

End Meter Read on 3/31/2024

736.618

Difference Between Start and End Meter Reads

90.720

Unit Conversion Factor (to AF)

Acre Feet (AF): x1

Total AF Extraction

90.720

**Estimated Groundwater Use in AF
For use during meter failure**

0

Provide method of computing estimated extractions occurring during meter failure, including dates of meter failure.

N/A

Do you have a photo of the start meter read?

Yes

Upload Photos of Start Meter Read

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your files according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[02N20W08Q01\(15\)-0-WM.JPG](#)

Comments:

Upload Photos of End Meter Read

If you do not have photos, please take photos as soon as possible.

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your file according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[02N20W08Q01\(15\)-0-WM.JPG](#)

Comments:

8. Well #6 - Extraction and Flow Meter Measurement Data - Mutual Water Company

State Well Number

02N20W08E01

Was a new or refurbished meter installed during this reporting period?

No

Meter Manufacturer

McCrometer

Meter Model

N/A

Meter Serial Number

20032254-12

Unit of Measure

Acre Feet (AF)

Start Meter Read on 10/1/2023

7058.12

End Meter Read on 3/31/2024

7137.76

Difference Between Start and End Meter Reads

79.640

Unit Conversion Factor (to AF)

Acre Feet (AF): x1

Total AF Extraction

79.640

Estimated Groundwater Use in AF

For use during meter failure

0

Provide method of computing estimated extractions occurring during meter failure, including dates of meter failure.

N/A

Do you have a photo of the start meter read?

Yes

Upload Photos of Start Meter Read

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your files according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[02N20W08E01\(17\)-5-WM.JPG](#)

Comments:

Upload Photos of End Meter Read

If you do not have photos, please take photos as soon as possible.

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your file according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[02N20W08E01\(17\)-7-WM.JPG](#)

Comments:

9. Well #7 - Extraction and Flow Meter Measurement Data - Mutual Water Company

State Well Number

02N20W08M01

Was a new or refurbished meter installed during this reporting period?

No

Meter Manufacturer

McCrometer

Meter Model

N/A

Meter Serial Number

09-02428-10

Unit of Measure

Acre Feet (AF)

Start Meter Read on 10/1/2023

6074.029

End Meter Read on 3/31/2024

6299.874

Difference Between Start and End Meter Reads

225.845

Unit Conversion Factor (to AF)

Acre Feet (AF): x1

Total AF Extraction

225.845

Estimated Groundwater Use in AF**For use during meter failure**

0

Provide method of computing estimated extractions occurring during meter failure, including dates of meter failure.

N/A

Do you have a photo of the start meter read?

Yes

Upload Photos of Start Meter Read

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your files according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[02N20W08M01\(18\)-7-WM.JPG](#)

Comments:

Upload Photos of End Meter Read

If you do not have photos, please take photos as soon as possible.

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your file according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[02N20W08M01\(18\)-2-WM.JPG](#)

Comments:

10. Well #8 - Extraction and Flow Meter Measurement Data - Mutual Water Company

State Well Number

02N20W09Q07

Was a new or refurbished meter installed during this reporting period?

No

Meter Manufacturer

McCrometer

Meter Model

N/A

Meter Serial Number

974059-12

Unit of Measure

Acre Feet (AF)

Start Meter Read on 10/1/2023

11200.83

End Meter Read on 3/31/2024

11321.03

Difference Between Start and End Meter Reads

120.200

Unit Conversion Factor (to AF)

Acre Feet (AF): x1

Total AF Extraction

120.200

**Estimated Groundwater Use in AF
For use during meter failure**

0

Provide method of computing estimated extractions occurring during meter failure, including dates of meter failure.

N/A

Do you have a photo of the start meter read?

Yes

Upload Photos of Start Meter Read

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your files according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[02N20W09Q07\(20\).JPG](#)

Comments:

Upload Photos of End Meter Read

If you do not have photos, please take photos as soon as possible.

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your file according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[02N20W09Q07_Well_20.pdf](#)

Comments:

11. Well #9 - Extraction and Flow Meter Measurement Data - Mutual Water Company

State Well Number

02N20w04R03

Was a new or refurbished meter installed during this reporting period?

Yes

Please enter the following information for the new meter that was installed for this well.

Meter Manufacturer

McCrometer

Meter Model

ML04D-12

Meter Serial Number

20231901-12

Unit of Measure

Acre Feet (AF)

Start Meter Read on 10/1/2023

0.00

End Meter Read on 3/31/2024

5.75

Difference Between Start and End Meter Reads

5.75

Unit Conversion Factor (to AF)

Acre Feet (AF): x1

Total AF Extraction

5.750

**Estimated Groundwater Use in AF
For use during meter failure**

0

Provide method of computing estimated extractions occurring during meter failure, including dates of meter failure.

N/A

Meter Manufacturer

Seametrics

Meter Model

N/A

Meter Serial Number

052017001565

Unit of Measure

Acre Feet (AF)

Start Meter Read on 10/1/2023

2113.4067

End Meter Read on 3/31/2024

2409.0437

Difference Between Start and End Meter Reads

295.637

Unit Conversion Factor (to AF)

Acre Feet (AF): x1

Total AF Extraction

295.637

**Estimated Groundwater Use in AF
For use during meter failure**

12.073

Provide method of computing estimated extractions occurring during meter failure, including dates of meter failure.

Used meter readings from Nov 28, 2023 (date of failure) thru January 24, 2024 (date removed & new meter installed) and then added 13% for the estimated usage not captured by old flowmeter due to 87% accuracy.

Do you have a photo of the start meter read?

Yes

Upload Photos of Start Meter Read

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your files according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[02N20W04R03\(21\)-6-WM.JPG](#)

[Well_21-02N20W04R03_Start_New_Meter.pdf](#)

Comments:

Upload Photos of End Meter Read

If you do not have photos, please take photos as soon as possible.

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your file according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[02N20W04R03\(21\)_Old_Meter_Final.JPG](#)

[02N20W04R03\(21\)-1-WM.JPG](#)

Comments: Final reading on old meter & end read on new meter.

12. Well #10 - Extraction and Flow Meter Measurement Data - Mutual Water Company

State Well Number

02N20W07R03

Was a new or refurbished meter installed during this reporting period?

No

Meter Manufacturer

McCrometer

Meter Model

N/A

Meter Serial Number

93-10-7905

Unit of Measure

Acre Feet (AF)

Start Meter Read on 10/1/2023

4559.155

End Meter Read on 3/31/2024

4645.716

Difference Between Start and End Meter Reads

86.561

Unit Conversion Factor (to AF)

Acre Feet (AF): x1

Total AF Extraction

86.561

**Estimated Groundwater Use in AF
For use during meter failure**

0

Provide method of computing estimated extractions occurring during meter failure, including dates of meter failure.

N/A

Do you have a photo of the start meter read?

Yes

Upload Photos of Start Meter Read

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your files according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[02N20W07R03\(22\)-8-WM.JPG](#)

Comments:

Upload Photos of End Meter Read

If you do not have photos, please take photos as soon as possible.

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your file according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[02N20W07R03\(22\)-8-WM.JPG](#)

Comments:

33. Extraction Reporting - Mutual Water Company

What is the total amount of groundwater extracted by wells owned by the WMID?

1372.380

What is the total amount of groundwater (in AF) used by Mutual Exclusive Shareholders?

1005.485

34. Groundwater Deliveries to Other Parties - Mutual Water Company

Did you deliver groundwater to Mutual Hybrid Shareholders or any other Party?

Yes

How many Mutual Hybrid Shareholders did you deliver groundwater to?

13

Please list the WMID and the Total Groundwater delivered to the WMID.

Mutual Hybrid Shareholder #1

WMID

4263

Total Groundwater delivered (AF)

11.215

Mutual Hybrid Shareholder #2

WMID

1153

Total Groundwater delivered (AF)

22.926

Mutual Hybrid Shareholder #3

WMID

1025

Total Groundwater delivered (AF)

13.230

Mutual Hybrid Shareholder #4

WMID

1150

Total Groundwater delivered (AF)

0

Mutual Hybrid Shareholder #5

WMID

1003

Total Groundwater delivered (AF)

0

Mutual Hybrid Shareholder #6

WMID

1073

Total Groundwater delivered (AF)

71.736

Mutual Hybrid Shareholder #7

WMID

1001

Total Groundwater delivered (AF)

0.000

Mutual Hybrid Shareholder #8

WMID

1087

Total Groundwater delivered (AF)

43.614

Mutual Hybrid Shareholder #9

WMID

1115

Total Groundwater delivered (AF)

29.955

Mutual Hybrid Shareholder #10

WMID

1080

Total Groundwater delivered (AF)

68.322

Mutual Hybrid Shareholder #11

WMID

1037

Total Groundwater delivered (AF)

7.037

Mutual Hybrid Shareholder #12

WMID

1002

Total Groundwater delivered (AF)

42.740

Mutual Hybrid Shareholder #13

WMID

1099

Total Groundwater delivered (AF)

0

How many other parties did you deliver groundwater to?

4

Please list the WMID and the Total Groundwater delivered to the WMID.

Other Party #1

WMID

4223

Total Groundwater delivered (AF)

0

Other Party #2

WMID

4246

Total Groundwater delivered (AF)

3.690

Other Party #3

WMID

1122

Total Groundwater delivered (AF)

5.510

Other Party #4

WMID

1076

Total Groundwater delivered (AF)

20.245

35. Use Reporting - Mutual Water Company

Do you receive water from any other sources (e.g., another well, Mutual Water Company)?

No

46. Review and Sign - Mutual Water Company

Email Address

mandi@zonemutual.com

Check below when completed with review.

Survey Complete and Ready to Submit

I certify under penalty of perjury that the data and information included in this Semi-Annual Extraction and Use Report is true and correct.

A handwritten signature in black ink, appearing to read 'Mandi Freitas', with a stylized, flowing script.

Signature of: Mandi Freitas

Las Posas Valley Watermaster Semi-annual Extraction and Use Report - Due November 15, 2024

1. Background

1. Water Management Identification Number (WMID) as defined in [Exhibit C](#) of the Judgement
Enter numeric of 4 digits

4200

2. Party Name

Zone Mutual Water Company

3. Type of Reporting Party

Mutual Water Company

2. Extraction Reporting - Mutual Water Company

How many wells are owned by shareholder of the WMID indicated in the previous page and supply groundwater to parcels identified in the WMID?

10

3. Well #1 - Extraction and Flow Meter Measurement Data - Mutual Water Company

State Well Number

02N20W09R01

Was a new or refurbished meter installed during this reporting period?

No

Meter Manufacturer

McCrometer

Meter Model

Meter Serial Number

03-07921-10

Unit of Measure

Acre Feet (AF)

Start Meter Read on April 1, 2024

986.049

End Meter Read on September 30, 2024

997.871

Difference Between Start and End Meter Reads

11.822

Unit Conversion Factor (to AF)

Acre Feet (AF): x1

Total AF Extraction

11.822

**Estimated Groundwater Use in AF
For use during meter failure**

0

Do you have a photo of the start meter read?

Yes

Upload Photos of Start Meter Read

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your files according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[02N20W09R01\(10\)-4-WM.JPG](#)

Comments:

Upload Photos of End Meter Read

If you do not have photos, please take photos as soon as possible.

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your file according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[Well 10 02N20W09R01 093024.jpg](#)

Comments:

4. Well #2 - Extraction and Flow Meter Measurement Data - Mutual Water Company

State Well Number

02N20W09F01

Was a new or refurbished meter installed during this reporting period?

No

Meter Manufacturer

McCrometer

Meter Model

Meter Serial Number

03-07502-08

Unit of Measure

Acre Feet (AF)

Start Meter Read on April 1, 2024

2458.788

End Meter Read on September 30, 2024

2681.941

Difference Between Start and End Meter Reads

223.153

Unit Conversion Factor (to AF)

Acre Feet (AF): x1

Total AF Extraction

223.153

**Estimated Groundwater Use in AF
For use during meter failure**

0

Do you have a photo of the start meter read?

Yes

Upload Photos of Start Meter Read

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your files according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[02N20W09F01\(12\)-3-WM.JPG](#)

Comments:

Upload Photos of End Meter Read

If you do not have photos, please take photos as soon as possible.

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your file according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[Well 12 02N20W09F01 093024.jpg](#)

Comments:

5. Well #3 - Extraction and Flow Meter Measurement Data - Mutual Water Company

State Well Number

02N20W08F01

Was a new or refurbished meter installed during this reporting period?

No

Meter Manufacturer

McCrometer

Meter Model**Meter Serial Number**

06-00623-10

Unit of Measure

Acre Feet (AF)

Start Meter Read on April 1, 2024

7416.755

End Meter Read on September 30, 2024

7849.745

Difference Between Start and End Meter Reads

432.990

Unit Conversion Factor (to AF)

Acre Feet (AF): x1

Total AF Extraction

432.990

**Estimated Groundwater Use in AF
For use during meter failure**

0

Do you have a photo of the start meter read?

Yes

Upload Photos of Start Meter Read

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your files according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[02N20W08F01\(13\)-0-WM.JPG](#)

Comments:

Upload Photos of End Meter Read

If you do not have photos, please take photos as soon as possible.

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your file according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[Well_13_02N20W08F01_093024.jpg](#)

Comments:

6. Well #4 - Extraction and Flow Meter Measurement Data - Mutual Water Company

State Well Number

02N20W09Q05

Was a new or refurbished meter installed during this reporting period?

No

Meter Manufacturer

Water Specialties

Meter Model**Meter Serial Number**

20081552-06

Unit of Measure

Acre Feet (AF)

Start Meter Read on April 1, 2024

887.410

End Meter Read on September 30, 2024

900.214

Difference Between Start and End Meter Reads

12.804

Unit Conversion Factor (to AF)

Acre Feet (AF): x1

Total AF Extraction

12.804

**Estimated Groundwater Use in AF
For use during meter failure**

0

Do you have a photo of the start meter read?

Yes

Upload Photos of Start Meter Read

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your files according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[02N20W09Q05\(14\)-5-WM.JPG](#)

Comments:

Upload Photos of End Meter Read

If you do not have photos, please take photos as soon as possible.

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your file according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[Well 14_02N20W09Q05_093024.jpg](#)

Comments:

7. Well #5 - Extraction and Flow Meter Measurement Data - Mutual Water Company

State Well Number

02N20W08Q01

Was a new or refurbished meter installed during this reporting period?

No

Meter Manufacturer

McCrometer

Meter Model**Meter Serial Number**

17-01412-08

Unit of Measure

Acre Feet (AF)

Start Meter Read on April 1, 2024

736.618

End Meter Read on September 30, 2024

908.560

Difference Between Start and End Meter Reads

171.942

Unit Conversion Factor (to AF)

Acre Feet (AF): x1

Total AF Extraction

171.942

**Estimated Groundwater Use in AF
For use during meter failure**

0

Do you have a photo of the start meter read?

Yes

Upload Photos of Start Meter Read

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your files according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[02N20W08Q01\(15\)-0-WM.JPG](#)

Comments:

Upload Photos of End Meter Read

If you do not have photos, please take photos as soon as possible.

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your file according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[Well_15_02N20W08Q01_093024.jpg](#)

Comments:

8. Well #6 - Extraction and Flow Meter Measurement Data - Mutual Water Company

State Well Number

02N20W08E01

Was a new or refurbished meter installed during this reporting period?

No

Meter Manufacturer

McCrometer

Meter Model

Meter Serial Number

20032254-12

Unit of Measure

Acre Feet (AF)

Start Meter Read on April 1, 2024

7137.76

End Meter Read on September 30, 2024

7347.71

Difference Between Start and End Meter Reads

209.950

Unit Conversion Factor (to AF)

Acre Feet (AF): x1

Total AF Extraction

209.950

**Estimated Groundwater Use in AF
For use during meter failure**

0

Do you have a photo of the start meter read?

Yes

Upload Photos of Start Meter Read

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your files according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[02N20W08E01\(17\)-7-WM.JPG](#)

Comments:

Upload Photos of End Meter Read

If you do not have photos, please take photos as soon as possible.

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your file according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[Well 17 02N20W08E01_093024.jpg](#)

Comments:

9. Well #7 - Extraction and Flow Meter Measurement Data - Mutual Water Company

State Well Number

02N20W08M01

Was a new or refurbished meter installed during this reporting period?

No

Meter Manufacturer

McCrometer

Meter Model

Meter Serial Number

09-02428-10

Unit of Measure

Acre Feet (AF)

Start Meter Read on April 1, 2024

6299.874

End Meter Read on September 30, 2024

6718.916

Difference Between Start and End Meter Reads

419.042

Unit Conversion Factor (to AF)

Acre Feet (AF): x1

Total AF Extraction

419.042

**Estimated Groundwater Use in AF
For use during meter failure**

0

Do you have a photo of the start meter read?

Yes

Upload Photos of Start Meter Read

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your files according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[02N20W08M01\(18\)-2-WM.JPG](#)

Comments:

Upload Photos of End Meter Read

If you do not have photos, please take photos as soon as possible.

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your file according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[Well 18 02N20W08M01 093024.jpg](#)

Comments:

10. Well #8 - Extraction and Flow Meter Measurement Data - Mutual Water Company

State Well Number

02N20W09Q07

Was a new or refurbished meter installed during this reporting period?

No

Meter Manufacturer

McCrometer

Meter Model

Meter Serial Number

974059-12

Unit of Measure

Acre Feet (AF)

Start Meter Read on April 1, 2024

11321.03

End Meter Read on September 30, 2024

11727.43

Difference Between Start and End Meter Reads

406.40

Unit Conversion Factor (to AF)

Acre Feet (AF): x1

Total AF Extraction

406.400

**Estimated Groundwater Use in AF
For use during meter failure**

0

Do you have a photo of the start meter read?

Yes

Upload Photos of Start Meter Read

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your files according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[02N20W09Q07 Well 20.pdf](#)

Comments:

Upload Photos of End Meter Read

If you do not have photos, please take photos as soon as possible.

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your file according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[Well 20 02N20W09Q07 093024.jpg](#)

Comments:

11. Well #9 - Extraction and Flow Meter Measurement Data - Mutual Water Company

State Well Number

02N20W04R03

Was a new or refurbished meter installed during this reporting period?

No

Meter Manufacturer

McCrometer

Meter Model

ML04D-12

Meter Serial Number

20231901-12

Unit of Measure

Acre Feet (AF)

Start Meter Read on April 1, 2024

5.7500

End Meter Read on September 30, 2024

572.1100

Difference Between Start and End Meter Reads

566.3600

Unit Conversion Factor (to AF)

Acre Feet (AF): x1

Total AF Extraction

566.360

**Estimated Groundwater Use in AF
For use during meter failure**

0

Do you have a photo of the start meter read?

Yes

Upload Photos of Start Meter Read

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your files according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[02N20W04R03\(21\)-1-WM.JPG](#)

Comments:

Upload Photos of End Meter Read

If you do not have photos, please take photos as soon as possible.

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your file according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[Well_21_02N20W04R03_093024.jpg](#)

Comments:

12. Well #10 - Extraction and Flow Meter Measurement Data - Mutual Water Company

State Well Number

02N20W07R03

Was a new or refurbished meter installed during this reporting period?

No

Meter Manufacturer

McCrometer

Meter Model**Meter Serial Number**

93-10-7905

Unit of Measure

Acre Feet (AF)

Start Meter Read on April 1, 2024

4645.716

End Meter Read on September 30, 2024

4917.513

Difference Between Start and End Meter Reads

271.797

Unit Conversion Factor (to AF)

Acre Feet (AF): x1

Total AF Extraction

271.797

**Estimated Groundwater Use in AF
For use during meter failure**

0

Do you have a photo of the start meter read?

Yes

Upload Photos of Start Meter Read

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your files according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[02N20W07R03\(22\)-8-WM.JPG](#)

Comments:

Upload Photos of End Meter Read

If you do not have photos, please take photos as soon as possible.

Photos shall include: meter serial number, totalizer reading, totalizer units, and multiple displays (as needed for digital meters).

Please name your file according to the following format: StateWellNumber_MeterSerialNumber_YYYY_MM_DD-#

Example: 12345678_9999999_2023_10_31-1

[Well_22_02N20W07R03_093024.jpg](#)

Comments:

33. Extraction Reporting - Mutual Water Company

What is the total amount of groundwater extracted by wells owned by the WMID?

We have pulled in the AF Extracted from each well below. Just add ALL the values below to get your total extraction for wells owned by the WMID.

IMPORTANT:

You will only see data for the number of wells you entered. The total number of wells is referenced below. "Old meter" reading numbers only populated if the well meter was replaced. Otherwise, it will be blank, and you will only have a "new/only meter" read.

Total Wells Reported: 10

Well #1:	old meter: ,	new/only meter: 11.822
Well #2:	old meter: ,	new/only meter: 223.153
Well #3:	old meter: ,	new/only meter: 432.990
Well #4:	old meter: ,	new/only meter: 12.804
Well #5:	old meter: ,	new/only meter: 171.942
Well #6:	old meter: ,	new/only meter: 209.950
Well #7:	old meter: ,	new/only meter: 419.042
Well #8:	old meter: ,	new/only meter: 406.400
Well #9:	old meter: ,	new/only meter: 566.360
Well #10:	old meter: ,	new/only meter: 271.797
Well #11:	old meter: ,	new/only meter:
Well #12:	old meter: ,	new/only meter:
Well #13:	old meter: ,	new/only meter:
Well #14:	old meter: ,	new/only meter:
Well #15:	old meter: ,	new/only meter:
Well #16:	old meter: ,	new/only meter:
Well #17:	old meter: ,	new/only meter:
Well #18:	old meter: ,	new/only meter:
Well #19:	old meter: ,	new/only meter:
Well #20:	old meter: ,	new/only meter:
Well #21:	old meter: ,	new/only meter:
Well #22:	old meter: ,	new/only meter:
Well #23:	old meter: ,	new/only meter:
Well #24:	old meter: ,	new/only meter:
Well #25:	old meter: ,	new/only meter:
Well #26:	old meter: ,	new/only meter:
Well #27:	old meter: ,	new/only meter:
Well #28:	old meter: ,	new/only meter:
Well #29:	old meter: ,	new/only meter:
Well #30:	old meter: ,	new/only meter:

What is the total amount of groundwater (in AF) used by Mutual Exclusive Shareholders?

2011.771

34. Groundwater Deliveries to Other Parties - Mutual Water Company

Did you deliver groundwater to Mutual Hybrid Shareholders or any other Party?

Yes

How many Mutual Hybrid Shareholders did you deliver groundwater to?

10

Please list the WMID and the Total Groundwater delivered to the WMID.

Mutual Hybrid Shareholder #1

WMID

4263

Total Groundwater delivered (AF)

2.694

Mutual Hybrid Shareholder #2

WMID

1153

Total Groundwater delivered (AF)

43.646

Mutual Hybrid Shareholder #3

WMID

1073

Total Groundwater delivered (AF)

126.778

Mutual Hybrid Shareholder #4

WMID

1086

Total Groundwater delivered (AF)

1.687

Mutual Hybrid Shareholder #5

WMID

1087

Total Groundwater delivered (AF)

42.090

Mutual Hybrid Shareholder #6

WMID

1115

Total Groundwater delivered (AF)

80.006

Mutual Hybrid Shareholder #7

WMID

1080

Total Groundwater delivered (AF)

158.936

Mutual Hybrid Shareholder #8

WMID

1037

Total Groundwater delivered (AF)

83.012

Mutual Hybrid Shareholder #9

WMID

1099

Total Groundwater delivered (AF)

28.475

Mutual Hybrid Shareholder #10

WMID

1025

Total Groundwater delivered (AF)

11.441

How many other parties did you deliver groundwater to?

3

Please list the WMID and the Total Groundwater delivered to the WMID.

Other Party #1

WMID

1076

Total Groundwater delivered (AF)

65.856

Other Party #2

WMID

4246

Total Groundwater delivered (AF)

15.900

Other Party #3

WMID

1122

Total Groundwater delivered (AF)

10.450

35. Use Reporting - Mutual Water Company

Do you receive water from any other sources (e.g., another well, Mutual Water Company)?

No

46. Review and Sign - Mutual Water Company

Email Address

mandi@zonemutual.com

Check below when completed with review.

Survey Complete and Ready to Submit

I certify under penalty of perjury that the data and information included in this Semi-Annual Extraction and Use Report is true and correct.

A handwritten signature in black ink, appearing to read 'Mandi Freitas', with a long horizontal stroke extending to the right.

Signature of: Mandi Freitas



EXHIBIT B

P.O. Box 239, Somis, CA 93066
(805) 386-4061
info@zonemutual.com

July 25, 2025

Las Posas Valley Basin Watermaster
800 South Victoria Avenue
Ventura, CA 93009

Via email to LPV.Watermaster@ventura.org

Re: Request for Agenda Item
WMID 4246 (Kachans) Water Use Accounting

Dear Watermaster Board Members:

Zone Mutual Water Company respectfully requests that the issue concerning water use for WMID 4246 (Kachans) be formally referred to the Policy Advisory Committee (PAC) and then placed on an upcoming Watermaster Board agenda.

The Kachans are Zone shareholders but were assigned no groundwater allocation in the Judgment. As a result, their Water Year 2023 water use should not have been recorded against Zone's Aggregate Mutual Supply, which is reserved under the Judgment for mutual exclusive shareholders with recognized pumping rights. The Kachans' Water Year 2023 water use should have been recorded as overuse under WMID 4246. Following Water Year 2023, the Kachans' water use should be recorded as overuse under WMID 4246 unless they obtain allocation or carryover from another WMID.

Zone has attempted to resolve this issue through informal channels since the draft Water Year 2023 allocation accounting was issued by Watermaster in February 2025. We were advised that County Counsel would prepare a memorandum and refer this matter to the PAC. Despite repeated follow-up over several months, no memorandum has been issued, and the item has not appeared on a PAC agenda. We have received no indication that Watermaster staff or County Counsel intends to take further action absent direction from the Board.

Given the lack of progress, Zone believes it is necessary to elevate this matter for formal Board consideration. Section 6.3 of the Judgment authorizes the Watermaster to assign matters to the PAC for review and recommendation. We believe this is the appropriate next step to ensure the issue is resolved in a timely and transparent manner during an upcoming Watermaster Board agenda. We desire to resolve this matter before the beginning of Water Year 2025.

We appreciate your attention and are available to provide further background or documentation at the Board's request.

Very truly yours,

A handwritten signature in blue ink, appearing to read "John Menne", is written over a light blue circular stamp.

John Menne,
President

Canger, Jason

From: Jeff Warren <Jwarren@KleinLaw.com>
Sent: Friday, March 14, 2025 5:03 PM
To: Canger, Jason
Cc: Paula Davis
Subject: RE: Revised Appendix A for review - Draft LPV Annual Report & Appendices - Submit feedback by March 7, 2025

WARNING: If you believe this message may be malicious use the Phish Alert Button to report it or forward the message to Email.Security@ventura.org.

Jason,

Thank you for the call back this afternoon. Per our brief discussion, I am providing a written explanation for Zone's positions that (1) it has not violated the judgment by delivering water to the Kachans, and (2) the Kachans' water judgment should not be debited against allocations managed by Zone.

By way of background, I was one of the attorneys who drafted the judgment.

During the judgment drafting process, there was sensitivity to a number of issues around mutual water companies. Among these sensitivities was that we didn't want mutual water companies to have to amend their governing documents in order to implement the judgment—the adjudication adjudicated water rights to be implemented by a physical solution; it does not dictate corporate governance. Also, that there were a number of agricultural users who were heavily invested (literally and figuratively) in seeing their mutual water companies continue forward—hence, the pooled allocations of the Mutual Exclusive Shareholders.

In the discussion of the pooled allocations, two hypothetical problems were discussed:

1. The case of an existing shareholder that was not granted allocation basis; and
2. The case where an existing mutual water company shareholder sells land and mutual water company shares, but does not also transfer allocation.

In each problem, we wanted to prevent the shareholder without Allocation Basis (in #1) and the "buyer" (in #2) from freeloading to the detriment of those shareholders who were Water Right Holders. At the same time, we were aware that mutual water companies' governing documents did not incorporate the concept of water rights into the prerequisite conditions for water delivery, and, again, we did not want mutual water companies to have to amend their governing documents to implement the judgment.

We solved these problems through carefully defining Mutual Exclusive Shareholders as including only those shareholders who were granted Allocation Basis. Those shareholders who were not granted Allocation Basis are—for purposes of the determining carryover and overuse under the Judgment—treated as if they are "Hybrids," notwithstanding that their only means for obtaining water service would be from the mutual water company. This way, if a shareholder without an allocation (in #1) or the "buyer" (in #2) nonetheless demanded water from the mutual water company, the mutual water company was able to comply with its governing documents and deliver the water, but not at a penalty to the Mutual Exclusive Shareholders. Finally, section 4.15.2.3 expressly deals with overuse by a shareholder who does not have Allocation Basis.

Several provisions of the Judgment are in play:

- "Mutual Exclusive Shareholder – **A Mutual Shareholder granted Allocation Basis** that receives all of its Groundwater from a Mutual Water Company, and not from a Landowner's private well." (J'mnt., § 1.65.)

EXHIBIT C

- “Aggregate Mutual Supply – The total aggregated Annual Allocation **managed by a Mutual Water Company on behalf of its Mutual Exclusive Shareholders**. The Aggregate Mutual Supply is comprised of Annual Allocation derived from: (i) the aggregated Allocation Basis of all of a Mutual Water Company’s **Mutual Exclusive Shareholders**, excluding the Allocation Basis of those Mutual Exclusive Shareholders who have agreed with their Mutual Water Company to the separate reporting of said Mutual Exclusive Shareholder’s Groundwater Use pursuant to Section 4.7.1; (ii) any Allocation Basis acquired by a **Mutual Exclusive Shareholder** described in (i) above through a Transfer pursuant to Section 4.12; (iii) the Mutual Water Company’s Mutual Water Company Allocation; (iv) any Allocation Basis acquired by a Mutual Water Company through a Transfer pursuant to Section 4.12; (v) any Carryover managed by the Mutual Water Company; and (vi) any Groundwater to which the Mutual Water Company is entitled pursuant to a Subscription Project.” (J’mnt., § 1.3.)
- Landowner Reporting Obligations: “**A Landowner, other than a Mutual Exclusive Shareholder**, shall report to Watermaster both the total amount of all Groundwater Extracted and the total amount of Groundwater Used by the Landowner from any source as provided in the Watermaster Rules.” (J’mnt., § 4.5.) “**A Landowner** or Mutual Hybrid Shareholder shall report to Watermaster both the total amount of all Groundwater Extracted and the total amount of Groundwater Used by the Landowner or Mutual Hybrid Shareholder from any source.” (Watermaster Rules, § 5.2.2.)
- Reporting Obligations for Mutual Exclusive Shareholders: “The Mutual Water Company will be responsible for complying with the Judgment, including reporting Groundwater Use to Watermaster and paying all Basin Assessments, and any Overuse Assessments related to the Groundwater delivered by the Mutual Water Company and Used by its **Mutual Exclusive Shareholders**...Unless otherwise agreed by the Mutual Water Company and one or more of its shareholders, the Mutual Water Company shall report to Watermaster, as the sole reporting entity, the total applied Groundwater Use by all of its **Mutual Exclusive Shareholders** as provided in the Watermaster Rules. (J’mnt., § 4.7.1.) “A Mutual Water Company shall report to Watermaster the total amount of all Groundwater Extracted, and **on behalf of its Mutual Exclusive Shareholders**, as the sole reporting entity, the total applied Groundwater Use by all of its **Mutual Exclusive Shareholders**. A Mutual Water Company shall also report to Watermaster the total amount of any Groundwater delivered by the Mutual Water Company to a Mutual Hybrid Shareholder **or any other Party**.” (Watermaster Rules, § 5.2.3.)
- Carryover in the context of Mutual Exclusive Shareholders: “Any underuse of the aggregated Allocation **managed by a Mutual Water Company on behalf of its Mutual Exclusive Shareholders** shall result in an equal amount of Carryover to be managed by such Mutual Water Company subject to the terms governing Carryover in the Judgment.” (J’mnt., § 4.11.4.)
- Overuse in the context of Mutual Exclusive Shareholders: “**Mutual Exclusive Shareholder** Allocations shall be aggregated for reporting of Groundwater Use and therefore no Overuse Assessment shall be charged to the Mutual Water Company or its Mutual Exclusive Shareholders unless the aggregate total Use of Groundwater by the **Mutual Exclusive Shareholders** is greater than the sum of all Allocations held by the **Mutual Exclusive Shareholders** plus the Mutual Water Company Allocation.” (J’mnt., § 4.7.1.) Overuse occurs where “The aggregate Use of Allocated Groundwater by a Mutual Water Company’s **Mutual Exclusive Shareholders** (excluding those Mutual Exclusive Shareholders who have agreed with their Mutual Water Company to separately report their Groundwater Use pursuant to section 4.7.1) exceeds the Aggregate Mutual Supply.” (J’mnt., § 4.15.1.2.)
- Overuse in the context of shareholders without an allocation: “In the case of Overuse by a Mutual Water Company’s Mutual Shareholders without an Annual Allocation, the Overuse may be cured by: (i) acquisition of an Annual Allocation by Transfer; or (ii) the Mutual Water Company and the Mutual Shareholder agreeing to account for the Mutual Shareholder’s use from the Mutual Water Company’s Aggregate Mutual Supply.” (J’mnt., § 4.15.2.3.)

Because the Kachans were not granted Allocation Basis, they are **not** Mutual Exclusive Shareholders. (J’mnt., § 1.65.) Therefore, while Zone is required to report water deliveries to them (Watermaster Rules, § 5.2.3), the Kachans are independently required to report their groundwater use. (J’mnt., § 4.5; Watermaster Rules, § 5.2.2.)

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The Watermaster actions at issue involve the annual calculation of carryover and overuse. As they are not Mutual Exclusive Shareholders, the Kachans are not part of Zone's Aggregate Mutual Supply. (J'mnt., § 1.3.) Absent Zone's express agreement to account for their use, the Kachans' groundwater use is not debited against Zone's Aggregate Mutual Supply for purposes of determining carryover or overuse. (J'mnt., §§ 4.7.1, 4.11.4, 4.15.1.2, 4.15.2.3.) Here, there is no such agreement between Zone and the Kachans; Watermaster cannot contort the lack of an agreement as a Transfer or "essentially" a Transfer.

If Watermaster wants to levy an overuse assessment on the Kachans (assuming the Kachans do not cure), Watermaster may do so—by assessing the Kachans directly. (J'mnt., §§ 4.15.2.1, 4.15.3, 4.15.2.3.) If Watermaster seeks to enjoin their groundwater use on the basis that they do not have an allocation (J'mnt., § 3.4), it is free to do so.

What Watermaster cannot do, however, is ignore the express provisions of section 4.15.2.3 and instead charge Zone with Watermaster's duties to enforce the judgment by calling the delivery of **wet water** "essentially" a transfer of **Allocation Basis**. Beyond ignoring the express provisions of section 4.15.2.3, Watermaster's tortured claim that Zone's delivery of wet water to a shareholder in excess of that allowed under the judgment is "essentially" an unauthorized transfer of allocation basis would thrust responsibility on Zone to police all recipients of Zone-extracted groundwater (i.e., including hybrid shareholders with their own wells, and third-party recipients who receive water in the case of emergency), regardless of whether Zone has legal authority to so police or access to the information required to do so. With respect to delivery of **wet water**, Zone is duty-bound to comply with its governing documents, which provide the conditions under which Zone must supply its shareholders with said wet water. As the Kachans met those conditions, Zone was duty-bound to deliver the **wet water**. It is Watermaster's function under the Judgment—not Zone's—to police **Annual Allocations**.

Please let me know if/when you'd like to discuss further.

Thanks,

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