

# FOX CANYON GROUNDWATER MANAGEMENT AGENCY

A State of California Water Agency



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## EXECUTIVE OFFICER

**John Demers**

January 28, 2026

Board of Directors  
Fox Canyon Groundwater Management Agency  
800 South Victoria Avenue  
Ventura, CA 93009-1610

**SUBJECT: Groundwater Use by Mutual Water Company Shareholders Without a Water Right Allocation [LPV Watermaster] – (New Item)**

**RECOMMENDATION:** Receive and file a presentation on the LPV Watermaster's treatment and processing of groundwater use by a mutual water company shareholder without an allocation.

## BACKGROUND:

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; § 3.4.) 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.) The Judgment does not grant a water right allocation to each shareholder of each mutual water company. Consequently, there are some shareholders that, although they may be parties to the Judgment, 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).) Therefore, 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.

#### **DISCUSSION:**

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). 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.<sup>1</sup> 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. Instead, Zone asserted that the Judgment allowed the Kachans to use groundwater without an allocation so long as the Kachans cured their overuse of groundwater either (i) by acquiring a 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 groundwater used by a shareholder without an allocation is unauthorized use or overuse under the Judgment. As explained above, the Kachans do not have a Water Right Allocation, which is the “entitlement granted to a Party to Use Allocated Groundwater from the Basin.” (Judgment, § 1.8.) In the absence of any right or entitlement to use groundwater, the Kachan’s “[u]se is inconsistent with the Judgment.” (Judgment, § 3.4.) Moreover, as a use inconsistent with the Judgment, the Judgment provides that the Kachans’ groundwater use “will frustrate efforts to achieve Sustainable Groundwater

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<sup>1</sup> 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.)

Item 16 – Mutual Water Company Shareholders Without a Water Right Allocation  
FCGMA Board Meeting, January 28, 2026

Management and to protect public, environmental, and economic interests of the Basin; injure the Parties' rights; and interfere with the Physical Solution.” (Judgment, § 3.4.) In contrast, Zone argues that the Kachans' use during WY2023 (October 1, 2023 – September 30, 2024) is overuse and therefore can only be cured by the Kachans paying an Overuse Assessment (because Zone has refused to deduct the amount it delivered to the Kachans from its Mutual Aggregate Supply as provided in Section 4.15.2.3). (See attached Exhibit 16A.) However, as explained above, a Water Right Allocation is the entitlement authorizing a party to use groundwater under the Judgment. The Kachans do not have a Water Right Allocation. Therefore, the Kachans groundwater use, and Zone's extraction and delivery of groundwater to the Kachans, may be interpreted as unauthorized use and enjoined as inconsistent with the Judgment. (See Judgment, § 3.4.)

The “shareholder without allocation” issue also raises basin management and administration concerns for Watermaster. If shareholders without an allocation are allowed to use groundwater, then your Board should always expect some amount of groundwater use in excess of the operating yield established in the basin optimization yield study for the applicable water year. 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. In other words, groundwater use by shareholders without an allocation affects Watermaster's ability to manage its finances and ensure 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.) Moreover, these issues are exacerbated by Zone's position that the water it delivers to its shareholders without an allocation should not be deducted from Zone's Aggregate Supply. If the use of groundwater by shareholders without an 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 significant amounts of Carryover Allocation which will exacerbate Watermaster's ability to sustainably management the 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 attached Exhibit 16A.) 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.

On July 31, 2025, Watermaster submitted a memorandum to the LPV Policy Advisory Committee (PAC) (See attached Exhibit 16B.) requesting PAC's recommendations on the following questions:

1. The Kachans' Use of Groundwater. 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. 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'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. If use of groundwater by the Kachans (and shareholders without an allocation like them) is unauthorized use, then should Zone (and other mutual water companies with shareholders without an allocation) be enjoined (legally prohibited) from delivering groundwater to the Kachans (and other shareholders without an allocation)?

On August 7, 2025, the PAC submitted its recommendations to Watermaster recommending that "the Kachans...should be allowed to use groundwater provided they cure their use in accordance with the Judgment" and the Watermaster should levy an Overuse Assessment against the Kachans if they fail to cure their overuse. The PAC, which consists of several mutual water company representatives, recommended the Watermaster not enjoin Zone's (or other mutual water companies') delivery of groundwater to shareholders without an allocation. (See Exhibit 16C.)

#### **CONCLUSION:**

Staff have reviewed the PAC recommendations and made the following determinations.

Although in a technical sense, any use of water that occurs outside of the allocations specified in the Judgment is unauthorized, the Judgment channels this specific scenario into the Overuse classification for the purpose of enforcement and fees. Specifically, as noted in the Background section of this letter, the Judgment anticipated this condition, stating "In the case of *Overuse* by a Mutual Water Company's Mutual Shareholders *without an Annual Allocation...*" (Judgment, § 4.15.2.3; (emphasis added)), the exact situation that is addressed here. The Judgment allows that a shareholder in an Overuse condition be allowed an opportunity to "cure" their Overuse prior to the application of an Overuse Assessment by either "(i) the 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"

Item 16 – Mutual Water Company Shareholders Without a Water Right Allocation  
FCGMA Board Meeting, January 28, 2026

(Ibid.). If not cured, the consequence of Overuse is the shareholder being subject to an Overuse Assessment and potential injunctive relief, as provided for in the Judgment. Unlike shareholders with an allocation who pay a routine Basin Assessment, the shareholder without an allocation is directly tied to the punitive Overuse Assessment for their usage.

Mutual water companies have the option to account for a shareholder's use from their Aggregate Mutual Supply. If they choose to do so, then the use by shareholders without an allocation will be charged to the mutual water companies' Aggregate Mutual Supply allocation. However, it is expected that due to the limited amount of each mutual water company's Aggregate Mutual Supply, they will not do so, since it may result in an Overuse Assessment against them. Regardless, any water used by a shareholder without an allocation must be reported. To accomplish this, the mutual water company should report the use separately from their allocation, under the WMID of the shareholder with zero allocation. Currently, this is accomplished by the mutual water company reporting the WMID and water delivered to the shareholder without allocation under the reporting section titled "Groundwater Deliveries to Other Parties."

Due to the specific language within the Judgment, and the existing contracts that mutual water companies have in place with their shareholders, in the case of a mutual water company shareholder without an allocation, Watermaster will impose an Overuse Assessment for the entire amount of any extraction, subject to their ability to cure their Overuse as provided for in the Judgment. Watermaster will also ensure that the mutual water company reports said usage under a separate line item in their statements and reports to the Watermaster, and that the usage is not charged against the mutual water company's Aggregate Mutual Supply. Watermaster reserves the right to review this policy as necessary for effective basin management.

Staff recommend that your Board receive and file this presentation.

This letter has been reviewed by Agency Counsel. If you have any questions, please call me at (805) 650-4083.

Sincerely,



John Demers  
Executive Officer

Attachments:

- Exhibit 16A – Correspondence from Jeffrey Warren dated March 25, 2025
- Exhibit 16B – Watermaster Memorandum dated July 31, 2025
- Exhibit 16C – PAC Recommendation Report dated August 7, 2025



R. Jeffrey Warren 661-328-5391 [jwarren@kleinlaw.com](mailto:jwarren@kleinlaw.com)

10000 Stockdale Highway, Suite 200, Bakersfield, CA 93311  
p. 661-395-1000 f. 661-326-0418 [www.kleinlaw.com](http://www.kleinlaw.com)

March 25, 2025

**VIA EMAIL**

Board of Directors  
Fox Canyon Groundwater Management Agency  
Ventura County Government Center  
Hall of Administration Building  
800 S. Victoria Avenue L#1610  
[FCGMA@ventura.org](mailto:FCGMA@ventura.org)  
[LPV.Watermaster@ventura.org](mailto:LPV.Watermaster@ventura.org)

Re: Fox Canyon Groundwater Management Agency  
Regular Board Meeting, March 26, 2025  
Agenda Item 21: Approval of an Annual Report for the Las Posas Valley Basin  
for Water Year 2024  
Objection re: Appendix A (Annual Allocation Accounting)

Dear Board of Directors:

This office represents Zone Mutual Water Company in connection with the Las Posas Valley Basin groundwater adjudication, styled *Las Posas Valley Water Rights Coalition, et al. v. Fox Canyon Groundwater Management Agency*, Santa Barbara County Superior Court Case No. VENCI00509700. We are writing concerning your Agenda Item 21, concerning adoption of the 2025 Annual Report for the Las Posas Valley Basin Covering Water Year 2024.

More specifically, we are writing to preserve the issues under discussion between Zone Mutual Water Company and Watermaster pertaining to Appendix A of the Annual Report, which purports to contain an Annual Allocation Accounting.

Since Watermaster published its Annual Allocation Accounting in mid-February, Zone Mutual Water Company has been engaged with Watermaster to reconcile issues between Zone's internal accounting of its Annual Allocation and that published by Watermaster.

Earlier this month, the matter was referred to this office (for Zone) and to Ventura County Counsel (for Watermaster). This office has been corresponding with Jason Canger of the Ventura County Counsel's office regarding Zone Mutual Water Company's concerns with the Annual Allocation Accounting—particularly as it concerns Watermaster's interpretation of the Judgment, the calculation of carryover and overuse under the Judgment, and Zone's delivery of wet water to its shareholders.

Klein • DeNatale • Goldner

Board of Directors  
Fox Canyon Groundwater Management Agency  
Ventura County Government Center  
March 26, 2025  
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The discussion between this office and Mr. Canger is ongoing. Most recently, on March 20, 2025, Mr. Canger emailed the undersigned:

Morning Jeff,

Sorry I missed your call this afternoon. And, apologies in advance, I have a full schedule today. But this issue will not be resolved prior to next week's FCGMA meeting. Staff and outside counsel are still reviewing. Also, if your interpretation is correct, then this issue needs to be discussed with the Board because it implicates WM's management obligations under the judgment.

Talk tomorrow at 1100, thanks.

Jason Canger  
Ventura County Counsel's Office  
(805) 654-2879

A true and correct copy of the email thread discussing the issues between Zone Mutual Water Company and Watermaster is enclosed.

Should Fox Canyon Groundwater Management Agency consider approving the Annual Report at its March 26, 2025 meeting, it should do so (a) with directions to amend the Annual Allocations Accounting as interpreted by Zone Mutual Water Company in the enclosed email thread; or (b) without prejudice to the continued discussion of issues between Zone Mutual Water Company and Watermaster.

Very truly yours,

*/s/ R. Jeffrey Warren*

R. Jeffrey Warren

RJW:pd

cc: Jason Canger (via email: [Jason.Canger@ventura.org](mailto:Jason.Canger@ventura.org))  
Gene West (via email: [efwest2012@gmail.com](mailto:efwest2012@gmail.com))  
John Mene (via email: [johndmenne@gmail.com](mailto:johndmenne@gmail.com))  
Bryan Bondy (via email: [bryan@zonemutual.com](mailto:bryan@zonemutual.com))  
Enclosure as stated

## Paula Davis

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**From:** Jason T. Canger  
**Sent:** Thursday, March 20, 2025 8:40 AM  
**To:** Jeff Warren  
**Cc:** Paula Davis  
**Subject:** RE: Revised Appendix A for review - Draft LPV Annual Report & Appendices - Submit feedback by March 7, 2025

Morning Jeff,

Sorry I missed your call this afternoon. And, apologies in advance, I have a full schedule today. But this issue will not be resolved prior to next week's FCGMA meeting. Staff and outside counsel are still reviewing. Also, if your interpretation is correct, then this issue needs to be discussed with the Board because it implicates WM's management obligations under the judgment.

Talk tomorrow at 1100, thanks.

Jason Canger  
Ventura County Counsel's Office  
(805) 654-2879

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**From:** Jeff Warren <Jwarren@KleinLaw.com>  
**Sent:** Monday, March 17, 2025 10:30 AM  
**To:** Canger, Jason <Jason.Canger@ventura.org>  
**Cc:** Paula Davis <PDavis@kleinlaw.com>  
**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](mailto:Email.Security@ventura.org).

Yes, Friday at 1100a works.

Thanks,

R. Jeffrey Warren  
Attorney | Klein, DeNatale, Goldner, et al.  
10000 Stockdale Hwy., Ste. 200  
Bakersfield, CA 93311  
Tel.: (661) 395-1000  
Dir.: (661) 328-5391  
Fax: (661) 326-0418

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**From:** Canger, Jason <[Jason.Canger@ventura.org](mailto:Jason.Canger@ventura.org)>  
**Sent:** Monday, March 17, 2025 10:24 AM  
**To:** Jeff Warren <[Jwarren@KleinLaw.com](mailto:Jwarren@KleinLaw.com)>  
**Cc:** Paula Davis <[PDavis@kleinlaw.com](mailto:PDavis@kleinlaw.com)>  
**Subject:** RE: Revised Appendix A for review - Draft LPV Annual Report & Appendices - Submit feedback by March 7, 2025

Hi Jeff,

Thanks for your email. Are you available Friday at 1100 to discuss?

Jason Canger  
Ventura County Counsel's Office  
(805) 654-2879

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**From:** Jeff Warren <[Jwarren@KleinLaw.com](mailto:Jwarren@KleinLaw.com)>  
**Sent:** Friday, March 14, 2025 5:03 PM  
**To:** Canger, Jason <[Jason.Canger@ventura.org](mailto:Jason.Canger@ventura.org)>  
**Cc:** Paula Davis <[PDavis@kleinlaw.com](mailto:PDavis@kleinlaw.com)>  
**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](mailto: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.)
- “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.)

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,

R. Jeffrey Warren  
Attorney | Klein, DeNatale, Goldner, et al.  
10000 Stockdale Hwy., Ste. 200  
Bakersfield, CA 93311  
Tel.: (661) 395-1000  
Dir.: (661) 328-5391  
Fax: (661) 326-0418

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**From:** Canger, Jason <[Jason.Canger@ventura.org](mailto:Jason.Canger@ventura.org)>

**Sent:** Friday, March 14, 2025 4:05 PM

**To:** Jeff Warren <[Jwarren@KleinLaw.com](mailto:Jwarren@KleinLaw.com)>

**Subject:** FW: Revised Appendix A for review - Draft LPV Annual Report & Appendices - Submit feedback by March 7, 2025

Hi Jeff,

Following up on the email below, FCGMA Interim Director Arne Anselm asked that I contact you discuss Zone Mutual Water Company's position on its transfer of water to Kachans. The below email string includes FCGMA's interpretation of the transfer and how it should be treated under the LPV Adjudication judgment. I'd be happy to discuss with you. Please email me Zone's position on the transfer, and then we'll get something scheduled.

Thanks in advance.

Jason Canger  
Ventura County Counsel's Office  
(805) 654-2879

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**From:** Anselm, Arne <[Arne.Anselm@ventura.org](mailto:Arne.Anselm@ventura.org)>  
**Sent:** Friday, March 14, 2025 3:50 PM  
**To:** Canger, Jason <[Jason.Canger@ventura.org](mailto:Jason.Canger@ventura.org)>; Kaseke, Farai <[Farai.Kaseke@ventura.org](mailto:Farai.Kaseke@ventura.org)>  
**Subject:** FW: Revised Appendix A for review - Draft LPV Annual Report & Appendices - Submit feedback by March 7, 2025

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**From:** Bryan Bondy <[bryan@zonemutual.com](mailto:bryan@zonemutual.com)>  
**Sent:** Friday, March 14, 2025 3:45 PM  
**To:** LPV Watermaster <[LPV.Watermaster@ventura.org](mailto:LPV.Watermaster@ventura.org)>; Anselm, Arne <[Arne.Anselm@ventura.org](mailto:Arne.Anselm@ventura.org)>  
**Cc:** Kaseke, Farai <[Farai.Kaseke@ventura.org](mailto:Farai.Kaseke@ventura.org)>; John Menne <[johndmenne@gmail.com](mailto:johndmenne@gmail.com)>; Info Zonemutual <[info@zonemutual.com](mailto:info@zonemutual.com)>; LPV Watermaster <[LPV.Watermaster@ventura.org](mailto:LPV.Watermaster@ventura.org)>; Jeff Warren <[jwarren@KleinLaw.com](mailto:jwarren@KleinLaw.com)>  
**Subject:** RE: Revised Appendix A for review - Draft LPV Annual Report & Appendices - Submit feedback by March 7, 2025

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Hi Arne,

Nice talking with you this afternoon. Per our discussion, we concluded that it would be good for Watermaster counsel and Zone counsel to have a discussion and try to resolve their differing interpretations of the Judgment concerning issue #2 in the email below. Can you please contact your counsel and ask him to have a discussion with Zone's counsel Jeffrey Warren. Jeff can be reached at Tel.: (661) 395-1000 Dir.: (661) 328-5391 and he is cc'd on this email. We would do everything possible to resolve this before the Watermaster Board meeting.

Thanks,

Bryan

--

Bryan Bondy  
Contract General Manager  
805-386-4061 Main  
805-212-0484 Cell  
[www.zonemutual.com](http://www.zonemutual.com)



---

**From:** Bryan Bondy  
**Sent:** Friday, March 7, 2025 4:34 PM  
**To:** Watermaster LPV <[LPV.Watermaster@ventura.org](mailto:LPV.Watermaster@ventura.org)>  
**Cc:** Farai Kaseke <[Farai.Kaseke@ventura.org](mailto:Farai.Kaseke@ventura.org)>; John Menne <[johndmenne@gmail.com](mailto:johndmenne@gmail.com)>; Christine Mount

<[info@zonemutual.com](mailto:info@zonemutual.com)>; Watermaster LPV <[LPV.Watermaster@ventura.org](mailto:LPV.Watermaster@ventura.org)>; Jeff Warren <[jwarren@KleinLaw.com](mailto:jwarren@KleinLaw.com)>

**Subject:** Re: Revised Appendix A for review - Draft LPV Annual Report & Appendices - Submit feedback by March 7, 2025

Hello Farai,

Zone's legal council has reviewed your response and fundamentally disagrees with item number two.

We request a meeting prior to the board meeting to discuss and resolve. Please advise regarding some options for a zoom meeting with staff and legal counsel to discuss. We would like to resolve this without having to argue it out in front of the Watermaster board.

Thank you.

Best Regards,

Bryan

Sent from my iPhone

On Mar 7, 2025, at 11:47 AM, LPV Watermaster <[LPV.Watermaster@ventura.org](mailto:LPV.Watermaster@ventura.org)> wrote:

Good morning, Mr. Bondy.

Thank you for inquiry and your submissions. Staff have prepared detailed responses to the issues raised in your previous email.

1. After reviewing Watermaster Basin Assessment Invoices (WY23-, WY24-1 and WY24-2) and database, WMID 1122 has been invoiced as a Del Norte Mutual Exclusive Shareholder. As such, Watermaster will continue this practice and accept Zone's original designation of deliveries to WMID 1122 as to other parties. Zone's allocation becomes **4625.89 AF** (Exclusives + Domestic) and **4619.23 AF** when excluding Domestic. *(Please see edits in red in table in previous email below).*
2. The delivery of groundwater by Zone Mutual Water Company [WMID 4200] (collectively, "Zone") to Jason Kachan and Justin Kachan, as joint tenants [WMID 4246] (collectively, the "Kachans"), raises several issues for Watermaster's enforcement of the LPV Adjudication judgment.
  1. First, the judgment "adjudicates, determines, defines, and allocates all rights to Use Groundwater...from the Basin," such that "each and every Person and Party...is enjoined and restrained from Using Groundwater...from the Basin except pursuant to this Judgment." (Judgment, § 3.4.) Under the judgment, these rights are called "Allocations" and are also defined in terms of groundwater use: "An entitlement granted to a Party to Use Allocated Groundwater from the Basin." (Judgment, § 1.8.) All Allocations are subject to limitations provided in the judgment. For example, while Agricultural Allocations and Commercial Allocations may be transferred, Domestic Allocations and Mutual Water Company Allocations may not (although carryover derived from unused Mutual Water Company Allocation may be transferred). (Judgment, §§ 4.5.3.1, 4.8, 4.12.1, 4.12.5.)

Under the judgment, Zone is granted a Mutual Water Right Allocation, but the Kachans were not granted any Allocation and thus have no right to use groundwater. In essence, Zone's delivery of groundwater resulted is an unauthorized transfer of Zone's Mutual Water Company Allocation. (Watermaster

recognizes that carryover derived from unused Mutual Water Company Allocation may be transferred. \*Judgment, § 4.8.) But Zone cannot have accrued any carryover during prior to WY 2023, the first year of judgment implementation.) But transfer of a Mutual Water Company Allocation is not allowed. (Judgment, §§ 4.8, 4.12.1, 4.12.5.)

2. Second, the judgment establishes a process for Watermaster review and approval of transfers. (See Judgment, § 4.12.1.) The judgment requires that the process be started by the “Water Right Holder with an...Allocation[.]” (Judgment, § 4.12.1.) Specifically, “[t]he seller or lessor to the proposed Transfer shall file a complete Transfer Request Form with Watermaster to initiate Watermaster’s review of a proposed Transfer.” (Judgment, § 4.12.1.) Then, Watermaster must evaluate whether the transfer will cause Material Injury or Undesirable Results; the transferring parties are in Good Standing; and confirm that an instrument evidencing the transfer was recorded. (Judgment, § 4.12.4.1.) In fact, “[n]o Transfer shall be effective until Watermaster finds that the [transferring] Parties have complied with all applicable provisions of...Section 4.12.” (Judgment, § 4.12.4.1.)

Watermaster has no record of Zone submitting a transfer request form (or any other notice of transfer) to Watermaster. Watermaster only learned about the transfer to the Kachans when reviewing Zone’s groundwater extraction & use reporting during preparation of Watermaster’s WY 2023 annual report. Because Zone failed to initiate the transfer review process, Watermaster never had the opportunity to assess whether the transfer will result in Material Injury or Undesirable Results; whether Zone and the Kachans are in Good Standing; and whether an instrument evidencing the transfer was recorded. (See Judgment, § 4.12.4.1.) Accordingly, Zone’s transfer of its Mutual Water Company Allocation to the Kachans failed to “compl[y] with all applicable provisions of...Section 4.12,” and thus the delivery to the Kachans, which essentially amounted to a transfer of a portion of Zone’s Mutual Water Company Allocation, was not “effective” under the judgment. (Judgment, § 4.12.4.1.)

3. Third, to the extent that the Kachans actually received groundwater under the belief that they had acquired a portion of Zone’s Mutual Water Company Allocation, the Kachans violated the judgment because they did not have an effective Water Right Allocation. Under the judgment, “each and every Person and Party...is enjoined and restrained from Using Groundwater...Extracted from the Basin except pursuant to this Judgment.” (Judgment, § 3.4.) And the Watermaster is required to enforce this provision by filing motions with the Court. (Judgment, § 3.4.) Because the Kachans received groundwater without an effective Water Right Allocation, they likely violated Section 3.4.

In light of the above, both Zone and the Kachans have violated the judgment. Specifically, Zone essentially transferred a portion of its Mutual Water Company Allocation when delivering groundwater to the Kachans in violation of Section 4.8 and failed to initiate and adhere to the transfer process set forth in Section 4.12. Accordingly, staff will recommend that Watermaster deem Zone to have used 19.59 AF of its WY2023 Mutual Water Company Allocation, which represents the amount transferred to the Kachans. As a result, Zone will be deemed to have **89.783AF** of unaccounted Mutual Water Company Allocation for WY2023. (*Please see edits in red in table from previous email*). The Kachans received groundwater without an effective Water Right Allocation in violation of Section 3.4. Accordingly, staff will recommend

that the Kachans be assessed an Overuse Assessment based on the amount of groundwater that they received from Zone Mutual Water Company. Finally, staff is still reviewing Zone's and the Kachan's violations and may additional recommendations to Watermaster, including accounting for the violations in both Zone's and the Kachan's record of Good Standing.

3. Staff is in agreement with your calculation and have revised the domestic allocation to 6.66.
  1. (Zone exclusive allocation - Zone Domestic Allocation + Zone allocation) – Zone Ag+Com Exclusive Water Use – Zone Unaccounted = (4,625.89\* -6.66 + 92.220) – 3,010.656 – 89.783 = **1,611.011 AF** (\* = excludes WMID 1122 annual allocation as this is not considered an exclusive of Zone see item no. 1 above)

Zone Mutuals Carryover for WY23 is thus calculated as **1,6011.011AF**.

Thank you,

LPV Watermaster

---

**From:** Bryan Bondy <bryan@zonemutual.com>  
**Sent:** Wednesday, February 26, 2025 12:36 PM  
**To:** LPV Watermaster <LPV.Watermaster@ventura.org>; Kaseke, Farai <Farai.Kaseke@ventura.org>  
**Cc:** John Menne <johndmenne@gmail.com>; Info Zonemutual <info@zonemutual.com>  
**Subject:** RE: Revised Appendix A for review - Draft LPV Annual Report & Appendices - Submit feedback by March 7, 2025

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Dear Watermaster Staff,

Thank you for responding to our inquiry.

Our responses to your responses are provided below. We request that this be elevated to management as we fundamentally disagree with how Watermaster is interpreting and implementing the Judgment on item nos. 1 through 3 discussed below and because we believe Zone is being shorted 69.313 AF of carryover.

We look forward to hearing back from management. If necessary, please schedule a meeting with us to review these issues.

\*\*\*\*\*  
\*\*\*\*\*  
\*\*\*\*\*  
\*\*\*\*\*

1. WMID 1122 is listed in Judgment Exhibit, Schedule B as an exclusive agricultural shareholder with water delivery history from **both** Zone and Del Norte. However, Watermaster assigned 100% of the WMID 1122 annual allocation to Del Norte Water Co. for WY 2023. The position Watermaster is taking is that Zone water deliveries to WMID 1122 should be debited from Zone's allocation even though Watermaster has not provided Zone with **any** portion of the WMID 1122 annual allocation. That is clearly unfair to Zone. Zone proposes that Watermaster split the WMID 1122 annual allocation between Del Norte and

Zone on the basis of the relative percentage of 2013 – 2019 water deliveries by both water companies shown in Judgment Exhibit, Schedule B. Doing so would provide Zone with 24.6% of the annual allocation , which equates to  $129.6 \text{ AF} \times .246 = 31.891 \text{ AF}$  to Zone for WY 23. The same approach should be used WY 24 and beyond, unless Zone, Del Norte, and WMID 1122 agree to some other split.

2. WMID 4246 is **not** identified as an exclusive in Judgment. Therefore, Watermaster has no basis for debiting WMID 4246 water deliveries from Zone’s allocation. Instead, the WMID 4246 water deliveries should be applied against WMID 4246 and Watermaster should levy an Overuse Assessment against WMID 4246.
3. We disagree with the handling of the Zone domestic exclusive shareholders in the carryover calculation for two reasons.
  1. First, the Zone domestic exclusive annual allocations added up to 6.66, not 6.69 as stated in your email.
  2. Second, and more importantly, the mathematical approach Watermaster is taking effectively assumes the Zone domestic exclusive WMIDs used zero water, which is not correct and is, therefore, unfair. During WY 23, Zone domestic exclusive WMIDs used their allocations in WY 23. The math for calculating Zone carryover should be  $(\text{Zone exclusive allocation} - \text{Zone Domestic Allocation} + \text{Zone allocation}) - \text{Zone Ag+Com Exclusive Water Use} - \text{Zone Unaccounted} = (4,657.771* - 6.66 + 92.220) - 3,010.656 - 70.193 = 1,662.482$  (\* = includes 31.891 AF for Zone's pro rata share of WMID 1122 annual allocation that should have been attribute to Zone – see item no. 1 above.)
4. Regarding 2<sup>nd</sup> reporting period hybrid usage, we agree that value we showed in our email was incorrect and should be 578.765 AF. A 2.005 AF difference.

The table below shows what Zone believes the correct numbers should be for WY 23 based on the above.

WY Ending 9/30/24 Period	REPORT		
	Extractions	Dom. Exclusive	Ag. + Com. Exclusive
1	1,372.380	3.300	1,002.185
2	2,726.260	3.300	2,008.471
WY Ending 9/30/24 Total	4,098.640	6.600	3,010.656
Annual Allocation <sup>2</sup>	N/A	6.660	4,619.23 4,651.111
Carryover	N/A	N/A	1,608.574 1,640.455

Notes:

(1) Calculated as Extractions - Delivery to Dom. Exclusives - Delivery to Ag+Com Exclusives - Delivery to Hyb

(2) Ag + Com Exclusive Annual Allocation includes 31.891 AF for Zone's pro rata share of WMID 1122 annual Zone.

Please respond as soon as possible so we can resolve before the deadline. Thank you.

Best Regards,

--

Bryan Bondy  
Contract General Manager  
805-386-4061 Main  
805-212-0484 Cell  
[www.zonemutual.com](http://www.zonemutual.com)  
<image001.jpg>

---

**From:** LPV Watermaster <[LPV.Watermaster@ventura.org](mailto:LPV.Watermaster@ventura.org)>  
**Sent:** Tuesday, February 25, 2025 10:28 AM  
**To:** Bryan Bondy <[bryan@zonemutual.com](mailto:bryan@zonemutual.com)>  
**Subject:** RE: Revised Appendix A for review - Draft LPV Annual Report & Appendices - Submit feedback by March 7, 2025

Good afternoon, Mr. Bondy.

For the 1<sup>st</sup> reporting period:

1. WMID 1122 is listed as an Exclusive Shareholder of Zone in Exhibit C thus  $1,032.16 + 5.51 = 1,037.67$  AF
2. WMID 4246 does not have an allocation under the Judgment, so this was taken from the Zone's allocation  $1,037.67 + 3.69 = 1,041.36$  AF.

For the 2<sup>nd</sup> reporting period:

1. Deliveries to Hybrids according to Zone 580.77 AF but is actually 578.765 AF (miscalculation) but according to Watermaster 567.739 AF which is 13.031 AF or 11.026 AF using the corrected value.
2. Deliveries to others is reported as 92.21 AF but Watermaster calculates this as 81.735 AF a 10.45 AF difference attributed to WMID 1122 being listed as an Exclusive in Exhibit C.
3. Adding  $567.739 + 81.735 = 649.474$  AF delivered to Hybrids and others.
4. Zones reported extractions (2726.26) - deliveries to exclusives (2011.771) - delivered to hybrids and others (649.473) = 65.016 AF is unaccounted for possibly line losses
5. Zones reported exclusives (2011.771) + 65.061 unaccounted = 2076.786 AF.

Correction:

However, Watermaster has implemented a correction to the 2<sup>nd</sup> reporting period because WMID1122 was not included in the calculation for exclusives above

1. WMID 1122 is listed as an Exclusive for Zone in Exhibit C thus  $2,011.771 + 10.45 = 2,022.221$
6. WMID 4246 does not have an allocation in the Judgment thus 15.9 is taken from Zone's allocation =  $2022.221 + 15.9 = 2038.121$  AF
7. Removing 15.9 AF from deliveries to hybrids and others = 633.574 AF
8. Zones reported extractions (2726.26) - deliveries to exclusives edited (2038.121) - delivered to hybrids and others (633.574) = 54.565 AF is unaccounted for possibly line losses
9. Deliveries to exclusives edited (2038.121) + 54.565 unaccounted = 2092.686 AF.

Watermaster calculated Zone Year ending total =  $1,041.36 + 2,092.686 = 3,134.06$  AF

1. Zone allocation = 4,625.88 + 92.23 = 4,718.440 AF but domestics do not accrue carryover thus 4,718.440 – 6.69 = **4,711.750 AF**
2. 4,711.750 – 3134.406 AF = **1,577.269 AF new carryover**

Please let Watermaster know if you have any additional questions.

Thank you,

LPV Watermaster

**From:** Bryan Bondy <[bryan@zonemutual.com](mailto:bryan@zonemutual.com)>  
**Sent:** Friday, February 14, 2025 10:17 PM  
**To:** LPV Watermaster <[LPV.Watermaster@ventura.org](mailto:LPV.Watermaster@ventura.org)>  
**Cc:** John Menne <[johndmenne@gmail.com](mailto:johndmenne@gmail.com)>; Info Zonemutual <[info@zonemutual.com](mailto:info@zonemutual.com)>  
**Subject:** RE: Revised Appendix A for review - Draft LPV Annual Report & Appendices - Submit feedback by March 7, 2025

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Dear LPV Watermaster Staff,

Zone Mutual Water Company (Zone) has reviewed the annual allocations accounting and groundwater allocation schedule and has identified the following discrepancies that need to be resolved:

Appendix A comments:

1. Values for Zone (WMID 4200) do not match our reporting to Watermaster and calculations therefrom. Please see table below. For your convenience, we have attached our reporting submittals for your reference.

WY Ending 9/30/24 Period	REPORTED			
	Extractions	Delivery to Exclusives	Delivery to Hybrids	Delivery to Other
1	1,372.380	1,005.485	310.78	29.2
2	2,726.260	2,011.771	580.77	92.2
WY Ending 9/30/24 Total	4,098.64	3,017.26	891.54	121.4
Allocation	N/A	4,625.88	N/A	N/A
Carryover	N/A	N/A	N/A	N/A

Notes:

(1) Calculated as Extractions - Delivery to Exclusives - Delivery to Hybrids - Delivery to Others

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2. Missing WMIDs - Zone reported delivery of water to the following WMIDs that are not listed in the Appendix A:
  1. WMID 4246
  2. WMID 1122
3. The third column from the right of Appendix A is titled " WY23-24 Allocations – Domestic". This appears to be an error. Most of the allocations are not domestic.

Appendix E comments:

1. Zone's (WMID 4200) Mutual Water Company Allocation is incorrectly listed as a Base Agricultural Allocation.

Best Regards,

--

Bryan Bondy  
Contract General Manager  
805-386-4061 Main  
805-212-0484 Cell  
[www.zonemutual.com](http://www.zonemutual.com)  
<image001.jpg>

---

**From:** LPV Watermaster <[LPV.Watermaster@ventura.org](mailto:LPV.Watermaster@ventura.org)>  
**Sent:** Friday, February 14, 2025 10:30 AM  
**To:** LPV Watermaster <[LPV.Watermaster@ventura.org](mailto:LPV.Watermaster@ventura.org)>  
**Subject:** Revised Appendix A for review - Draft LPV Annual Report & Appendices - Submit feedback by March 7, 2025

Good morning,

This message is to inform stakeholders that the [Annual Allocations Accounting \(Appendix A\)](#) linked below has been **revised**. Please review the appendices linked below and [on our website](#) for accuracy and completeness. Provide Watermaster with your feedback via email by March 7, 2025.

Regards,

**LPV Watermaster**  
c/o Fox Canyon Groundwater Management Agency  
800 S. Victoria Avenue, L#1610, Ventura, CA 93009  
[LPV.Watermaster@ventura.org](mailto:LPV.Watermaster@ventura.org) | <https://fcgma.org/las-posas-valley-watermaster/>

**From:** LPV Watermaster  
**Sent:** Tuesday, February 11, 2025, 4:42 PM

Dear Las Posas Valley Basin Stakeholders,

In accordance with the Judgment entered in Las Posas Valley Water Rights Coalition v. Fox Canyon Groundwater Management Agency VENCI00509700 (Judgement), the Las Posas Valley Watermaster (Watermaster) has prepared a Draft 2025 Las Posas Valley Basin Groundwater Sustainability Plan (GSP) Annual Report [available on the Watermaster website](#).

The draft includes the **revised** [Annual Allocations Accounting \(Appendix A\)](#) and an updated [Groundwater Allocation Schedule \(Appendix E\)](#) for WY23-24. **Please review these materials for accuracy and completeness.** [Please send Watermaster an email with your feedback](#) by March 7, 2025.

Watermaster staff plans to bring the Draft 2025 Las Posas Valley Basin GSP Annual Report to the Fox Canyon Groundwater Management Agency Board of Directors (acting as the Watermaster Board) for approval at its March 26, 2025, meeting, with planned submission to the California Department of Water Resources (DWR) by April 1, 2025.

All LPV Annual Report materials are linked on a dedicated website page at <https://fcgma.org/annual-report/>.

Please respond to this message with any questions or concerns.

Regards,

**LPV Watermaster**  
c/o Fox Canyon Groundwater Management Agency  
800 S. Victoria Avenue, L#1610, Ventura, CA 93009  
[LPV.Watermaster@ventura.org](mailto:LPV.Watermaster@ventura.org) | <https://fcgma.org/las-posas-valley-watermaster/>

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## Disclaimer

Item 16A - Correspondence from Jeffrey Warren, dated 3/25/2025  
FCGMA Board Meeting, January 28, 2026

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# FOX CANYON GROUNDWATER MANAGEMENT AGENCY

## LAS POSAS VALLEY WATERMASTER

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### 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.<sup>1</sup> 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.

---

<sup>1</sup> 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

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](mailto: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

**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:**

**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, cursive 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

**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

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**

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**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



July 25, 2025

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

Via email to [LPV.Watermaster@ventura.org](mailto: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

**TO: Las Posas Valley Watermaster**

**FROM: Las Posas Valley Watermaster Policy Advisory Committee**

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

**DATE: August 7, 2025**

---

The Las Posas Valley Watermaster Policy Advisory Committee (PAC) provides this Recommendation Report on the Use of Groundwater by Mutual Water Company Shareholders Without a Water Right Allocation.

Recommendation:

*Watermaster Consultation Request No. 1:*

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?

*PAC Recommendation for Consultation Request No. 1:*

Watermaster staff's conclusion that the Kachan's groundwater use is unauthorized is inconsistent with the Judgment. Rather, PAC concludes that the Judgment expressly contemplates such use and provides two mechanisms for the Kachans to address it:

*"In the case of Overuse<sup>1</sup> 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)*

Therefore, the Kachans, and similarly situated landowners, should be allowed to use groundwater provided they cure their use in accordance with Judgment § 4.15.2.3.

---

<sup>1</sup> The Kachan's groundwater use is Overuse by definition because they do not have an allocation.

*Watermaster Consultation Request No. 2:*

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?

*PAC Recommendation for Consultation Request No. 2:*

The Watermaster should levy an Overuse Assessment against the Kachans if they fail to cure their Overuse before the end of WY 2024 (Judgment § 4.15.2).

*Watermaster Consultation Request No. 3:*

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 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)?

*PAC Recommendation for Consultation Request No. 3:*

Consultation Request No. 3 is not applicable because PAC is not recommending that the Kachans and similarly situated landowners be prohibited from using groundwater without an allocation. Moreover, Zone and other mutual water companies should not be enjoined from complying with their bylaws, which requires them to deliver water to their shareholders.

Policy Rationale for Recommendation:

PAC's recommendations are consistent with a reasonable interpretation of the Judgment and a key goal of the physical solution to "maximize reasonable and beneficial use of the Basin's water resources consistent with Article X, section 2 of the California Constitution" (Judgment § 3.2).

In addition, PAC recognizes that when Zone Mutual Water Company delivers water to one of its shareholders, its role is limited to extracting and conveying that water, not using it, as confirmed in Judgment § 4.1. The Judgment's allocation framework governs the use of groundwater, not the act of extraction by an entity serving its shareholders. This is analogous to a private well-owner who, in an emergency, delivers water to a neighbor. Under the Judgment, if such water delivery is clearly reported as applied on another property, the well owner would not be penalized for extracting more than his allocation, because the use occurred elsewhere and is subject to the receiving party's allocation. This understanding reinforces that deliveries by a mutual water company to its shareholders should be evaluated under the shareholder's use, consistent with the mechanisms provided in Judgment § 4.15.2.3 and the overuse provisions in § 4.15.2, and in furtherance of the Physical Solution's objective in § 3.2 to maximize reasonable and beneficial use of the Basin's water resources.

Summary of Facts in Support of Recommendation:

N/A

Tally of Committee Member Votes:

	YES	NO	ABSTAIN	ABSENT
Ian Prichard, Calleguas MWD				X
Jeff Palmer, VC WWD No. 1 & 19				X
John Menne, Zone MWC			X	
Rob Grether, West LPV Large Ag	X			
David Schwabauer, East LPV Large Ag	X			
Patty Martinez, East LPV Small Ag	X			
Richard Cavaletto, West LPV Small Ag	X			
Laurel Servin, East LPV MWC	X			
Steven Murata, West LPV MWC				X
Arturo Aseo, Commercial	X			

Report of Bases for Majority and Minority Committee Member Positions:

N/A