State Water Resources Control Board
Division of Drinking Water

December 27, 2023

Joe Tapia
Interim General Manager
Sheep Creek Water Company
4200 Sunnyslope Rd
PO Box 291820
Phelan, CA 92329
sheepcreek@verizon.net

Dear Mr. Tapia:

RESPONSE TO REQUEST FOR EARLY RELEASE OF COMPLIANCE ORDER NUMBER 05_13_18R_002 SHEEP CREEK WATER COMPANY (SYSTEM NO. 3610109)

The State Water Resources Control Board, Division of Drinking Water (Division) received a letter dated December 15, 2023, from Sheep Creek Water Company's (SCWC) Secretary, Ms. Kellie Williams. Ms. Williams requested the Division consider the release of Compliance Order 05_13_18R_002 prior to its expiration.

Based on the following reasons, Division hereby rejects the SCWC request:

According to Directive 6 of the Compliance Order 05_13_18R_002A1, SCWC was required to have Well No. 13 constructed and equipped for operation into the distribution system no later than November 1, 2022. Additionally, based on Directive 4 of the Compliance Order 05_13_18R_002A1, SCWC was required to comply with all source capacity requirements as described in Section 64554 of Title 22 no later than December 1, 2023.

As of the date of this letter, Well No. 13 is not equipped for operation, nor SCWC has complied with all source capacity requirements. Furthermore, the production pump test reports provided as a part of SCWC's request indicate that the tests were not conducted pursuant to the procedural requirements listed in Section 64554 of Title 22, which means

that SCWC did not accurately demonstrate and determine the capacity of the SCWC's existing production sources. Thus, Sheep Creek Water Company fails to comply with Directives 4 and 6 of the Compliance Order 05_13_18R_002A1, and the Division cannot revoke this compliance order.

The Division is determined to continue working with SCWC to complete the directives of the Compliance Order 05_13_18R_002A1, to bring the water system back to compliance.

To demonstrate that Well No. 13 is installed and equipped, the Division requests SCWC to submit the following answers and documents no later than January 10, 2024.

- Current photos of Well No. 13 installed surface features and the associated equipment and apparatus.
- A copy of purchase order, the delivery status, and the estimated completion time for installation of Well No. 13 production pump.
- The task description and status of outstanding electrical work and the estimated completion time for all electrical work related to Well No. 13 construction.
- The estimated submission date for Well No. 13 pump test after the installation of the actual production pump.
- The estimated submission date for water quality reports including bacteriological analysis, and full suite of Title 22 drinking water analysis after the installation of the actual production pump.

The Division appreciates your continued efforts towards resolving this compliance issue. If you have any questions regarding this letter, please contact David Divani at (909) 383-4320 or by email at David.Divani@Waterboards.ca.gov or me at (909) 383-4328 or by email at Wei.Chang@waterboards.ca.gov.

Sincerely,

Wei H. Chang Digitally signed by Wei H. Chang
Date: 2023.12.27 13:11:07 -08'00'

Water Boards

Wei Chang, P.E.
District Engineer
San Bernardino District
Southern California Field Operations Branch

Enclosure:

1. Sheep Creek Water Company's Request for Early Release of Corrective Order Corrective Order Number 05_13_18R_002

CC: Sean McCarthy, DDW, sean.mccarthy@waterboards.ca.gov

Hector Cazares, DDW, hector.cazares@waterboards.ca.gov

Sheep Creek Water Company
4200 Sunnyslope Rd.
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Office (760) 868-3755/Fax (760) 868-2174
Email sheepcreek@verizon.net / www.sheepcreekwater.com

System No. 3610109

December 15, 2023

SWRCB
Division of Drinking Water
464 W 4th Street, Suite 437
San Bernardino, CA 92401
Attn: Mr. David Divani

Regarding:
- Corrective Order Number 05-13-18R002
- Request for Early Release of Corrective Order

The Sheep Creek Water Company (SCWC) is working diligently to comply with the State Water Resource Control Board (SWRCB) Corrective Order Number 05-13-18R002, set to expire on December 31, 2025. SCWC requests that after Well #13 has been permitted by the SWRCB, that the Corrective Order be released prior to its expiration.

Following is an update on our progress of increased production levels in the canyon:

A. Progress: Sheep Creek Canyon Production and Maximum Daily Demand

As you know, SCWC canyon wells have hard water. When our production dropped dramatically in July 2018, the management team and Board of Directors had difficulty determining why the production dropped so unexpectedly. The drought played a role in the lower production levels. Production from all five wells in the canyon varied, which was unusual.

The SCWC Board of Directors and management team were making serious efforts to meet the water requirements of our shareholders.

- Based on upon the Board of Directors recommendations, the shareholders approved at its 2019 Annual Shareholders Meeting to drop the water allotment from 1,000 cu ft per share to 750 cu ft for the 1st share and 150 cu ft for each additional share owned per shareholder.
- An agreement to transfer water between Phelan Pinion Hills Community Service District (PPHCSD) and SCWC was signed and dated July 31, 2018.
- The CEQA initial study for Well #11 was started in April 2017, and the Well was online and permitted by SWRCB in December 2018.

Our water users were not out of water and did not experience low water pressure. SCWC maintained our storage tanks levels, which meet all fire requirements. But because of the lower production, the State issued SCWC a corrective notice on August 30, 2018.

The corrective notice added a layer of urgency. But before the corrective notice, SCWC had already begun investigating and determining why the production levels dropped dramatically. Two of our wells produced water and were rehabbed before 2018. But our other three wells were producing little water. We discovered that in the bottom 60% of those wells, the casings were severely plugged with calcium and magnesium carbonate.

While the drought lowered our production, the plugged casings had a far more significant impact on our overall production. SCWC had the water; we just couldn't get the water through the casings. This was a mechanical problem, which has since been fully resolved. After rehabilitating the three wells, our production levels increased dramatically. SCWC has video evidence of the initially plugged, and subsequently cleared casings, and our production reports show the increase in water production, summarized below.

B. The following shows our production levels before rehabilitation and after:

Well #3A: Production in August 2019, before the rehab, was 167 GPM.
Production in February 2020, after the rehab, was 312 GPM.

Well #4A: Production in July 2022, before rehab, was 222 GPM.
Production in November 2022, after rehab, was 403 GPM.

Well #8: Production in April 2023, before rehab, was 352 GPM.
Production in July 2023, after rehab, was 412 GPM.

Sheep Creek Water Company hired an outside water testing company, Pump Check, to test our wells for our current production, and accuracy of the flow meters. As confirmed by their findings on or about May 5, 2023 SCWC's current production far exceeds our current maximum daily demand requirements.

Pump check hydraulic test report production for Well Levels – GPM (Exhibit A)

Well #2A:	Average Production May 2023,	361 GPM
Well #3A:	Average Production May 2023,	344 GPM
Well #4A:	Average Production May 2023,	377 GPM
Well #5:	Average Production May 2023,	241 GPM
Well #8:	Average Production May 2023,	369 GPM
Tunnel:	Average Production May 2023,	175 GPM
	Total 1,867 GPM	
		X 60 min/hour
	112,020 G/hour	
	X18 hours/day	
	2,016,360 gallons per day	

Our current water consumption in the month of July was 374 GPM times 60 minutes per hour times 24 hours equals 538,560 gallons per day. So, our daily production (wells and tunnel) in July was more

than double our daily consumption. While it could be argued that our production has increased because 2022-23 was a "wet" year, our production in 2021-22, at the end of the 17-year drought was 2,046 GPM, still met the current maximum daily demand 1,970,000 GPD.

To ensure that this does not occur again, SCWC will promptly inspect wells with significant water levels or production drops, determine the cause, and fix the issue immediately to maintain water production. Sheep Creek Water Company is committed to rehabilitating all of its wells, on a rotating ten year schedule. Well #5 is scheduled to be rehabbed in 2024.

C. Backup Wells Installed

Since Corrective Order Number 05-13-18R002 was issued on August 30, 2018 SCWC has drilled two backup wells.

1. Well #11 was put into production on December 2018 and is currently producing 251 GPM (Exhibit B).
2. Well #13 was test-pumped by Layne Christensen in October 2023. Layne Christensen is designing Well #13 to produce 400 GPM. The preliminary water quality testing has come back with a rating of "good." All tests have since been sent for lab analysis, in order to permit Well #13 as soon as possible. Lab analysis has been submitted to the SWRCB as of December 7, 2023.

We are aware that the backup Wells must be larger than our largest producing Well and produce at least half our current usage. SCWC's largest producing well is #8, which produces an average of 412 GPM. For the month of August 2023 (Exhibit C), SCWC's current usage is 421 GPM. Half of 421 gallons is 210 GPM. Well #11 is producing 251 GPM, and Well #13 can produce up to 400 GPM. Together, Wells #11 and #13 produce 651 GPM. SCWC requirements for backup Wells have been met.

If production in the Sheep Creek Canyon drops below 1,500 GPM, SCWC is committed to pumping backup Wells #11 and #13 to meet the demands of our water users and dramatically lower the demand for water from the Sheep Creek Canyon. The current Board is committed to never overdraft the Sheep Creek Canyon.

Water Allotment Conservation Plan

When SCWC production was declining in 2018, the entire state of California was asked to cut back on water usage due to the ongoing drought. At the Boards direction, SCWC customers did what was asked of them. The shareholders voted twice to lower their overall usage, once at the 2019 Annual Shareholder's meeting and again at a Special Shareholders meeting in August 2019. The shareholders voted to allow the Board to lower water allotments over the next few months to keep up with the dropping production levels. The Board and crew immediately started investigating why the levels were dropping quickly. The first action was to rehab Wells #3A, #4A, and #8.

In addition to lowering the allotments, starting in 2018, SCWC has drilled two Wells in Phelan, Well #11 and #13. Well #11 was completed in 2018, and Well #13 will be completed in December 2023. Both Wells are outside the Canyon. The cost to pump water from these wells is significantly higher than the water acquired from the Canyon. Mojave Water Agency fees and electricity to pump the water are the two most significant factors for the higher costs.

SCWC is a mutual water company that provides water to its customers at cost, a Tier system was implemented to be fiscally responsible and fair. The Tier 1 rate is the cost of the water from the Canyon. The Tier 2 rate is the cost of the water from Wells in the town of Phelan (#11 & #13). The Tier 3 rate is the overage water cost shareholders use above their allotment. This water is significantly higher in cost to encourage conservation of water. The money generated from Tier 3 will be used to subsidize the upgrade of our water company. In the future, the SCWC is committed to using the production levels from 2018 as the basis for calculating the water allotment for Tier 1 (Canyon water). SCWC cannot return to the days when each share was allotted thousands of cu ft of water per share.

The current meter application fee is $10,750. This will be adjusted in the future to account for inflation. Currently, SCWC has the water for an additional 150 meters. When SCWC issues 100 of the150 meters, the plan is to start drilling an additional well, and so forth, as the town grows.

Request for Early Release of Corrective Order

The Board of SCWC feels that all the requirements of the corrective order have been met pending the imminent permitting of Well #13. We respectively request the release of the corrective order in advance of the 12/31/25 expiration. We would also like to request an additional 150 meters to move forward with the above plan to provide water for our community.

Thank you for your time and consideration of SCWC's request for early release of the Corrective Notice.

Thank you,

Kellie Williams

Secretary/Treasurer
Sheep Creek Water Company Board of Directors

CC:
1. Mr. Sean McCarthy, DDW Sean.Mccarthy@Waterboards.ca.gov
2. Mr. Wei Chang, DDW Wei.Chang@Waterboards.ca.gov
3. Mr. David Divani, DDW David.Divani@Waterboards.ca.gov

PUMP CHECK

Pumping Systems Analysts

Hydraulic Test Report

Since 1958

Exhibit: A

(951) 684-9801 • Lic. 799498 • Fax (951) 684-2988

CERTIFICATE OF ACCURACY

Customer: Sheep Creek Water Company
Test Date: 05/05/2023
Location: 6666 Highway 2
Identification: **Well #2A**

Meter Size: 10" Make: McCrometer
Meter No: 00 218 10 Register: Gal x 1000

General Data

Meter read before test: 329355 Meter read after test: 329373

Pipe ID: 10 (Inch) Pipe area: 78.540 (sq.in.) Pressure: 11.0 (Lbs/sq.in.)

Test Data **Test Before Inspection**

Test Equipment			Totalizer			Volume			
Test No.	Mano Read	Actual GPM	Second Read	First Read	Diff.	Convert to Gallons	Time in Seconds	Metered GPM	Percent of Flow
1	4.60	361	329360	329358	2	2,000	333.29	360	99.7%
2	4.90	385	329366	329364	2	2,000	312.76	384	99.7%
3	5.35	420	329372	329369	3	3,000	430.96	418	99.4%
Avg.		388.8					Avg.	387.1	**99.6%**

Remarks

34.22.3247n117.36.5454w
PC 5198

Test 1 was with the VFD operating at 57.0 Hz.
Test 2 was with the VFD operating at 58.5 Hz.
Test 3 was with the VFD operating at 60.0 Hz.

Approved

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Hydraulic Test Report

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CERTIFICATE OF ACCURACY

Customer: Sheep Creek Water Company
Location: 6666 Highway 2
Identification: **Well #3A**

Test Date: 05/05/2023

Meter Size: 8"
Meter No: 20023511-08/E12-02020
Make: Water Specialties
Register: Gal x 1000

General Data

Meter read before test: 261720
Meter read after test: 261738

Pipe ID: 8 (Inch) Pipe area: 50.266 (sq.in.) Pressure: 6.0 (Lbs/sq.in.)

Test Data **Test Before Inspection**

Test Equipment			Totalizer		Volume				
Test No.	Mano Read	Actual GPM	Second Read	First Read	Diff.	Convert to Gallons	Time in Seconds	Metered GPM	Percent of Flow
1	6.80	342	261725	261723	2	2,000	352.20	341	99.7%
2	8.80	442	261730	261728	2	2,000	272.58	440	99.5%
3	12.70	638	261737	261733	4	4,000	377.85	635	99.5%
Avg.		474.2					Avg.	472.0	**99.5%**

Remarks
34.22.2993n117.36.5199w
PC 5196

Test 1 was with the VFD operating at 45.8 Hz.
Test 2 was with the VFD operating at 50.0 Hz.
Test 3 was with the VFD operating at 60.0 Hz.

Approved

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Pumping Systems Analysts
Hydraulic Test Report

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CERTIFICATE OF ACCURACY

Customer: Sheep Creek Water Company
Location: 6666 Highway 2
Identification: **Well #4A**

Test Date: 05/05/2023

Meter Size: 10" Make: Water Specialties
Meter No: 20041188-10 Register: Gal x 1000

General Data

Meter read before test: 103839 Meter read after test: 103873

Pipe ID: 10 (Inch) Pipe area: 78.540 (sq.in.) Pressure: 2.5 (Lbs/sq.in.)

Test Data **Test Before Inspection**

Test Equipment			Totalizer		Volume				
Test No.	Mano Read	Actual GPM	Second Read	First Read	Diff.	Convert to Gallons	Time in Seconds	Metered GPM	Percent of Flow
1	4.80	377	103850	103848	2	2,000	319.85	375	99.5%
2	5.80	456	103859	103857	2	2,000	264.57	454	99.6%
3	6.70	526	103869	103866	3	3,000	343.26	524	99.7%
Avg.		452.9					Avg.	451.0	**99.6%**

Remarks
34.22.2856n117.36.5008w
PC 5199

Test 1 was with the VFD operating at 54.5 Hz.
Test 2 was with the VFD operating at 57.5 Hz.
Test 3 was with the VFD operating at 60.0 Hz.

Approved

PUMP CHECK
Pumping Systems Analysts
Hydraulic Test Report

Since 1958

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CERTIFICATE OF ACCURACY

Customer: Sheep Creek Water Company
Location: 6666 Highway 2
Identification: **Well #5**

Test Date: 05/05/2023

Meter Size: 8" Make: Water Specialties
Meter No: 911778-08 Register: Gal x 1000

General Data

Meter read before test: 426119 Meter read after test: 426127

Pipe ID: 8 (Inch) Pipe area: 50.266 (sq.in.) Pressure: 11.0 (Lbs/sq.in.)

Test Data **Test Before Inspection**

Test Equipment			Totalizer		Volume				
Test No.	Mano Read	Actual GPM	Second Read	First Read	Diff.	Convert to Gallons	Time in Seconds	Metered GPM	Percent of Flow
1	6.80	342	426122	426120	2	2,000	355.59	337	98.7%
2	6.75	339	426124	426122	2	2,000	357.27	336	99.0%
3	6.75	339	426126	426124	2	2,000	357.31	336	99.0%
Avg.		340.1					Avg.	336.4	**98.9%**

Remarks
34.22.3228n117.30.5283w
PC 5197

All of the above tests were performed with the VFD operating at 60.0 Hz.

Approved

PUMP CHECK

Pumping Systems Analysts

Hydraulic Test Report

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CERTIFICATE OF ACCURACY

Customer: Sheep Creek Water Company
Location: 6666 Highway 2
Identification: **Well #8**

Test Date: 05/05/2023

Meter Size: 8" Make: McCrometer
Meter No: 04-06568-08 Register: Gal x 1000

General Data

Meter read before test:	332616	Meter read after test:	332634
Correction factor found on meter:	+ 3.0%	Correction factor left on meter:	+ 3.0%
Gallons per rev found on meter:	2.500	Gallons per rev left on meter:	2.500

Pipe ID: 8 (Inch) Pipe area: 50.266 (sq.in.) Pressure: 0.5 (Lbs/sq.in.)

Test Data **Test Before Inspection**

Test Equipment			Totalizer		Volume				
Test No.	Mano Read	Actual GPM	Second Read	First Read	Diff.	Convert to Gallons	Time in Seconds	Metered GPM	Percent of Flow
1	7.35	369	332620	332618	2	2,000	324.16	370	100.2%
2	9.85	495	332625	332623	2	2,000	241.71	496	100.3%
3	12.60	633	332633	332630	3	3,000	281.54	639	100.9%
Avg.		499.3					Avg.	502.0	**100.5%**

Remarks

34.22.2435n117.36.4800w
PC 5200

Test 1 was with the VFD operating at 50.0 Hz.
Test 2 was with the VFD operating at 54.0 Hz.
Test 3 was with the VFD operating at 60.0 Hz.

Approved

PUMP CHECK

Pumping Systems Analysts

Hydraulic Test Report

Since 1958

(951) 684-9801 • Lic. 799498 • Fax (951) 684-2988

CERTIFICATE OF ACCURACY

Customer: Sheep Creek Water Company
Location: 6666 Highway 2
Identification: **Tunnel Well**

Test Date: 05/05/2023

Meter Size: 8"
Meter No: 20190451-08/E19-01421
Make: Water Specialties
Register: Gal x 1000

General Data

Meter read before test: 264624
Meter read after test: 264633

Pipe ID: 8 (Inch) Pipe area: 50.266 (sq.in.) Pressure: 7.0 (Lbs/sq.in.)

Test Data **Test Before Inspection**

Test Equipment			Totalizer		Volume				
Test No.	Mano Read	Actual GPM	Second Read	First Read	Diff.	Convert to Gallons	Time in Seconds	Metered GPM	Percent of Flow
1	8.30	417	264628	264625	3	3,000	433.15	416	99.6%
2	4.50	226	264630	264628	2	2,000	531.85	226	99.7%
3	4.05	204	264632	264630	2	2,000	593.42	202	99.3%
Avg.		282.3					Avg.	281.1	**99.6%**

Remarks
34.22.3563n117.36.5193w

Approved

Exhibit: B

AVERAGE GALLONS PER MINUTE

	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	
2023	19%	18%	14%	8%	16%	-7%	21%	26%	27%	43%	13%	-10%	
Tunnel	144	148	156	175	184	182	175	173	176	178	184		
Well # 2A	364	300	347	323	367	369	344	369	372	375	333	367	
Well # 3A	449	545	542	319	374	240	357	310	361	421	504	500	
Well # 4A	370	333	319	333	360	426	359	353	365	368	366	348	
Well # 5	296	283	306	314	308	298	330	390	314	403	391	383	
Well # 8	325	330	340	352	409		412	372	352	379	384		**Pump Pulled 5-11-23**
Well # 11	251	251	251	251	251	261	251	251	251	251	251	251	
TOTAL G	**2,199**	**2,190**	**2,261**	**2,067**	**2,253**	**1,776**	**2,228**	**2,218**	**2,191**	**2,375**	**2,413**	**1,849**	
2022	-8%	-11%	-5%	-8%	-5%	-5%	-4%	-1%	-4%	-7%	18%	10%	Compare 2021
Tunnel	140	140	140	141	141	141	143	142	142	142	142	142	
Well # 2A	309	296	333	361	333	334	326	322	319	318	328	331	
Well # 3A	330	333	312	333	334	317	305	398	383	364	325	299	
Well # 4A	227	227	306	250	256	236	222	0	0	0	403	338	**Pump Pulled 7-11-22**
Well # 5	278	286	278	250	310	287	287	280	274	277	288	307	
Well # 8	311	316	359	329	319	336	310	365	350	313	400	313	
Well # 11	251	251	251	251	251	251	251	251	251	251	251	316	
TOTAL G	**1,846**	**1,849**	**1,979**	**1,915**	**1,944**	**1,902**	**1,844**	**1,758**	**1,719**	**1,665**	**2,137**	**2,046**	
2021	36%	13%	13%	4%	4%	2%	-7%	-14%	-10%	-8%	-7%	-8%	Compare 2020
Tunnel	132	133	133	134	136	136	137	137	138	138	140	140	
Well # 2A	333	345	315	351	343	336	333	327	318	311	313	333	
Well # 3A	329	308	313	310	315	315	317	288	295	306	325	318	
Well # 4A	300	348	354	345	315	317	258	212	227	227	227	227	
Well # 5	310	310	312	298	299	300	297	289	276	271	262	283	
Well # 8	351	393	396	393	378	352	333	273	292	284	289	303	
Well # 11	251	251	251	251	251	251	251	251	251	251	251	251	
TOTAL G	**2,006**	**2,088**	**2,074**	**2,082**	**2,037**	**2,007**	**1,926**	**1,777**	**1,797**	**1,788**	**1,807**	**1,855**	
2020	26%	43%	40%	56%	51%	53%	62%	50%	55%	48%	45%	36%	Compare 2019
Tunnel	123	122	122	123	127	131	133	133	133	132	132	133	
Well # 2A	250	279	262	306	286	292	344	339	336	333	319	333	
Well # 3A	0	312	324	327	318	311	311	347	321	333	323	329	
Well # 4A	272	292	250	319	292	302	372	350	332	269	288	300	
Well # 5	305	309	327	314	319	307	311	318	289	289	302	310	
Well # 8	270	284	295	367	367	367	348	322	333	333	333	350	
Well # 11	251	251	251	251	251	251	251	251	251	251	251	251	
TOTAL G	**1,471**	**1,849**	**1,831**	**2,007**	**1,960**	**1,961**	**2,070**	**2,060**	**1,995**	**1,940**	**1,948**	**2,006**	
2019	26%	-2%	0%	3%	13%	61%	155%	166%	155%	154%	70%	83%	Compare 2018
Tunnel	107	109	112	119	124	119	123	128	128	126	125	124	
Well # 2A	150	208	207	170	179	189	184	158	172	204	186	229	
Well # 3A	148	186	194	186	186	167	162	167	0	0	0	0	**Pump Pulled 9-19**
Well # 4A	174	179	185	189	194	167	167	179	207	207	207	312	
Well # 5	155	168	170	173	165	197	196	231	270	283	290	299	
Well # 8	181	193	193	198	198	192	195	258	259	242	285	263	
Well # 11	251	251	251	251	251	251	251	251	251	251	251	251	
TOTAL G	**1,166**	**1,294**	**1,312**	**1,286**	**1,297**	**1,282**	**1,278**	**1,372**	**1,287**	**1,313**	**1,344**	**1,478**	
2018	-40%	-27%	-16%	-12%	-19%	-42%	-57%	-49%	-48%	-48%	-17%	-21%	Compare 2017
Tunnel	131	129	127	125	125	124	122	121	119	118	118	116	
Well # 2A	0	150	175	135	125	55	30	30	25	25	30	30	
Well # 3A	115	211	122	195	167	33	25	25	25	25	25	25	
Well # 4A	199	213	251	194	168	99	60	60	60	60	60	60	
Well # 5	286	289	297	279	274	278	124	119	124	128	138	147	
Well # 8	320	325	337	317	284	205	141	161	152	161	167	179	
Well # 11	0	0	0	0	0	0	0	0	0	0	251	251	
TOTAL G	**1,051**	**1,317**	**1,309**	**1,245**	**1,143**	**794**	**502**	**516**	**505**	**517**	**789**	**808**	
2017													
Tunnel	147	145	147	148	147	147	143	140	137	136	136	134	
Well # 2A	214	274	0	0	0	50	50	50	107	107	0	0	**Pump Pulled 11-17**
Well # 3A	330	330	345	295	301	280	180	143	115	115	115	115	
Well # 4A	370	333	333	253	253	200	200	144	115	130	154	184	
Well # 5	353	372	372	355	353	353	280	257	238	244	258	275	
Well # 8	333	361	367	358	350	342	310	278	256	266	288	308	
TOTAL G	**1,747**	**1,815**	**1,564**	**1,409**	**1,404**	**1,372**	**1,163**	**1,012**	**968**	**998**	**951**	**1,016**	

Exhibit: C

Service Connection X 3.2
Population 3846

CONSUMPTION 10-YEAR

	-2%	0%	11%	-9%	-2%	-12%	-19%	2%	-16%	-5%	-8%	-18%		vs 2022
	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	TOTAL	
2023	-38%	-38%	-38%	-59%	-48%	-53%	-52%	-29%	-55%	-51%	-30%	-100%		
Cons'n HCF	11,051	11,638	11,782	12,616	18,524	18,659	22,333	25,146	17,349	16,624	14,598		180,320	
Cons'n GPM	185	216	197	218	310	323	374	421	300	279	253	0	256	
Cons'n A.F.	25.370	26.717	27.048	28.962	42.525	42.835	51.270	57.727	39.828	38.163	33.512	0.000	413.958	
Ave GPDPP	69.331756	73.014477	73.917904	79.150252	116.21586	120.96492	140.11276	157.76096	112.47228	104.29564	94.637754	0		
2022	-31%	-32%	-18%	-43%	-41%	-40%	-52%	-27%	-45%	-50%	-24%	-38%		Reduction with 2013
Cons'n HCF	12,268	12,858	15,510	17,551	20,711	23,764	22,170	25,581	21,299	16,717	15,793	11,744	215,966	
Cons'n GPM	206	239	288	326	384	411	371	429	369	280	273	197	314	
Cons'n A.F.	28.164	29.518	35.606	40.292	47.546	54.555	50.895	58.726	48.896	38.377	36.256	26.961	495.790	
Ave GPDPP	76.967723	80.669202	97.306628	110.11145	129.93666	149.09057	139.09013	160.49006	133.62565	104.8791	99.082113	73.679499		
2021	-30%	-17%	-31%	-37%	-43%	-29%	-39%	-42%	-31%	-43%	-12%	-11%		Reduction with 2013
Cons'n HCF	12,493	12,897	13,998	19,265	21,063	27,040	27,372	25,069	25,460	17,604	17,078	14,263	233,603	
Cons'n GPM	209	239	235	334	353	468	459	420	441	295	296	239	332	
Cons'n A.F.	28.680	29.607	32.136	44.227	48.354	62.074	62.838	57.551	58.448	40.414	39.205	32.744	536.279	
Ave GPDPP	78.37983	80.9125	87.823717	120.86663	132.14478	169.64046	171.72876	157.27844	159.73093	110.44478	107.14256	89.485584		
2020	-33%	-27%	-43%	-58%	-46%	-40%	-44%	-44%	-34%	-30%	-25%	-10%		Reduction with 2013
Cons'n HCF	12,108	11,353	11,457	13,003	19,970	23,014	25,219	24,223	24,214	21,641	14,550	14,433	215,185	
Cons'n GPM	203	211	192	225	335	398	423	406	419	363	252	242	306	
Cons'n A.F.	27.795	26.062	26.302	29.850	45.846	52.833	57.894	55.608	55.588	49.681	33.403	33.133	493.996	
2019	-31%	-30%	-49%	-47%	-53%	-49%	-46%	-43%	-40%	-36%	-28%	-20%		Reduction with 2013
Cons'n HCF	12,481	10,980	10,327	16,381	17,288	19,469	24,323	24,572	21,868	19,744	13,907	12,940	204,279	
Cons'n GPM	209	204	173	284	290	337	408	412	379	331	241	217	290	
Cons'n A.F.	28.652	25.207	23.707	37.606	39.688	44.695	55.838	56.409	50.203	45.325	31.926	29.706	468.960	
2018	-15%	-7%	-37%	-41%	-40%	-35%	-40%	-39%	-39%	-39%	-16%	-18%	-30%	Reduction with 2013
Cons'n HCF	15,360	14,461	12,701	18,206	22,082	24,730	27,000	26,417	22,364	18,762	16,399	13,123	231,605	
Cons'n GPM	257	268	213	315	370	428	452	443	387	314	284	220	329	
Cons'n A.F.	35.262	33.198	29.157	41.796	50.692	56.772	61.983	60.646	51.341	43.072	37.647	30.126	531.693	
2017	-38%	-35%	-24%	-33%	-34%	-33%	-42%	-30%	-40%	-29%	3%	-3%	-28%	Reduction with 2013
Cons'n HCF	11,121	10,088	15,275	20,758	24,151	25,786	26,112	30,311	22,165	21,963	19,912	15,588	243,231	
Cons'n GPM	186	187	256	359	405	446	438	508	384	368	345	261	345	
Cons'n A.F.	25.531	23.159	35.066	47.653	55.443	59.196	59.945	69.585	50.885	50.420	45.713	35.785	558.381	
2016	-25%	10%	3%	-26%	-21%	11%	-21%	-17%	-28%	-35%	0%	-19%	-16%	Reduction with 2013
Cons'n HCF	13,498	17,144	20,915	22,752	29,188	42,373	35,594	35,657	26,381	19,859	19,429	13,103	295,892	
Cons'n GPM	226	318	350	394	489	734	596	597	457	333	336	220	421	
Cons'n A.F.	30.986	39.356	48.014	52.232	67.007	97.274	81.712	81.857	60.561	45.589	44.604	30.081	679.274	
2015				-4%	-27%	-20%	-33%	-27%	-9%	-18%	-8%	11%	-15%	
Cons'n HCF	15,686	15,711	20,472	29,631	26,759	30,807	30,067	31,370	33,365	25,346	18,042	17,975	295,231	
Cons'n GPM	263	291	343	513	448	533	504	526	578	425	312	301	420	
Cons'n A.F.	36.010	36.068	46.997	68.023	61.430	70.723	69.025	72.015	76.596	58.187	41.418	41.266	677.757	
2014														
Cons'n HCF	17,899	18,812	18,885	30,747	35,306	39,612	46,285	35,211	38,411	33,592	20,749	19,044	354,552	
Cons'n GPM	300	349	316	532	592	686	776	590	665	563	359	319	504	
Cons'n A.F.	41.091	43.187	43.353	70.585	81.051	90.937	106.256	80.833	88.180	77.117	47.632	43.719	813.941	
2013														
Cons'n HCF	17,965	15,582	20,215	30,811	36,733	38,221	44,989	43,058	36,655	30,752	19,423	16,096	350,501	
Cons'n GPM	301	289	339	533	616	662	754	721	635	515	336	270	498	
Cons'n A.F.	41.242	35.771	46.408	70.732	84.327	87.743	103.281	98.848	84.149	70.598	44.588	36.952	805	
													46.763566	