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District at ParkCenter, LLC

**BEFORE THE DEPARTMENT OF WATER RESOURCES
OF THE STATE OF IDAHO**

IN THE MATTER OF APPLICATION FOR
PERMIT NOS. 63-34403, 63-34652, 63-34897
AND 63-34900 IN THE NAME OF CAT
CREEK ENERGY LLC

DECLARATION OF HEIDI WELSH IN
SUPPORT OF SBAR RANCH, LLC AND
THE DISTRICT AT PARKCENTER,
LLC'S PETITION FOR REVIEW OF
OCTOBER 20, 2020, ORDER RE: SBAR
RANCH, LLC AND THE DISTRICT AT
PARKCENTER, LLC'S RENEWED
MOTION FOR RULE 40.05.B. ORDER
FOR APPLICANT TO SUBMIT
COMPLETE RULE 40.05
INFORMATION

Heidi Welsh, being first duly sworn, deposes and says:

1. I hold a B.S. degree in Watershed Science from Colorado State University.
2. As detailed in my *curriculum vitae* attached hereto as Exhibit A, I have substantial experience and expertise in the field of hydrology and I am a registered Professional Hydrologist.
3. Currently, I am a Principal and Senior Watershed Scientist at Spronk Water Engineers, a private consulting water resource engineering firm located in Denver, Colorado.

4. I was retained by SBar Ranch, LLC and The District at ParkCenter, LLC to evaluate the information Cat Creek Energy LLC (“CCE”) posted on its online repository in this matter for compliance with the Idaho Department of Water Resources’ Water Appropriation Rule 40.05. In connection with my work, in addition to reviewing the information on CCE’s repository, I also have reviewed Cat Creek’s Applications for Water Right Permit Nos. 63-34403, 63-34652, 63-34897 and 63-34900, Idaho Code 42-203A(5), the October 20, 2020, Order Re: SBar Ranch, LLC and The District at ParkCenter, LLC’s Renewed Motion for Rule 40.05.b Order for Applicant to Submit Complete Rule 40.05 Information (the “Order”) and Idaho Water Appropriation Rule 40.05, as well as other publicly available information and pertinent materials available to me.

5. I reached the opinions presented here by applying accepted data analysis methodologies in the field of hydrology. The opinions expressed here are my own and are based on the data and facts available to me at the time of writing. I hold the opinions set forth here to a reasonable degree of certainty.

6. I prepared the “Summary of Documents Provided by Cat Creek Energy Pursuant to Rule 40.05,” attached as Exhibit B to the May 1, 2020, SBar Ranch, LLC and The District at ParkCenter, LLC’s Motion for Rule 40.05(b) Order for Applicant to Submit Complete Rule 40.05 Information which described the inadequacies of the Rule 40.05 information on the CCE repository as of that date.

7. I prepared the “Summary of Documents Provided by Cat Creek Energy Pursuant to Rule 40.05,” attached as Exhibit A to the June 30, 2020, SBar Ranch, LLC and The District at ParkCenter, LLC’s Response to Motion for Protective Order and Renewed Motion for Rule

40.05.b Order for Applicant to Submit Complete Rule 40.05 Information which described the inadequacies of the Rule 40.05 information on the CCE repository as of that date.

8. The “Summary of Documents Provided by Cat Creek Energy Pursuant to Rule 40.05,” attached as Exhibit B hereto, identifies with yellow highlighting the kinds of Rule 40.05 information that in my professional opinion are not addressed by the Order but that remain unsatisfied. To address these additional information requirements, I recommend the following additions to the Order:

a) Related to IDAPA 37.03.08.40.05.c – Effect on Existing Water Rights:

The frequency and/or locations of measurements are not always specified in the Order. Therefore, I propose additional language for the Order specifying desirable measurement frequencies and locations. Also, to allow for review and confirmation of the information provided by CCE, I propose revisions to the Order to require that CCE provide all backup data and spreadsheets used in analyses. The Order does not adequately require assessment of possible impacts to ground water, springs and the nearby Big Wood Drainage, as required by Rule 40.05.c. Additional information is also required under Rule 40.05 if ground water, springs or surface water sources are determined to be intercepted or impacted. Accordingly, I recommend modifications to the Order to require that CCE establish whether its operations/storage pond will intercept or appropriate ground water, will interrupt natural historic aquifer recharge and will impact springs and other headwaters in the area, including those of the Big Wood River Drainage. If ground water and/or springs will be affected, further information about impacts to other water rights from these sources also should be required. For these reasons, I recommend the following revisions (underlined) to IDAPA 37.03.08.40.05.c – Effect on Existing Water Rights section of the Order, page 12:

“Cat Creek shall submit documents analyzing and discussing how daily water diversions, releases, storage retention, and losses will be measured at Cat Creek Reservoir and Anderson Ranch Reservoir. Cat Creek should also analyze and discuss how data will be gathered, downloaded, and transmitted, including the employment of telemetry (i.e., 15 minute data). Finally, Cat Creek should evaluate the possibility of remote control over pumps, gates, release valves, and the like, in order to ensure the watermaster can control and regulate diversion and release of water in real time. Documents shall contain backup data and spreadsheets used in all analyses. Cat Creek also shall establish whether its operations/storage pond will intercept or appropriate ground water, will interrupt natural historic aquifer recharge or will impact springs and other headwaters in the area, including those of the Big Wood River Drainage. If ground water and/or springs will be affected, further information about the impacts to water rights from these sources shall be provided, including identification of the water rights and the locations of these wells, springs and sources and any design, construction or operation techniques which will be employed to eliminate or reduce the impact on these other water rights.”

b) Related to IDAPA 37.03.08.40.05.d – Sufficiency of Water Supply:

To satisfy Rule 40.05.d’s water requirement provision, the Order should be modified to require that CCE also provide information on evaporative losses, and daily release amounts, transportation losses and deliveries (volumes and rates) to the downstream water users. Also, to assess possible ground water impacts pursuant to Rule 40.05.d, revisions to the Order should require that ground water data already available will be provided along with further ground water assessment plans (e.g. locations of wells, dates, static water levels, the properties of aquifers, modeling, along with other pertinent ground water information). Also, to fully address Rule 40.05.d’s mandates, the Order should require that other water rights, such as Elmore County’s Permit No. 63-34348, be included in CCE’s water availability analysis, and that other sources of water supply that may be used to supplement the applied for water be identified. For these reasons, I recommend the following revisions (underlined) to IDAPA 37.03.08.40.05.d – sufficiency of the Water Supply section of the Order, page 12:

“Cat Creek shall submit documents containing specific information about how much water will be daily pumped to the reservoir, lost to evaporation, and stored to generate power, and the timing of the pumping and subsequent releases of water for power generation. Cat Creek shall provide information on the daily release amounts, transportation losses and deliveries (volumes and rates) to the downstream water users. Cat Creek shall provide information on ground water data already collected and further ground water monitoring plans (location of wells, dates, static water levels, the properties of aquifers, modeling, along with other pertinent ground water information). Cat Creek shall consider other water rights (e.g., Elmore County Permit 63-34348) in its water availability analysis. Cat Creek shall provide information on other sources of supply that may be used to supplement the applied for water.”

c) Related to IDAPA 37.03.08.40.05.e – Good Faith, Delay, or Speculation.

Pursuant to Rule 40.05.e, I recommend language to require additional information on all rights of way, permits and other approvals that may be needed not just to beneficially use the water, but also to convey, and deliver the water. For these reasons, I recommend the following revisions (underlined) to IDAPA 37.03.08.40.05.e – Good Faith, Delay or Speculation Section of the Order, pages 12-13:

“Cat Creek shall submit documentation that it either: (1) owns the proposed generally identified lands where water will be beneficially used; or (2) has consent from the owners of specific parcels of property to apply the storage water for beneficial use on the generally identified lands; or (3) has the consent of a municipal provider or irrigation district that is authorized to deliver water to the generally identified lands and shall identify the beneficial uses on the respective lands, for the following purposes:

- Irrigation from Storage;
- Municipal from Storage;
- Domestic from Storage;
- Mitigation by Delivery from Storage;
- Industrial from Storage;
- Commercial from Storage; and
- Ground Water Recharge from Storage.

Cat Creek shall provide additional information on all rights of way, permits and other approvals that may be needed, not just to beneficially use the water but also to convey and divert the water.”

I declare under penalty of perjury that the foregoing is true and correct.

DATED THIS 3rd day of November, 2020.



Heidi Welsh

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the date indicated below I caused to be served a true copy of the foregoing DECLARATION OF HEIDI WELSH IN SUPPORT OF SBAR RANCH, LLC AND THE DISTRICT AT PARKCENTER, LLC'S PETITION FOR REVIEW OF OCTOBER 20, 2020, ORDER RE: SBAR RANCH, LLC AND THE DISTRICT AT PARKCENTER, LLC'S RENEWED MOTION FOR RULE 40.05.B. ORDER FOR APPLICANT TO SUBMIT COMPLETE RULE 40.05 INFORMATION with Exhibits by email addressed to the following:

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Dated: November 3, 2020



Dana L. Hofstetter

Exhibit A
Professional Resume of
Adelheid (Heidi) Marie Welsh

Education: B.S. Watershed Science, 2007, Colorado State University

Professional Registration: Professional Hydrologist, American Institute of Hydrology

Professional Experience:

2009 - Present: *Spronk Water Engineers, Inc., Principal and Senior Watershed Scientist*
Responsible for compilation and analysis of water resources, water rights and hydrologic data including climatological data, streamflow data, diversion records, cropping patterns, call records, water rights tabulations and decrees. Analyses include quantification of historical consumptive use, crop evapotranspiration calculations, water availability analyses, stream depletion modeling, point flow modeling, other surface water modeling; and, geospatial modeling related to water resources including georeferencing and digitizing, delineation and quantification of irrigated area, and other hydrologic analyses. Assists with water rights protection, substitute water supply plans, augmentation plans, and water rights accounting.

Summary of Experience:

Ms. Welsh has over ten years of experience working in the water resources field in Colorado, Wyoming, New Mexico, Montana, and Idaho. She has provided engineering support and expert assistance with water rights protection, substitute water supply plans, augmentation plans, and interstate compact compliance. She is experienced in the review, development, and maintenance of water rights accounting. She has extensive experience in GIS applications and modeling related to water resources and data management.

Description of Representative Projects:

Town of La Salle, Water Supply Consulting.
Assisted the Town in developing a water supply for irrigation of parks, ballfield, and subdivision lawns. Assisted with a substitute supply plan and assisted in change of Godfrey Ditch and Union Reservoir water rights



application to allow use of an irrigation well, replacing depletions with leased water supplies from the reservoir. Engineering analyses include calculation of water demands, water consumption and timing of stream depletions to the South Platte River. Responsible for daily augmentation plan accounting.

City of Pocatello, Water Rights Protection and Water Supply.

Assists in preparation of exhibits and water rights analyses for administrative hearings. Engineering analyses include analysis and review of water rights data and water measurements, summarizing and mapping depletions using Eastern Snake Plain Aquifer Model runs, and mapping water rights data.

State of New Mexico, Rio Grande Compact.

Responsible for review, compilation, and maintenance of surface water data. Assists in the review of surface water modeling efforts, including RiverWare modeling.

Cherry Creek Project Water Authority.

Assists with analysis and mapping of the Cherry Creek Basin in support of water rights applications and basin modeling. Analyses include water availability analyses, point flow modeling, consumptive use analyses, operations modeling, and stream depletion modeling.

Climax Molybdenum, Plan for Augmentation in Division 2.

Assists with analysis in support of a water rights application. Analyses include computation of current and historical depletions, point flow and exchange potential modeling, and probability analyses. Responsible for GIS analyses and mapping for the project.

Centennial Water & Sanitation District, Water Rights Protection.

Assists with review of water court applications and substitute water supply plans for water rights protection. Analyses include return flow and consumptive use calculations, delineation of irrigated area, compilation of diversion records, and stream depletion modeling.



2007 – 2009:

AATA International, Inc., Environmental/GIS Specialist

Compiled and interpreted social and environmental data for preparation of large-scale environmental impact assessments and other technical reports. Responsible for collection and maintenance of databases. Conducted impact analysis, assessed water supply sources, and developed mitigation and monitoring plans for natural resource development projects. Utilized GIS software in mapping and analyses of environmental data.

2006 – 2007:

USDA Forest Service, Hydrologic Technician

Completed soil, stream crossing, and stream health surveys for timber sale units. Managed grazing by the completion of soil inventories for NEPA compliance. Mapped streams and forest roads using GPS and GIS. Evaluated Best Management Practices for feasibility and effectiveness for protection of the forest hydrologic resources.

2006:

Teton Science School, Hydrology Intern

Measured stream discharge, monitored ground water well levels, and collected water quality samples weekly at twelve sites. Entered and analyzed data for technical documentation. Taught watershed science and hydrology field methods to adults and children.

**Professional
Memberships:**

American Institute of Hydrology
American Water Resources Association
Colorado Ground Water Association



Exhibit B
Summary of Documents Provided by Cat Creek Energy Pursuant to Rule 40.05

Rule 40.05	Subsection	Document(s)	Notes
40.05. Additional Information Requirements.			
c. The following information shall be submitted for applications to appropriate unappropriated water or trust water...			
i. For applications appropriating springs or surface streams with five (5) or fewer existing users...		Unnumbered documents ^A	More than 5 water users on South Fork Boise River – CCE claims provision doesn't apply.
ii. For applications appropriating groundwater, a plat shall be submitted locating the proposed well relative to all existing wells and springs and permitted wells within a one-half mile radius of the proposed well.			CCE claims provision does not apply. However, no information provided to establish that storage pond will not intercept or appropriate ground water.
iii. Information shall be submitted concerning any design, construction, or operation techniques which will be employed to eliminate or reduce the impact on other water rights.		CCE-X-00001 - 00028, CCE-D-00003 - 00007	General documents on project concept. No design, construction, or operation specifics.
		CCE-X-00001 - 00028	Claims no impact on water rights without supporting information. No information has been provided on the ground water resources in the area and the interconnection of the aquifers, springs, and other headwaters in the area, including those of the Big Wood River Drainage. This is needed to show potential impacts of intercepting historical recharge to the aquifer and its effect on water rights in the region.
		Unnumbered documents ^A	Claim diversions only in high flows and that Water Master will ensure no injury but no information on how CCE Project will be designed, constructed, operated or administered on a real-time basis to protect other water rights.

Items not specifically addressed in the October 20, 2020 IDWR Order are highlighted yellow.

Rule 40.05	Subsection	Document(s)	Notes
	d. Information relative to sufficiency of water supply		
	i. Information shall be submitted on the water requirements of the proposed project, including, but not limited to, the required diversion rate during the peak use period and the average use period, the volume to be diverted per year, the period of year that water is required, and the volume of water that will be consumptively used per year.	CCE-E-00001 - 00171	Report on municipal water use projections and future demands in the Treasure Valley/Boise area.
		CCE-E-00191 – 00311 - CCE-E-00312	Feasibility studies of additional storage by raising Arrowrock and Anderson Ranch Dams.
		Unnumbered documents ^A	Claims water not consumptively used for power generation, but may be consumptively used by the downstream users. Claims maximum diversion is 10,000 cfs, but that there is no diversion rate required for operation.
		CCE-B-00001 - 00058	Calculation of annual reservoir evaporation with hydro water right application.
		Omitted	No analysis to determine timing and frequency of water availability, timing and amount of water needed for hydropower and timing and amounts of water needed and consumptively used by downstream users.
		Omitted	Inadequate documentation on seepage and other losses. No documentation on reservoir accounting and daily evaporation calculations.

Rule 40.05	Subsection	Document(s)	Notes
	ii. Information shall be submitted on the quantity of water available from the source applied for, including, but not limited to, information concerning flow rates for surface water sources available during periods of peak and average project water demand, information concerning the properties of the aquifers that water is to be taken from for groundwater sources, and information on other sources of supply that may be used to supplement the applied for water source.	CCE-A-00001 - 00003	Analysis of in-priority water availability 2000-2019 (volume and number of days) (Hal Anderson report). No results on flow rates available and dates of water availability. No information on peak and average project water demand. No information about availability and ability to divert claimed rate (9,996 cfs). Does not consider effect of Elmore County Permit 63-34348 diversion from South Fork Boise River. Study spreadsheets not provided.
		CCE-E-00172 - 00185	Annual analysis of in-priority water availability 2000-2019 (volume, number of days, water in Anderson Ranch Reservoir, and snowpack percent of average).
		CCE-B-00207 - 00287	Proposed place of use legal descriptions for CCE water rights.
		CCE-B-00288 - 00306 - CCE-B-00307	Water availability for Anderson Ranch Reservoir and Boise Basin snowpack information
		CCE-B-00308 - 00342	IDWR Water Right Accounting Data – South Fork Boise River near Featherville.
		CCE-B-00343 ^B	Summary of static ground water levels for wells near CCE property. No location map, measurement dates, or units for the water levels.
		Omitted	Information on other sources of supply that may be used to supplement the applied for water source.

Rule 40.05	Subsection	Document(s)	Notes
	e. Information relative to good faith, delay, or speculative purposes of the applicant		
	i. The applicant shall submit copies of deeds, leases, easements or applications for rights-of-way from federal or state agencies documenting a possessory interest in the lands necessary for all project facilities and the place of use or if such interest can be obtained by eminent domain proceedings the applicant must show that appropriate actions are being taken to obtain the interest. Applicants for hydropower uses shall also submit information required to demonstrate compliance with Sections 42-205 and 42-206, Idaho Code.	CCE-C-00001 - 00012	Memoranda of Energy Project Leases with Sawtooth Grazing Association and Wood Creek Ranch. Actual Leases not provided.
		CCE-X-00001 - 00028	Public land ownership map. Map does not show Sawtooth Grazing Association and Wood Creek Ranch lands.
		CCE-B-00059 - 00140 - CCE-B-00183 - 00206	Copies of Memoranda of Understandings to sell water to downstream users. The amounts of water and timing are not specified in MOUs. No MOUs provided for the places of use listed in Application #4 (CCE-B-00183 - 00206).
		Unnumbered documents ^A	Conclusory statements regarding compliance with Idaho Code Sections 42-205 and 42-206.
		Omitted	No information on ownership/authority to use lands west of the Proposed Cat Creek Reservoir and including parts of the Reservoir (Big Sky Farms Limited), as shown in Application #3 (CCE-B-00141 - 00182).
		Omitted	No information on the authorization to use US Forest Service lands that are within the identified CCE Project area.
		Omitted	Inadequate information on rights of way, permits and other approvals that may be needed to convey and divert the water for beneficial use.

Rule 40.05	Subsection	Document(s)	Notes
	ii. The applicant shall submit copies of applications for other needed permits, licenses and approvals, and must keep the department apprised of the status of the applications and any subsequent approvals or denials.	CCE-C-00013 - 00015 - CCE-C-01009 - 01109	County Conditional Use Permitting documents. CUPs are currently subject to Idaho Supreme Court Appeal.
		CCE-C-01110 - 01120 CCE-C-01213 - 01216	FERC documents (application for preliminary permit for power generation).
		CCE-C-01217 – 01219 - CCE-C-01491 - 01545	BOR documents (preliminary lease of power privilege application).
		CCE-C-01217 - 01218 ^B	Letter requesting USDA Forest Service comments on CCE water rights applications.
		Omitted	Information on other permits that may be needed (e.g., NPDES, CWA 404?).

Rule 40.05	Subsection	Document(s)	Notes
	f. Information Relative to Financial Resources		
	i. The applicant shall submit a current financial statement certified to show the accuracy of the information contained therein, or a financial commitment letter along with the financial statement of the lender or other evidence to show that it is reasonably probable that financing will be available to appropriate the water and apply it to the beneficial use proposed.	CCE-D-00008 - 00012	Ballpark total cost figure provided without any itemization or supporting information. General assertion about project being financed "through both debt and equity" without any particulars. States "the Project's sales of energy and water will provide revenues for operations, debt amortization, taxes and returns to investors" without any further detail.
		CCE-D-00001 - 00002 - CCE-D-00003 - 00007 ^B	Preliminary and conceptual CCE Project drawings. No financial information provided.
		CCE-D-00013 - 00014 - CCE-D-00022 ^B	
		CCE-D-00025 - 00034 - CCE-D-00035 ^B	
		CCE-D-00023 - 00024 ^B	General financing sources and uses for the Cat Creek Energy Project.
		CCE-X-00039 - 00041 ^B	Permitting work milestones and timeline.
		Unnumbered documents ^{C,D}	Redacted declarations on financial resources from CCE (James Carkulis and John Faulkner).
		Omitted	No financial statement or commitment letter provided or other evidence that to show probable financing. See second declaration of Anthony Jones.
	ii. The applicant shall submit plans and specifications along with estimated construction costs for the project works. The plans shall be definite enough to allow for determination of project impacts and implications.	Unnumbered documents ^C	Partially redacted construction plan.
		Omitted	No cost/return on investment analysis. See second declaration of Anthony Jones.

Rule 40.05	Subsection	Document(s)	Notes
	g. Information Relative to Conflict with the Local Public Interest, Section 42-203A(5)(e), Idaho Code, shall be submitted as follows: The applicant shall seek comment and shall submit all letters of comment on the effects of the construction and operation of the proposed project from the governing body of the city and/or county and tribal reservation within which the point of diversion and place of use are located, the Idaho Department of Fish and Game, the Idaho Department of Environmental Quality, and any irrigation district or canal company within which the proposed project is located and from other entities as determined by the Director.	Unnumbered documents ^A	CCE claims it met this requirement by statewide advertisement of water right permit applications and IDWR letters requesting comments from certain State and local entities. No comments in addition to Protests filed with IDWR provided.
		CCE-E-00001 - 00171 - CCE-E-00313	Documents on Treasure Valley water demands - not specific to CCE Project.
		CCE-E-00190, CCE-E-00314 - CCE-E-00316 - 00324	Documents on renewable energy demands in the region. However, these documents are not relevant to the local public interest since CCE has stated that its hydro component will be independent from the wind and solar components of CCE's project and will use conventional power from the grid, resulting in net negative power production.
		CCE-E-00325 - CCE-E-07983 - 08022	Information on fish or biological impacts (journal articles, non-Project specific reports, studies for Anderson Ranch Reservoir) prepared by other parties for other purposes.
		Omitted	Specific local public interest analysis for this project not provided.
	h. The following information Relative to the Public Interest Criteria of Section 42-203C(2), Idaho Code, shall be submitted by an applicant seeking reallocation of trust water for a project which the Director determines will reduce the flow of the Snake River by more than two (2) acre-feet per day. For filings proposing irrigation as a purpose of use, the additional information is required if more than two hundred (200) acres will be irrigated. The Director may request any or all of the following information for any filing seeking the reallocation of trust water.	Unnumbered documents ^A	CCE claims that this is not applicable since the application do not seek to appropriate trust water.

Notes:

- A. Reference to the following documents (documents not assigned bates numbers):
 - a. "Cat Creek Energy, LLC - Water Rules Compliance"
 - b. "Notice of Additional Information"
 - c. "Notice of Amended Rule 40.05 Disclosure"
- B. New documents provided in a June 16, 2020 Amended Rule 40.05 Disclosure including the following:
 - a. CCE-B-00343 "Surrounding Groundwater Wells "
 - b. CCE-C-01217 - 01218 "Ltr from USDA to ID Dept Water Resources re No Protest"
 - c. CCE-D-00015 "Cat Creek Reservoir Preliminary Design Modification SE"
 - d. CCE-D-00016 "Electrical System Single Line Consolidated - CCE-D-S001-1 Rev 0B (1)"
 - e. CCE-D-00020 "Powerhouse Substation - CCE-D-P003-1 (2)"
 - f. CCE-D-00021 "PSH Substation General Arrangement - SLS-D-P003-1 - Not For Construction"
 - g. CCE-D-00022 "PSH Switching Diagram - CCE-D-S001-6 Rev 0A (1) - Not For Construction"
 - h. CCE-D-00023 - 00024 "Sources & Uses - Cat Creek Energy"
 - i. CCE-D-00025 - 00034 "Transmission Pole - Single Circuit - 230 kV Exhibit Drawings - Not For Construction"
 - j. CCE-D-00035 "Transmission Structure Design - Parallel 230 kV & 115 kV - Exhibit Drawing - Not For Construction"
 - k. CCE-X-00039 - 00041 "Major Activities Timeline Breakdown - Cat Creek Energy"
- C. Redacted declaration from Mr. Carkulis provided on June 16, 2020 ("20200616 Second Carkulis Declaration (Redacted)"). The redacted letter contains a partially redacted construction budget with a brief narrative explanation of redacted items. The redacted declaration does not contain the following financial information attachments:
 - a. Construction Budget
 - b. Project Finance Process Narrative
- D. Redacted declaration from Mr. Faulkner provided on June 16, 2020 ("20200616 Faulkner Declaration (Redacted)"). The redacted declaration does not contain the following financial information attachments:
 - a. Itemized accounting of Cat Creek's investment (June 16, 2020)