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May 30, 2025

DEPARTMENT OF
WATER RESOURCES

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

**IN THE MATTER OF APPLICATION
FOR TRANSFER NOS. 84488 AND
84490 IN THE NAME OF LCSC
ENTERPRISES LLC**

**SURFACE WATER COALITION'S
NOTICE OF SERVICE OF REBUTTAL
EXPERT REPORT**

COME NOW, A&B IRRIGATION DISTRICT, AMERICAN FALLS
RESERVOIR DISTRICT #2, BURLEY IRRIGATION DISTRICT, MILNER
IRRIGATION DISTRICT, MINIDOKA IRRIGATION DISTRICT, NORTH SIDE
CANAL COMPANY, and TWIN FALLS CANAL COMPANY ("Surface Water
Coalition" or "Coalition"), by and through counsel of record, and hereby provides notice
of service of its rebuttal expert report on the parties to this case pursuant to the *Notice of
Hearing, Notice of Status Conference, and Scheduling Order* (January 13, 2025). Counsel
emailed the *SWC Rebuttal Report prepared by David C. Colvin* to those counsel of record
listed on the certificate of service.

DATED this 30th day of May, 2025.

MARTEN LAW LLP



Abby R. Bitzenburg

*Attorneys for A&B Irrigation District,
Burley Irrigation District, Milner
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/s/ Norman M. Semanko

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CERTIFICATE OF MAILING

I certify that on this 30th day of May, 2025, I served true and correct copies of the foregoing *SWC'S Notice of Service of Rebuttal Expert Report* upon the following by the method indicated:

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LCSC Transfer Applications 84488 and 84490 SWC Rebuttal Report

Prepared for:

Surface Water Coalition

May 30, 2025

1604FLE01

The technical material in this report was prepared by or under the supervision and direction of the undersigned.



David Colvin, PG

The following LRE Water staff members contributed to the preparation of this report.

Principal Hydrogeologist	David Colvin, PG
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1. Introduction

On October 13, 2020, LCSC Enterprises LLC (LCSC) submitted Water Right Transfer applications 84488¹ and 84490², proposing modifications to water right 35-14041³. This water right authorizes the diversion of 3.18 cubic feet per second (CFS) from the Eastern Snake Plain Aquifer (ESPA) to irrigate 322.5 acres, with an annual limit of 1,290 acre-feet (AF). The proposed transfers involve changing the place of use and point of diversion to a combination of existing and new wells within the ESPA, without altering the authorized diversion rate or volume.

The following report represents the expert opinions of David Colvin, Principal Hydrogeologist and Rocky Mountain Regional Manager for LRE Water. Mr. Colvin's resume is provided as Attachment A. If additional information becomes available, Mr. Colvin reserves the right to alter his opinions regarding these transfer applications.

2. LCSC Transfer Application Expert Report Assessments

On April 30, 2025, LCSC submitted an expert report disclosure associated with Transfer Applications 84488 and 84490. The disclosure contained several expert reports including:

- Jason C. Helms report titled *Transfer Nos. 84488 and 84490 (Water Right 35-14041) Report* (Helms, 2025);
- Clearwater Geosciences, LLP *Expert Report on LCSC Enterprises LLC 2024 Field Activities* (Clearwater Geosciences, 2024); and,
- Clearwater Geosciences, LLP *Expert Report on Modeling Analysis Associated with LCSC Enterprises LLC Transfer Applications* (Clearwater Geosciences, 2025)

The expert report disclosure also included a presentation and report prepared by Idaho Department of Water Resources (IDWR) staff which evaluated the cumulative effects of ESPA transfers since 2024.

¹ <https://idwr.idaho.gov/apps/ExtSearch/RelatedDocsTransfers.asp?TransferNumber=84488>

² <https://idwr.idaho.gov/apps/ExtSearch/RelatedDocsTransfers.asp?TransferNumber=84490>

³ <https://research.idwr.idaho.gov/apps/shared/WrExtSearch/Reports/WaterRightReport?basin=35&seq=14041&suffix=>

My over-arching opinions regarding the LCSC Transfer Applications Nos. 84488 and 84490 include:

- **Opinion 1** – The applications are incomplete because they do not follow IDWR guidance for transfer application procedures. The unique characteristics of the applications require an alternative procedure, which the applicant failed to provide.
- **Opinion 2** – The applicant has not recommended an acceptable alternative method for evaluating impacts or injury. LCSC has not clearly quantified the impact of the applications on Snake River reaches and has not shown or proven that there is no injury to existing water rights.
- **Opinion 3** – Due to the short distance between the proposed points of diversion (PODs) and the Snake River, and the complex hydrogeology in the areas of the proposed PODs, the Eastern Snake Plain Aquifer Model (ESPAM) and the ESPA Model Transfer Spreadsheet (ETRAN) are inappropriate for evaluating these transfers and the impact of flows on specific reaches of the Snake River.

Near the site of the proposed PODs, the subsurface geology is characterized by interbedded basalt and sedimentary units, with significant local heterogeneity in permeability and aquifer connectivity. ESPAM incorporates a simplified representation of this geology, relying on a regional conceptualization that does not fully capture site-specific features such as perched aquifers, discontinuous impermeable layers, or preferential flow paths associated with basalt flow boundaries. All ESPAM versions include a single-layer structure with a one-mile grid. These characteristics limit ESPAM's ability to resolve local stratigraphic features, vertical anisotropy, and heterogeneity in hydraulic properties.

Idaho Code Section 42-222⁴ states that, "*The director of the department of water resources shall examine all the evidence and available information and shall approve the change in whole, or in part, or upon conditions, provided no other water rights are injured thereby...*". The Idaho Department of Water Resources (IDWR) provides an undated Quick Guide to ESPA Modeling Tools⁵ and ETRAN modeling and transfer mitigation analysis user's guide (IDWR, 2016). These documents detail procedures to identify injury to existing water rights and specify evaluation criteria that allow for unmitigated injury as a result of a transfer. This is in contrast to Section 42-222 of Idaho Code.

The following sections contain Mr. Colvin's rebuttal opinions related to the three LCSC expert reports.

⁴ <https://legislature.idaho.gov/statutesrules/idstat/title42/t42ch2/sect42-222/>

⁵ <https://idwr.idaho.gov/wp-content/uploads/sites/2/water-rights/quick-guide-to-the-espa-modeling-tools.pdf>

2.1 2025 J.C. Helms Transfer Nos. 84488 and 84490 (Water Right 35-14041) Report

LCSC submitted an expert report from Jason Helms (Helms, 2025) herein referred to as the “Helms report” as part of their transfer application materials. The Helms report describes the original water right transfer applications from 2020 and references the ETRAN analysis originally submitted using version ETRAN 3.2 (IDWR, 2020). ETRAN 3.2 is based on ESAPM 2.1 (IDWR, 2014). It appears that no ETRAN analysis update has been performed and that the original 2020 ETRAN modeling is still the basis for the applicant claiming that no mitigation is required.

LRE Water prepared a rebuttal expert report in 2021 (LRE Water, 2021) that addresses several issues with the Helms 2020 ETRAN analysis. Some of these issues are still relevant rebuttal opinions including the following opinions, which are restated here:

- **Opinion 4** – The applicant’s interpretation of ETRAN results inappropriately combines predicted impacts on the near Blackfoot to Neeley and Neeley to Minidoka reaches. This combined reach would cover over 73 miles of the Snake River.
- **Opinion 5** – The ETRAN transfer analysis presented lacks steady state ETRAN results.
- **Opinion 6** – The applicant’s ETRAN analysis lacks Mitigation Analysis Spreadsheet results.
- **Opinion 7** – The ETRAN analysis presented includes incorrect inputs showing year-round pumping rather than the period of use associated with the water rights (April 1 – November 1).

None of the information in the 2025 LCSC expert reports corrects the errors above. Additional descriptions of why these issues are unacceptable are in the LRE Water 2021 report.

While I do not propose the use of the ESPAM or ETRAN tools in evaluating these transfers, we attempted to verify the Helms analysis. As described in the LRE Water 2021 report, we evaluated the transfers using Helm’s input information with IDWR ETRAN 3.3 transfer analysis methodology and tools, based on ESPAM 2.1, which LCSC’s experts recommend over the latest and best available modeling tools. This analysis determined that transfer application No. 84488 and No. 84490 require mitigation of the Neeley to Minidoka reach because the depletive impacts exceed the steady state and transient mitigation criteria. Both applications also require mitigation of several spring reaches that exceed the transient mitigation criteria.

- **Opinion 8** – Utilizing the ESPAM and ETRAN versions proposed by Helms indicates mitigation is required in the Neeley to Minidoka reach and several spring reaches.

The "FROM" POD well was involved in the Conservation Reserve Enhancement Program (CREP) from 2007 through 2022. Helms claims this pumping reduction as transient reach credits that mitigate short-term impacts. However, this is not an approved mitigation plan and should not be treated as such.

Helms discusses various aspects of Lake Walcott and American Falls Reservoir operations as justification for combining the near Blackfoot to Neeley and Neeley to Minidoka reaches. Any impact to the individual reaches are changes to natural flow rights or accumulation of storage water rights and are essentially independent of reservoir operations. The IDWR prescribed methodology calculates the impacts to these reaches individually.

- **Opinion 9** – Neither CREP pumping reductions nor reservoir operations are approved mitigation plans. Reservoir operations do not justify combining reaches.

Helms goes on to say that the IDWR cumulative impacts analysis shows a net gain in the Neeley to Minidoka reach and that the LCSC transfers would equalize the cumulative impacts of other transfers. Transfers by other parties are not approved mitigation plans and should not be treated as such.

IDWR evaluated the cumulative impacts of 795 transfers from 2012 to 2024 (Sukow, 2024). They state that, *"Most transfers involve relatively small amounts of water (Figure 5) or move points of diversion a relatively short distance (Figure 6)."* It is notable that the LCSC transfer applications propose to move water rights over 50 miles, which is a distance that exceeds more than 98% of all transfers evaluated by IDWR. For large transfers over large distances such as the proposed LCSC transfer, the potential for injury is higher because pumping depletions before and after the transfer affect different river reaches.

2.1.1 Idaho Power Company 2021 Rebuttal Report

When LCSC filed the original 2020 applications and associated expert report, Idaho Power Company filed a rebuttal report (Schreuder and Blew, 2021) raising issues still relevant to the Helms 2024 report. Many of these issues are consistent with the LRE Water 2021 report and the opinions expressed herein, including:

- ESPAM 2.2 represents the best available science for transfer evaluation and yields results more reasonable than ESPAM 2.1;
- LCSC transfer analysis simulates pumping year-round instead of seasonally;
- The transfer application does not consider seasonal impacts; and,
- The IDWR transfer policies do not adequately protect water rights.

2.2 Clearwater Geosciences, LLP Expert Report on LCSC Enterprises LLC 2024 Field Activities

A 2024 report by Clearwater Geosciences, LLP (Clearwater Geosciences, LLP, 2024 herein referred to as the "Clearwater report") documents a field investigation that was conducted to estimate aquifer parameters and evaluate the potential for hydraulic connectivity between proposed groundwater Points of Diversion (PODs) and the Snake River. The study was developed in support of Water Right Transfer Applications Nos. 84488 and 84490, and claims that groundwater withdrawals from the deeper basalt does not cause depletion in the surface water system. During the field investigation two shallow monitoring wells were drilled; MW-1 and MW-2. Water levels were recorded by pressure transducer in MW-1, MW-2, and Well 352874 over a five-month period, from April 28 to September 24, 2024. During this time, Well 352874 was intermittently pumped for irrigation purposes.

The Clearwater report concludes that there is no hydraulic connection between the shallow perched aquifer and the deeper basalt aquifer, citing the presence of a thick low-permeability clay layer reported in the driller's lithology log for Well 352874 and their interpreted lack of response in shallow monitoring wells during deep well pumping. Based on these findings, the report concludes that the proposed PODs, located in the deep aquifer are unlikely to impact the Snake River. Setting aside the basic fact that irrigation pumping must cause a depletion somewhere unless water is only being removed from storage, the Clearwater report does not reach an accurate conclusion regarding the relationship between Well 352874 and water levels in the shallow monitoring wells.

LRE Water conducted an independent interpretation of the hydrogeologic framework and original water level dataset to reassess the potential for vertical connectivity between horizontal intervals of the aquifer system at the site. This included replotting and reanalyzing water level data collected during the 2024 irrigation season from the deep irrigation well (Well 352874) and the adjacent shallow monitoring wells (MW-1 and MW-2).

2.2.1 Site Specific Hydrogeologic Considerations

Clearwater presents a localized hydrogeologic model based on driller's logs from Well 352874, MW-1, MW-2, and a nearby domestic well (Well 353857). They claim that the data presented demonstrates a complete disconnection between shallow and deep aquifers and that pumping from the proposed PODs will not directly affect the Snake River. Near the site of the proposed PODs, the subsurface geology is characterized by interbedded basalt and sedimentary units,

with significant local heterogeneity in permeability and aquifer connectivity. We evaluated driller's logs for nearby wells and created a cross section shown below in Figure 1 and Figure 2.

Figure 1 shows significant geologic heterogeneity near the proposed LCSC transfer site.

The cross section shows significant variability in lithology near the proposed PODs and no clear evidence of a laterally contiguous impermeable layer separating shallow and deep aquifer materials. The LCSC transfer site includes Well 352874, MW-1, MW-2, and Well 352857. The lithology reported in Well 352857 is significantly different from Well 352874, with only a thin clay interval reported. This lithology does not support the theory that a thick, laterally continuous clay layer disconnects the deeper basalt aquifer from the Snake River.

The regional geologic framework also shows several mapped faults near the site, including the Great Rift Zone to the north of the proposed PODs and additional structures to the south of the Snake River (Figure 1). These faults may influence groundwater flow patterns in the area. Fault zones often exhibit enhanced fracturing and increased secondary permeability, which can create vertical pathways through otherwise low-permeability layers.

- **Opinion 10** – Geologic evidence does not support the theory that a laterally continuous impermeable layer vertically separates Snake River impacts from pumping proposed PODs.

2.2.2 Hydrogeological Interpretation of Observed Water Levels

Using the pressure-transducer collected water level data and manual water level measurements reported by Clearwater, we converted the water level data to elevations and drawdown (defined as the change of water levels relative to the start date with a negative drawdown value corresponding to the water level declining) values to better visualize relationships between Well 352874, MW-1, and MW-2. Figure 3 presents continuous water level data collected between April 29 and September 24, 2024, from Well 352874 and two adjacent shallow monitoring wells (MW-1 and MW-2).

The deep irrigation well exhibits clear and repeated drawdown events consistent with irrigation pumping cycles followed by recovery.

Clearwater plotted all the water level data on one scale, which obscures the changes in MW-1 and MW-2 water levels. In their graph, water levels in MW-1 and MW-2 appear generally stable during the monitoring period. However, when the water level data are plotted on separate scales with MW-1 and MW-2 as drawdown, fluctuations are visible during periods that correspond with deep well pumping (Figure 4). These are most apparent in late May, late July, and early to mid-September.

The timing and shape of these changes in shallow water levels suggest a measurable hydraulic response to deep aquifer pumping. The response repeats during multiple pumping and recovery events, supporting the possibility of vertical connectivity between the aquifers. These data do not support Clearwater's theory that the pumping of Well 352874 is disconnected from the Snake River.

The water level observations suggest the existence of vertical hydraulic connectivity between the shallow and deep aquifer zones and indicate that the aquifers may not be completely hydraulically isolated as previously concluded. This calls into question the effectiveness of the intervening clay-rich sequence as a confining unit and suggests that assumptions regarding aquifer isolation should be re-evaluated.

When focusing on the water levels during the May period before pumping started, Well 352874, MW-1, and MW-2 show similar water level patterns and magnitudes of change (Figure 5). In fact, over the period when water levels began increasing on May 5th until late on May 9th, all three wells increased by approximately one foot. In a disconnected system, this degree of correlation would be highly unusual compared to the alternative hypothesis, which is that the systems are connected.

- **Opinion 11** – Water level data presented by Clearwater do not clearly demonstrate that the shallow monitoring wells were unaffected by pumping of the deep irrigation Well 352874. The water level data does not clearly demonstrate that pumping from the proposed PODs will be disconnected from the Snake River. The water levels in the irrigation well and the shallow wells move in tandem indicating the different depth intervals are connected.

2.3 Clearwater Geosciences, LLP Expert Report on Modeling Analysis Associated with LCSC Enterprises LLC Transfer Applications

LCSC filed a second expert report from Clearwater (Clearwater Geosciences, LLP, 2025) as part of their transfer application materials. This report primarily addresses modeling performed in support of the transfer applications. Many of the opinions expressed by Clearwater are similar to the opinions presented by Helms, and covered by my opinions above.

Clearwater states that in their analyses, they followed IDWR's historic policy combining the Near Blackfoot to Neeley and Neeley to Minidoka reaches. We are unaware of such a policy. They claim that increased depletions in the Neeley to Minidoka reach of the river are offset by the increased reach gains of the Near Blackfoot to Neeley reach. This approach is inconsistent with

IDWR transfer analysis procedures, will deplete water rights in the Neeley to Minidoka reach, and will generally decrease the water available to fulfill water rights downstream of Neeley. Not all water rights rely upon both reaches of the Snake River as a source of water to fulfill the right. Combining the two reaches would result in a Snake River reach more than 73 miles long. As presented in Opinion 4 above, it is not appropriate to combine the predicted impacts on the near Blackfoot to Neeley and Neeley to Minidoka reaches.

Clearwater claims that Snake River reservoir operations effectively mitigate the impact of the proposed LCSC transfers. As previously mentioned in Opinion 9 above, reservoir operations do not represent an approved mitigation plan that offsets the impacts of these transfers on natural flow or storage water rights.

2.3.1 ESPAM and ETRAN Version Analysis

Clearwater conducted a detailed groundwater modeling evaluation to assess the potential impacts of LCSC Enterprises LLC's proposed water right transfers on the Snake River system, with particular focus on the reach between Neeley and Minidoka. This analysis included a comparative review of two versions of the Eastern Snake Plain Aquifer Model (ESPAM): Versions 2.1 and 2.2, along with their associated transfer tools, ETRAN 3.2 and ETRAN 3.4, respectively.

When the transfer applications were originally filed, ESPAM Version 2.2 had not yet been implemented. Although ESPAM 2.2 is now available, Clearwater claims that ESPAM 2.1 should be utilized because it more accurately represents hydrogeologic conditions near the Neeley to Minidoka reach. Clearwater justifies this claim by referencing the lower coefficients of determination for calibration quality of the Neeley to Minidoka reach targets: $R^2 = 0.0147$ for ESPAM 2.1 and $R^2 = 0.0079$ for ESPAM 2.2. There is effectively no statistical difference in these numbers with neither one showing a significant correlation between the model results and observed reach gains. This is further evidence that ESPAM is not appropriate for use in evaluating these transfers, but does not justify using ESPAM 2.1 over ESPAM 2.2.

It is also important to note that the results presented in Table 1, titled "Comparison of ESPAM 2.2 and ETRAN Version 3.4," are illegible and cannot be independently verified in their current format.

ESPAM 2.2 incorporates enhanced boundary conditions and improved calibration near American Falls Reservoir, making it suitable for analyzing regional-scale water budget trends. However, the model's simplified geologic structure and single-layer design limit its resolution of site-scale features. These limitations reduce its ability to represent vertical gradients and localized hydrostratigraphic variability. While ESPAM 2.2 is a valuable tool for regional assessments, it is not considered reliable for detailed, site-specific evaluations near the river.

There are several Clearwater points that we agree with, including these statements: *"The general notion, for which we agree, is that the ESPAM2.2 is a more robust regional-scale model than ESPAM2.1 due to many improvements made during the development and calibration processes of ESPAM 2.2, such as more spring discharge and reach gain/loss measurements as calibration targets, more accurate riverbed elevations and so on (Sukow, 2021b). However, neither ESPAM2.1 nor ESPAM2.2 are very reliable for evaluating impacts from the transfer applications along the Near Neeley to Minidoka Reach."* (Clearwater Geosciences, LLP, 2025)

Although it is my opinion that ESPAM and ETRAN tools are inappropriate for evaluating the impacts of these transfers, if LCSC is required to use them, the latest versions should be used.

- **Opinion 12** – If LCSC is required to use ESPAM and ETRAN tools to evaluate the impacts of these transfers, the most recent versions should be used (ESPAM 2.2 and ETRAN 3.4).

3. Conclusions and Summary of Opinions

The LCSC transfer applications Nos. 84488 and 84490 propose to move water rights over 50 miles downstream, drastically changing the location and timing of depletive impacts on the Snake River and associated water rights. The applications propose to move the POD from a well over 16 miles away from the river to shallow/perched well locations less than half of a mile from the river. Moving the PODs to locations much closer to the river will significantly change the timing and magnitude of depletive impacts to Snake River reaches.

My detailed opinions regarding these transfers are summarized below.

- **Opinion 1** – The applications are incomplete because they do not follow IDWR guidance for transfer application procedures. The unique characteristics of the applications require an alternative procedure, which the applicant failed to provide.
- **Opinion 2** – The applicant has not recommended an acceptable alternative method for evaluating impacts or injury. LCSC has not clearly quantified the impact of the applications on Snake River reaches and has not shown or proven that there is no injury to existing water rights.
- **Opinion 3** – Due to the short distance between the proposed points of diversion (PODs) and the Snake River, and the complex hydrogeology in the areas of the proposed PODs, the Eastern Snake Plain Aquifer Model (ESPAM) and the ESPA Model Transfer Spreadsheet (ETRAN) are inappropriate for evaluating these transfers and the impact of flows on specific reaches of the Snake River.

- **Opinion 4** – The applicant’s interpretation of ETRAN results inappropriately combines predicted impacts on the near Blackfoot to Neeley and Neeley to Minidoka reaches. This combined reach would cover over 73 miles of the Snake River.
- **Opinion 5** – The ETRAN transfer analysis presented lacks steady state ETRAN results.
- **Opinion 6** – The applicant’s ETRAN analysis lacks Mitigation Analysis Spreadsheet results.
- **Opinion 7** – The ETRAN analysis presented includes incorrect inputs showing year-round pumping rather than the period of use associated with the water rights (April 1 – November 1).
- **Opinion 8** – Utilizing the ESPAM and ETRAN versions proposed by Helms indicates mitigation is required in the Neeley to Minidoka reach and several spring reaches.
- **Opinion 9** – Neither CREP pumping reductions nor reservoir operations are approved mitigation plans. Reservoir operations do not justify combining reaches.
- **Opinion 10** – Geologic evidence does not support the theory that a laterally continuous impermeable layer vertically separates Snake River impacts from pumping proposed PODs.
- **Opinion 11** – Water level data presented by Clearwater do not clearly demonstrate that the shallow monitoring wells were unaffected by pumping of the deep irrigation Well 352874. The water level data does not clearly demonstrate that pumping from the proposed PODs will be disconnected from the Snake River. The water levels in the irrigation well and the shallow wells move in tandem indicating the different depth intervals are connected.
- **Opinion 12** – If LCSC is required to use ESPAM and ETRAN tools to evaluate the impacts of these transfers, the most recent versions should be used (ESPAM 2.2 and ETRAN 3.4).

4. References

Clearwater Geosciences, LLP, 2024. *Expert Report on LCSC Enterprises LLC 2024 Field Activities*

Clearwater Geosciences, LLP, 2025. *Expert Report on Modeling Analysis Associated with LCSC Enterprises LLC Transfer Applications*

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<https://www.idahogeology.org/>

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Schreuder and Blew, 2021. *Idaho Power Expert Report on LCSC Transfers T84488 and T84990*

LRE Water, 2021. *Surface Water Coalition EXPERT REPORT ON LCSC TRANSFER APPLICATIONS NOS. 84488 AND 84490*

Sukow, 2024. *Cumulative Review of ESPA Transfers between 2012 and 2024.* IDWR.

Peppersack, J. 2009. *Transfer Processing Policies and Procedures.* Administrator's Memorandum, IDWR.

Figures

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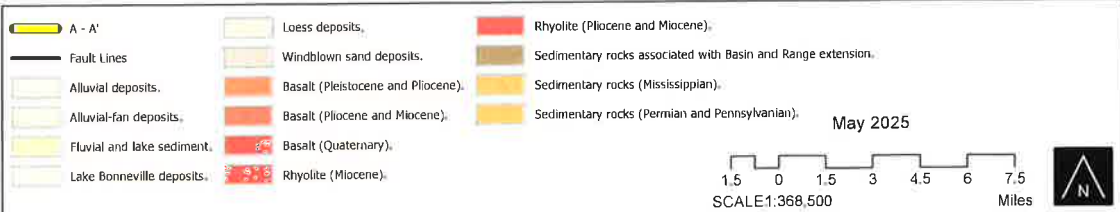
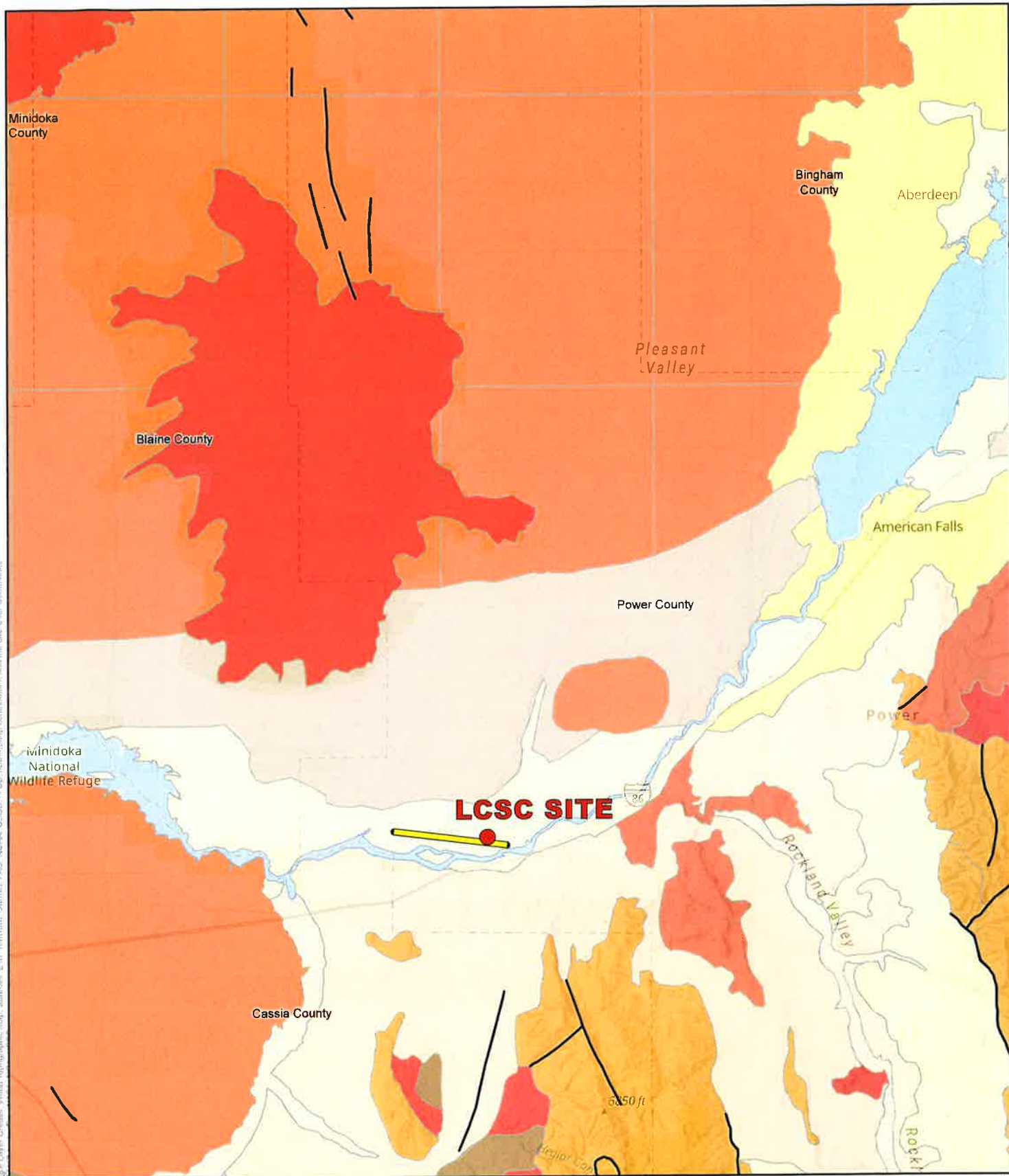
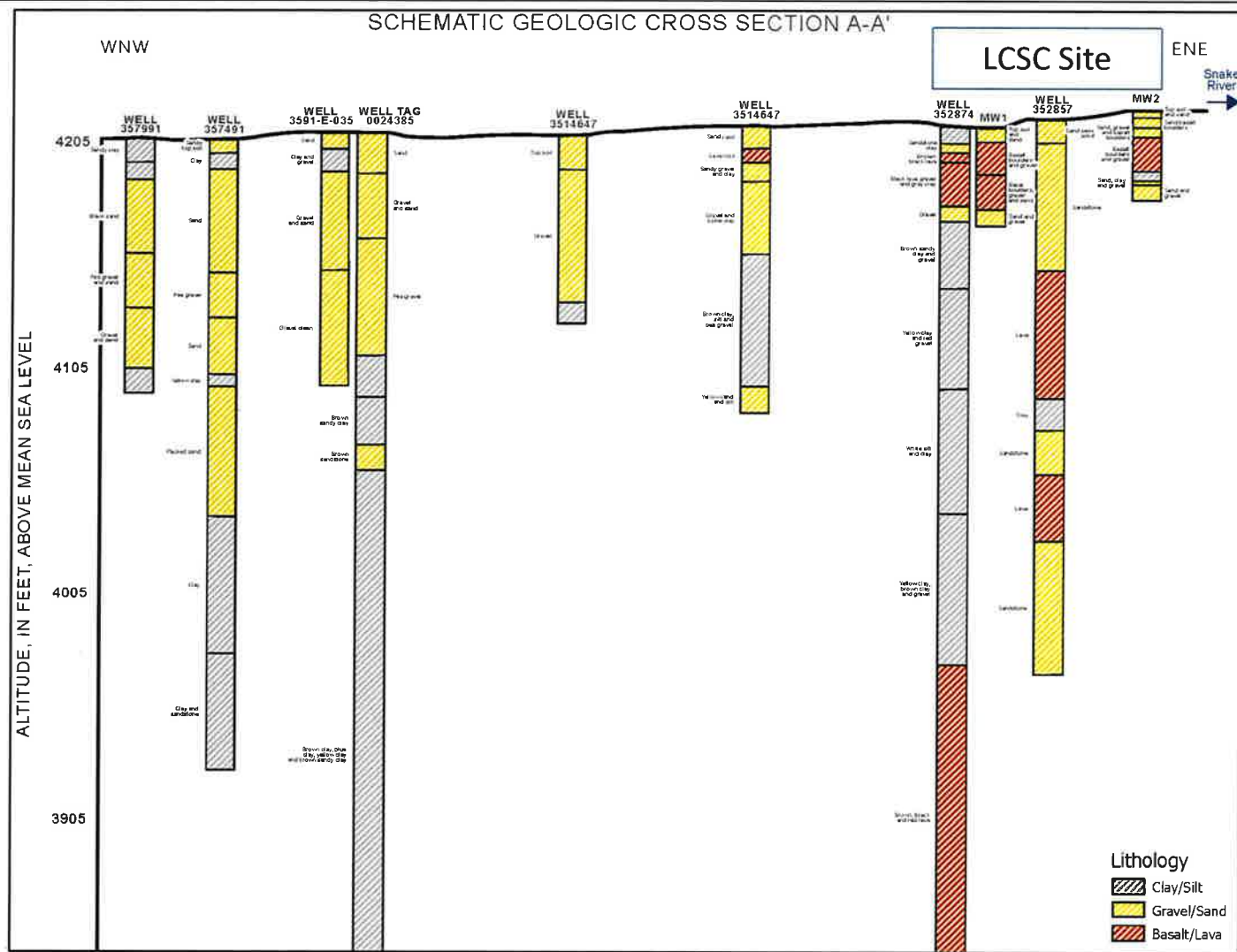


FIGURE 1
GEOLOGIC MAP AND
CROSS SECTION LOCATION
NEAR LCSC PROPOSED PODS

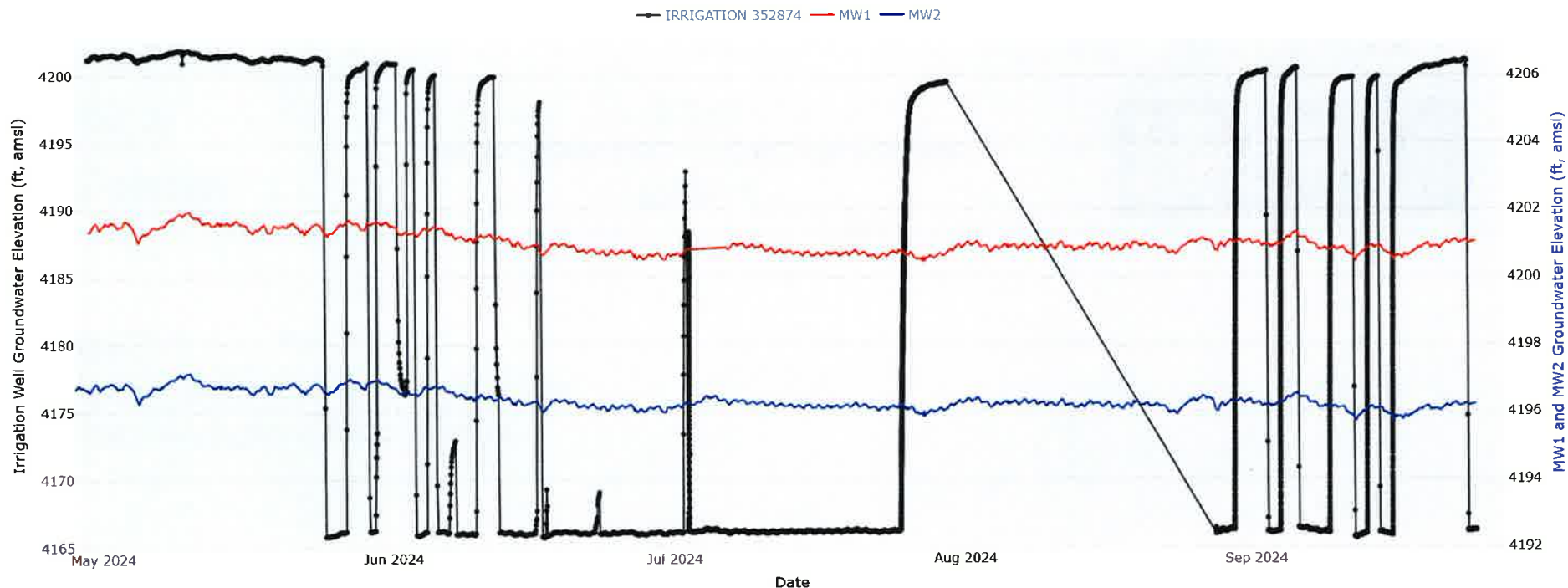


DATE: 5/30/2025

AUTHOR: TF

CHECKED BY: DC

Figure 2
Cross Section of Driller's Logs for Wells
Near the LCSC Proposed PODs



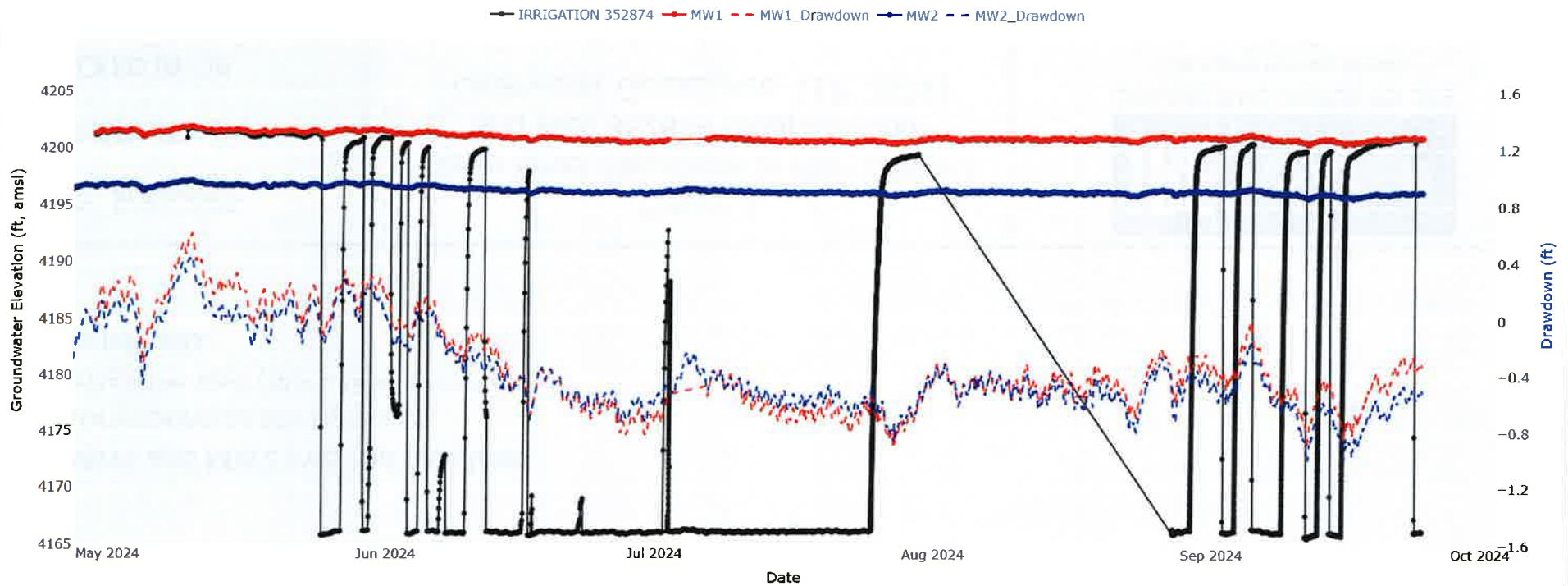
MW1 and MW2 (red and blue lines, correspond to the right axis.
Irrigation well (black line) corresponds to left axis

DATE: 5/30/2025

AUTHOR: SS

CHECKED BY: JB

Figure 3
Water Level Elevations in MW-1, MW-2
and Well 352874 (adapted from
Clearwater Geoscience, LLP, 2024)



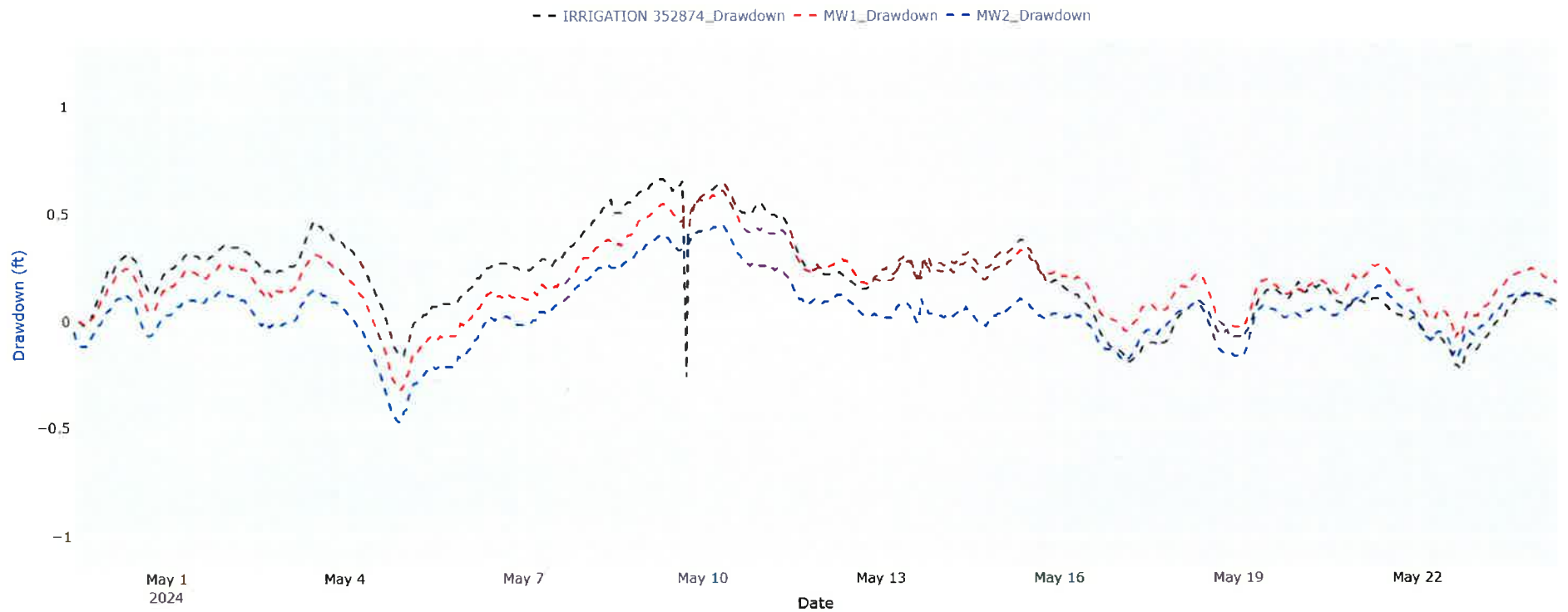
MW1 and MW2 drawdown curve
(dashed lines) correspond to the right
axis.

DATE: 5/30/2025

AUTHOR: SS

CHECKED BY: JB

Figure 4
Water Level Data Plotted On Multiple
Scales



DATE: 5/30/2025

AUTHOR: SS

CHECKED BY: JB

Figure 5
Pre-Pumping Drawdown Data from
Well 352874, MW-1, MW-2