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COUNTY OF INYO WATER DEPARTMENT

August 30, 2013

Mr. Chris Ellis, Site Manager Coso Operating Company, LLC P.O. Box 1690 Inyokern, California 93527

Subject: Conditional Use Permit #2007-03/Coso

Dear Mr. Ellis:

Pursuant to Conditional Use Permit #2007-03/Coso and the associated Hydrologic Monitoring and Mitigation Plan (HMMP), Coso Operating Company's (COC) groundwater pumping rate and duration are subject to restrictions based on an ongoing analysis of monitoring data. The Water Department's consultant Daniel B. Stephens & Associates (DBS&A) has completed an assessment of the current state of the Rose Valley groundwater system with respect to groundwater pumping pursuant to the Conditional Use Permit. DBS&A recently completed a reevaluation of allowable pumping rates and duration based on the following activities:

- Updating the groundwater model with pumping that has occurred since the HMMP was amended in 2011. COC was permitted to pump at a rate of 4,839 acre-feet/year through September 1, 2013. The actual pumping rate has been 3,040 acre-feet/year.
- Updating the groundwater model with recharge estimates based on the additional precipitation data. The previous recharge estimates were based on data from 2000-2009.
 The recharge estimate has been revised to include data from 2010-2012.
- Modification of groundwater model boundary conditions at Little Lake to better simulate observed groundwater discharge. Surface water gauges installed on the Little Lake Ranch property in 2009 were used to provide an estimate groundwater discharge at Little Lake.

Reassessment of the duration for how long COC may pump at their current rate, yet
maintain the requirement of the HMMP that groundwater discharge at Little Lake without
exceeding a 10% reduction in groundwater discharge to Little Lake.

Based on the DBS&A's analysis, the Water Department concludes that the drawdown trigger exceedences that have occurred at the Little Lake North well are linked to fluctuating lake levels, rather than from actual reductions in groundwater discharge. Evaluation of groundwater discharge at Little Lake using data developed as part of the HMMP does not indicate that the observed declines in Well RV-180 are a result of a decline in groundwater discharge.

Based on the above, the Water Department approves continuation of pumping at a rate of 3,040 acre-feet/year until June 30, 2014, subject to the revised groundwater level triggers as set forth in Table 1, below.

Table 1. Modified drawdown triggers, in terms of drawdown and groundwater elevation (GWE).

Well ID	Well Name	Baseline GWE (ft amsl)	Drawdown at cessation of pumping		Maximum acceptable drawdown	
			Drawdown (ft)	GWE (ft amsl)	Drawdown (ft)	GWE (ft amsl)
RV-40	Dunmovin	3252.73	21.4	3231.33	21.4	3231.33
RV-80	Hay Ranch 2A	3240.92	19.0	3221.92	19.0	3221.92
RV-90	Coso Junction Ranch	3230.65	9.0	3221.65	9.4	3221.25
RV-100	Coso Junc. Store #1	3227.59	7.7	3219.89	8.2	3219.39
RV-120	Red Hill	3200.66	1.8	3198.86	3.3	3197.36
RV-130	G-36	3198.35	1.1	3197.25	2.9	3195.45
RV-140	Lego	3199.21	0.1	3199.11	1.9	3197.31
RV-150	Cinder Road	3186.92	0.3	3186.62	1.9	3185.02
RV-160	18-28 GTH	3187.67	0.1	3187.57	1.8	3185.87
RV-180	LLR North Well	3158.88	0.0	3158.88	1.1	3157,78

This approval does not diminish the discretion afforded to the Water Department under Conditional Use Permit #2007-03 to further enforce or modify mitigation measures to protect the citizens, economy, and environment of the County.

Please feel free to call me if you have any questions.

Sincerely

Robert Harrington, Water Director

cc: Inyo County Board of Supervisors
Inyo County Planning Commission
Inyo County Water Commission
Kevin Carunchio, County CAO
Margaret Kemp-Williams, County Counsel
Josh Hart, Planning Director
Neil Blanford, Daniel B. Stephens & Assoc.
Keith Rainville, TEAM Engineering
Gary Arnold, Little Lake Ranch