



(760) 878-0001
FAX: (760) 878-2552

P.O. Box 337
135 South Jackson Street
Independence, CA 93526
WEB: <http://www.inyowater.org>

COUNTY OF INYO WATER DEPARTMENT

November 1, 2020

Ryan Smith, P.G., C.Hg
VP Resource Management and Regulatory Compliance
CG Roxane LLC
1210 South Highway 395
PO Drawer A
Olancha CA 93549

Subject: Recommendation for monitoring according to the GMMRP for Crystal Geysers
Roxanne, Cabin Bar Ranch, Inyo County, California

Dear Mr. Smith,

The Inyo County Water Department (ICWD) has reviewed the October 7, 2020 letter from TEAM Eng. recommending reduced monitoring at the Cabin Bar Ranch Bottling facility in Olancha. Over the previous four years, we have been pleased with the quality of monitoring and reporting by the consultants to comply with the Groundwater Monitoring, Mitigation and Reporting Plan (GMMRP) for this project. Sections 6 and 9 of the GMMRP allows the ICWD to review the monitoring program after two years from start of the pumping for the project and consider recommendations from the monitoring team for future monitoring and reporting requirements. The ICWD has ultimate authority in any decision to revise the monitoring and reporting to comply with the GMMRP. This letter contains the ICWD determination.

Thus far, annual pumping has been less than the maximum amount allowed for this project. Because the annual amount of pumping could increase in future years, groundwater and biological monitoring for the project should continue. It is a positive indication that no triggers described in the GMMRP have been met or exceeded.

Water level trends in the monitoring wells rose over the last two years, and based on present trends, there is no immediate threat of tripping a drawdown trigger. The data loggers over the last four years in the 14 monitoring wells (CMW-2, MW-3, P-10, P-15, PAT-1, OW-7u, OW-7m, OW-8us, OW-9u, OW-10u, RP-1, AND SS-1A) have been demonstrated to be mostly reliable with relatively few device failures and minimal drift over time from manual measurements. On the few occasions when transducers failed, there was a lag installing a replacement of up to a few months. Transducer failure with quarterly field visits as proposed

could result in a gap in logged data of several months. To prevent that from occurring and to continue to acquire data capable of distinguishing seasonal water level changes from drawdown, the Water Department recommends that the manual DTW reads and reports be conducted bi-monthly (six visits per year). The manual water level measurement procedures, the transducer logging interval, and the procedure to correct for transducer drift are sufficient and should continue.

Given the hydrologic setting of the project, the water quality trends must be carefully monitored and understood to identify and prevent impacts from brine migration caused by pumping. The water quality sampling methods and data collected by the consultants appear sound, but the ICWD concurs that the sampling record is insufficient to fully understand seasonality and multiyear trends evident in the data for several analytes. Measurements of total dissolved solids and some other analytes increased in the last two monitoring events which could exert undue weight on the trend analysis included in TEAM Eng. letter and required by the GMMRP. The Water Department concurs with the recommendation to complete two more quarterly sampling events in the fourth quarter of 2020 and the first quarter of 2021 and then reassess the monitoring program. We look forward to receiving the monitoring team recommendations following analysis of the additional water quality data.

The Water Department concurs with the recommendation that the monthly schedule for totalizer reads for production wells (CGR-8, CGR-9 and CGR-10) should continue. Data should reported bi-monthly according to the recommended water level reporting schedule.

The Water Department recommends no changes to the biological monitoring procedures and schedule in the GMMRP.

If you have any questions please contact the Water Department at 878-0001.

Sincerely,

A handwritten signature in blue ink that reads "Aaron S".

Aaron Steinwand, Ph.D.
Water Director
Inyo County Water Dept.

Cc: Richard Shore, TEAM Engineering
Kevin Coffman, Geosyntec Consultants