

Exhibit A

WESTLANDS WATER DISTRICT

Distribution System Integration Program

Procedures for Pumping Groundwater Into the District's Distribution System

The purpose of the Distribution System Integration Program is to provide the water users flexibility in the timing and use of groundwater available to them. The Program provides for the accumulation of water credits for groundwater pumped into the District's distribution system by the water user (Pumper). The credits accumulated may be used at times and locations which will assist the Pumper meet his overall water requirements. A Pumper who has signed an Agreement for Conveyance of Groundwater into the District's Distribution System (Conveyance Agreement) will be subject to charges and other terms and conditions for delivery of Credit Water contained in the Conveyance Agreement.

Proposals to pump into the distribution system must be approved by Westlands Water District (WWD) and, when necessary, the U.S. Bureau of Reclamation (USBR). In addition, water users on the lateral, which he intends to pump into, must provide written permission by signing District form WWD 528. The District will provide the contact information for water users who may be impacted. However it is the responsibility of the water user proposing to pump into the distribution system to request permission.

1. Application

The water user shall complete application form WWD 497, Distribution System Integration Program, and submit it to the Resources Division.

2. Groundwater Quality

The District will coordinate all water quality testing associated with this program. The tests shall be performed by a WWD, USBR, and DWR approved laboratory.

a. After consultation with the Resources Division, the Pumper shall arrange for the appropriate water quality test. Prior to approval to pump into the District's distribution system, a Triennial Analysis shall be performed on the well water and the results approved by the Resources Division. The constituents and the maximum contaminate levels (MCL) for the Triennial Analysis are shown on Table 1.

Prior to having the Triennial Analysis performed, the Pumper may consider having a Compliance Analysis (Table 2) performed to check for the constituents of major concern to determine whether it is advisable to proceed with the Triennial Analysis.

Once approved to pump into the distribution system, a Compliance Analysis is required bimonthly and a Triennial Analysis is required every three years.

b. A sand test of the well shall be performed prior to any pumping into District facilities. Groundwater from wells producing more than an average 10 parts per million (ppm) of sand during a 45-minute test are not allowed to pump into the distribution system. The sand test, using a Rossum sand tester, shall begin 30 minutes after start up of the pump, following a 30-minute minimum shutdown period. If the test indicates a sand content greater than 10 ppm, the pump may continue to run for succeeding 45-minute tests, but the total time for testing shall not exceed 4 hours. A sand separator, approved by the Resources Division, may be installed to limit the amount of sand (10 ppm or less) entering the distribution system. The sand test is required every 5 years to verify the well is not discharging unacceptable levels of sand into the lateral.

c. Groundwater may be pumped into the lateral upon approval by the Resources Division, if the maximum contaminate level of the constituents listed in Table 1 are not exceeded, the well passes the sand test, and written permission from all water users on the lateral is obtained.

d. If the Pumper is the only water user on a lateral, the water quality standards do not apply unless M&I service is provided from the lateral.

e. Blending of water from more than one well to meet water quality standards will be allowed if the blending occurs prior to injection into the distribution system. Blending of Project water and groundwater to meet the water quality standards is not allowed. Injection of blended water into the distribution system requires the Compliance Analysis be performed monthly.

f. The Pumper shall be responsible for obtaining the required authorization of all the water users on the lateral. Authorization shall be for the water year identified on the agreement unless revocation in writing is provided to the Pumper and the District. Authorization shall be obtained from new water users on the lateral as they are identified. Authorization shall be obtained utilizing Form WWD 528.

3. Methods of Pumping into Distribution System

The quantity of groundwater pumped into the distribution system shall be measured with facilities which comply with District meter specifications as shown on Drawing No. 986-W-0093. These facilities shall be provided, installed, operated, and maintained by the Pumper to the satisfaction of the District. Modification of pump-in

facilities without prior approval of the District may result in the loss of Credit Water accrued after the time of the modification.

For approved methods of connection to the District's distribution system, contact the Resources Division.

4. Operating Requirements

a. Pumpers shall schedule an on, off, or flow change of their pump(s) with the Customer Accounting Department a minimum of 24 hours in advance of the time they plan to make changes. **Any Pumper running without a current or correct water order will not receive credit for any portion pumped above the current order.** Example: If no order, then no credit; if order is for 4 cfs and the meter indicates 5 cfs, then the difference between the 4 cfs and the 5 cfs will be subtracted back to their last good meter reading and their monthly total will be adjusted accordingly.

b. The District may require the Pumper to stop pumping water into the lateral at any time. Therefore, the Pumper shall provide emergency telephone numbers for personnel that can be reached 24 hours a day. Failure to respond within two hours to a District emergency request to terminate pumping may result in District personnel turning off your equipment. If this should occur and Pumper or District facilities are damaged as a result of an emergency shutdown, the Pumper shall be responsible for all costs to make the required repairs. Failure to respond to the District's request, may result in revocation of privileges to pump into District facilities.

c. Pumpers' flow may be limited in order to maintain the quality of water in the Lateral. The District will require that the ratio of surface water to groundwater be maintained at 8:1.

d. A water user on the lateral may revoke his permission to allow pumping groundwater into the lateral at any time and for any reason. Upon written notice from the water user revoking permission, the District will notify the Pumper to terminate pumping into the lateral. The Pumper is required to terminate within 24 hours from the time of notice from the District.

5. Program Costs

a. All costs associated with the Program are the responsibility of the Pumpers. These costs include but are not limited to labor, material, installation, power, operation, maintenance, water quality, sand testing, and any monitoring of water quality or other requirements which may be imposed by regulatory agencies.

b. When a water user takes delivery of Credit Water through the District's distribution system, it will be delivered at the appropriate operation and maintenance rate and water delivered benefit rate components of the District's agricultural water charge, less the temporary diversion credit if delivered through temporary diversion facilities, plus the applicable power surcharge for water delivered through temporary diversion facilities west of the San Luis Canal (SLC), if any. The water user shall also pay extraordinary costs which the District might incur in connection with the transportation of such water and any other charges that the District's Board of Directors may impose, such as a storage component.

c. Any groundwater pumped into the District's lateral that is conveyed and discharged into the SLC shall not receive credit for that water pumped. It is the responsibility of the Pumper to coordinate pumping closely with Customer Accounting to ensure that adequate demand on the lateral exists to prevent reverse flow to the SLC. Customer Accounting will make a reasonable effort to prevent the possibility of reverse flow into the SLC.

6. Water Credits

Deliveries of pumped water credits will be in accordance with District Regulations and the Conveyance Agreement and subject to all provisions of Reclamation law, at any delivery point from the distribution system or into the District's temporary diversion facilities from the San Luis or Coalinga Canals. The water user must use the Credit Water during the water year in which the water was pumped unless otherwise provided for in the Conveyance Agreement.

7. Environmental Documentation

All distribution system pump-in activity which results in any type of environmental documentation preparation by the District and cost to the District, shall be the responsibility of the Pumpers. All Pumpers are required to have on file with the District the Pumper's application, water quality tests, general well location map, detailed site map, and detailed installation sketch for each installation.

Table 1

WESTLANDS WATER DISTRICT
Distribution System Integration Program
Non-Project Water - Drinking Water Standards
Triennial Analysis

Revised April 16, 2019

<u>INORGANICS</u>		<u>SECONDARY STANDARDS</u>	
1. <u>Constituent</u>	<u>MCL</u>	2. <u>Constituent</u>	<u>CAL</u>
Aluminum	1000 µg/L	Chloride	600 mg/L
Arsenic	10 µg/L	Conductivity	2200 µmho/cm
Barium	1000 µg/L	Copper	1.0 mg/L
Cadmium	5 µg/L	Iron	.30 mg/L
Chromium	50 µg/L	Manganese	.05 mg/L
Fluoride	2 mg/L	Sulfate	600 mg/L
Lead	15 µg/L	Total Dissolved Solids	1500 mg/L
Mercury	2 µg/L	Zinc	5.0 mg/L
Nitrate	10 mg/L		
Selenium	50 µg /L		
Silver	0.1 mg/L		
 <u>OTHER</u> 			
3. Boron	2.0 mg/l		
 <u>SEMIVOLATIVE ORGANICS</u> 			
4. <u>EPA 504</u>	<u>MCL</u>	<u>EPA 508</u>	<u>MCL</u>
Dibromochloropropane (DBCP)	0.2 µg/L	Heptachlor	0.01 µg/L
Ethylene Dibromide (EDB)	.05 µg/L	Heptachlor Epoxide	0.01 µg/L
		Chlordane	0.1 µg/L
<u>EPA 505</u>			
Endrin	2 µg/L	<u>EPA 515.1</u>	
Lindane	0.2 µg/L	2,4-D	70 µg/L
Methoxychlor	30 µg/L	2,4,5-TP (Silvex)	50 µg/L
Toxaphene	3 µg/L		
<u>EPA 507</u>			
Atrazine	1 µg/L	<u>EPA 515.1</u>	
Simazine	4 µg/L	Bentazon	18 µg/L
Thiobencarb	70 µg/L	<u>EPA 531</u>	
Molinate	20 µg/L	Carbofuran	18 µg/L
		<u>EPA 547</u>	
		Glyphosate	700 µg/L
 <u>RADIOLOGICAL</u> 		 <u>KEY FOR ABBREVIATED TERMS</u> 	
	<u>MCL</u>	CAL:	Consumer Acceptance Limits
5. Gross Alpha	15 pCi/L	MCL:	Maximum Contaminant Level
		µg/L:	Micrograms Per Liter
		mg/L:	Milligrams Per Liter
		pCi/L:	Picocuries Per Liter

Table 2

WESTLANDS WATER DISTRICT

Distribution System Integration Program

Compliance Analysis

Constituents	Maximum Contaminant Level (MCL)
Arsenic	50 µg/l
Selenium	10 µg/l
Manganese	.05 mg/l
Nitrate	10 mg/l
Chloride	600 mg/l
Sulfate	600 mg/l
Total Dissolved Solids	1,500 mg/l
Conductivity	2,200 µmho/cm
Boron	2 mg/l