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Newberry Springs Recreational Lakes Association
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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF RIVERSIDE
10 RIVERSIDE HISTORIC COURTHOUSE

11 Coordination Proceeding Special Title
(Cal. Rules of Court, Rule 3.550)

JCCP No. 5265
Case No. CIV 208568

12 MOJAVE BASIN WATER CASES

Judge: Hon. Craig G. Riemer
Dept: 1

13 CITY OF BARSTOW,

14 Plaintiff,

15 vs.

16 CITY OF ADELANTO, et al.,

17 Defendant.
18

**DECLARATION OF JEREMY JUNGREIS'
IN SUPPORT OF NEWBERRY SPRINGS
RECREATIONAL LAKES
ASSOCIATION'S OPPOSITION TO
WATERMASTER'S RENEWED MOTION
FOR DETERMINATION OF
HYDROLOGIC BASE PERIOD FOR
CALCULATION OF PRODUCTION SAFE
YIELD VALUES; MEMORANDUM OF
POINTS AND AUTHORITIES**

19 AND RELATED CROSS ACTIONS

*[Filed concurrently with Opposition to
Watermaster's Renewed Motion for
Determination of Hydrologic Base Period for
Calculation of Production Safe Yield Values and
Memorandum of P's and A's; Declaration of W.
Richard Laton]*

23 Date: March 18, 2026
24 Time: 8:30 a.m.
Dept: 1

25 Reservation No.: Per Court Order 2/20/2026

26 Date: February 20, 2026
27 Time: 8:30 am
Dept: 1

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EXHIBIT 1



Regional Groundwater Model Update

Presenter: Kapo Coulibaly

December 2025



- Background and Objectives
- What is a Model and Why We Need One
- Model Building Steps and Strategy
- Conceptual Model Update
- Baja Model
- Conclusion

A decorative horizontal band with a blue background and white wavy lines, resembling water or a stylized wave pattern.

Background and Objectives

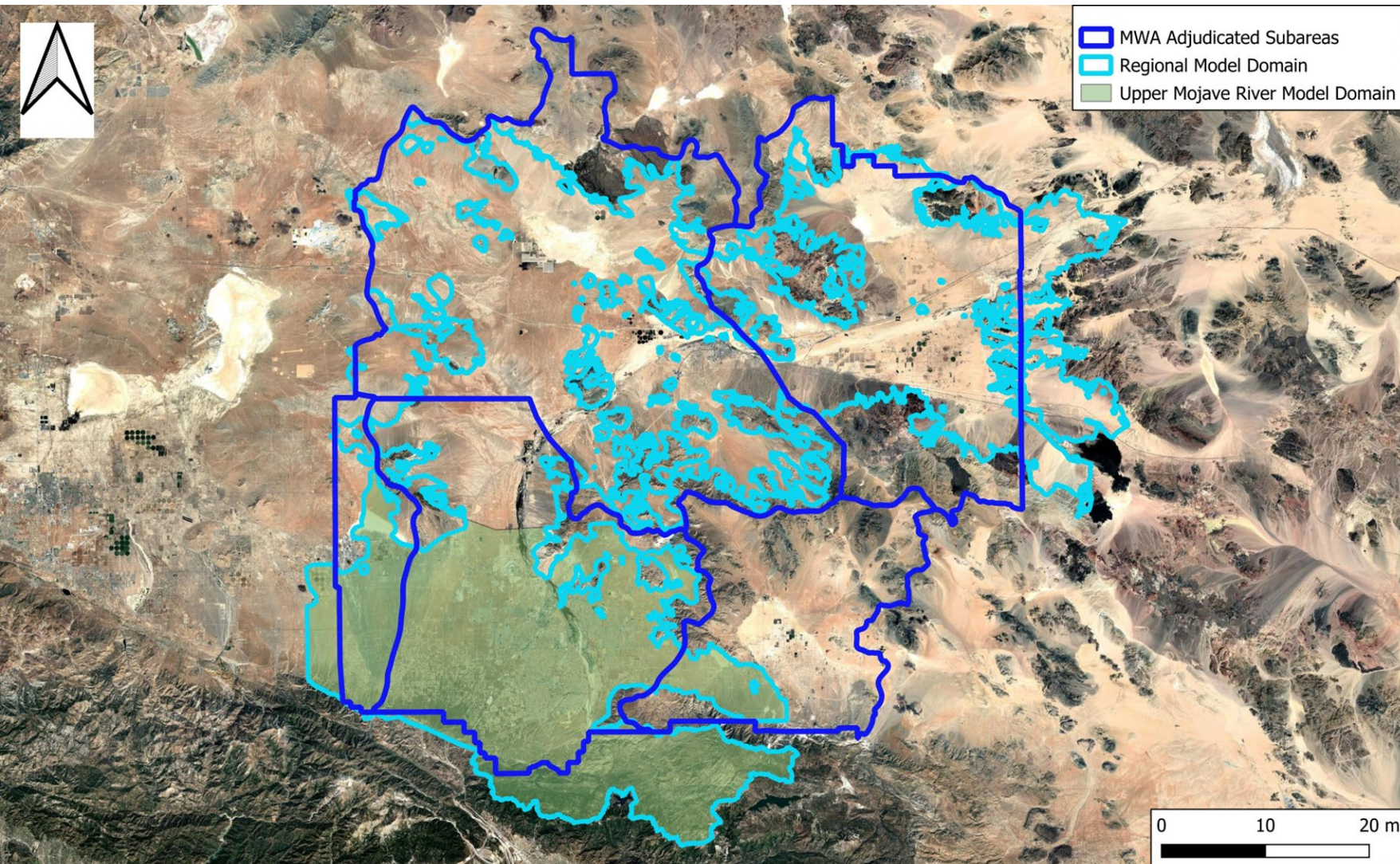
- **Background**

- Existing USGS Model (2001) Calibrated 1931 - 1999
- Most Recent Model Doesn't cover Centro and Baja

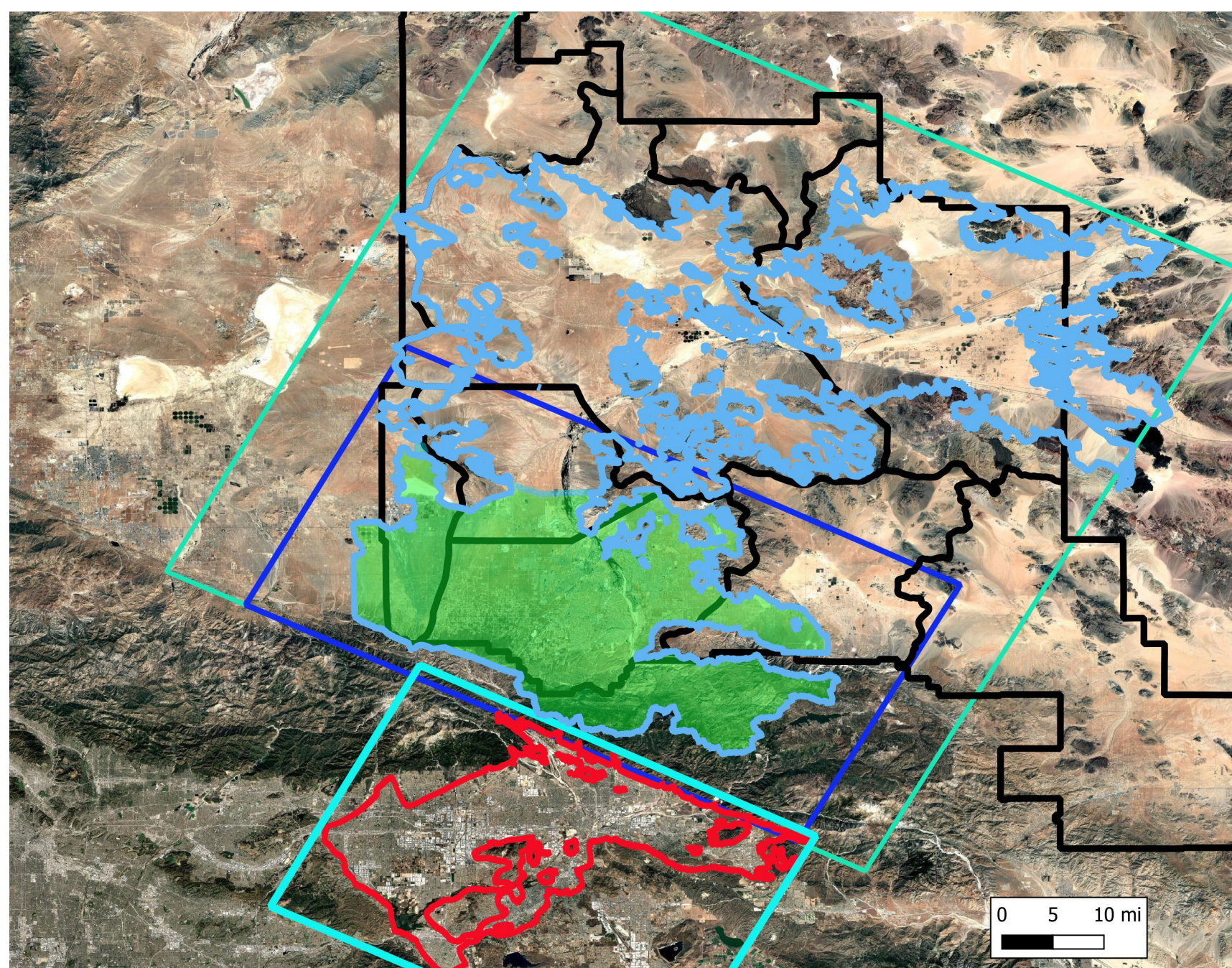
- **Objectives**

- Support Water Banking and Basin Management
- Support Watermaster
- Improve Basin Understanding

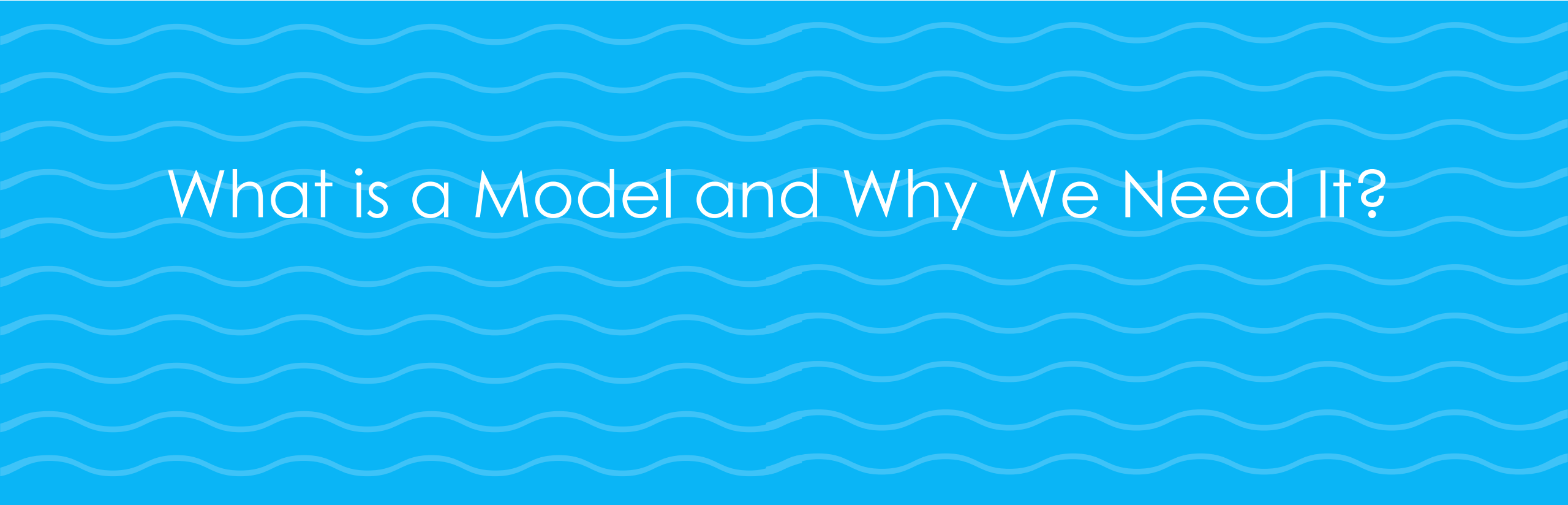
Model Update: Spatial and Temporal Extent



- 500ft x 500ft Cells
- WY 1951 – 2022
- 6 Layers



- **Content is King**
- **Context is God**

A decorative horizontal band with a blue background and white wavy lines, resembling water or a stylized wave pattern.

What is a Model and Why We Need It?

What is a Model?

- Any device that represents an approximation of a field situation
- A tool designed to represent a simplified version of reality
- A mathematical representation of a physical system (GW Basin)

Why Do We Model Groundwater?

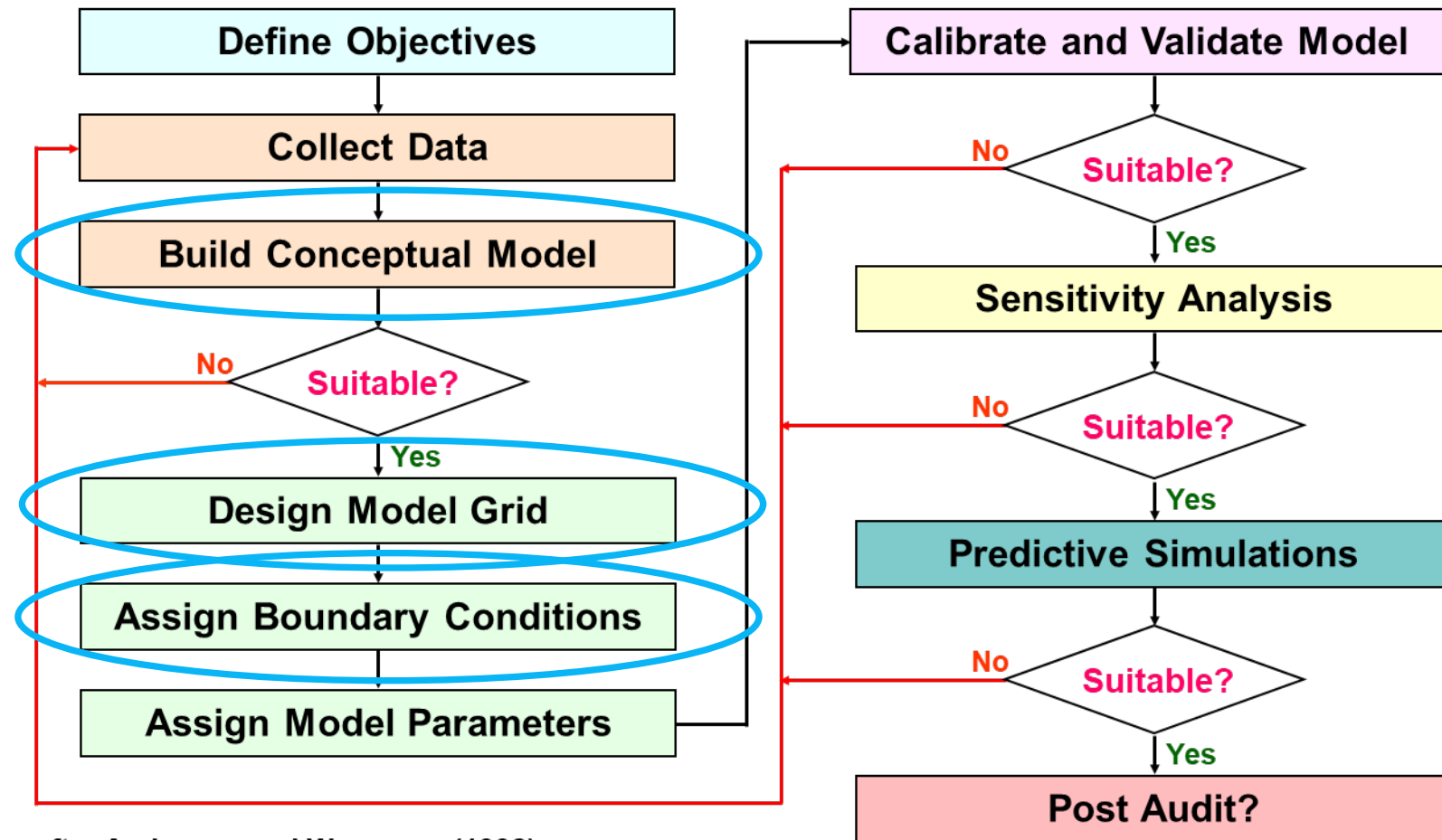
- **Analysis**

- Help understand and conceptualize natural processes
- Identify key issues needing more research

- **Management**

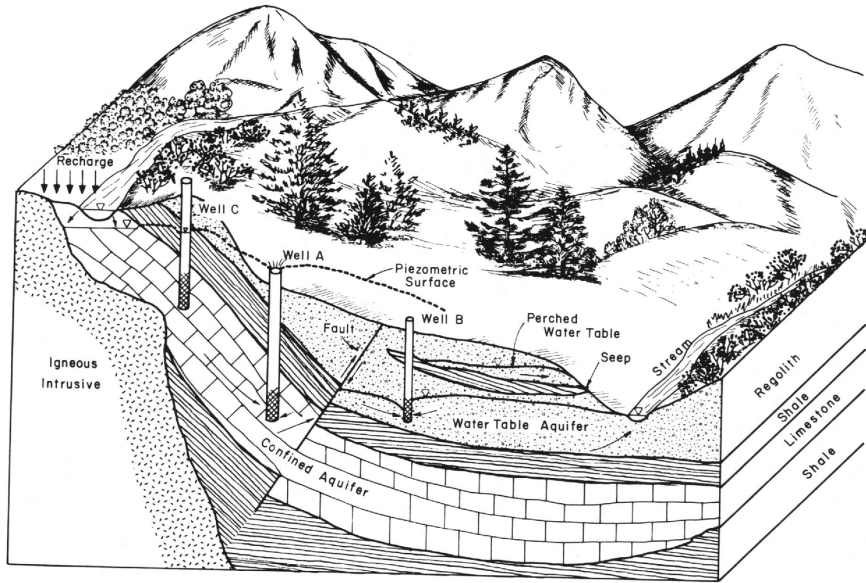
- Design work
- Predictive procedures
- Impact analysis

Numerical Modeling Process



after Anderson and Woessner (1992)

Conceptual Model



Consolidation of the current understanding of the key processes of the groundwater system including the influence of stresses and assist in the understanding of possible future changes

Barnett et al, 2012

💧 How It's Done (Conceptual Model)

It is really the description of the natural system with a story

“A story without data is just an anecdote, and data without a story is just a statistic.”



DATA



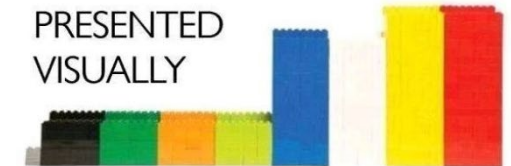
SORTED



ARRANGED



PRESENTED VISUALLY



EXPLAINED WITH A STORY



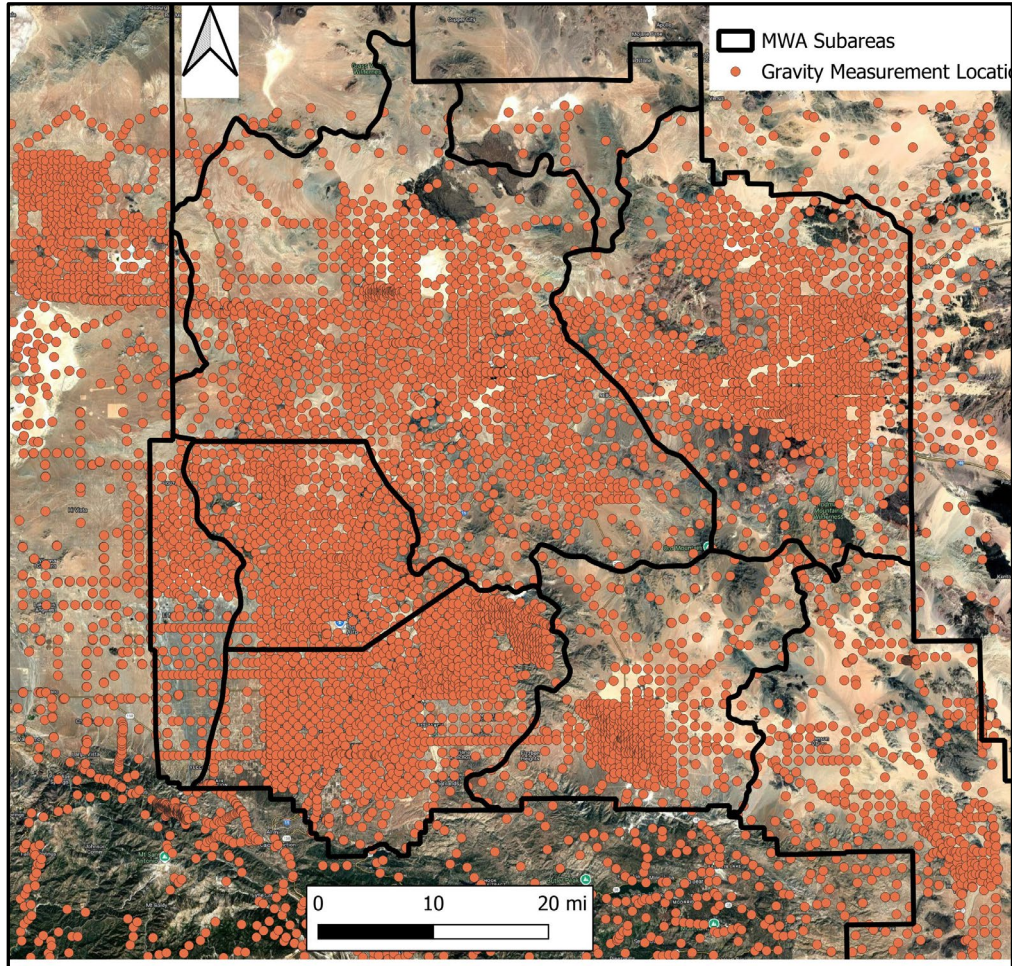


Methods

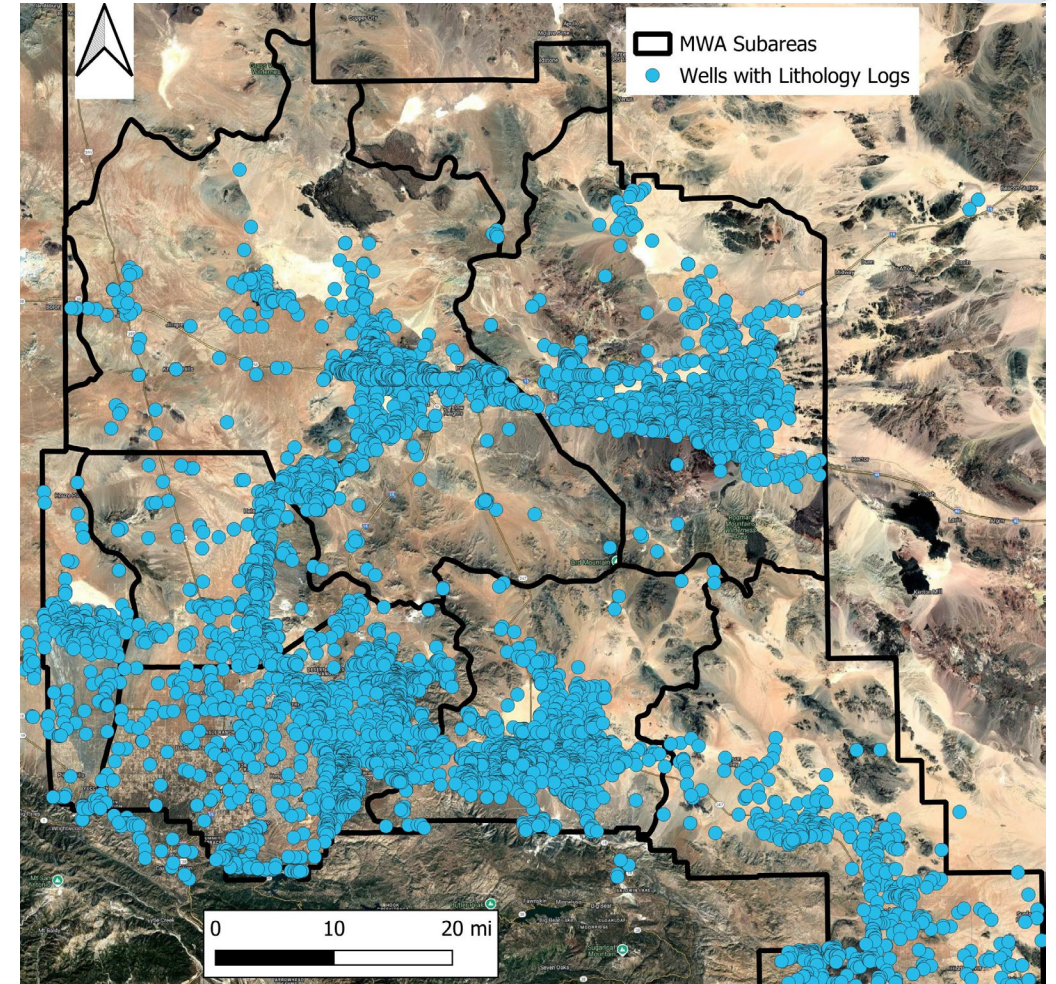


- Geophysics (Gravity and Surface Resistivity)
- Water Levels Contours (manual)
- Hydrographs (Water level timeseries)
- Lidar Ground Elevation
- Field Observation

Gravity Data and Depth to Bedrock



Gravity Data



Wells With Lith Logs

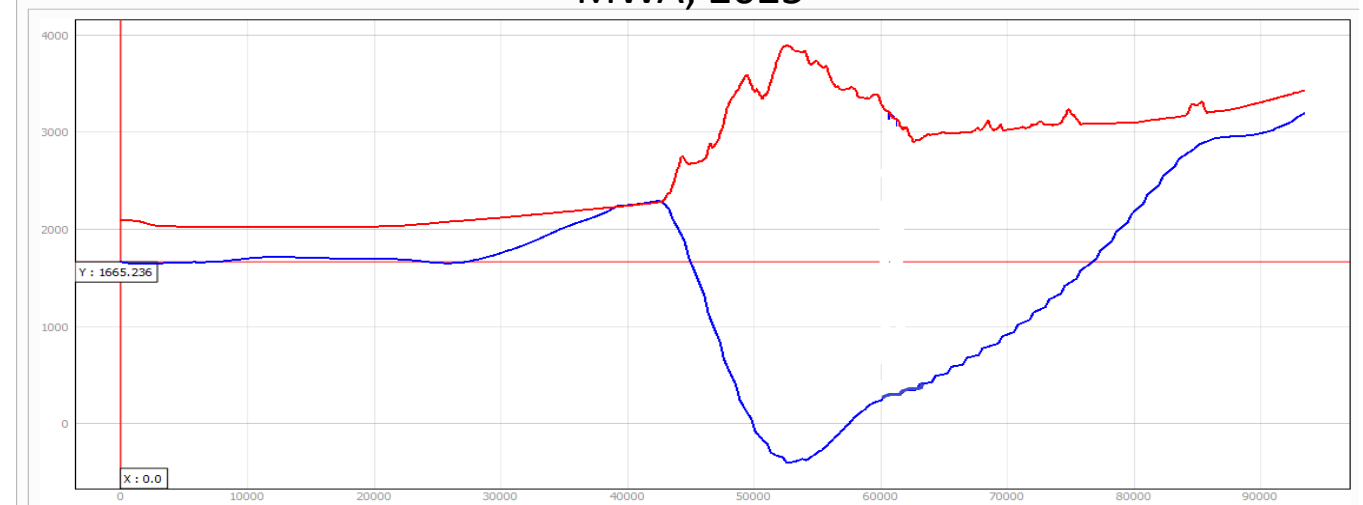
Depth to Bedrock QA/QC (1)

- Used Wells with Bedrock depth to calibrate model
- Ensured bedrock was deeper at non-bedrock wells
- Ensured known Outcrops are honored
- Checked bedrock trends against geological Cross-section (Diblee)

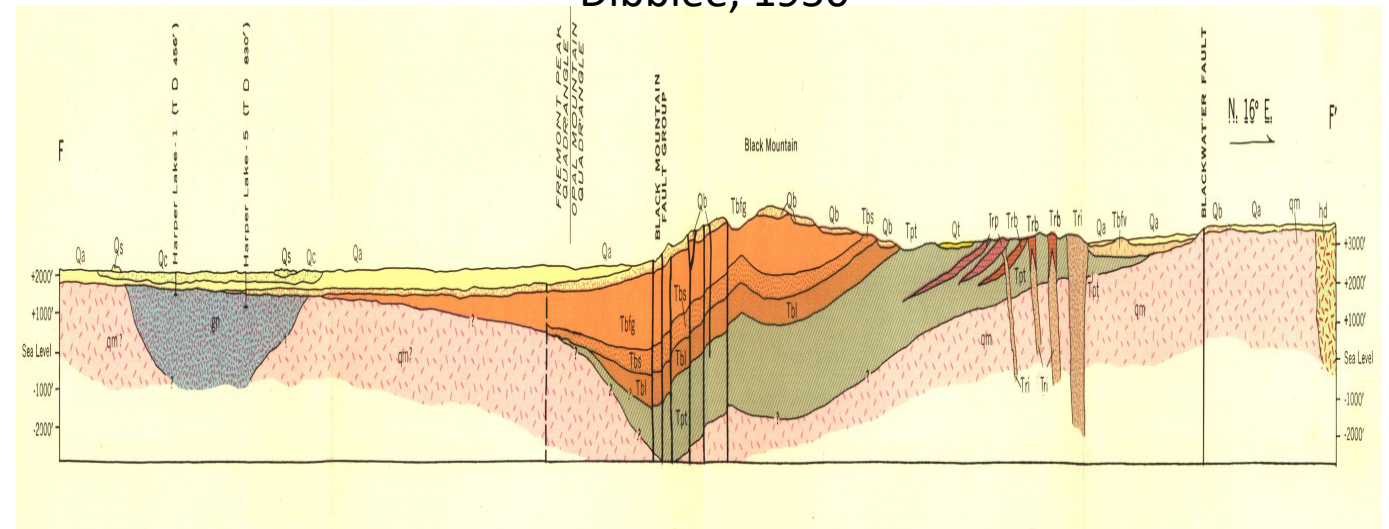
Depth to Bedrock QA/QC (2)

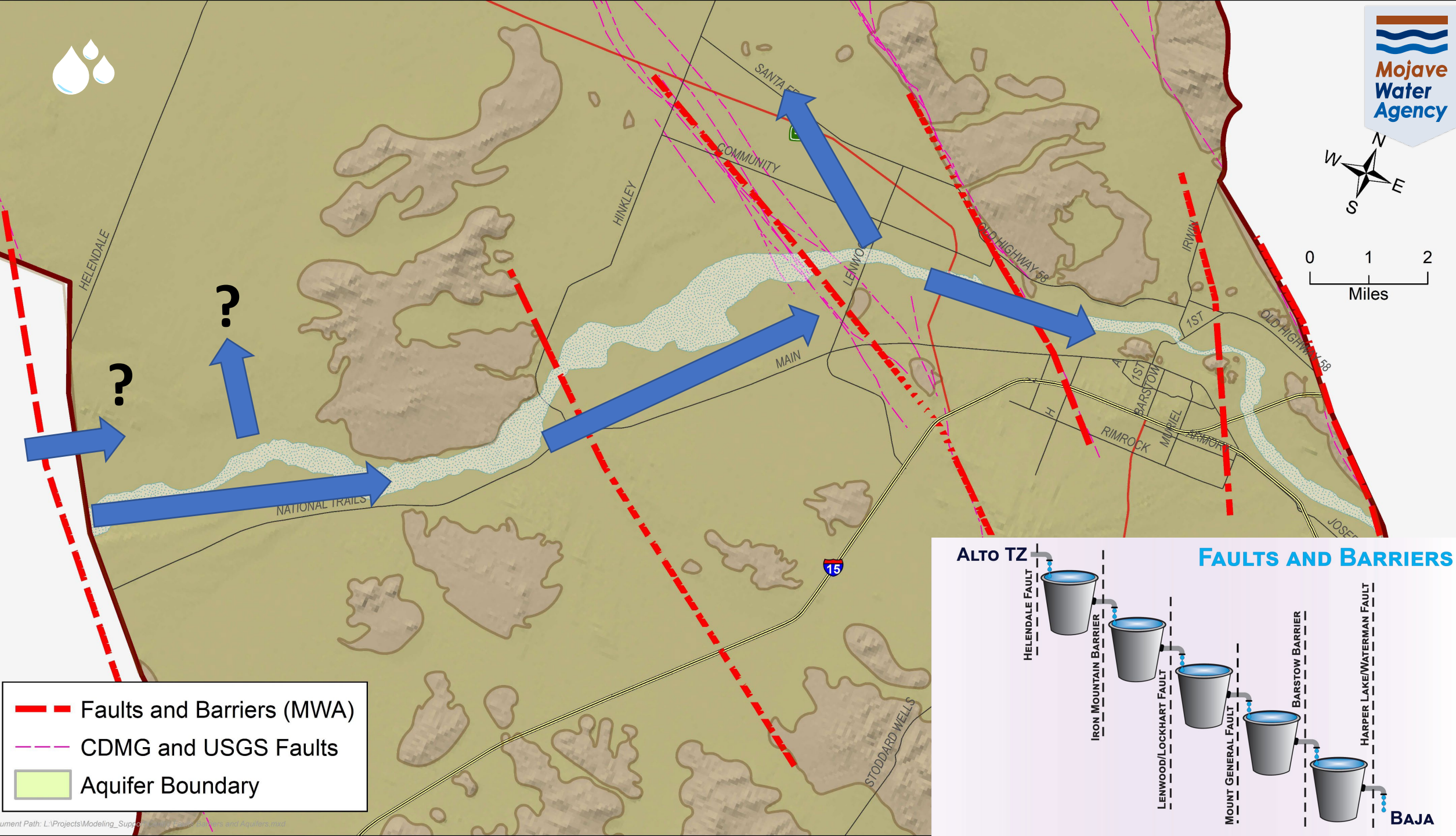
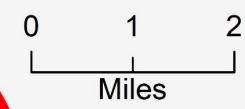


MWA, 2025

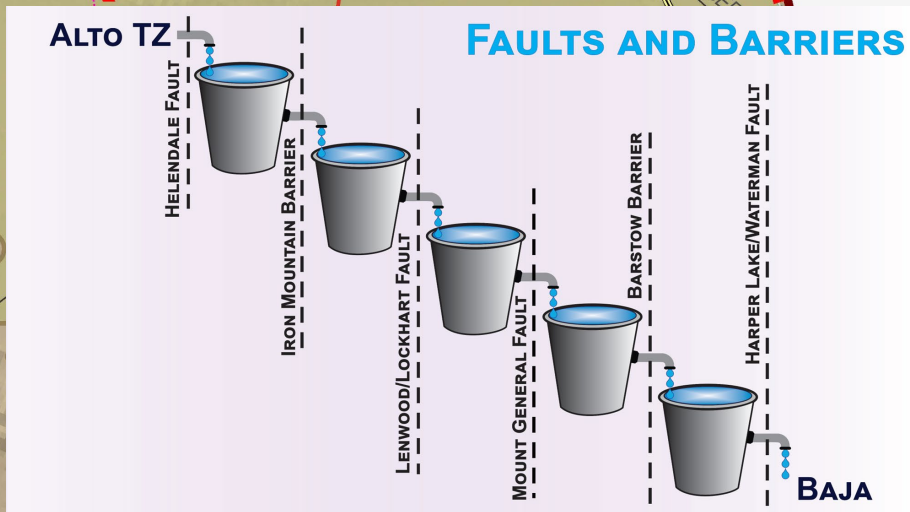


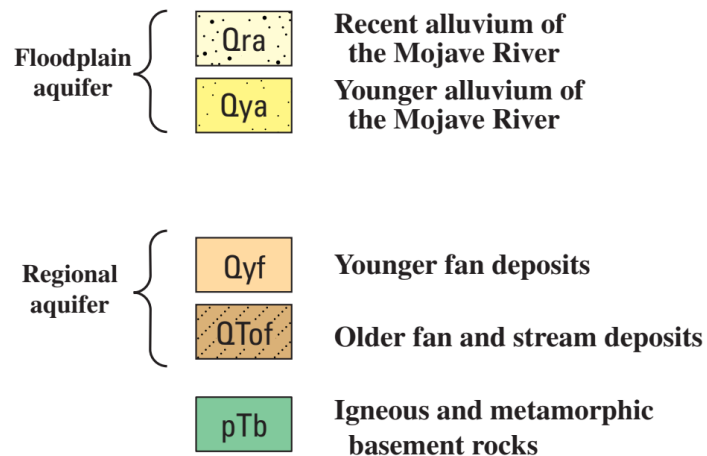
Dibblee, 1950



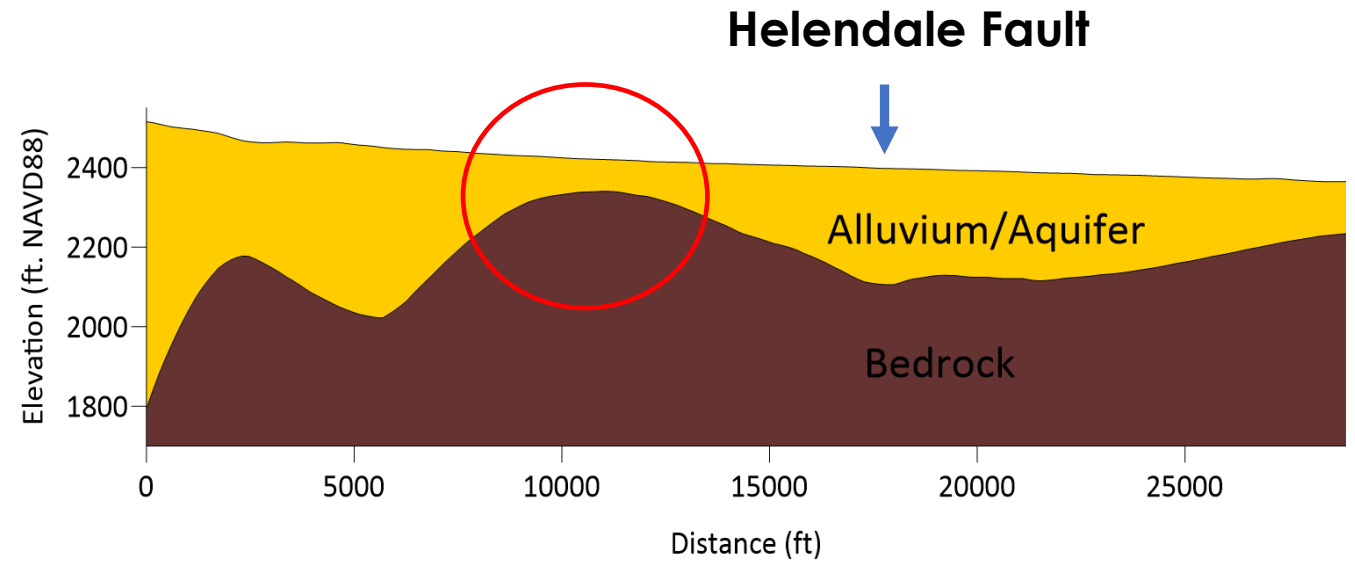
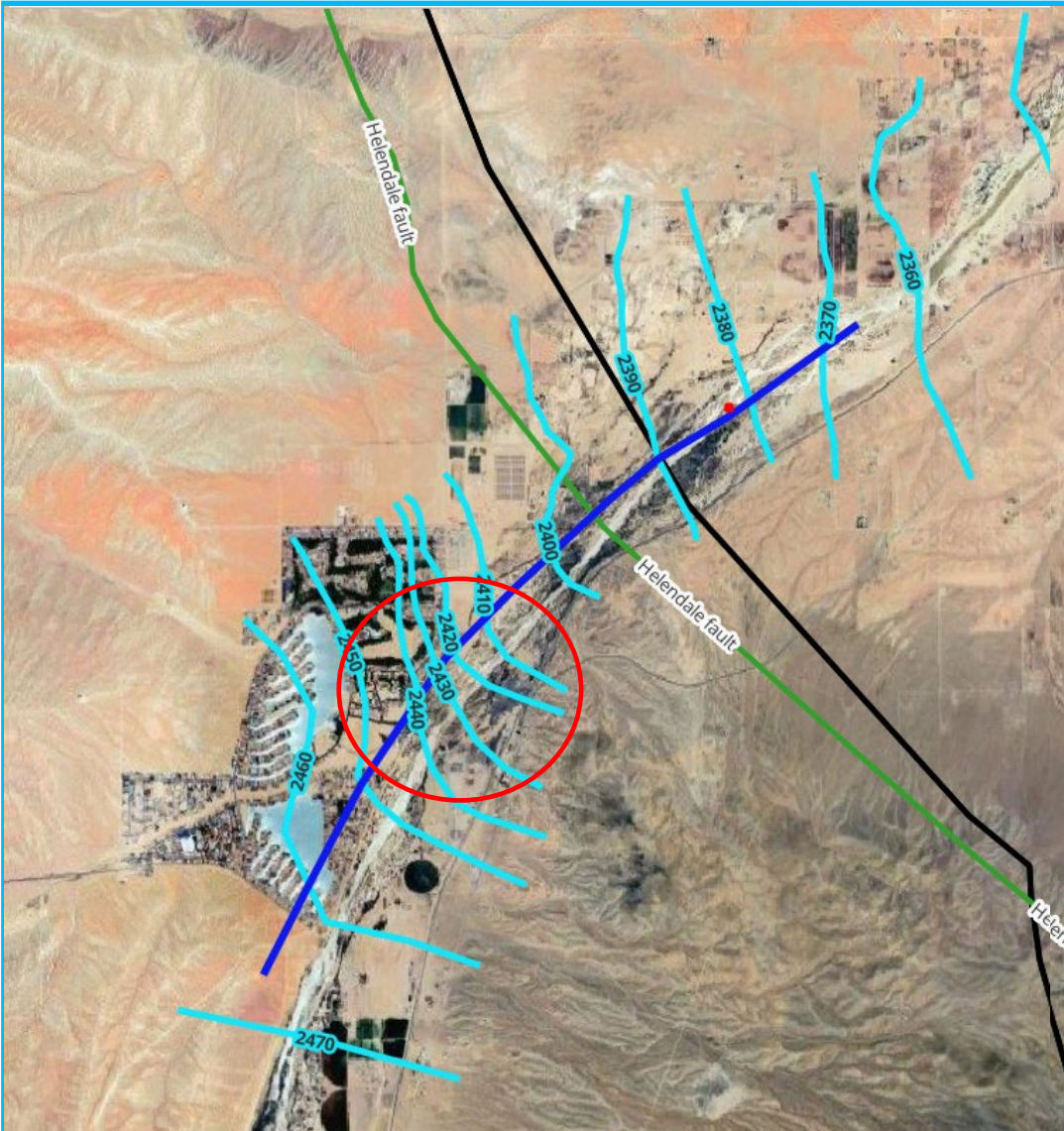


- Faults and Barriers (MWA)
- - - CDMG and USGS Faults
- Aquifer Boundary



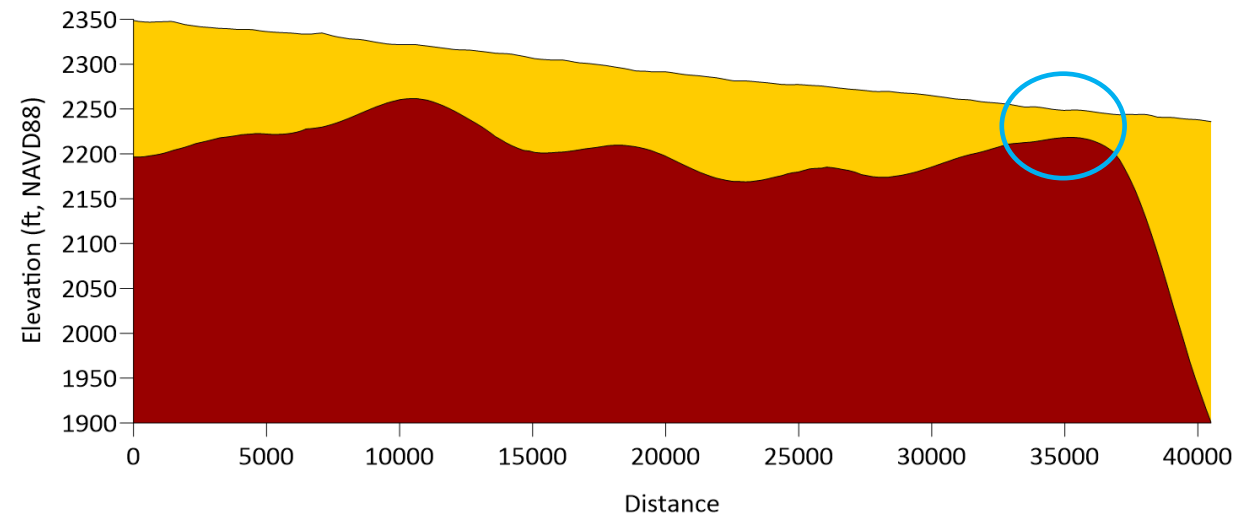


Helendale Fault



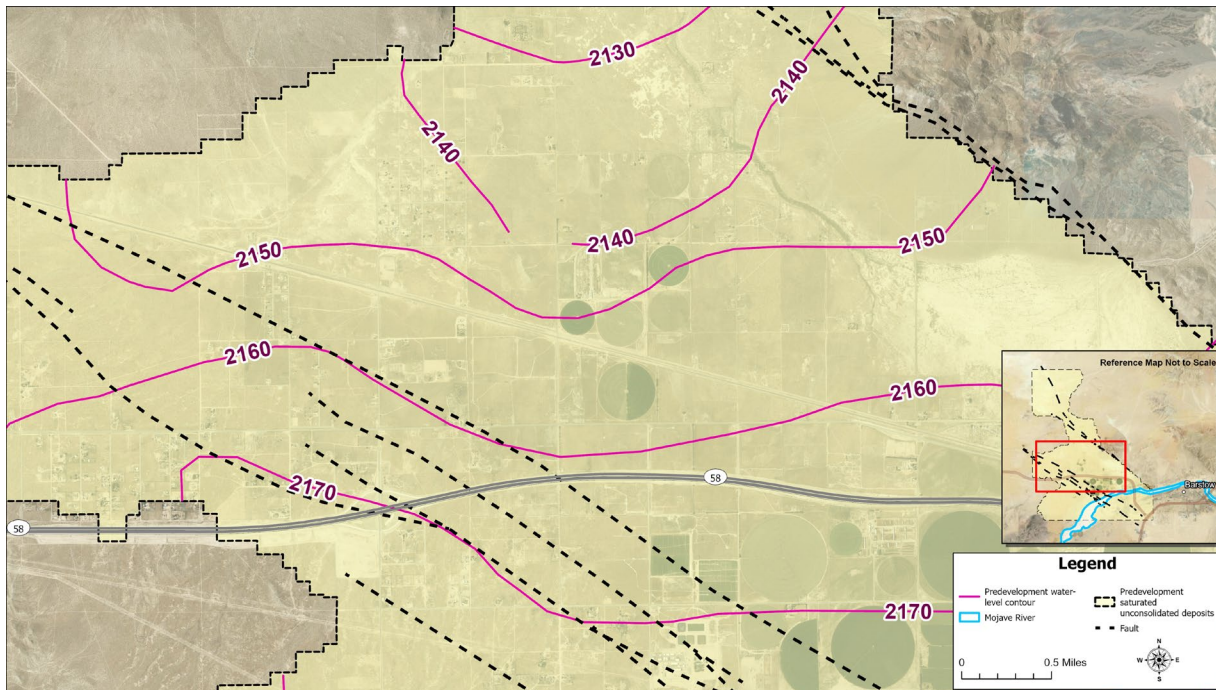
- Available 1958 Water levels
- Water levels contoured
- No obvious flow barrier
- Bedrock High

Iron Mountain Barrier

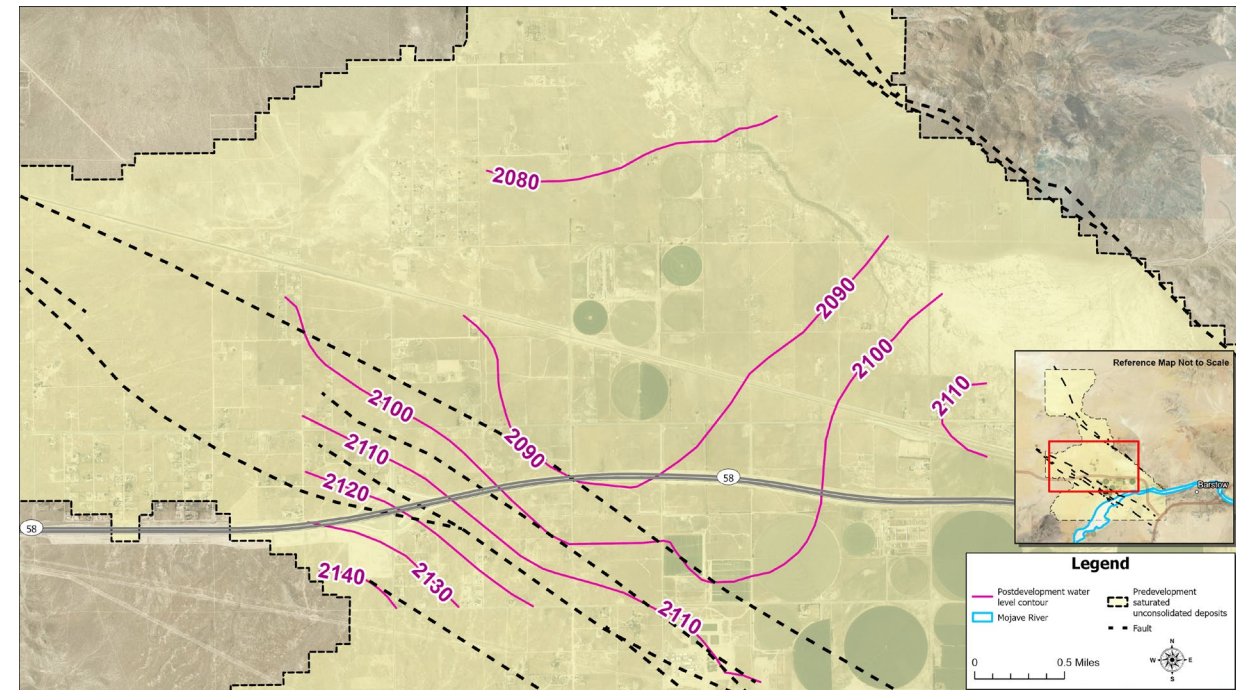


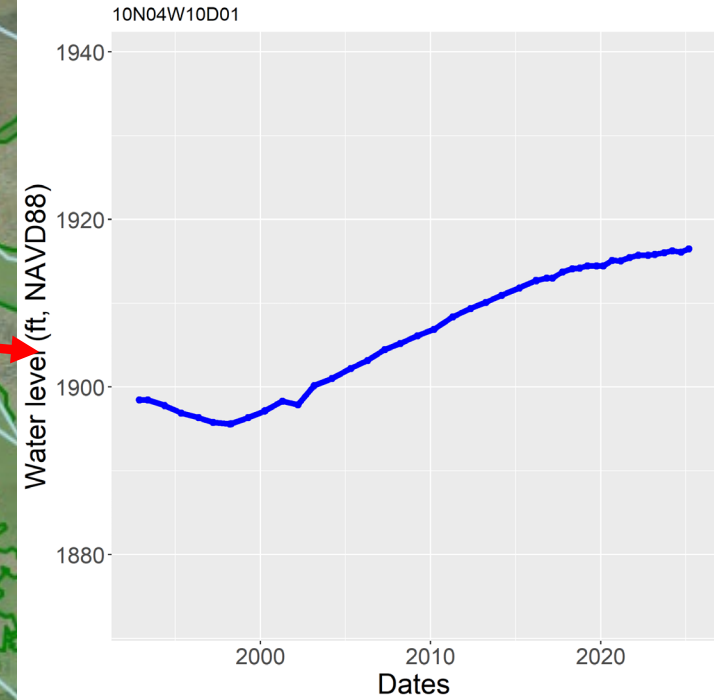
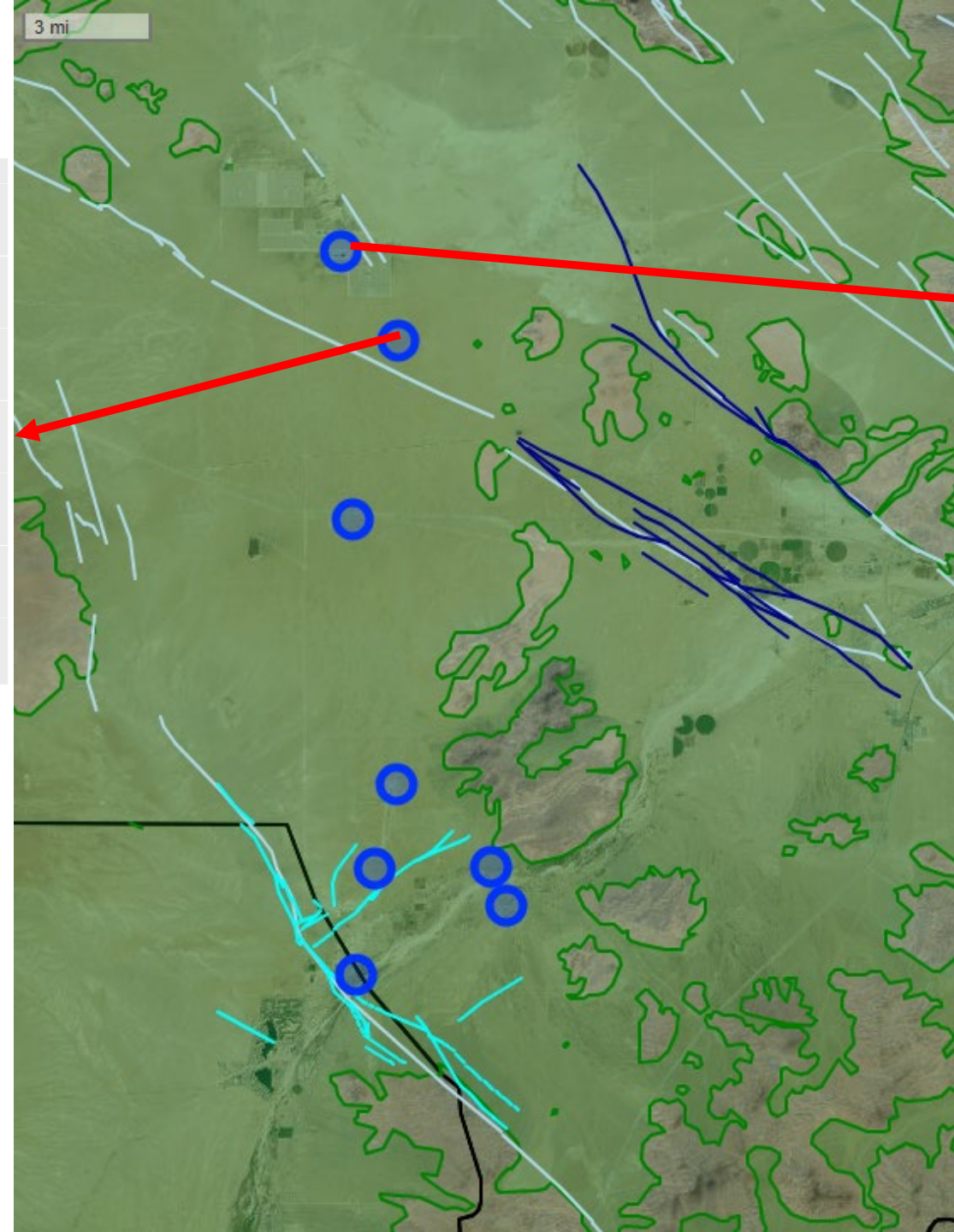
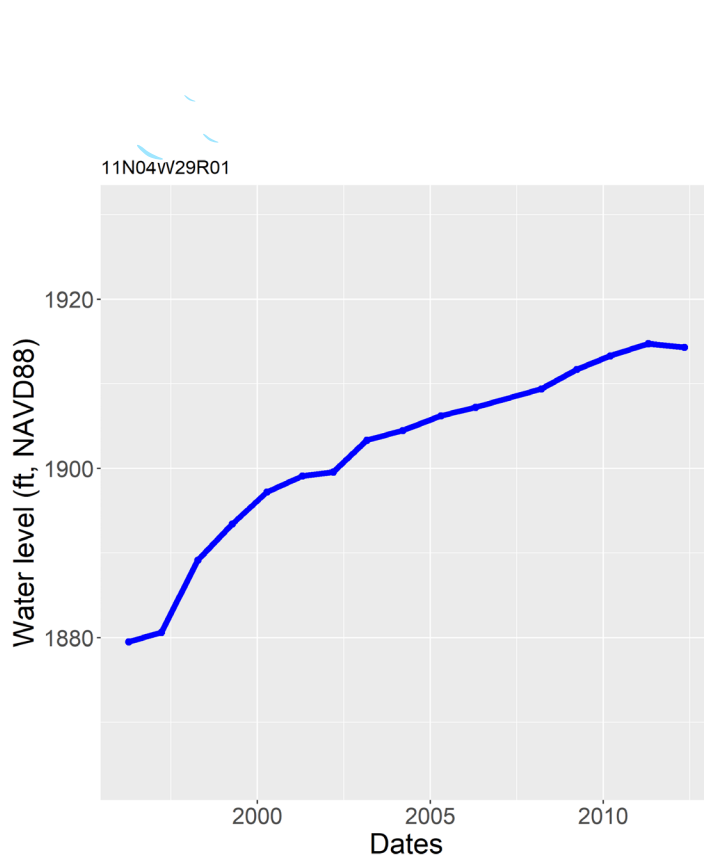
Lenwood-Lockhart Fault (1)

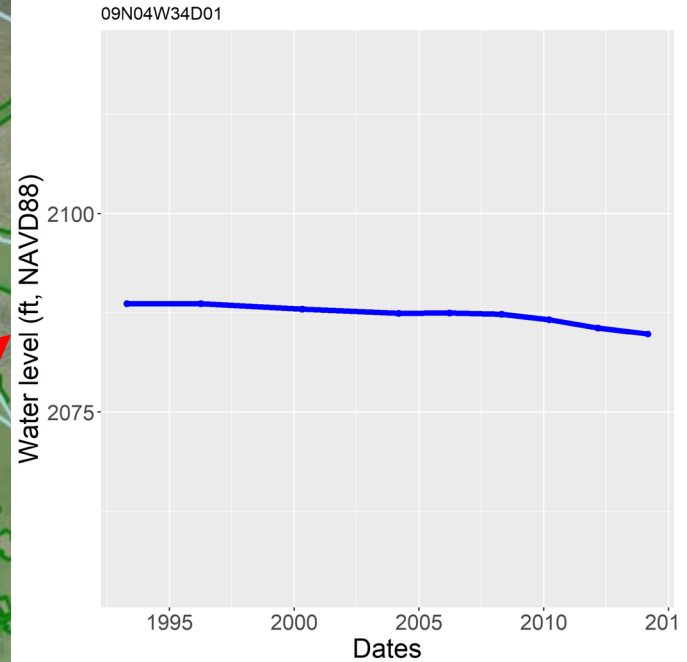
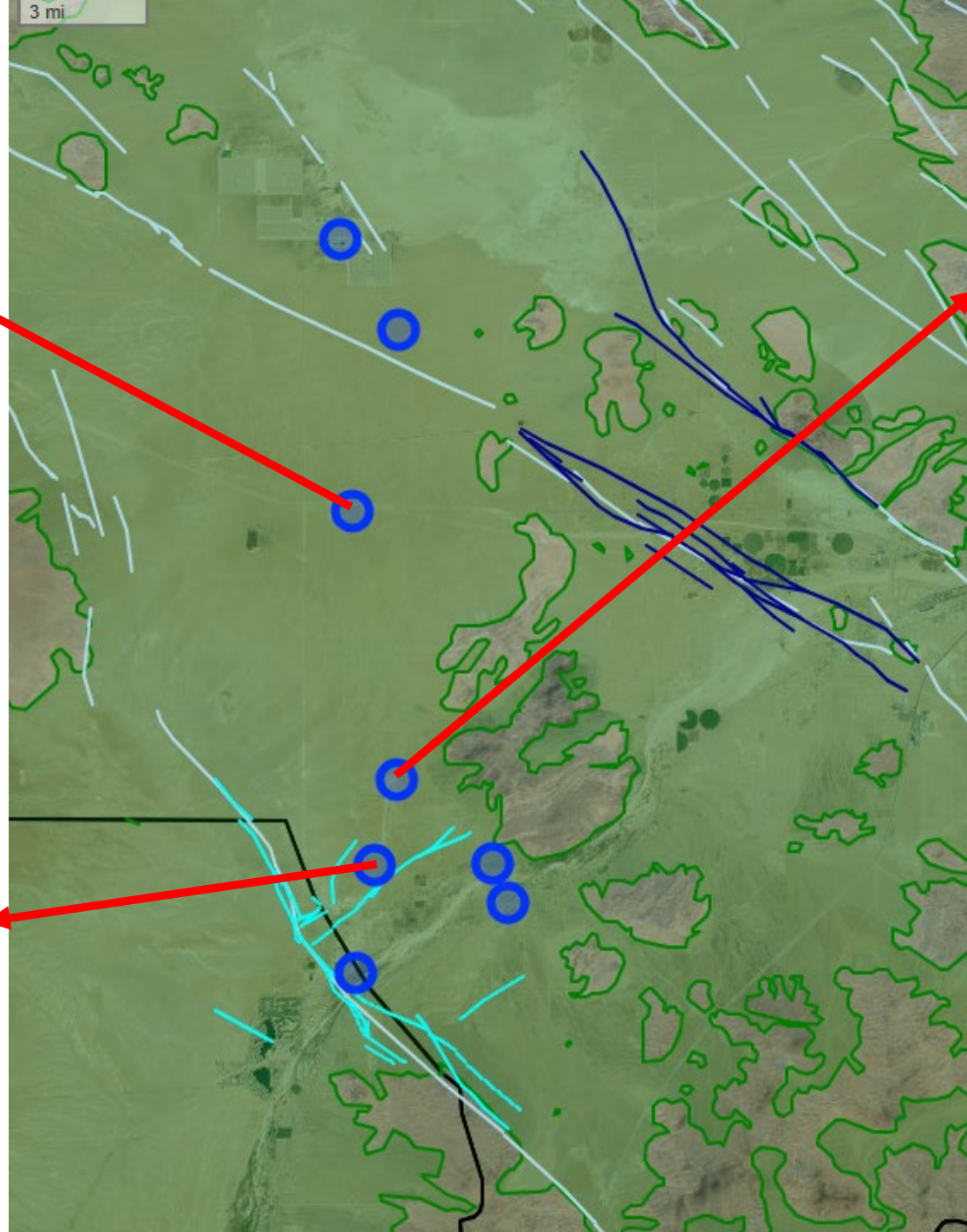
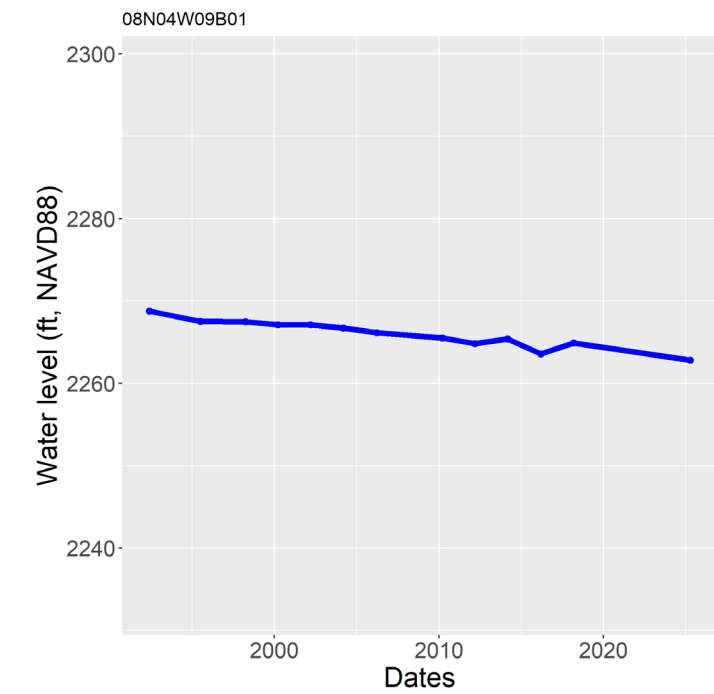
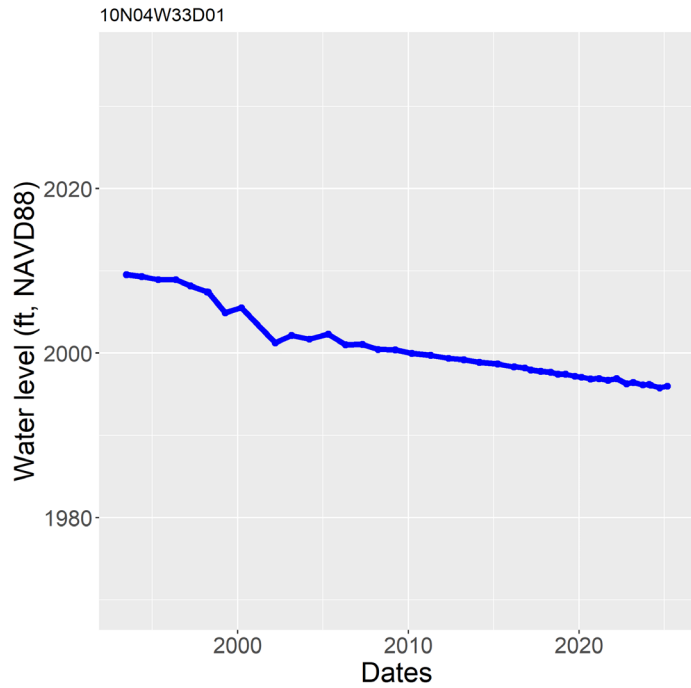
Pre 1930

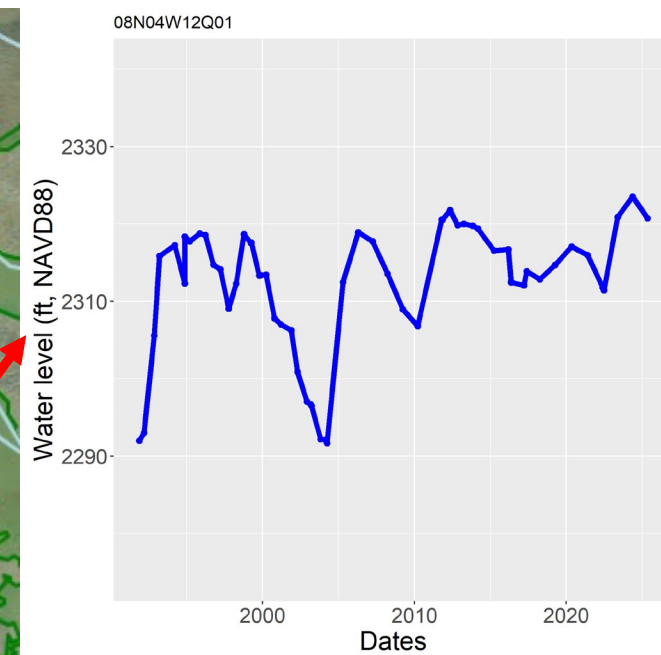
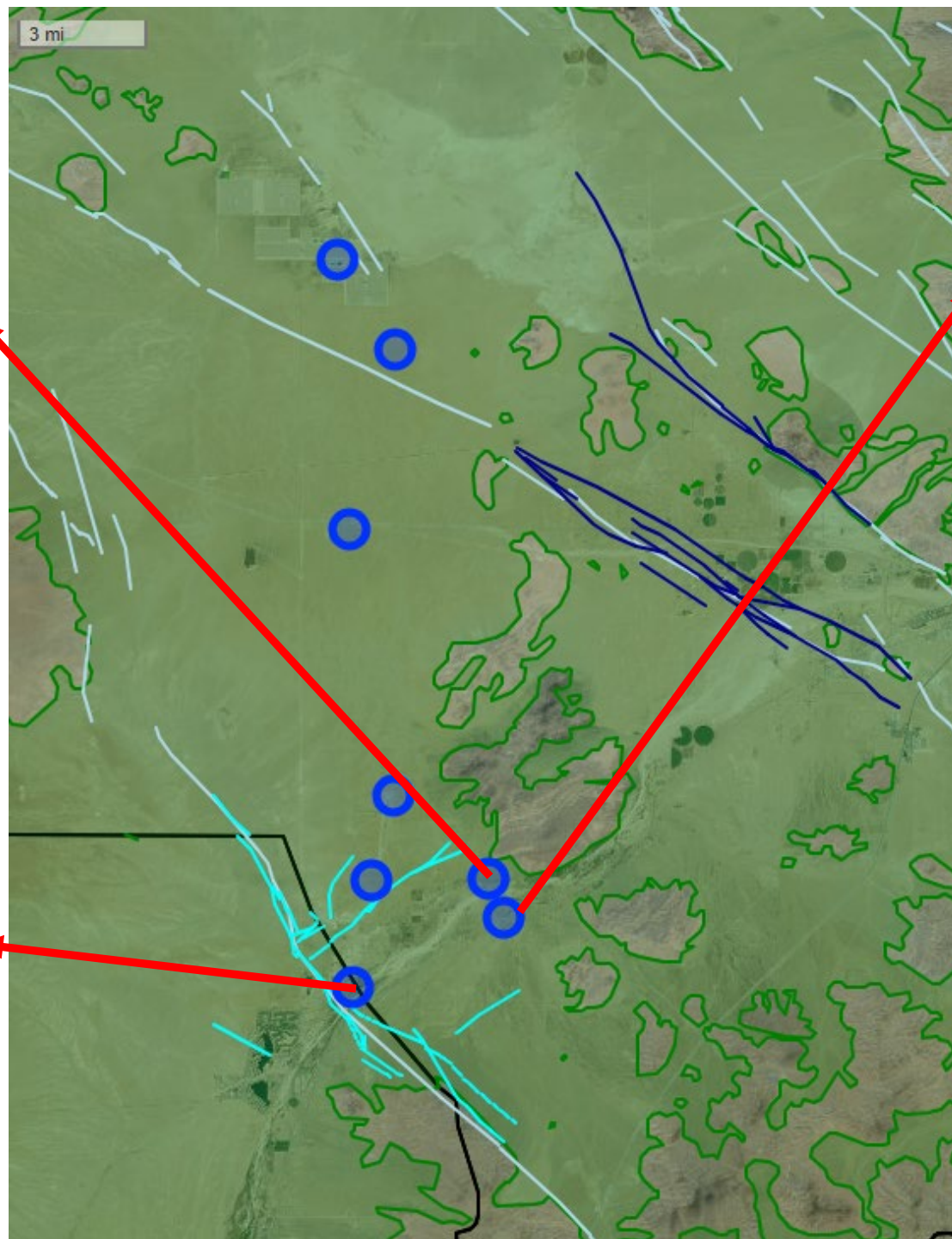
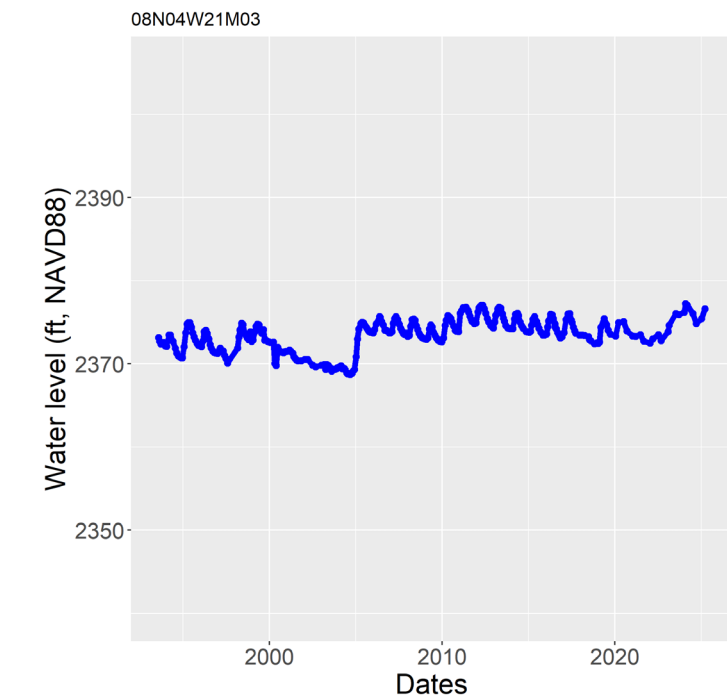
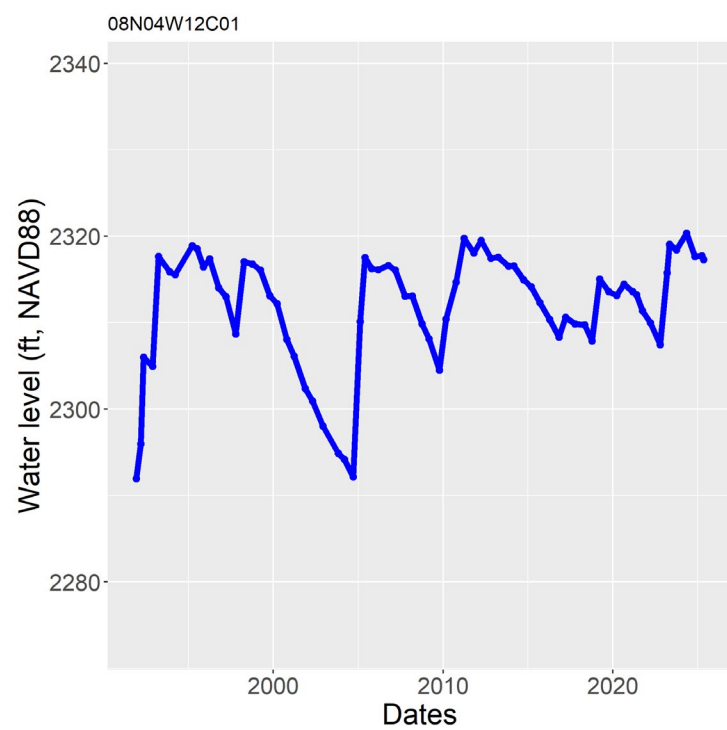


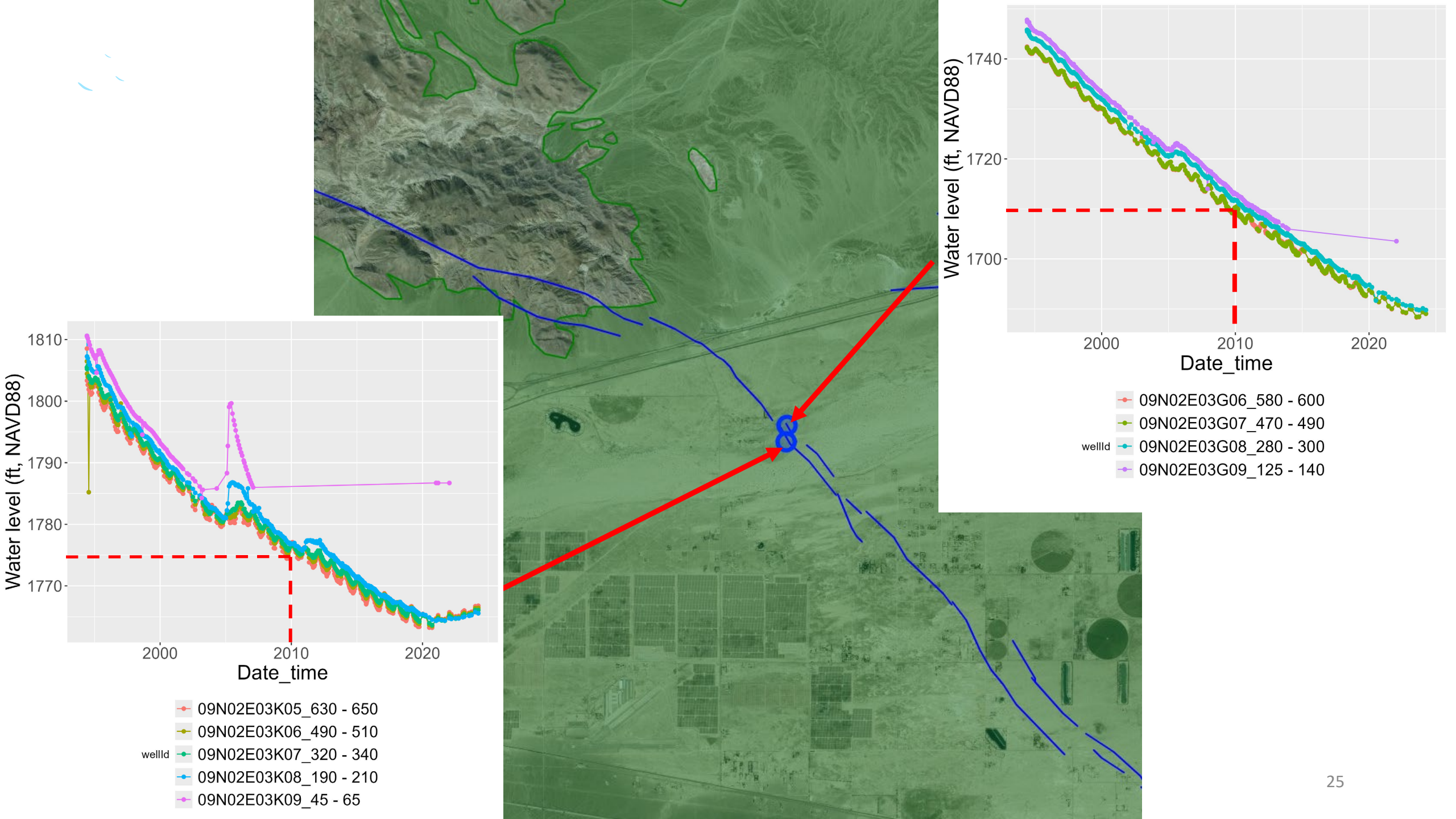
2015

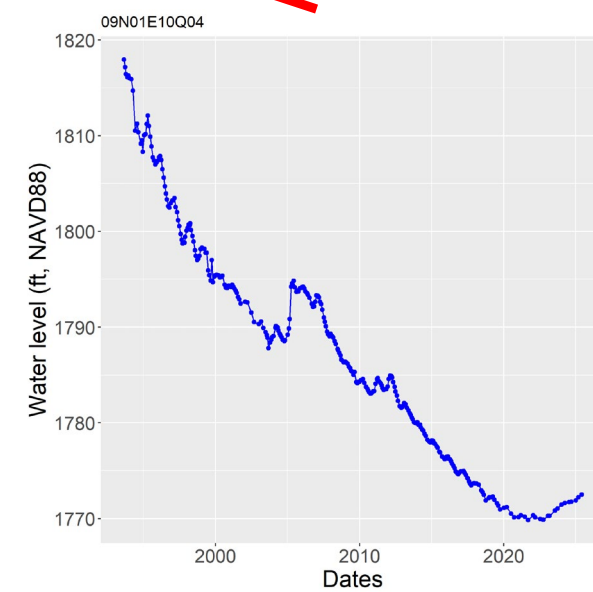
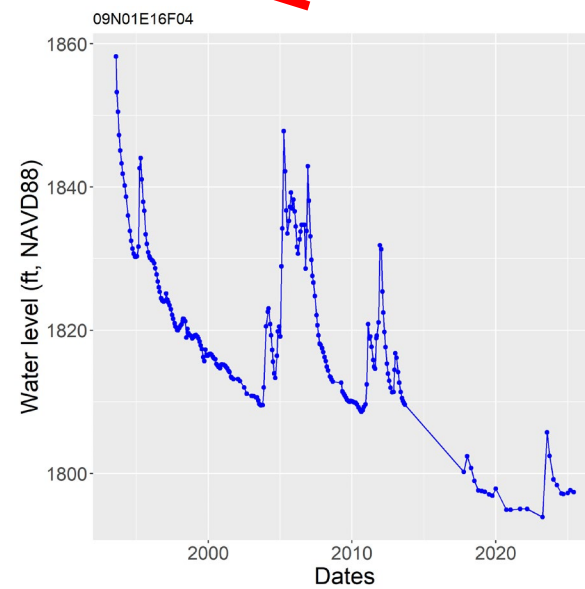
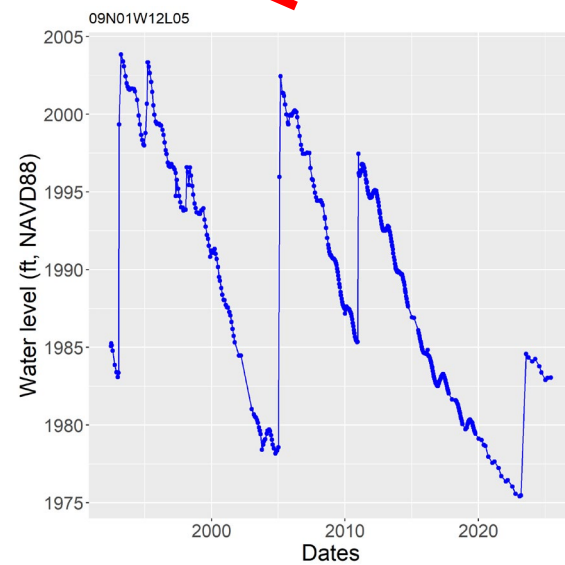
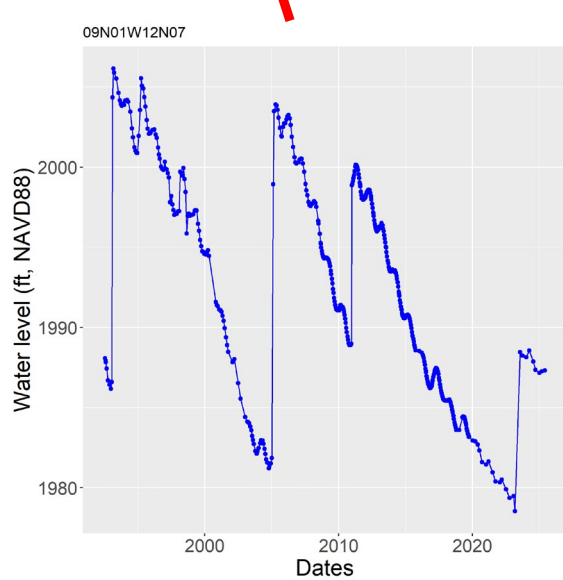


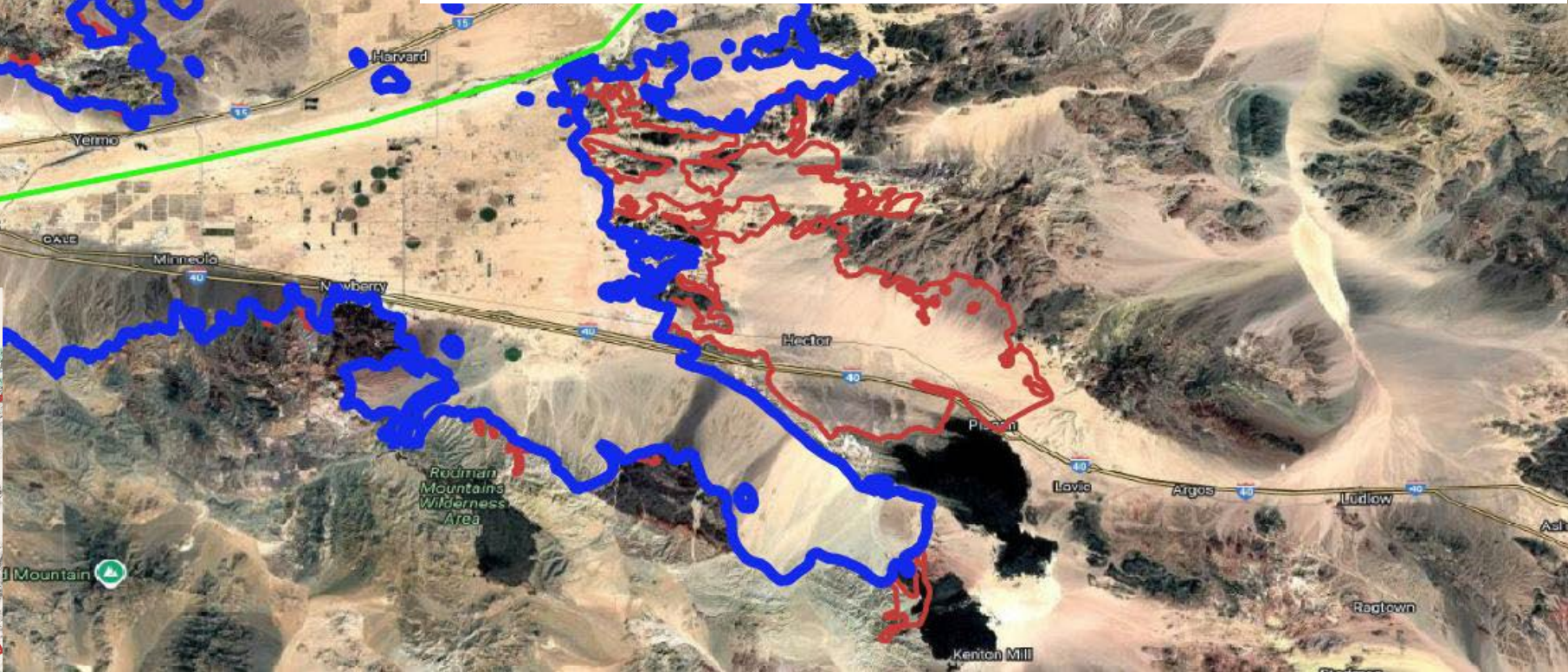
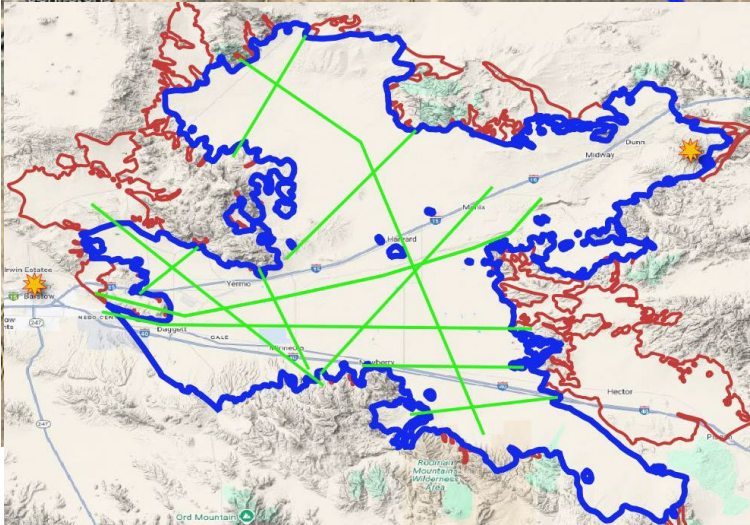
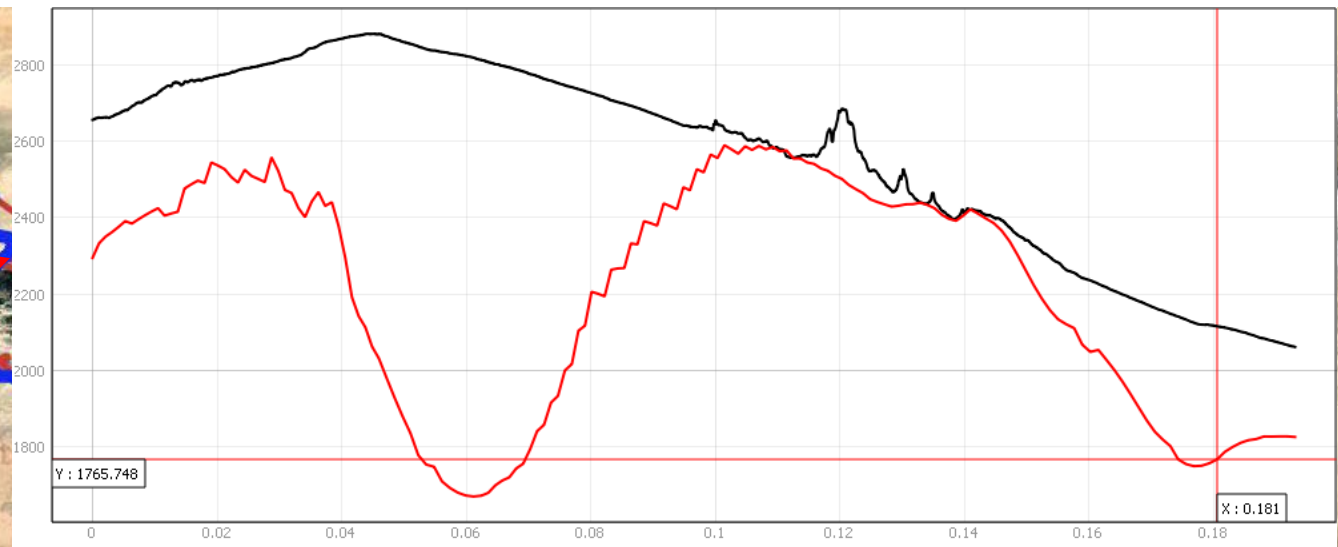
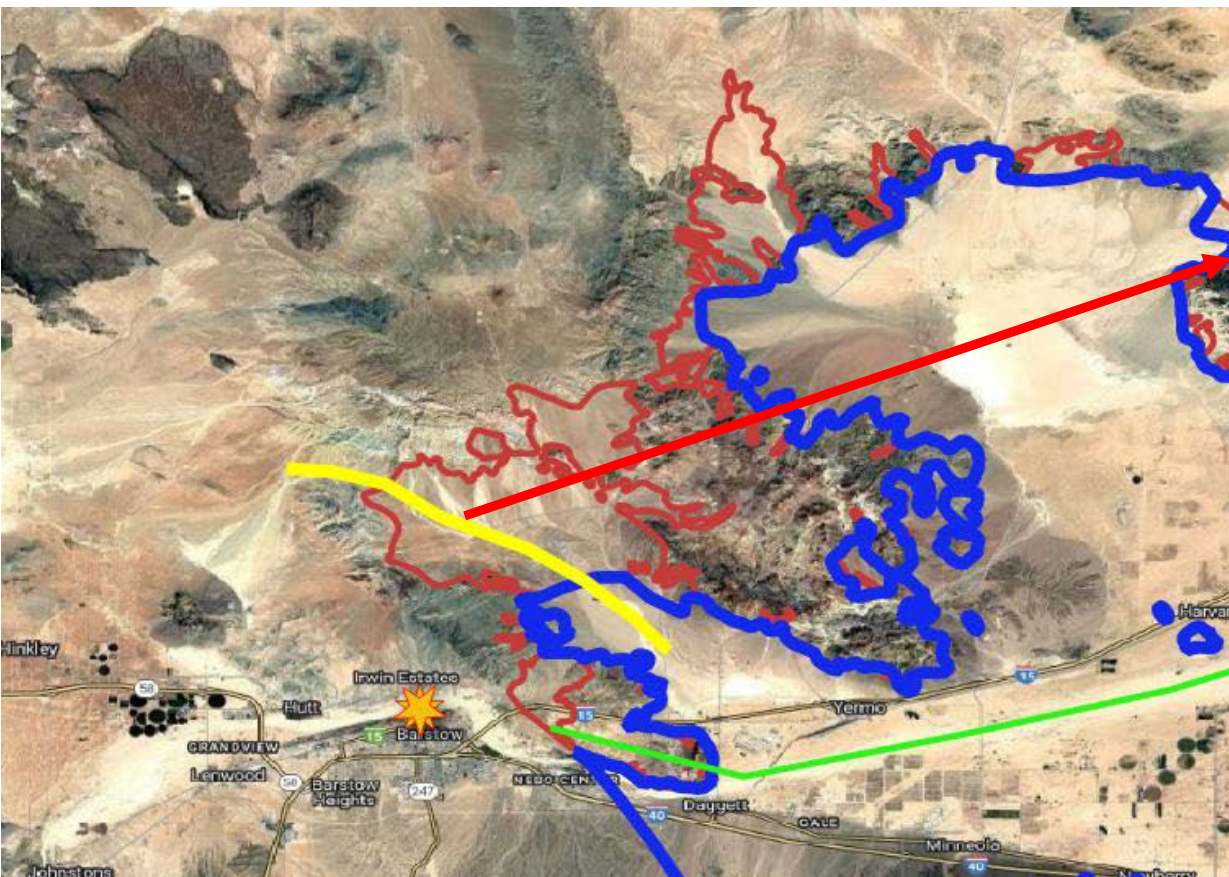


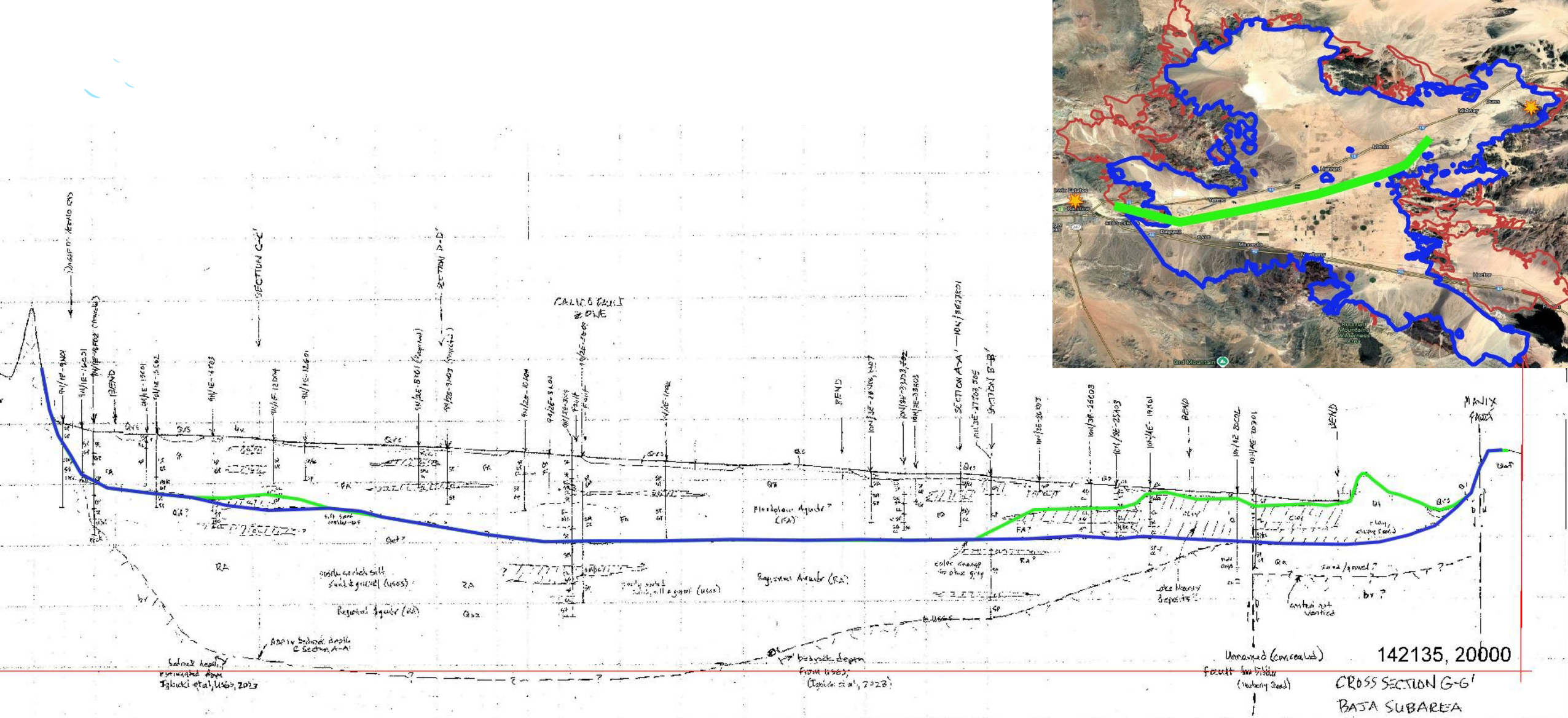


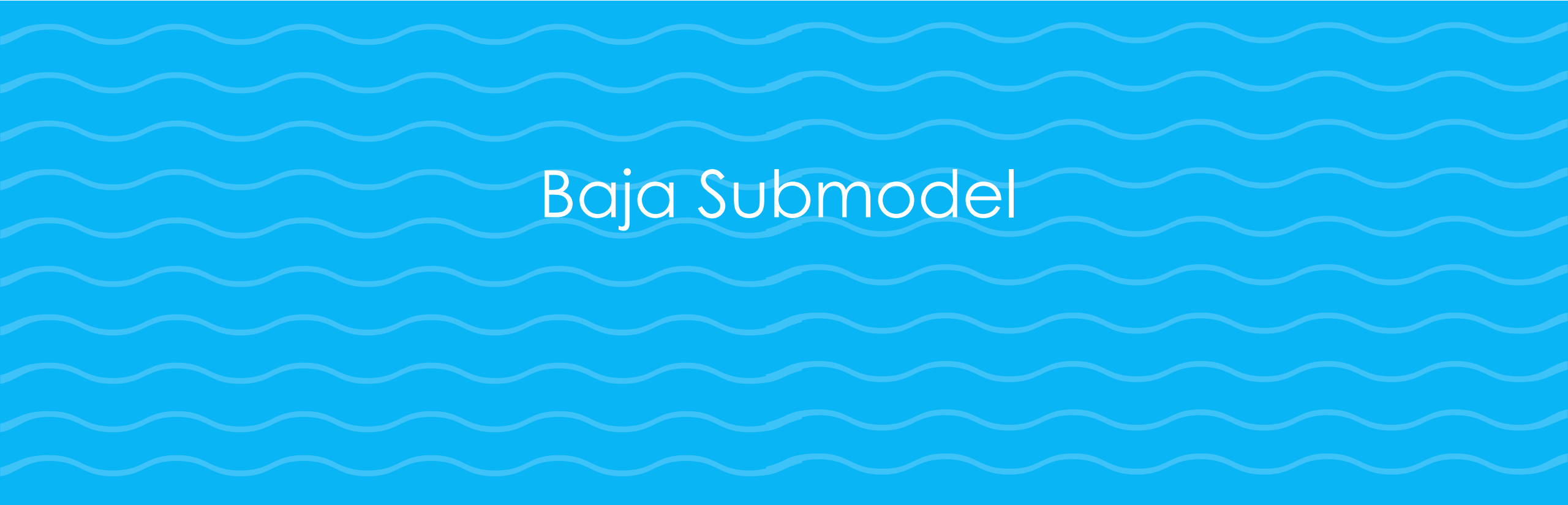




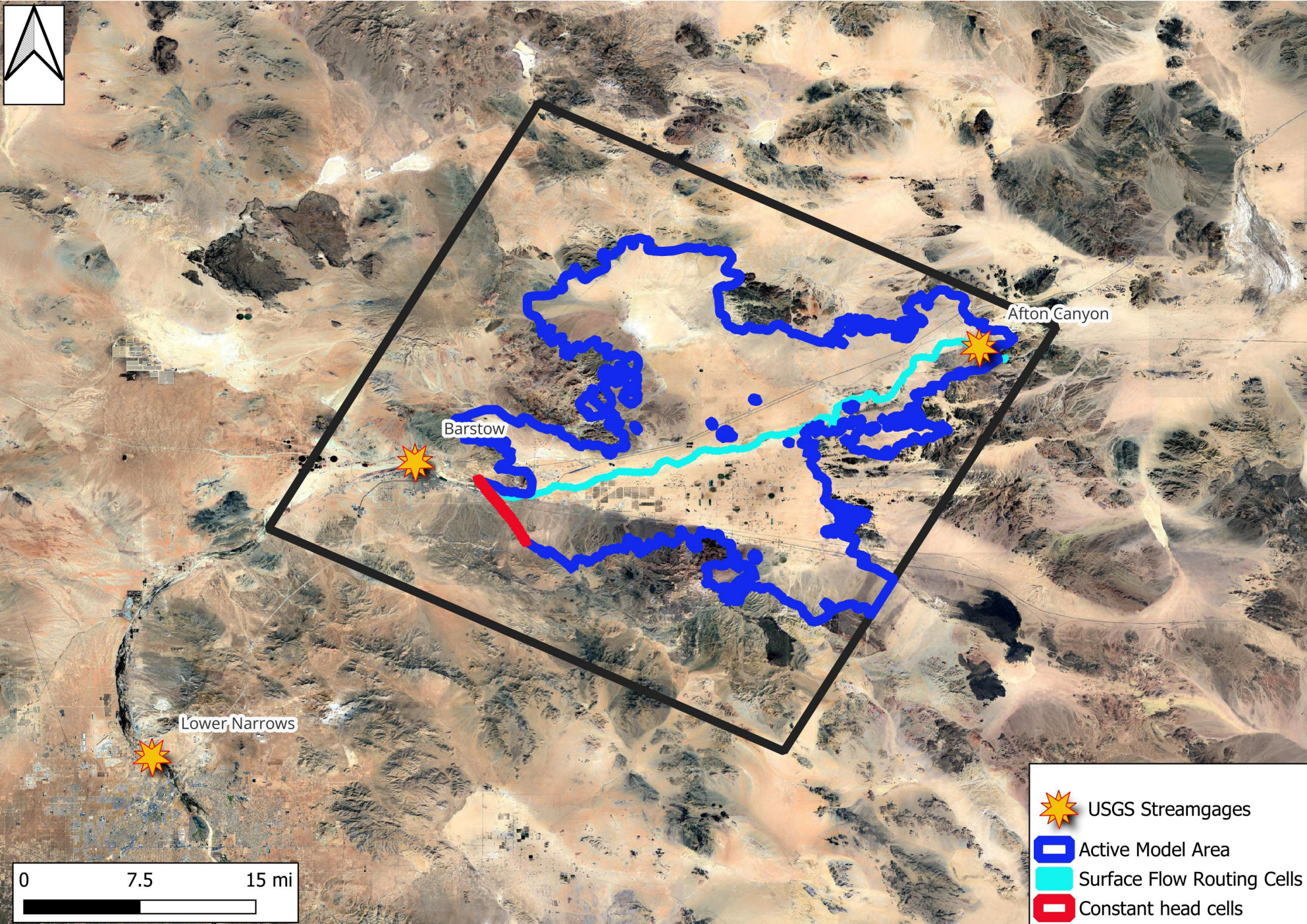


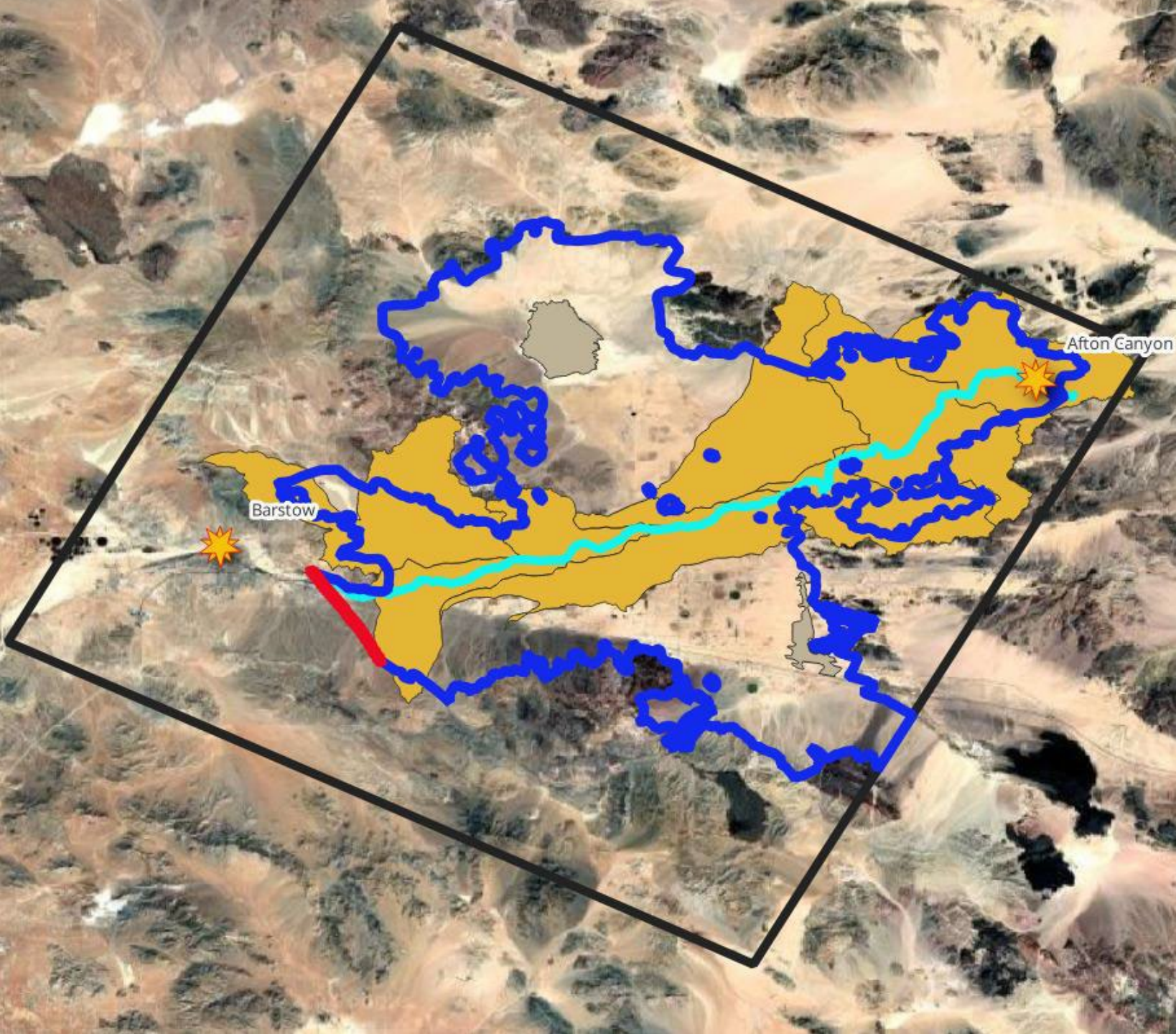




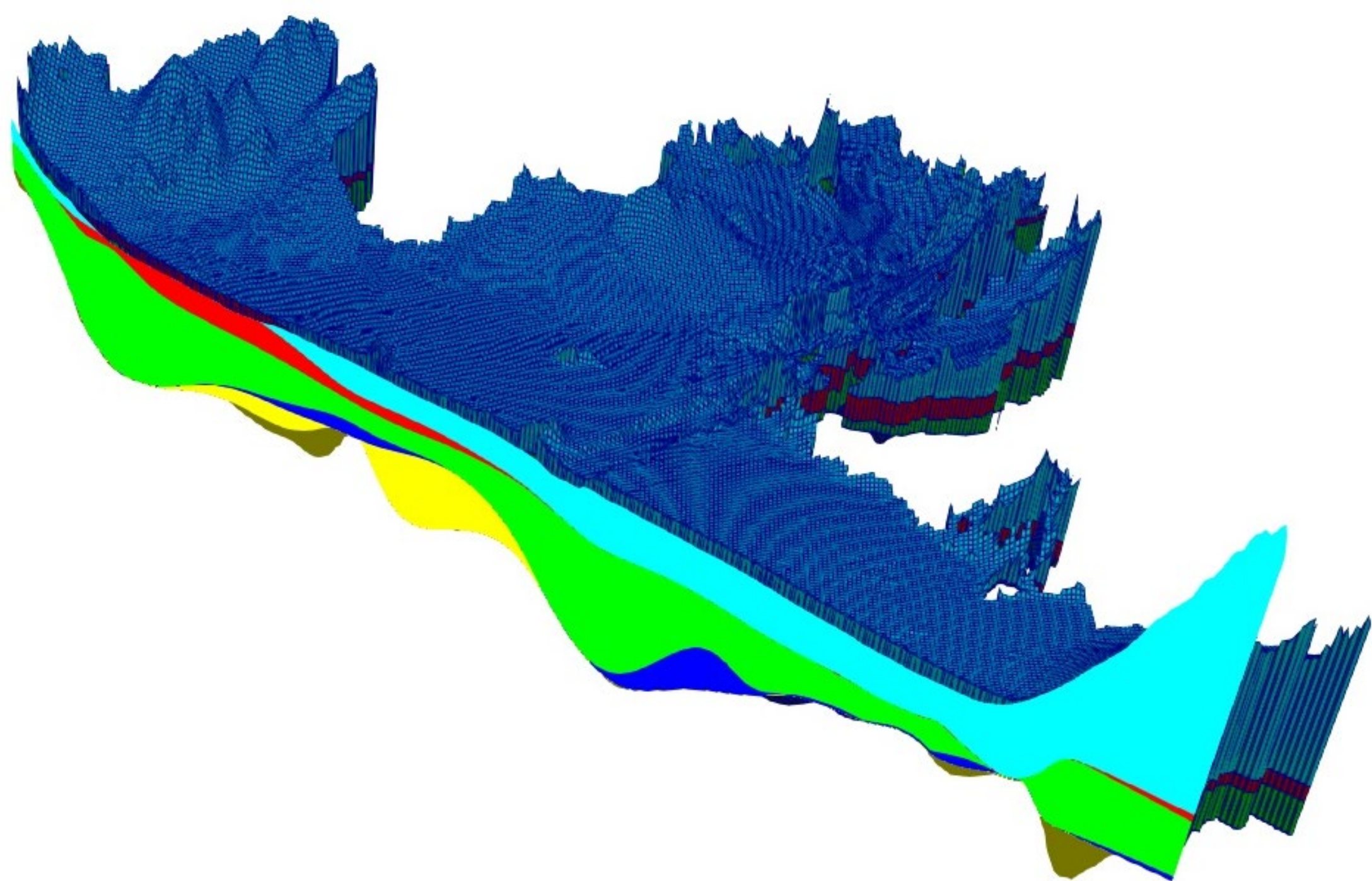
A decorative horizontal band with a blue background and white wavy lines, resembling water or a stylized wave pattern.

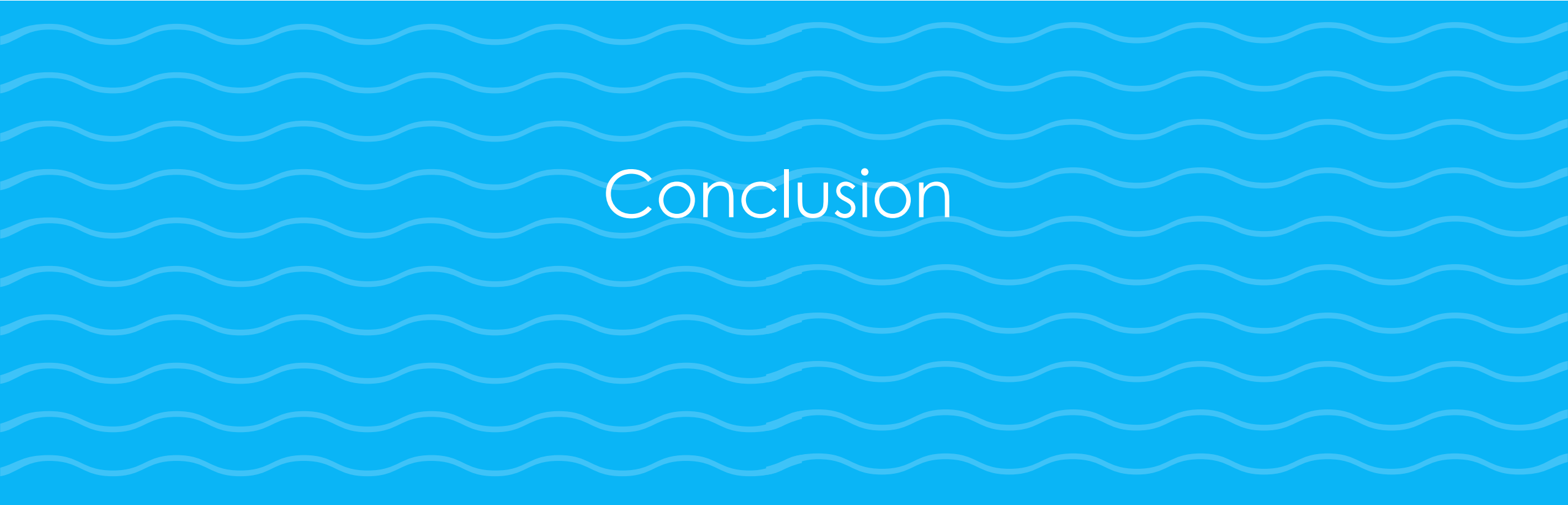
Baja Submodel





- CA BCM used for Flow



A decorative horizontal band with a blue background and white wavy lines, resembling water or a stylized wave pattern.

Conclusion

- Conceptual Model update ongoing
- Model being built and Calibrated in phases
- Currently Baja, then Centro, and UMRB
- Anticipated completion date tied to WaterSmart (Sep 2026)
- Accurate conceptual model takes precedence over deadline

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF ORANGE

I am employed by the law office of Rutan & Tucker, LLP in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is 18575 Jamboree Road, 9th Floor, Irvine, CA 92612.

On March 5, 2026, I served on the interested parties in said action the within:

1. NEWBERRY SPRINGS RECREATIONAL LAKES ASSOCIATION'S OPPOSITION TO WATERMASTER'S RENEWED MOTION FOR DETERMINATION OF HYDROLOGIC BASE PERIOD FOR CALCULATION OF PRODUCTION SAFE YIELD VALUES; MEMORANDUM OF POINTS AND AUTHORITIES;

2. DECLARATION OF W. RICHARD LATON IN SUPPORT OF NEWBERRY SPRINGS RECREATIONAL LAKES ASSOCIATION'S OPPOSITION TO WATERMASTER'S RENEWED MOTION FOR DETERMINATION OF HYDROLOGIC BASE PERIOD FOR CALCULATION OF PRODUCTION SAFE YIELD VALUES; MEMORANDUM OF POINTS AND AUTHORITIES;

3. DECLARATION OF JEREMY JUNGREIS' IN SUPPORT OF NEWBERRY SPRINGS RECREATIONAL LAKES ASSOCIATION'S OPPOSITION TO WATERMASTER'S RENEWED MOTION FOR DETERMINATION OF HYDROLOGIC BASE PERIOD FOR CALCULATION OF PRODUCTION SAFE YIELD VALUES; MEMORANDUM OF POINTS AND AUTHORITIES;

4. NEWBERRY SPRINGS RECREATIONAL LAKES ASSOCIATION'S OPPOSITION TO MITSUBISHI CEMENT CORPORATION'S NOTICE OF MOTION AND MOTION TO SELECT HYDROLOGIC BASE PERIOD OF 1995-2024; MEMORANDUM OF POINTS AND AUTHORITIES;

5. DECLARATION OF W. RICHARD LATON IN SUPPORT OF NEWBERRY SPRINGS RECREATIONAL LAKES ASSOCIATION'S OPPOSITION TO MITSUBISHI CEMENT CORPORATION'S NOTICE OF MOTION AND MOTION TO SELECT HYDROLOGIC BASE PERIOD OF 1995-2024; and

6. DECLARATION OF JEREMY JUNGREIS IN SUPPORT OF NEWBERRY SPRINGS RECREATIONAL LAKES ASSOCIATION'S OPPOSITION TO MITSUBISHI CEMENT CORPORATION'S NOTICE OF MOTION AND MOTION TO SELECT HYDROLOGIC BASE PERIOD OF 1995-2024

as stated below:

☒ (BY EMAIL or ELECTRONIC TRANSMISSION TO THE WATERMASTER)

I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful; and pursuant to the Mojave Basin Area Watermaster's Rules and Regulations paragraph 8.8.2 which provides for service by electronic mail upon election by the Party or paragraph 10.D, which provides that Watermaster shall mail a postcard describing each document being served, to each Party or its designee according to the official service list, a copy of which is attached hereto, and which shall be maintained by the

1 Mojave Basin Area Watermaster pursuant to Paragraph 37 of the Judgment. Served documents
2 will be posted to and maintained on the Mojave Water Agency's internet website for printing
and/or download by Parties wishing to do so.

3 Executed on March 5, 2026, at Irvine, California.

4 I declare under penalty of perjury under the laws of the State of California that the
5 foregoing is true and correct.

6 Beth P. Vaca
7 (Type or print name)

/s/ Beth P. Vaca
(Signature)

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SERVICE LIST

Mojave Basin Area Watermaster
c/o Valerie L. Wiegenstein
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iruesch@mojavewater.org

PROOF OF SERVICE

**STATE OF CALIFORNIA }
COUNTY OF SAN BERNARDINO}**

I am employed in the County of the San Bernardino, State of California. I am over the age of 18 and not a party to the within action; my business address is 13846 Conference Center Drive, Apple Valley, California 92307.

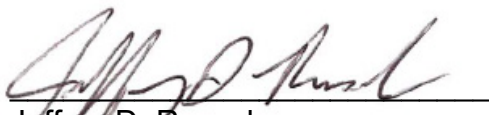
On March 5, 2026, the document(s) described below were served pursuant to the Mojave Basin Area Watermaster's Rules and Regulations paragraph 8.B.2 which provides for service by electronic mail upon election by the Party or paragraph 10.D, which provides that Watermaster shall mail a postcard describing each document being served, to each Party or its designee according to the official service list, a copy of which is attached hereto, and which shall be maintained by the Mojave Basin Area Watermaster pursuant to Paragraph 37 of the Judgment. Served documents will be posted to and maintained on the Mojave Water Agency's internet website for printing and/or download by Parties wishing to do so.

Document(s) filed with the court and served herein are described as follows:

Declaration of Jeremy Jungreis' in Support of Newberry Springs Recreational Lakes Association's Opposition to Watermaster's Renewed Motion for Determination of Hydrologic Base Period for Calculation of Production Safe Yield Values; Memorandum of Points And Authorities

 X (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on March 5, 2026 at Apple Valley, California.



Jeffrey D. Ruesch

Mojave Basin Area Watermaster Service List as of March 05, 2026

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Attn: John McCallum
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Attn: Jessie Florez (blopez@adelantoca.gov;
dbuckingham@adelantoca.gov;
irisramos@percwater.com;)
Adelanto, City Of (via email)
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Adelanto, CA 92301-1914

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Attn: Lori Clifton (lclifton@robar.com)
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Attn: Chun Soo and Wha Ja Ahn
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Attn: Chun Soo Ahn
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Apple Valley, CA 92307-0001

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Barstow, CA 92311-6757

Attn: Paul Tsai (paul@ezzlife.com)
America United Development, LLC (via email)
19625 Shelyn Drive
Rowland Heights, CA 91748-3246

Attn: Beinni Le
American States Water Company
160 Via Verde, Ste. 100
San Dimas, CA 91773-5121

Anderson, Ross C. and Betty J.
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Victorville, CA 92395-4832

Attn: Daniel B. Smith (avfwd@gmail.com)
Apple Valley Foothill County Water District
(via email)
22545 Del Oro Road
Apple Valley, CA 92308-8206

Attn: Matthew Patterson
Apple Valley Heights County Water District
P. O. Box 938
Apple Valley, CA 92308-0938

Attn: Beatriz Torres
Apple Valley Unified School District
14955 Dale Evans Parkway
Apple Valley, CA 92307-3061

Attn: Emely and Joe Saltmeris
Apple Valley View Mutual Water Company
P. O. Box 3680
Apple Valley, CA 92307-0072

Attn: Beatriz Torres
Apple Valley, Town Of
14955 Dale Evans Parkway
Apple Valley, CA 92307-3061

(ArchibekFarms@gmail.com;
Sandi.Archibek@gmail.com)
Archibek, Eric (via email)
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Newberry Springs, CA 92365-9517

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Compton, CA 90220-3946

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(LegalPeopleService@gmail.com)
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Attn: John Munoz
(barlenwater@hotmail.com;)
Bar-Len Mutual Water Company (via email)
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Barstow, CA 92312-0077

Attn: Curtis Palmer
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Aztec, NM 87410-9322

Attn: Jennifer Riley (hriley@barstowca.org)
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Bartels, Gwendolyn J.
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Buhl, ID 83316-

Mojave Basin Area Watermaster Service List as of March 05, 2026

Attn: Angelyn Bass
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Beinschroth Trust, Andy
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Attn: Deborah Stephenson
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BNSF Railway Company (via email)
602 S. Ferguson Avenue, Suite 2
Bozeman, MT 59718-6483

Box, Geary S. and Laura
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Brown, Jennifer
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(bubierbear@msn.com)
Bubier, Diane Gail (via email)
46263 Bedford Rd.
Newberry Springs, CA 92365-9819

(kjbco@yahoo.com)
Bush, Kevin (via email)
7768 Sterling Ave.
San Bernardino, CA 92410-4741

Attn: Robert W. Bowcock
CalMat Company
405 N. Indian Hill Blvd.
Claremont, CA 91711-4614

Attn: Tony Camanga
Camanga, Tony and Marietta
2309 Highland Heights Lane
Carrollton, TX 75007-2033

Attn: Remo E. Bastianon
Bastianon Revocable Trust
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Attn: Chuck Bell (Chuckb193@outlook.com;
Chuckb193@outlook.com)
Bell, Charles H. Trust dated March 7, 2014
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Brommer House Trust
9435 Strathmore Lane
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Attn: Noah Furie (noah@bfcloans.com)
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PO BOX 641339
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Attn: Leanna East (least@calportland.com)
CalPortland Company - Agriculture (via email)
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Oro Grande, CA 92368-0146

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Best, Byron L.
21461 Camino Trebol
Lake Forest, CA 92630-2011

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20784 Iris Canyon Road
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Attn: Paul Johnson
Brown Family Trust Dated August 11, 1999
26776 Vista Road
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Attn: Ian Bryant (irim@aol.com)
Bryant Family Trust dated May 9, 2007 (via
email)
17166 Sequoia Street
Hesperia, CA 92345-1842

Bunnell, Dick
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Mojave Basin Area Watermaster Service List as of March 05, 2026

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Attn: Danielle Stewart
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CDFW - Camp Cady (via email)
4775 Bird Farm Road
Chino Hills, CA 91709-3175

Attn: San Bernardino Co Regional Parks
CDFW - Mojave Narrows Regional Park
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San Bernardino, CA 92408-3241

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CDFW - Mojave River Fish Hatchery (via
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Attn: Nancy Ryman
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Contratto, Ersula
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email)
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Mojave Basin Area Watermaster Service List as of March 05, 2026

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Lucerne Valley, CA 92356-0709

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Attn: Judith Dolch-Partridge, Trustee
Dolch Living Trust Robert and Judith
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16736 B Road
Delta, CO 81416-8501

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Attn: Jerome Fisher
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Frates, D. Cole (via email)
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Fundamental Christian Endeavors, Inc. (via email)
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Gabrych Family Trust dated October 9, 2007
2006 Old Highway 395
Fallbrook, CA 92028

Gabrych Family Trust dated October 9, 2007
2006 Old Highway 395
Fallbrook, CA 92028-8816

Gaeta, Miguel and Maria
9366 Joshua Avenue
Lucerne Valley, CA 92356-8273

Attn: Jay Storer
Gaeta, Trinidad
10551 Dallas Avenue
Lucerne Valley, CA 92356

Mojave Basin Area Watermaster Service List as of March 05, 2026

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223 Rabbit Trail
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Attn: Toby Moore (toby.moore@gswater.com)
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160 Via Verde, Ste. 100
San Dimas, CA 91773-5121

Attn: Manoucher Sarbaz
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Beverly Hills, CA 90212-1606

Attn: Scot Gasper
Gordon Acres Water Company
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Lucerne Valley, CA 92356-1035

Gray, George F. and Betty E.
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Attn: Brian E. Bolin
Green Acres Estates
P. O. Box 29
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Attn: Eric Archibek
Green Hay Packers LLC
41717 Silver Valley Road
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Handrinos, Nicole A.
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Hass, Pauline L.
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Mojave Basin Area Watermaster Service List as of March 05, 2026

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Attn: Jeff Gallistel
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Hesperia - Golf Course, City of (via email)
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Attn: Janie Martines
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Attn: Jeremy McDonald
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Hesperia Water District (via email)
9700 7th Avenue
Hesperia, CA 92345-3493

Attn: Jeremy McDonald
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9700 Seventh Avenue
Hesperia, CA 92345-3493

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Attn: Weiya Noble
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Attn: Sandra D. Hood
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Mojave Basin Area Watermaster Service List as of March 05, 2026

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Attn: Paul Johnson
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Johnston, Harriet and Johnston, Lawrence W.
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Attn: Magdalena Jones
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Jones Trust dated March 16, 2002 (via email)
35424 Old Woman Springs Road
Lucerne Valley, CA 92356-7237

Attn: Paul Jordan
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Attn: Ray Gagné
Jubilee Mutual Water Company
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Attn: Cherie Casey (ccasey@jrcwd.org)
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Katcher, August M. and Marceline
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Mojave Basin Area Watermaster Service List as of March 05, 2026

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Mojave Basin Area Watermaster Service List as of March 05, 2026

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Mojave Basin Area Watermaster Service List as of March 05, 2026

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Mojave Basin Area Watermaster Service List as of March 05, 2026

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