Invoice Information

2014	Vendor#	No. of Loads	Gallons/Load	Total Gallons	Days of	Vendor #	No. of Loads	Gallons/Load	Total Gallons	Days of	Vendor#	No. of Loads	Gallons/Load	Total Gallons	Days of
					Diversion					Diversion					Diversion
May	103788	79	6,700	529,300	17							1	6,500	6,500	1
June	103788	87	6,700	582,900	21	113166	4	6,500	26,000	2	??				
July	103788	97	6,700	649,900	22	113166	15 *11	6,500	97,500	11	??	2	6,500	13,000	2
August	103788	46	6,700	308,200	19	113166	15 *13	6,500	97,500	11	??	3	6,500	19,500	2
September	103788	49	6,700	328,300	19	113166	15 **2 inv.s	6,500	97,500	15	??	3	6,500	19,500	3
October	103788	55	6,700	368,500	20	113166	17	6,500	110,500	17	??	4	6,500	26,000	4
November	103788	36	6,700	241,200	16	113166	10	6,500	65,000	10	?? ***Oct?	1	6,500	6,500	1
December	103788	36	6,700	241,200	15	113166	5	6,500	32,500	4	??	4	6,500	26,000	4
2015															
January	??	49	6,700	328,300	18						??	2	6,500	13,000	2
February	??	41	6,700	274,700 #328300	16						??	2	6,500	13,000	2
March	??	52 No loads after 3/20	6,700	348,400 #328300	17						??	3	6,500	19,500	3
April	??	75	6,700	502,500 #328300	25						??	2	6,500	13,000	2
May	??	59	6,700	395,300 #328300	17						??	2	6,500	13,000	2
June	??	19	6,700	127,300 missing pg	8	113166	15	6,500	97,500	10	??	4	6,500	26,000	4
July	??	29	6,700	194,300 #328300	12	113166	17	6,500	110,500	10	??	2	6,500	13,000	2
August	??	37	6.700	247.900 #328300	16	113166	14	6.500	91.000	10	??	3	6.500	19.500	3

V3	Augu: 1 = Ye	st es V1	V2	V3	September 1 = Yes V1	V2	V3	October 1 = Yes V1	V2	V3	November 1 = Yes V1	V2	V3	December 1 = Yes	/1 V2	V3			
1 1 1		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	2 4 3 6 6 1 1 1 3 6 6 1 1 2 1 1 4 4 1 2 2	2 1 2 1 1 1 1 1 1	2 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	2 2 2 2 2 2 4 4 2 2 1 1 3 5 5 4 1 1 4 2 2 2 2 2 2	1 1 1 1 1 1 1		3 2 3 3 4 4 2 2 3 3 2 2 4 4 5 5 5 3 2 2 1 4 4 4 4 3 3 2 2 2 2	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		2 2 2 3 2 2 1 1 2 3 3 2 2 1 1 4 2 2 1 1	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	1 1 1 1 4 4 2 2 5 5 3 2 2	1 1 2	1 1 1		2014 Maximum Penalty for unauthorized diversion in 2014 123 days of diversion \$1,000 Penalty per day for unauthorized diversion \$123,000 Penalty per Permit 2 Permit \$246,000 Penalty for diversion-days for both permits 456 reported loads of water 6600 average # of gala/load 3009600 gallons of spring water reported by invoice 325900 gallons/acre-load 9.24734581. Acre-feet \$2,500 Penalty per Acre-foot of unauthorized diversion \$23,087 Penalty based upon the amount of water taken by unauthorized diversion \$259,087 Maximum Penalty for unauthorized diversion in 2014
2	2	21	46 62	13	3 20 20	49	1	1 1 1 3 24 23	2 55 76	17	4 17 11	36 23 31	10 7	1 1 18 1 18	2 36 45	5	4	2014 Curtailment Perioc Total Days and Loads	d Days Loads 123 456
V3	April 1 = Ye	2S V1	V2 4 1 6	V3	May 1 = Yes V1	V2	V3	June 1 = Yes V1 1 1	V2 2 4	V3	July 1 = Yes V1 1 1	V2 1	V3 2	August 1 = Yes 1 1	/1 V2 2 3	V3			Additional Violations and Penalties Not Included in the ACL Calculation of the Maximum Penalty for Unauthorized Diversion in 2015 (based on invoice information provided pursuant to the 2015 Information Order) 48 additional days of diversion
1	1	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	2 4 2 1 3 4 2 2 5 5 2 4 4 3 3 2 2 4 4 2 3 3		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	3 3 2 4 3 3 1 5 5 9 3 3 3 5 5 2			1 6 2 1	1	0 0 0 0 1 1 1 1 1 1 1 0 0 0 1 0 0 1 1 1 0 0 1 1 1 1 0 0 1 1 1 1 1 1 1 1 1 1 0 0 1	1 3 3 2 2 3 3 3 3 3 3 3 3 3 3 3 3 3 3 3	2 1 1 2 2 2 2	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	2 1 1 2 3 2 4 3 3 1 1 1	2 2 2 2 2 1 1 1 1 1	1	1 3 9 0 1 4 1 1 7 1 2 0 0 1 1 1 1 0 0 0 0 0 0 0 0 0 0 0 0	Salous Penalty per day for unauthorized diversion S48,000 Penalty per day for unauthorized diversion S48,000 Penalty per Permit 2 Permits S56,000 Additional Penalty for diversion-days for both permits 150 reported loads of water 6000 average if of gais/load 99,0000 gallons of spring water reported by invoice 32500 gallons face-foot 3.04 Acre-feet S2,500 Penalty per Acre-foot of unauthorized diversion 57,394 Additional Penalty based upon the amount of water taken by unauthorized diversion 5103,594 Additional Penalty
	1	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	2 4 2 1 3 4 2 6 6 2 3 2 5 5	0	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	3 2 4 3 3 1 5 5 4 3 3 3 3 3 5 5			1 6 2 1	1 2 1 2 1 2 2 1 2 2	0 0 0 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	3 3 2 3 3 4 1 1 3	1 1 2 2 2	1 1 0 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	2 1 1 2 3 2 4 3 1 1	2 2 2 1 1 1 1	1 1 1 3	1 3 9 0 1 4 1 1 7 1 2 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 1	\$1,000 Penalty per day for unauthorized diversion \$48,000 Penalty per Permit 2 Permits \$6,000 Additional Penalty for diversion-days for both permits 150 reported loads of water 6600 average it of gals/load 990000 gallons of spring water reported by invoice 32500 gallons/acre-foct 3,04 Acre-feet \$2,500 Penalty per Acre-foot of unauthorized diversion \$7,594 Additional Penalty based upon the amount of water taken by unauthorized diversion \$103,594 Additional Penalty for Unauthorized Diversion in 2015 not included in the ACL The above calculations are based on invoice information provided pursuant to the 2015 information Order for the periods including April 23 - June 12 and August 28 - Septembers 30, 2015

³¹ Additional Days of Diversion prior to the surveillance period (including April 23 - June 12)
94 Additional Loads prior to the surveillance Period (including April 23 - June 12)

¹⁷ Additional Days of Diversion after the surveillance period (including August 28 - September 30) 56 Additional Loadsafter the surveillance period (including August 28 - September 30)

⁴⁸ Additional Days of Diversion prior to and after the surveillance period (including April 23 - June 12 and August 28 - September 30) 150 Additional Loads prior to and after the surveillance period (including April 23 - June 12 and August 28 - September 30)

Comparison of Reported Loads vs Observed Loads -- July 12 through August 27

	July and August 2015								
	, ,	Reported Loads	Days*	Observed Loads	Days**	Unreported Days w/ Loads Observed	Unreported Loads	Days with 3 or more Unreported Loads	Days with 5 or more Unreported Loads
July	12	0	0	0	0				
July	13	0	0	3	1	1	3	1	
	14	2	1	7	1	-	5	1	1
	15	0	0	4	1	1	4	1	
	16	2	1	7	1		5	1	1
	17	1	1	7	1		6	1	1
	18	0	0	1	1	1	1		
	19	2	1	2	1				
	20	3	1	6	1		3	1	
	21	4	1	4	1				
	22	0	0	3	1	1	3	1	
	23	6	1	11	1		5	1	1
	24	1	1	5	1		4	1	
	25 26	3 0	1	3 0	1				
	27	3	1	7	1		4	1	
	28	2	1	3	1		1	1	
	29	0	0	3	1	1	3	1	
	30	2	1	5	1	-	3	1	
	31	2	1	5	1		3	1	
August	1	2	1	3	1		1		
	2	0	0	0	0				
	3	3	1	6	1		3	1	
	4	2	1	1	1		-1		
	5	0	0	4	1	1	4	1	
	6	5	1	10	1		5	1	1
	7	0	0	5	1	1	5	1	1
	8	1	1	2	1		1		
	9	1	1	1	1		_		_
	10	2	1	8	1		6	1	1
	11	2 0	1	5 4	1	1	3	1	
	12 13	5	1	4 10	1	1	4 5	1	1
	14	2	1	7	1		5	1	1
	15	4	1	4	1		,	1	1
	16	0	0	0	0				
	17	3	1	9	1		6	1	1
	18	4	1	7	1		3	1	
	19	1	1	6	1		5	1	1
	20	3	1	8	1		5	1	1
	21	1	1	6	1		5	1	1
	22	0	0	1	1	1	1		
	23	0	0	0	0				
	24	0	0	5	1	1	5	1	1
	25	2	1	3	1		1		
	26	0	0	3	1	1	3	1	
	27	4	1	5	1		1		
Total	47	80	31	209	42	11	129	29	14
	= Sunday					days	37		
	* 1 = a day with	n reported load	is						

^{** 1 =} a day with observed loads

Surveillance period: July 12 through August 27. Total of 47 days of surveillance.

Surveillance images and staff observations document 209 loads over the course of 42 days during the surveillance period (night vision camera used on only about 1/2 of those days). Information provided by Fahey reports 80 loads over the course of 31 days during the surveillance period.

Invoices provided by Fahey fail to account for 129 loads that were observed during the surveillance period.

Invoices provided by Fahey fail to account for 11 days on which loads that were observed during the surveillance period.

Of the 37 days on which there were unreported loads observed, there were 29 days with 3 or more unreported loads observed and 14 days with 5 or more unreported loads observed.