

Appendix 3-C. Water Level ~~Sustainability~~Sustainable
Management Criteria (2024 Revision)

Contents

Groundwater Level Sustainable Sustainability Management Measurable Criteria

2	
Hydrographs <u>(2024 GSP Revision)</u>	2
Well Failure Analysis <u>(2024 GSP Revision)</u>	17

Groundwater Level Sustainable Sustainability Management Measurable Criteria

This Appendix provides further background information for Section 3.4.1 Sustainable Management Criteria - Groundwater Elevation in Butte Valley GSP Chapter 3. The following provides additional figures and discussion to supplement the main text:

- The hydrographs used to set the minimum thresholds and measurable objectives.
- The process and figures of the well failure analysis.

Please note that this Appendix provides the latest evaluation of groundwater level Sustainable Management Criteria (SMC) in the 2024 revision of Butte Valley GSP. Since drastic updates have been made to this appendix comparing to the 2022 version, where the groundwater level SMCs have been modified, and the well failure analysis has been updated and reorganized for more in-depth and cohesive evaluations, this revised document has been provided with the hydrographs and well failure analysis of "2024 GSP Revision" for better readability.

Hydrographs (2024 GSP Revision)

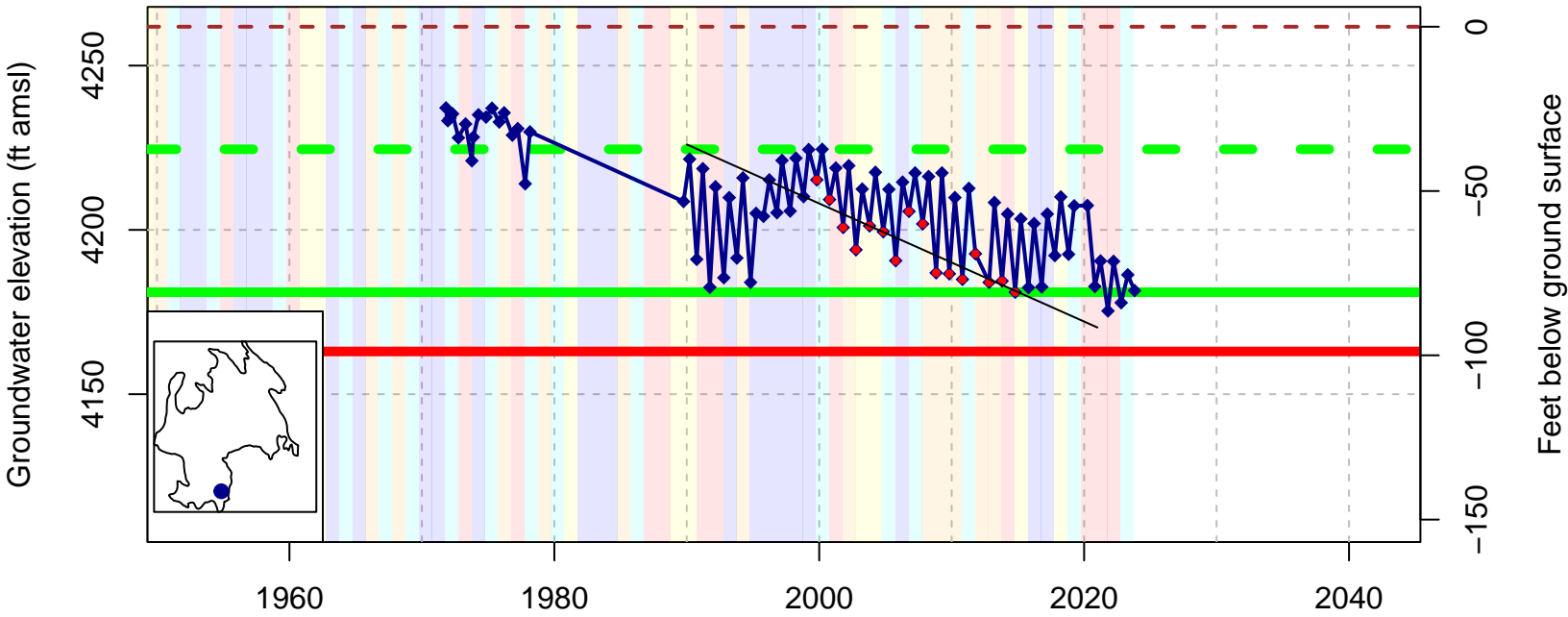
The hydrographs used to set the minimum thresholds and measurable objectives for each representative monitoring point are shown in the following figures. The groundwater level data used in the regression to calculate minimum thresholds have gone through a quality assurance and quality control (QAQC) process that removes data from the analysis for the following reasons:

- Oil or other foreign substances were floating at the groundwater surface inside the well and the data had high uncertainty as a result.
- The well was pumped recently.
- During the minimum threshold process and generation of a regression equation, a data point was deemed an outlier, which may result from the interference of drawdown from nearby wells.

Table 1: Removed groundwater level (WL) data from the regression analysis. The water level is in units of feet above mean sea level (ft amsl).

Well Name	Date	Removed WL	Reason
419451N1218967W001	2000-10-10	4157.23	Oil or foreign substance in casing
417944N1220350W001	2012-10-29	4203.73	Oil or foreign substance in casing
418512N1219183W001	1999-10-26	4208.79	Oil or foreign substance in casing
419451N1218967W001	1999-10-26	4159.73	Oil or foreign substance in casing
418512N1219183W001	2013-10-21	4194.69	Oil or foreign substance in casing
417944N1220350W001	2011-10-18	4189.83	Pumped recently
419755N1219785W001	2014-10-20	4172.7	Oil or foreign substance in casing
419451N1218967W001	2002-10-11	4138.73	Oil or foreign substance in casing
418661N1219587W001	1999-10-26	4204.5	Oil or foreign substance in casing
417789N1220759W001	2011-10-18	4215.01	Oil or foreign substance in casing
418948N1220832W001	2013-10-21	4197.37	Oil or foreign substance in casing
418948N1220832W001	2011-10-18	4197.57	Oil or foreign substance in casing
418948N1220832W001	2009-10-27	4202.07	Oil or foreign substance in casing
418948N1220832W001	1999-10-27	4204.27	Oil or foreign substance in casing
419451N1218967W001	2005-10-10	4153.73	Oil or foreign substance in casing
418661N1219587W001	2013-10-21	4193.7	Oil or foreign substance in casing
418512N1219183W001	2014-10-20	4191.99	Oil or foreign substance in casing
419451N1218967W001	2003-10-20	4139.63	Oil or foreign substance in casing
418948N1220832W001	2007-10-25	4205.57	Oil or foreign substance in casing
418948N1220832W001	2010-10-25	4199.97	Oil or foreign substance in casing
418948N1220832W001	2008-10-30	4205.07	Oil or foreign substance in casing
418948N1220832W001	2006-10-12	4204.87	Oil or foreign substance in casing
418948N1220832W001	2000-10-10	4201.67	Pumping
418948N1220832W001	2012-10-29	4197.97	Oil or foreign substance in casing
418948N1220832W001	2005-10-10	4200.07	Oil or foreign substance in casing
419451N1218967W001	2006-10-12	4149.93	Oil or foreign substance in casing
418948N1220832W001	2002-10-11	4202.37	Oil or foreign substance in casing
418948N1220832W001	2003-10-20	4203.07	Oil or foreign substance in casing
419451N1218967W001	2004-11-02	4136.23	Oil or foreign substance in casing
418948N1220832W001	2004-11-03	4204.37	Oil or foreign substance in casing
418512N1219183W001	2001-10-23	4182.69	Outlier
417789N1220759W001	2006-10-12	4204.81	Outlier

DWR Stn_ID: ; well_code: 417786N1220041W001; well_name: 45N01W06A001M; well_swn: 45N01W06A001M

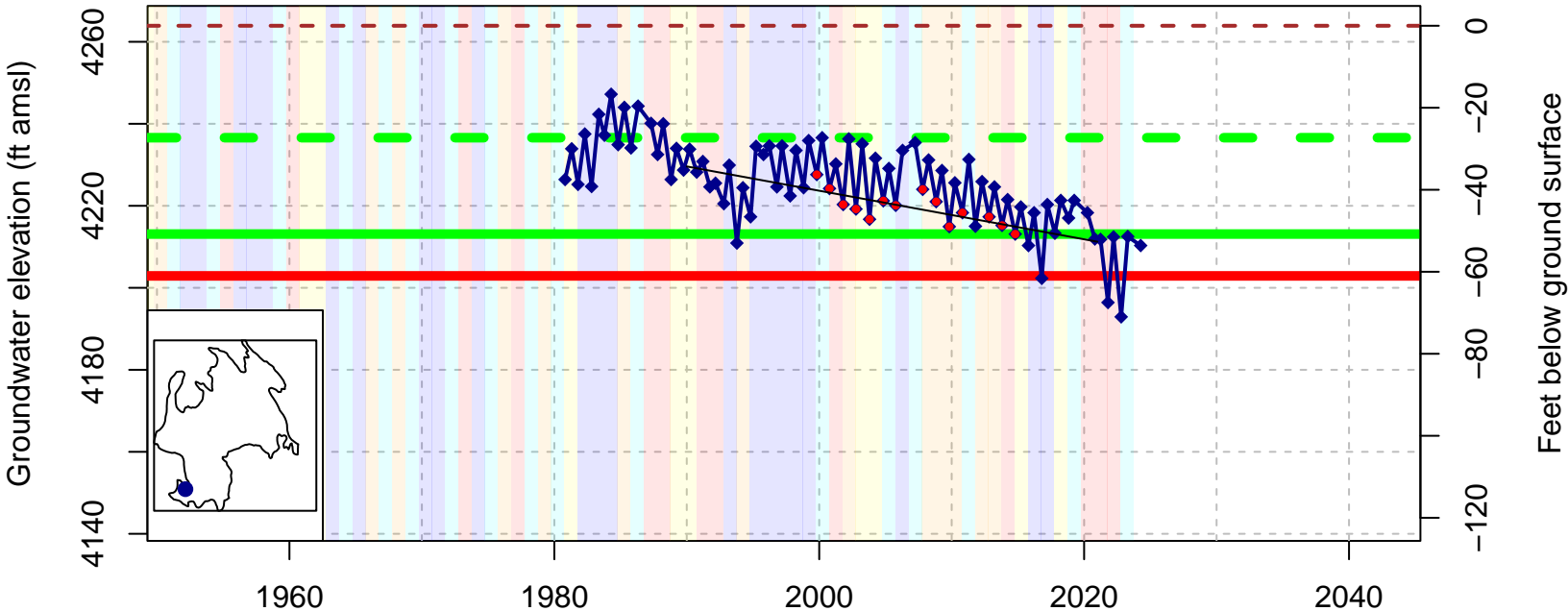


Note: The minimum threshold was moved to 5 ft above its bottom of well screen (104 ft bgs, 4158 ft amsl)

<ul style="list-style-type: none">--- Ground Surface (4262 ft amsl)--- Measurable Objective (Upper) (4225 ft amsl)--- Measurable Objective (Lower) (4181 ft amsl)--- Minimum Threshold (4163 ft amsl)— Regression Value(Fall2014): 4181 ft amsl, Slope: -1.7954 Feet/Year	<p>Water Year Type</p> <ul style="list-style-type: none">CriticalDryBelow NormalAbove NormalWet
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------

Water Year Types from WY 2019–2023 are preliminary results calculated based on SGMA Water Year Type Dataset Development Report. The results will be finalized once DWR updates the water year type dataset for these years.

DWR Stn_ID: ; well_code: 417789N1220759W001; well_name: 45N02W04B001M; well_swn: 45N02W04B001M



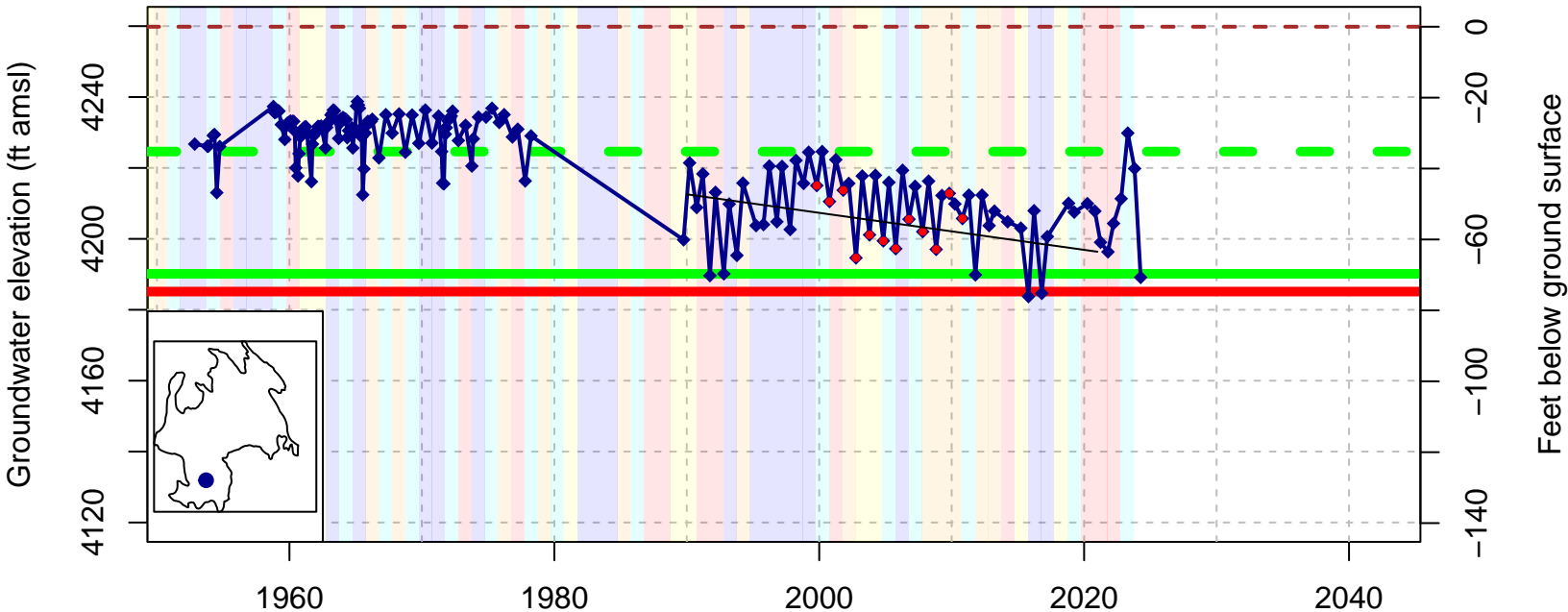
--- Ground Surface (4264 ft amsl)
--- Measurable Objective (Upper) (4237 ft amsl)
--- Measurable Objective (Lower) (4213 ft amsl)
--- Minimum Threshold (4203 ft amsl)
— Regression Value(Fall2014): 4215 ft amsl, Slope: -0.5916 Feet/Year

Water Year Type

- Critical
- Dry
- Below Normal
- Above Normal
- Wet

Water Year Types from WY 2019–2023 are preliminary results calculated based on SGMA Water Year Type Dataset Development Report. The results will be finalized once DWR updates the water year type dataset for these years.

DWR Stn_ID: ; well_code: 417944N1220350W001; well_name: 46N02W25R002M; well_swn: 46N02W25R002M

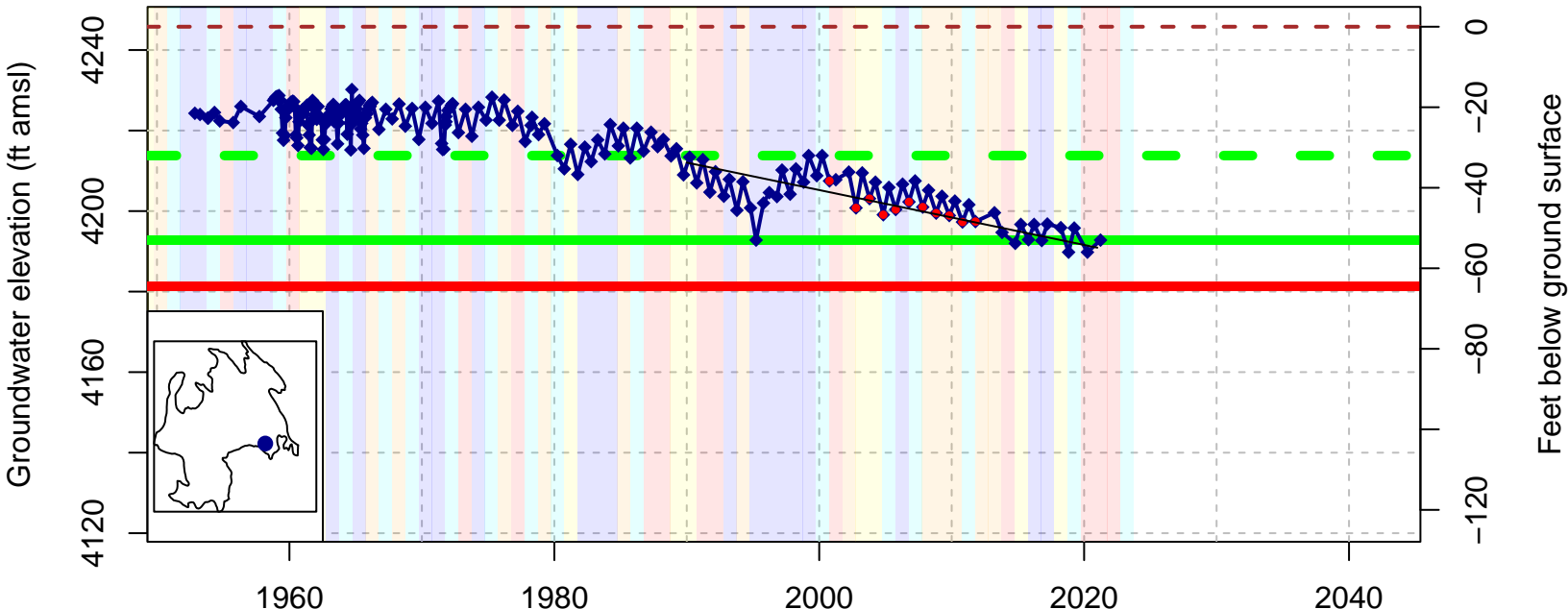


--- Ground Surface (4260 ft amsl)
--- Measurable Objective (Upper) (4225 ft amsl)
--- Measurable Objective (Lower) (4190 ft amsl)
--- Minimum Threshold (4185 ft amsl)
— Regression Value(Fall2014): 4200 ft amsl, Slope: -0.5218 Feet/Year

Water Year Type
Critical
Dry
Below Normal
Above Normal
Wet

Water Year Types from WY 2019–2023 are preliminary results calculated based on SGMA Water Year Type Dataset Development Report. The results will be finalized once DWR updates the water year type dataset for these years.

DWR Stn_ID ; well_code: 418512N1219183W001; well_name: 46N01E06N001M; well_swn: 46N01E06N001M

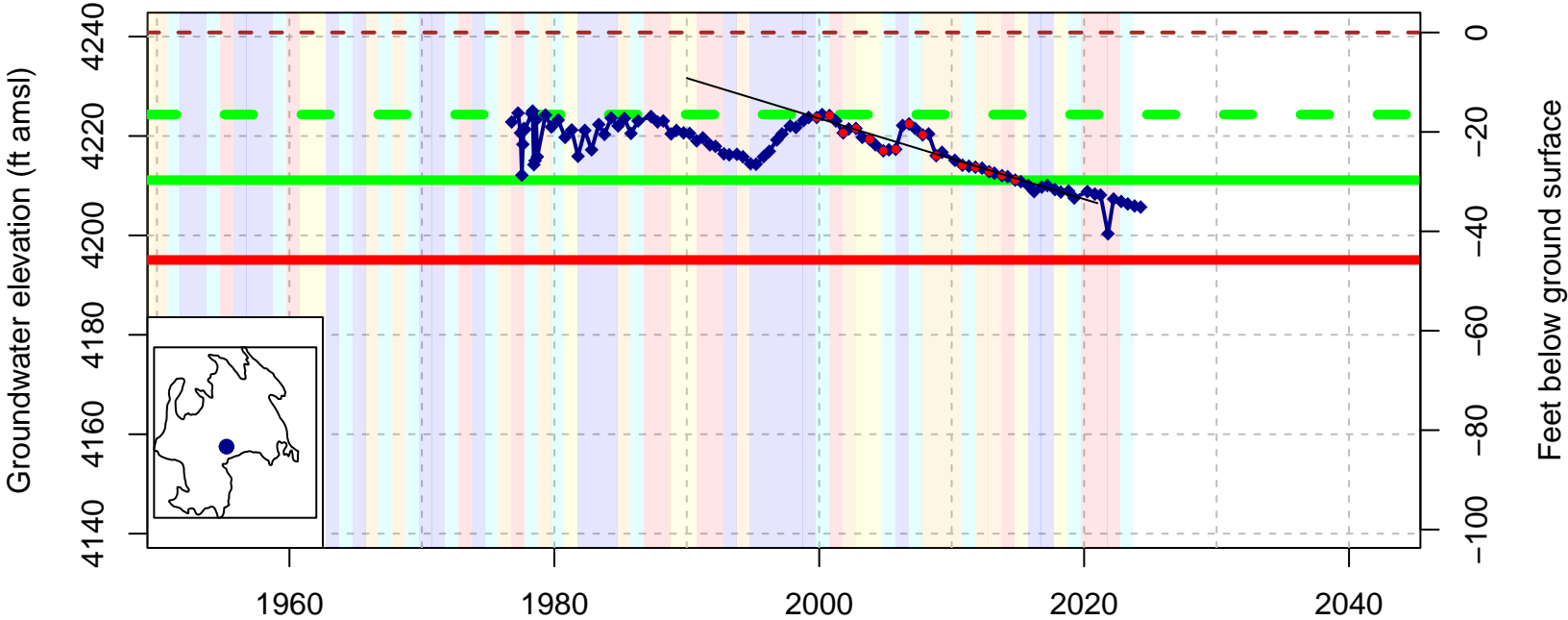


- - Ground Surface (4246 ft amsl)
- Measurable Objective (Upper) (4214 ft amsl)
- Measurable Objective (Lower) (4193 ft amsl)
- Minimum Threshold (4181 ft amsl)
- Regression Value(Fall2014): 4195 ft amsl, Slope: -0.681 Feet/Year

- Water Year Type
- Critical
 - Dry
 - Below Normal
 - Above Normal
 - Wet

Water Year Types from WY 2019–2023 are preliminary results calculated based on SGMA Water Year Type Dataset Development Report. The results will be finalized once DWR updates the water year type dataset for these years.

DWR Stn_ID: ; well_code: 418544N1219958W001; well_name: 46N01W04N002M; well_swn: 46N01W04N002M



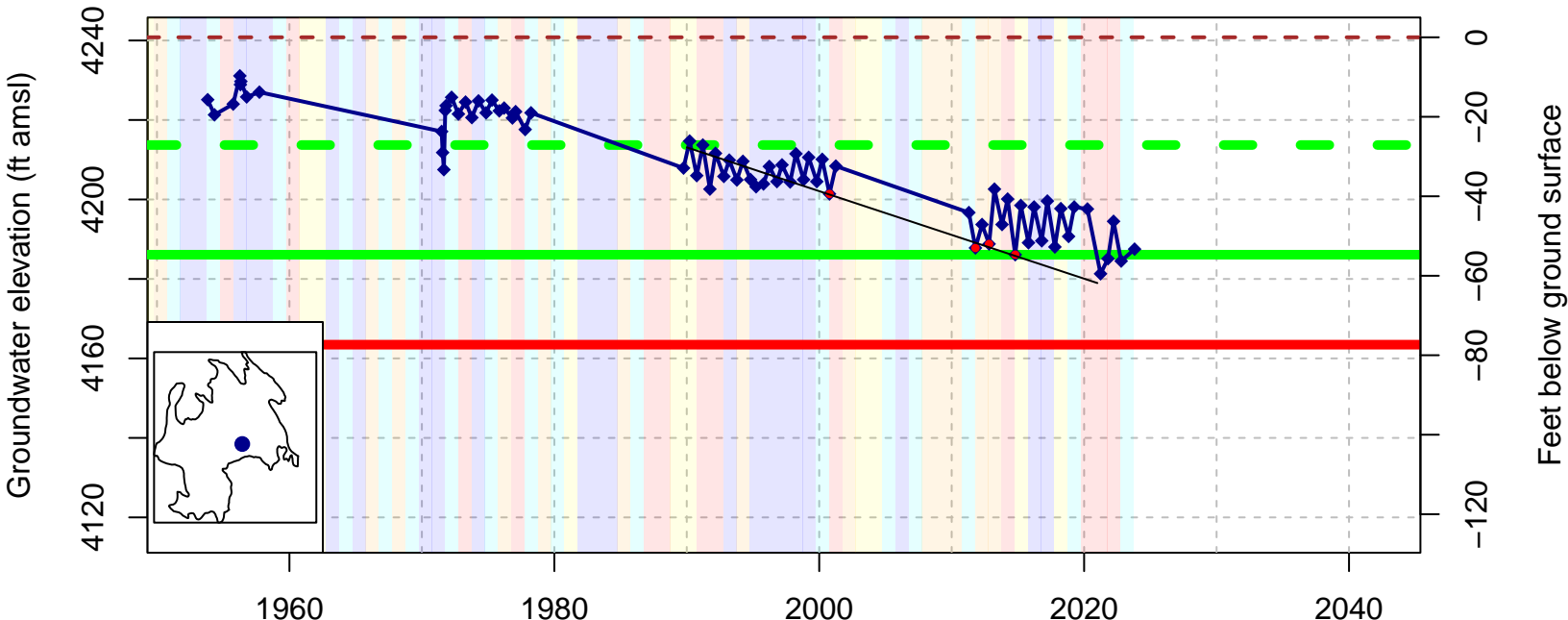
--- Ground Surface (4241 ft amsl)
--- Measurable Objective (Upper) (4224 ft amsl)
--- Measurable Objective (Lower) (4211 ft amsl)
--- Minimum Threshold (4195 ft amsl)
— Regression Value(Fall2014): 4211 ft amsl, Slope: -0.8111 Feet/Year

Water Year Type

- Critical
- Dry
- Below Normal
- Above Normal
- Wet

Water Year Types from WY 2019–2023 are preliminary results calculated based on SGMA Water Year Type Dataset Development Report. The results will be finalized once DWR updates the water year type dataset for these years.

DWR Stn_ID: ; well_code: 418661N1219587W001; well_name: 47N01W34Q001M; well_swn: 47N01W34Q001M



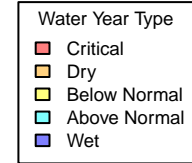
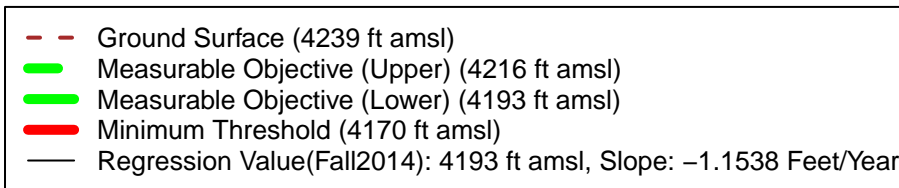
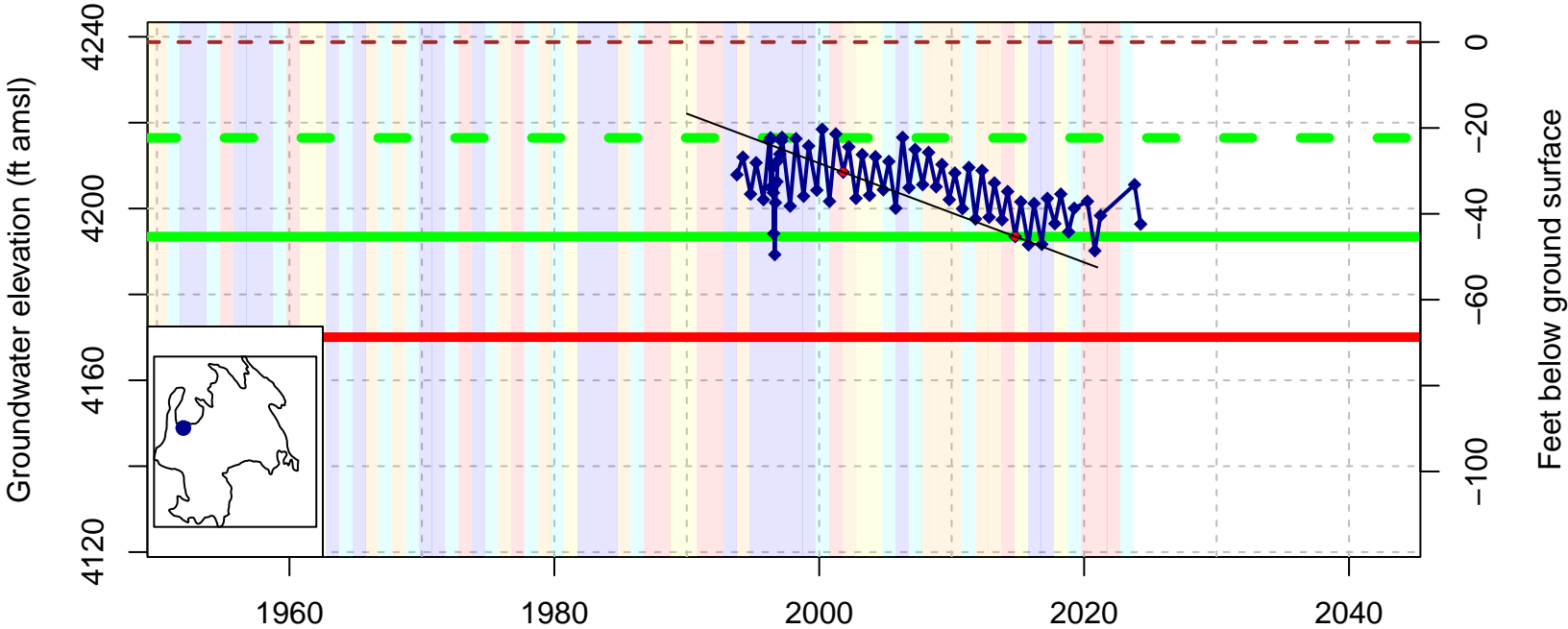
- - Ground Surface (4241 ft amsl)
 - - - Measurable Objective (Upper) (4214 ft amsl)
 - - - Measurable Objective (Lower) (4186 ft amsl)
 - - - Minimum Threshold (4163 ft amsl)
 - - - Regression Value(Fall2014): 4186 ft amsl, Slope: -1.1004 Feet/Year

Water Year Type

- Critical
- Dry
- Below Normal
- Above Normal
- Wet

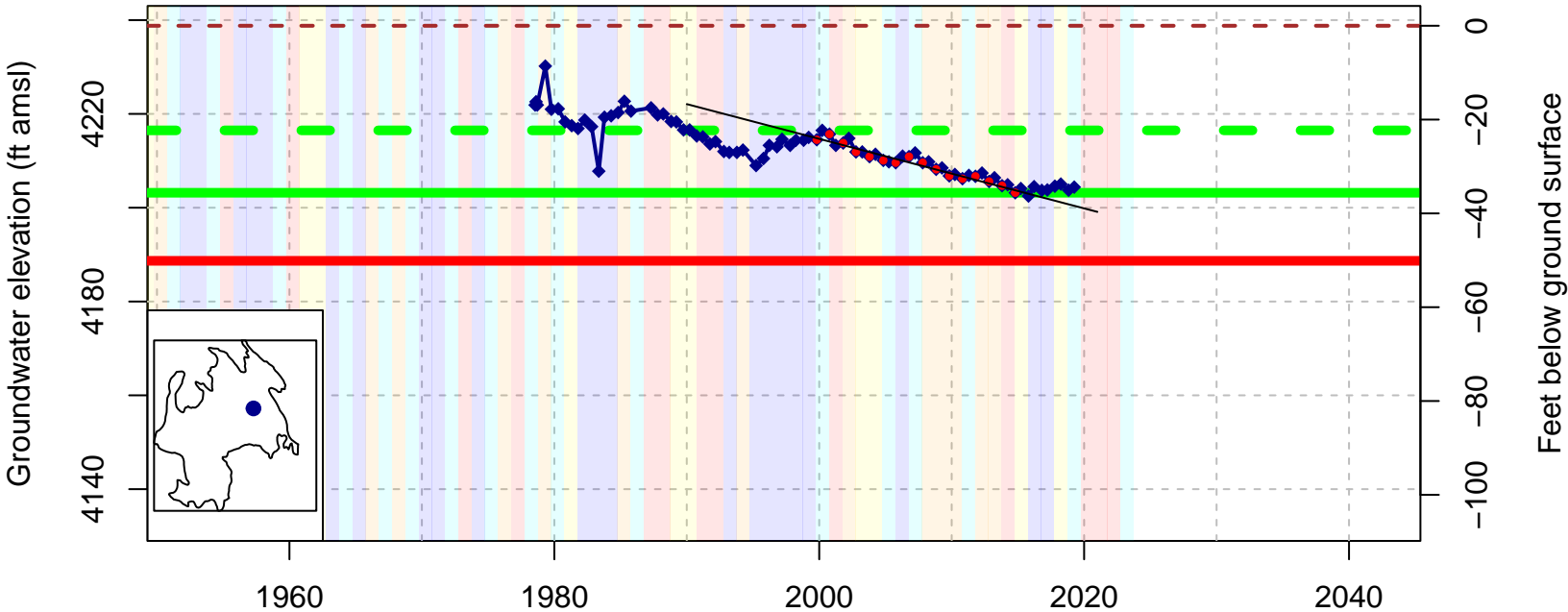
Water Year Types from WY 2019–2023 are preliminary results calculated based on SGMA Water Year Type Dataset Development Report. The results will be finalized once DWR updates the water year type dataset for these years.

DWR Stn_ID: ; well_code: 418948N1220832W001; well_name: 47N02W27C001M; well_swn: 47N02W27C001M



Water Year Types from WY 2019–2023 are preliminary results calculated based on SGMA Water Year Type Dataset Development Report. The results will be finalized once DWR updates the water year type dataset for these years.

DWR Stn_ID: ; well_code: 419021N1219431W001; well_name: 47N01W23H002M; well_swn: 47N01W23H002M

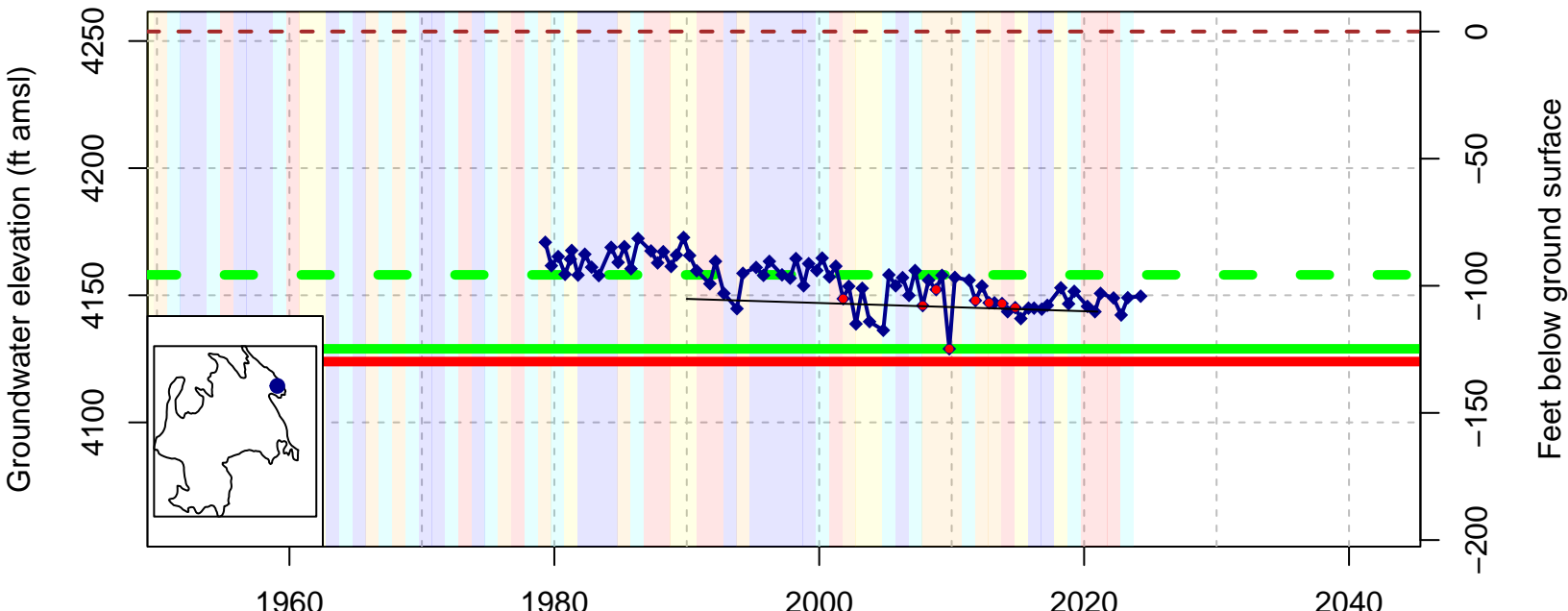


- - Ground Surface (4239 ft amsl)
- Measurable Objective (Upper) (4216 ft amsl)
- Measurable Objective (Lower) (4203 ft amsl)
- Minimum Threshold (4189 ft amsl)
- Regression Value(Fall2014): 4204 ft amsl, Slope: -0.7407 Feet/Year

- Water Year Type
- Critical
 - Dry
 - Below Normal
 - Above Normal
 - Wet

Water Year Types from WY 2019–2023 are preliminary results calculated based on SGMA Water Year Type Dataset Development Report. The results will be finalized once DWR updates the water year type dataset for these years.

DWR Stn_ID: ; well_code: 419451N1218967W001; well_name: 47N01E05E001M; well_swn: 47N01E05E001M

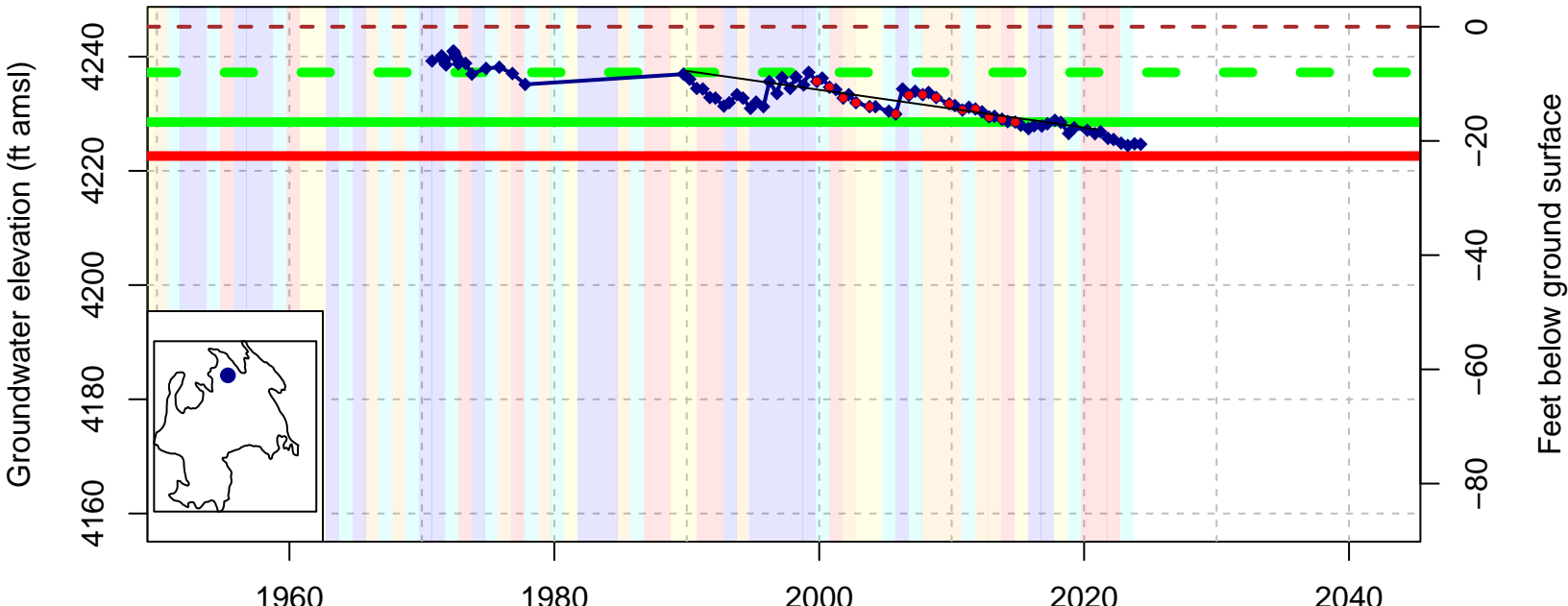


- - Ground Surface (4254 ft amsl)
- Measurable Objective (Upper) (4158 ft amsl)
- Measurable Objective (Lower) (4129 ft amsl)
- Minimum Threshold (4124 ft amsl)
- Regression Value(Fall2014): 4145 ft amsl, Slope: -0.1611 Feet/Year

- Water Year Type
- Critical
 - Dry
 - Below Normal
 - Above Normal
 - Wet

Water Year Types from WY 2019–2023 are preliminary results calculated based on SGMA Water Year Type Dataset Development Report. The results will be finalized once DWR updates the water year type dataset for these years.

DWR Stn_ID: ; well_code: 419519N1219958W001; well_name: 47N01W04D002M; well_swn: 47N01W04D002M

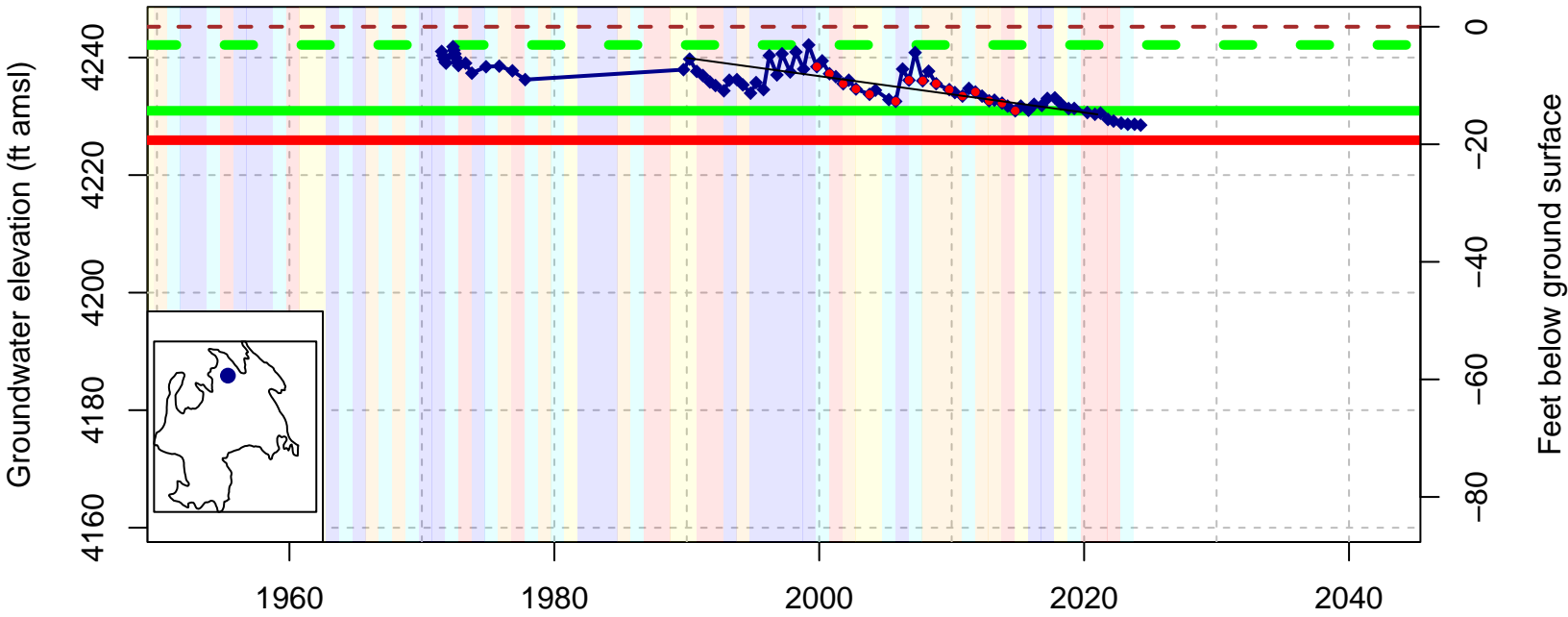


- - Ground Surface (4245 ft amsl)
- - Measurable Objective (Upper) (4237 ft amsl)
- - Measurable Objective (Lower) (4229 ft amsl)
- - Minimum Threshold (4223 ft amsl)
- - Regression Value(Fall2014): 4229 ft amsl, Slope: -0.3302 Feet/Year

- Water Year Type
- Critical
 - Dry
 - Below Normal
 - Above Normal
 - Wet

Water Year Types from WY 2019–2023 are preliminary results calculated based on SGMA Water Year Type Dataset Development Report. The results will be finalized once DWR updates the water year type dataset for these years.

DWR Stn_ID: ; well_code: 419520N1219959W001; well_name: 47N01W04D001M; well_swn: 47N01W04D001M



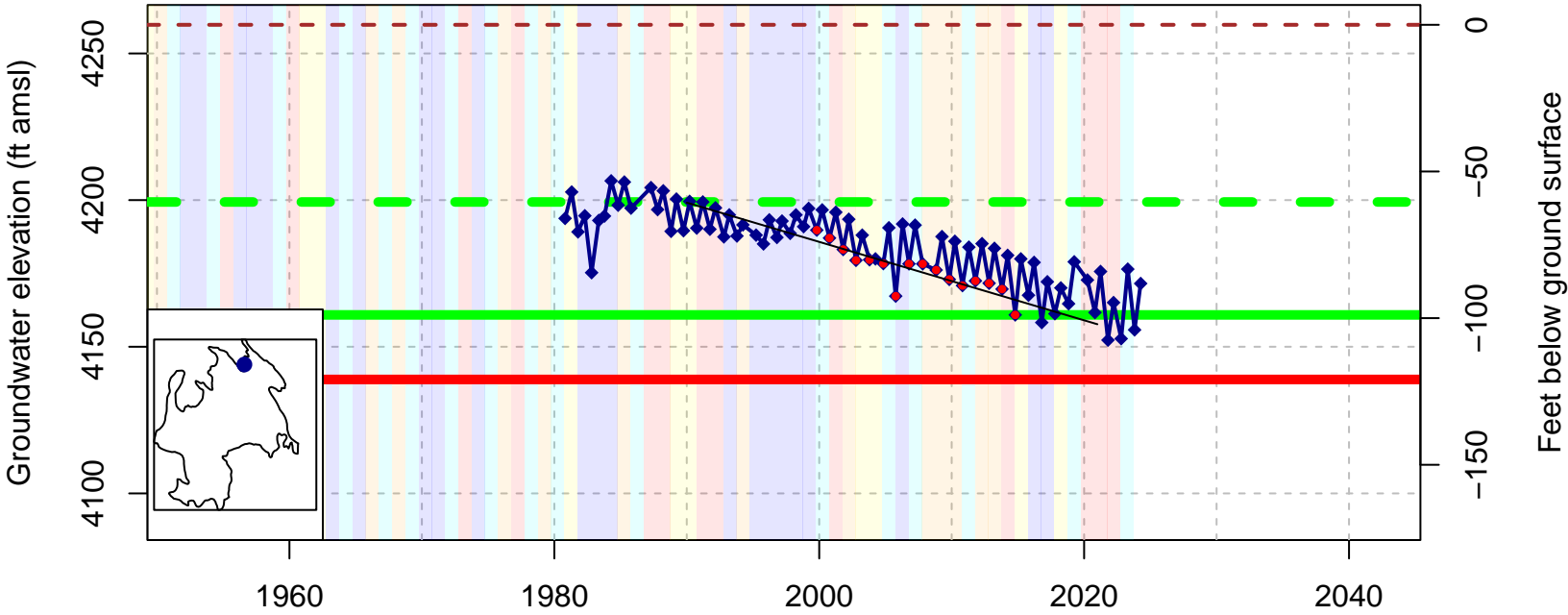
--- Ground Surface (4245 ft amsl)
— Measurable Objective (Upper) (4242 ft amsl)
— Measurable Objective (Lower) (4231 ft amsl)
— Minimum Threshold (4226 ft amsl)
— Regression Value(Fall2014): 4232 ft amsl, Slope: -0.3095 Feet/Year

Water Year Type

- Critical
- Dry
- Below Normal
- Above Normal
- Wet

Water Year Types from WY 2019–2023 are preliminary results calculated based on SGMA Water Year Type Dataset Development Report. The results will be finalized once DWR updates the water year type dataset for these years.

DWR Stn_ID: ; well_code: 419662N1219633W001; well_name: 48N01W34B001M; well_swn: 48N01W34B001M

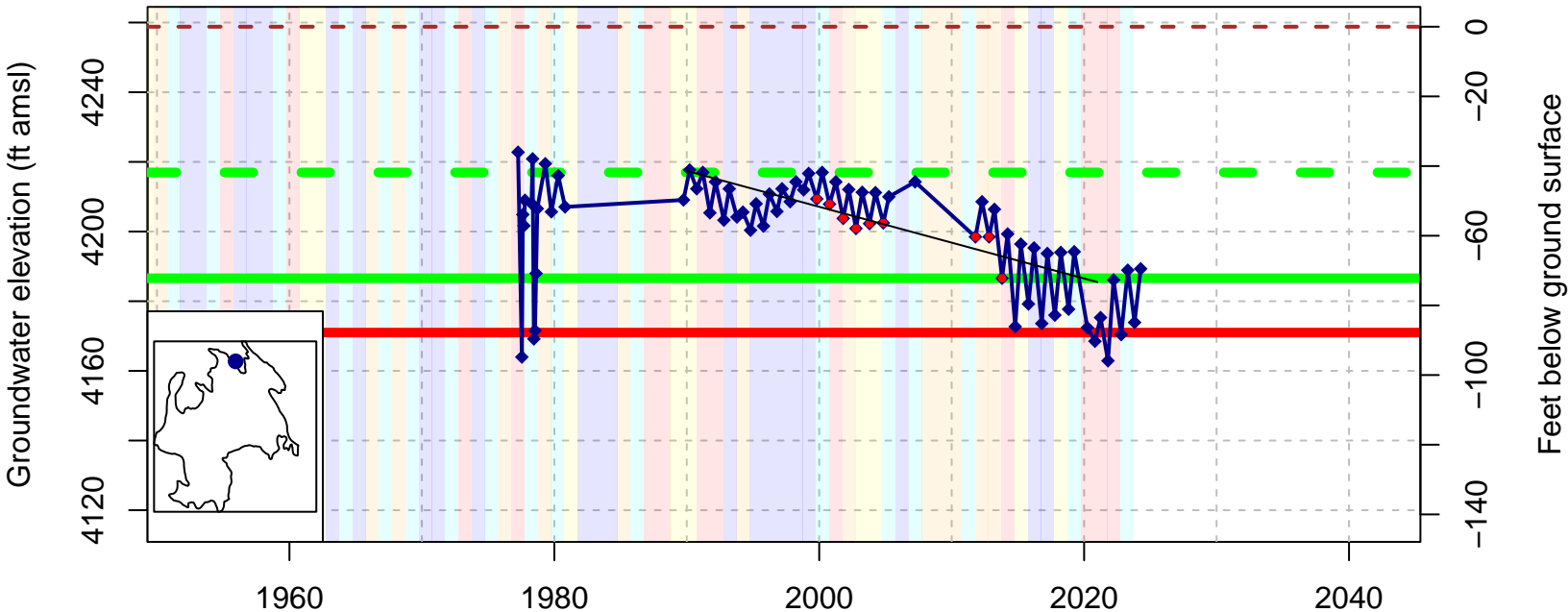


--- Ground Surface (4260 ft amsl)
--- Measurable Objective (Upper) (4199 ft amsl)
--- Measurable Objective (Lower) (4161 ft amsl)
--- Minimum Threshold (4139 ft amsl)
— Regression Value(Fall2014): 4166 ft amsl, Slope: -1.3362 Feet/Year

Water Year Type
Critical
Dry
Below Normal
Above Normal
Wet

Water Year Types from WY 2019–2023 are preliminary results calculated based on SGMA Water Year Type Dataset Development Report. The results will be finalized once DWR updates the water year type dataset for these years.

DWR Stn_ID: ; well_code: 419755N1219785W001; well_name: 48N01W28J001M; well_swn: 48N01W28J001M



--- Ground Surface (4259 ft amsl)
--- Measurable Objective (Upper) (4217 ft amsl)
--- Measurable Objective (Lower) (4187 ft amsl)
--- Minimum Threshold (4171 ft amsl)
— Regression Value(Fall2014): 4192 ft amsl, Slope: -1.0284 Feet/Year

Water Year Type

- Critical
- Dry
- Below Normal
- Above Normal
- Wet

Water Year Types from WY 2019–2023 are preliminary results calculated based on SGMA Water Year Type Dataset Development Report. The results will be finalized once DWR updates the water year type dataset for these years.

Well Failure Analysis (2024 GSP Revision)

Butte Valley Well Failure Discussion

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6/18/2024

Contents

5	Introduction	2
6	Methods	2
7	2024 Updates to the 2022 GSP Well Failure Discussion	2
8	Butte Well Data Statistics	3
9	Well Outage Risk Analysis	7
10	Uncertainties in Estimating Risk of Well Failure	8
11	Water Level Interpolation	8
12	Well Outage Risk Analysis by Direct Comparison	9
13	Well Outage Risk Analysis by Wet Depth Trend Analysis	10
14	Reported Well Outages	10
15	Results and Discussion	11
16	Well Distribution and Construction Information in Butte Valley	11
17	Well Outage Risk Analysis	15
18	Domestic Wells	15
19	Public Wells	26
20	Agricultural Wells	26
21	Reported Well Outages	26
22	Conclusion	28
23	Supplementary Information	29

Introduction

This analysis has been performed to determine the number of wells that may be dewatered due to declining groundwater levels. In the Butte Valley, groundwater elevations are highly seasonal. The highest risk of dewatering occurs in the late summer and early fall, when water levels are at their seasonal low.

A thorough assessment would involve a comparison of historic and current water levels against well construction details across all or a representative subset of wells in Butte Valley. However, two key data limitations inhibit a comparison of well construction details with water levels where they have been measured in wells:

- Well depth and perforated intervals, on one hand, and water level observations on the other hand have been collected by multiple organizations/agencies.
- The most common datum available for known wells (i.e., wells registered through DWR's Online System for Well Completion Reports, OSWCR) is well depth.
- Ground surface elevations are not commonly available with well construction information. Obtaining ground surface elevation from digital land surface elevation maps at the well location is hampered by the fact that the location of the well is reported by township, range, and section and the exact location within the reported one square-mile section is not readily available.
- Water level information, especially longer time series of such information is available only for a small subset of monitoring wells, with location accuracy tied to the reported section location (+/- 0.5 miles).
- For most wells associated with water level measurements, the corresponding well construction information is not readily available, making a direct comparison of water level to depth to top of perforation (or to total well depth) impossible without significant further reconnaissance.

Consequently, rather than comparing groundwater elevations with the well depth to top of perforations, this analysis focuses on interpolated groundwater elevation data to assess the aggregated risk of wells not being able to pump water due to low water levels ("well outages"). The risk analysis necessarily utilizes information that is readily available and is therefore limited in its specificity. Future analysis may be able to provide a more refined risk assessment as better information becomes available.

Methods

2024 Updates to the 2022 GSP Well Failure Discussion

During the original development and this 2024 revision of Butte Valley GSP, manual review of well logs from OSWCR for more accurate well locations have been performed by technical staff. In reviewing the original GSP, it was found that OSWCR data from within and outside the Bulletin 118 basin boundaries were used for the well record summary in Chapter 2, updates have been reflected in the revised chapter 2. Comparing to the well failure analysis in the 2022 GSP, the following improvements and updates were incorporated in this revised well failure analysis:

- OSWCR well records used and computations in this analysis were audited.

- The analysis result of fall 2017 in the original well failure analysis was replaced by the analysis of fall 2023, which reflects the most recent fall conditions.
- Only OSWCR well records in PLSS sections that are fully or partially within the Bulletin 118 basin were included in this analysis. A total of 443 wells with the minimum required construction information were considered for the Basin well failure analysis.
- A review of recently submitted Well Completion Reports was conducted. A summary of wells constructed between 2019 and 2023 and rationale for excluding the recently constructed wells for the well outage risk analysis is provided in the Results and Discussion section.
- In addition to considering a statistical measure that defines the fraction of well outages per average 10 ft water level decline in the Basin, a direct comparison of interpolated water level against the total well depth was performed. Results are consistent with the statistical measure and provide additional confidence in the estimated number of dry wells (well outages).
- Analysis was performed not only by comparing interpolated water level against the top of the perforation (available for only a small fraction of wells), but also by comparing interpolated water levels against the well depth (available for all of the 443 well records).
- The number of dry wells was determined at the minimum threshold (MT) across the basin, using both methods.

Butte Well Data Statistics

A total of 461 well logs from OSWCR were identified in the Butte Valley Bulletin 118 basin boundary from OSWCR. To determine the wells at risk of dewatering, a total of 443 wells have been identified with total well depth recorded. The remaining 18 records did not identify well depth or have any information about depth or length of screens. These 18 records are likely outdated and could not be used in the analysis.

The 443 wells considered in the analysis were classified by the dominant geologic formation identified at the bottom of the perforated interval during geologic model development. Formations are described in greater detail in the Basin Setting section of the GSP. Major formations and the number of wells identified are the Ql - Lake deposits, QTb - Older volcanic rocks of the "High Cascades", Qal - Alluvium, and Qb - Butte Valley basalt, with 93, 36, 22, and 16, wells each respectively, summarized in Table 1. Formations with fewer than 10 wells or where the formation was unknown were grouped as "Other (including unknown formation)".

Wells were also classified and mapped by their planned use (Figure 1 and Figure 2) Only six public wells are found within the basin, one in Dorris, three in Macdoel, and two in the southern part of the basin. Domestic wells are also scattered in the areas of the Basin outside the Butte Valley Wildlife Area and outside the National Grasslands, which occupy the central and southwestern portion of the Basin. The largest number of agricultural wells is found in the southern and eastern portions of the basin. Wells with missing planned use designation occur in and near Dorris, Macdoel, and Mt. Hebron and also scatter in surrounding rural areas. Domestic wells constitute the largest group of wells (163 of 443), agricultural wells are the second numerous type of wells (148 of 443, in Table 2)

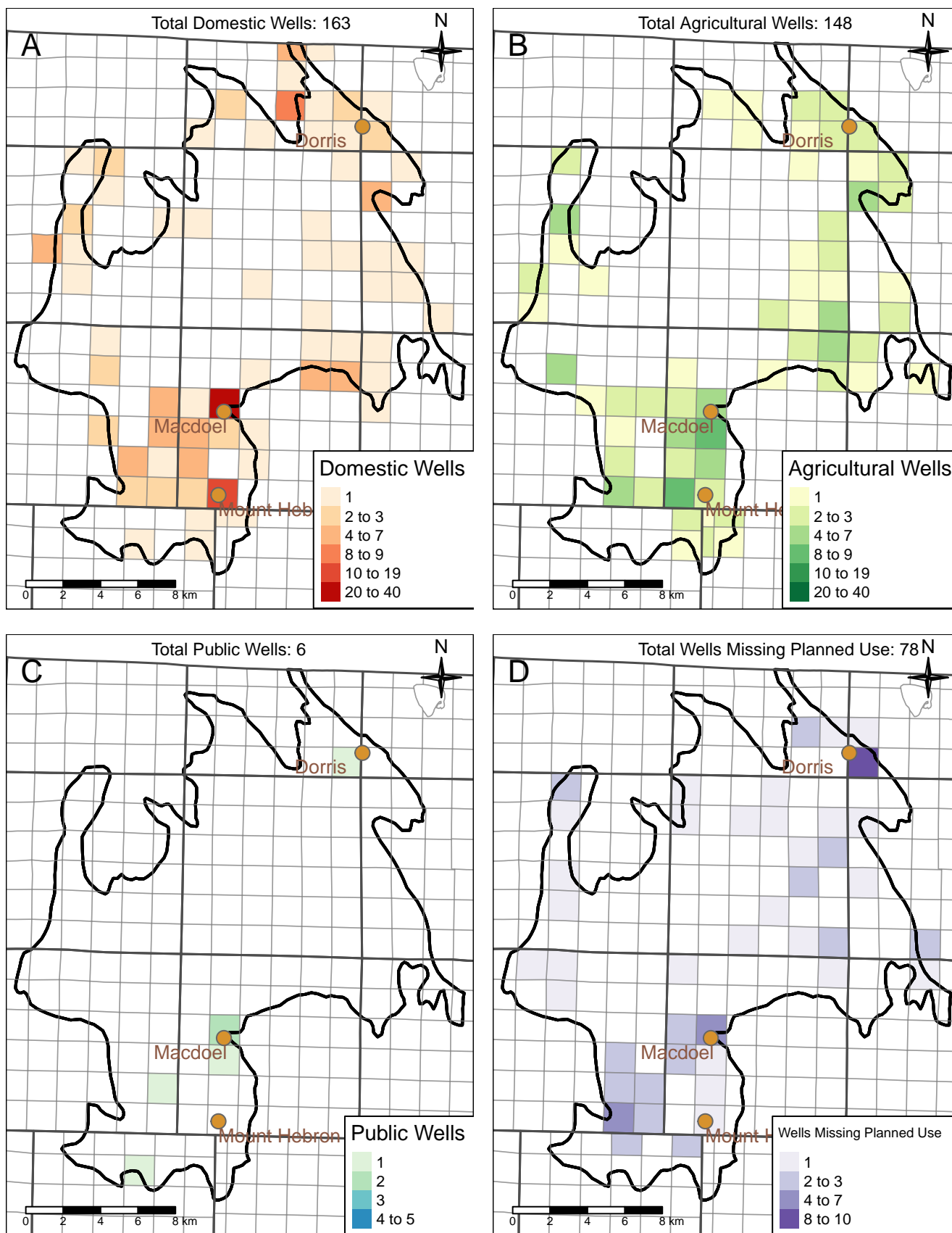


Figure 1: Butte Valley well choropleth maps by planned use from OSWCR.

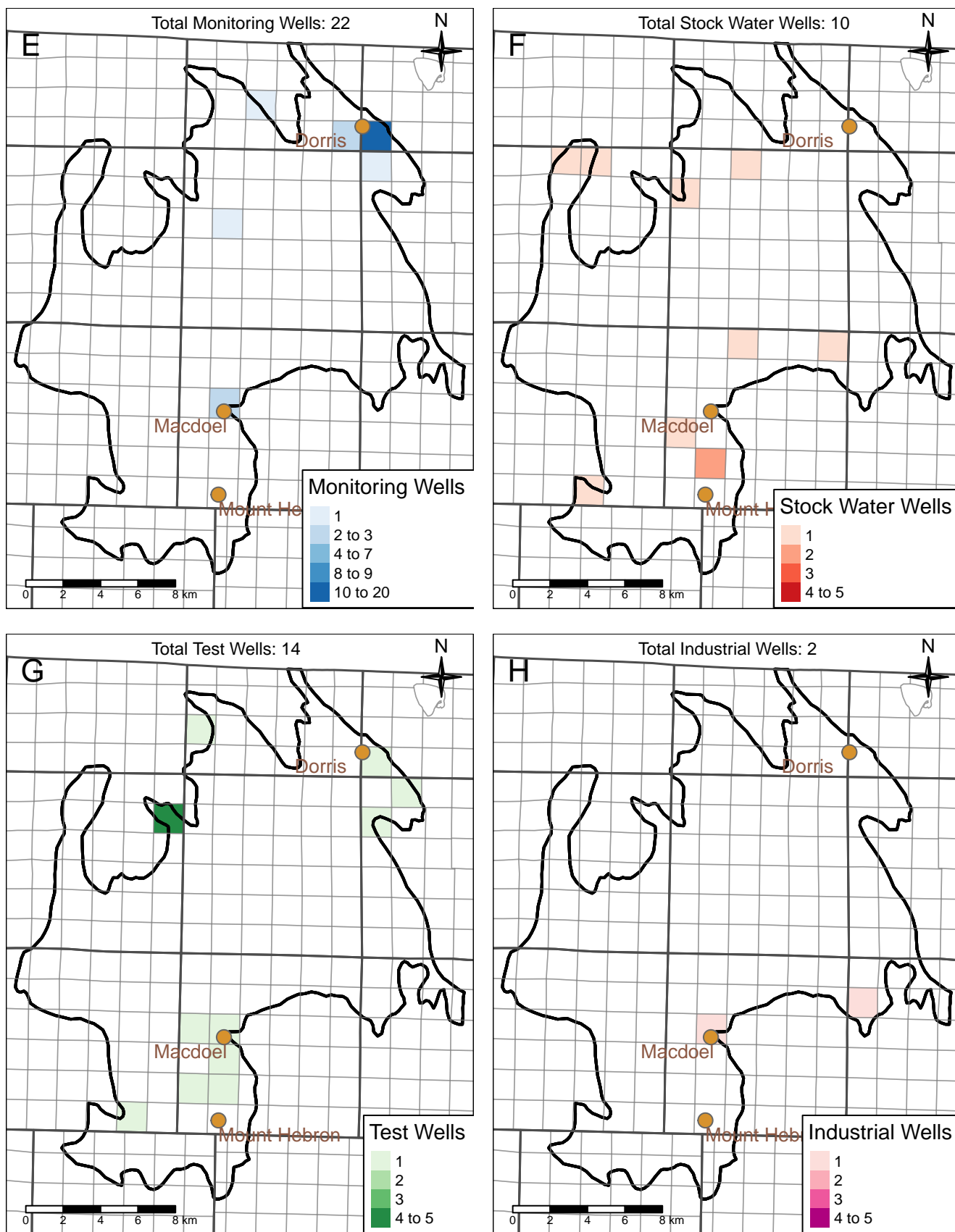


Figure 2: Butte Valley well choropleth maps by planned use from OSWCR (continued).

Table 1: Bottom Formation of Butte Valley Groundwater Basin Wells from OSWCR

Bottom Formation	No. of Wells
QTb - Older volcanic rocks of the "High Cascades"	36
Ql - Lake deposits	93
Qb - Butte Valley basalt	16
Qal - Alluvium	22
Other (including unknown formation)	276

Table 2: Planned Use of Butte Valley Groundwater Basin Wells from OSWCR

Planned Use	No. of Wells
agriculture	148
domestic	163
industrial	2
missing	78
monitoring	22
public	6
stock	10
test well	14

100 Well Outage Risk Analysis

101 As noted previously, paired top of well perforation elevations and water level measurements were
 102 only available in few wells. For 24 wells, the California Statewide Groundwater Elevation Monitoring
 103 Program (CASGEM) provides records of water level, depth to top of screen (perforations) and well
 104 depth. For an additional 21 wells, water level and well depth is available in CASGEM (Table 3). The
 105 number of these records (45 of 443 wells) is not sufficiently spatially distributed or representative
 106 of well type, depth, and construction to be used alone in determining well failure risk. We therefore
 107 utilize alternative methods for well failure analysis.

108 Due to the limited monitoring wells with water level data and human consumption wells with con-
 109 struction information available, a direct comparison of measured water levels to screened interval
 110 or well depth is not currently possible for the majority of Butte Valley consumption wells. Instead,
 111 two types of well failure analyses have been performed: a well failure analysis by direct comparison
 112 of estimated water level depth with well depth, and a more general trend analysis that considers
 113 the slope of the cumulative distribution of estimated wet water column depth. The rationales for
 114 and further details of these failure analyses are described in the following subsections.

Table 3: Available information for Butte Valley wells ('observations' refers to water level observa-
 tions).

Depth, Obs., Perf. Available?	Well Info Source	No. of Wells
None (location only)	DWR TSS Well	1
None (location only)	LWA GWO	115
Total Depth Only	LWA GWO	8
Observations Only	Volunteer Monitoring	34
Observations Only	DWR TSS Well	3
Observations Only	DWR Well Completion	27
Observations Only	DWR	9
Observations Only	LWA GWO	2
Perforation Only	–	0
Observations and Depth	DWR	21
Observations and Depth	LWA GWO	9
Depth, Obs. and Perf.	DWR	24

115 **Uncertainties in Estimating Risk of Well Failure**

116 Absent of direct observation of well construction records and water levels, water level elevation at
117 the well location must be estimated from nearby water level observations, incurring an estimation
118 error associated with the interpolation of water level elevations (or depth to water level) at monitored
119 well sites to the hundreds of other well sites across the Basin.

120 The location of wells is recorded, in most cases, to the center of the PLSS section within which a
121 well is located. While the land elevation at the center of a PLSS section is available from USGS
122 digital elevation maps and water level elevation or depth can be extrapolated to that exact location,
123 there may be differences in the land elevation, water level elevation, or water level depth between
124 the center of a PLSS section and the actual well location that cannot be accounted for in the spatial
125 extrapolation.

126 To understand potential errors arising from lack of precise well location records, it is useful to
127 consider the change in land elevation across a section and the change in water level depth across
128 a single PLSS section, relative to the center of the PLSS section:

129 Much of the Butte Valley floor is essentially flat at elevations between 4226 ft amsl (west of Meiss
130 Lake), 4236 ft amsl (Meiss Lake), 4240-4245 ft amsl (most of the central valley floor west, north,
131 and northeast of MacDoel, south of Dorris), 4250 ft amsl (MacDoel), 4255 ft amsl, Dorris) and
132 4260 ft amsl (Mt. Hebron). The base of foothills is generally at 4270 ft amsl. For sections entirely
133 contained within the Butte Valley floor, land elevation within a section commonly varies within +/-
134 5 ft from the section center. However, for sections overlapping with foothill or escarpment slopes,
135 land elevations within a section may be tens or even hundreds of feet different from the section
136 center.

137 Similar to land elevation, water levels across the floor of the Basin vary only gradually, especially
138 in spring, prior to the pumping season, when local cones of depression have not yet developed.
139 Analyses of water level interpolation across the Basin indicate that the depth to water level changes
140 typically by less than 10 ft per mile (the length of a PLSS section) to about 20 ft in some years and
141 locations (Figure 5 and Figure 6). In contrast, under foothill or escarpment terrain, depth to water
142 may change as rapid as land elevations (Figure 5 and Figure 6).

143 In light of these potential differences in land elevation and water level depth between interpolated
144 data and actual water level, and between the center of a section and the unknown location of a
145 well in that section, the uncertainty about measuring water level elevation above a reported depth
146 to top of perforation or above a depth to reported depth of well is on the order of less than 5 ft to
147 20 ft for wells on the floor of the Basin For wells in sections that include foothills or escarpments,
148 comparison of estimated water level elevation with well construction information may be associated
149 with errors far exceeding 10 ft.

150 Additional uncertainties arise from lack of pump placement records and lack of recorded physical
151 limitations to pump placement within the existing well casing, which is a function of geology, well
152 design, pumping rate and other construction details.

153 **Water Level Interpolation**

154 For both types of Well Outage Risk Analysis (direct comparison and trend analysis), three maps
155 of water levels have been constructed, two from measured depth to groundwater, in the fall of
156 2015 (dry year) and in the fall of 2023 (most recent fall conditions), and one from the MTs at the

157 Representative Monitoring Points (RMPs). The first two water level years were used to estimate
 158 well outages in Butte Valley over the most recent 8 year period and compare those to reported
 159 well outages in the DWR well outage database. The interpolation of MTs was used to predict the
 160 number of outages if the water levels reached the MTs at all RMPs simultaneously.

161 Fall season is considered to be the time period between September 15 - October 31, and the
 162 fall low is defined as the maximum depth to groundwater during that time interval. Fall lows are
 163 selected for the outage risk analysis to represent the typical low groundwater levels during a year.
 164 The interpolated water table depths are most accurate near the locations of the measured wells.
 165 The accuracy of estimates deteriorates with distance from a measured well.

166 **Well Outage Risk Analysis by Direct Comparison**

167 Measured water levels for the fall of years of interest and for MTs at the RMPs are interpolated to
 168 the reported location of all wells in the Butte Valley groundwater basin for which construction infor-
 169 mation is available. This allows for a direct comparison of total well depth against the interpolated
 170 water levels, as follow:

$$171 \quad [\text{reported total depth of well}] - [\text{interpolated depth to groundwater at} \\ 172 \quad \text{reported location}] = [\text{wet depth to bottom of well}]$$

173 For purposes of this first analysis, we assume that a **well outage** (dry well) occurs when the “wet
 174 depth to bottom of well” is less than 10 ft.

175 Considering that some wells may not be able to draw water when only 10 ft of water remain, a
 176 more conservative well outage risk criteria was used by comparing the depth to top of perforation
 177 and the interpolated water levels at each well were also performed, where construction information
 178 is available:

$$179 \quad [\text{reported depth to top of perforation}] - [\text{interpolated depth to groundwater} \\ 180 \quad \text{at reported location}] = [\text{wet depth to top of perforation}]$$

181 In this conservative evaluation, we assume that a **well outage** occurs when the “interpolated depth
 182 to groundwater” is greater than the “depth to top of perforation”, that is, when the “wet depth to top
 183 of perforation” is less than 0 ft.

184 Note: By using the USGS reported elevation at the reported well location as the reference elevation
 185 for both terms on the left-hand-side, the wet depth to top of perforations can also be expressed as:

$$186 \quad [\text{interpolated water table elevation at reported location}] - [\text{reported elevation} \\ 187 \quad \text{of total depth/top of perforation}] = [\text{wet depth to total depth/top of perforation}]$$

188 This first analysis may be expanded in the future, with a programmatic effort to better match water
 189 level data with well construction information and to obtain better well location information, partic-
 190 ularly near the margins of the basin, which are also the areas with most wells due to the lower
 191 flooding risk.

192 **Well Outage Risk Analysis by Wet Depth Trend Analysis**

193 Cumulative distributions have been created for the estimated wet water column depth obtained
194 from the direct comparison method above. The cumulative distribution values of the wet depth
195 (either above the bottom of the well plus 10 ft, or above the top of the screen) show the fraction
196 of wells that do not exceed the corresponding wet depth in a specific year (or at the MT). The
197 cumulative distribution value at a wet depth of zero indicates the fraction of wells that is likely
198 dry (subject to well outage), which is the same result obtained in the previous direct comparison
199 analysis.

200 The cumulative distribution provides additional information that is useful considering that there is
201 some uncertainty about the exact depth of the water level at the actual (but unknown) location of
202 the well and about the pump placement requirement: The slope of the cumulative distribution in
203 the shallower range of wet depth indicates the additional number of wells as a fraction of the total
204 number of wells per feet of additional wet depth (or say, percent of total wells per feet of wet depth).
205 The shallower range of wet depths has been quantified as the measures of wet depth between the
206 5th and 35th percentile of the cumulative distribution function. The slope determined within this
207 range would be reasonable as the distribution within this range of wet depth has been found to be
208 nearly linear. Additionally, this selection of percentile range not only ensures the shallowest set of
209 wells are considered for well outage risk analysis, but also excludes wells with exceedingly negative
210 wet depths, which indicates that the well might have been dry for many years or abandoned, or,
211 data errors might have occurred. Furthermore, the 5th to 35th percentile section of the cumulative
212 distribution tends to also be the steepest section, which indicates it is also the range where the
213 majority of wet depths falls into (or say, it has the most wells added to the cumulative distribution
214 function for every 1, 2, 5, 10 ft etc increase in wet depth).

215 Knowing how many wells have an additional 1, 2, 5, 10 ft etc of wet depth provides a means for
216 estimating the number wells that fall dry as a fraction of the total number of wells for each additional
217 1, 2, 5, 10 ft etc of water level decline, which is how the concept mentioned above got translated
218 into estimating additional well outage through the linear slope between 5th to 35 percentile of the
219 cumulative distribution function. And the advantages of this outage analysis approach are as stated
220 above.

221 In this analysis, the trend analysis results have been presented as the slope of the cumulative
222 distribution as mentioned above as the fraction of total wells, in percent, per 10 ft increase in wet
223 depth. This number represents an estimate of the percent of wells likely to fall dry per 10 ft of
224 additional water level decline, on average, across the Basin.

225 **Reported Well Outages**

226 For this 2024 well analysis revision, a review of the DWR Dry Well Report database is conducted
227 to further support and validate the findings from the well outage risk estimation for Butte Valley,
228 and to identify potential missing well outages reported for the GSA.

229 Results and Discussion

230 Well Distribution and Construction Information in Butte Valley

231 The major planned use of wells of interest for beneficial uses and users of groundwater in Butte
232 Valley are domestic, public, and agricultural water supply wells. In total, 317 out of 443 wells docu-
233 mented in OSWCR fall into these three categories (Figure 1, Figure 2 and Table 2). An analysis of
234 the depth distribution among the 78 wells with “missing” planned use reveals significant similarity
235 to that for domestic wells. For this analysis, the 78 wells are therefore assumed to be domestic
236 wells. The summary of well depth and perforation statistic is presented in Table 4 for these wells.
237 Table 4 shows that for all the OSWCR wells with total well depth available, a majority of them do
238 not have perforation details.

239 The total completed depths of these wells below ground surface and their associated bottom forma-
240 tion are demonstrated in Figure 3. Of the known formations, domestic wells and “missing” planned
241 use wells are mostly completed in quaternary lake deposits. Most domestic and “missing” planned
242 use wells have depth in the range of 100 ft to 250 ft unless they are completed in the older volcanic
243 rocks (at least 200 ft deep). Shallowest depths of all wells are over 30 ft and deepest wells can be
244 more than 1400 ft.

245 Agricultural wells have a significantly broader depth distribution than domestic wells. Many newer
246 agricultural wells are 300-500 feet deep while older wells have depths similar to domestic wells.
247 The depth distribution of agricultural wells is similar across geologic formations except in the older
248 volcanic rocks of the High Cascades (QTb) where agricultural wells are less common and are only
249 found at significant depth, typically near the basin boundaries. In the QTb, the agricultural well
250 depth ranges from about 30 ft to about 1800 ft (Table 4). Additional well construction information
251 can be found in the Supplementary Information.

252 To understand how chronic declining in water levels may affect human and natural beneficial uses,
253 the following analysis was performed to evaluate the 247 domestic and public wells from OSWCR
254 in Butte Valley groundwater basin (including “missing planned use). Their spatial distribution by
255 well formation is presented in Figure 4.

256 Well logs of newly constructed wells during 2019 and 2023 have been actively reviewed by tech-
257 nical staff for more accurate location information. The preliminary investigation on these wells’
258 construction information indicate that a total of 17 wells were newly installed for domestic and pub-
259 lic supply use (14 wells) and agricultural use (3 wells). The new domestic wells have total depth
260 ranging from 80 to 400 ft below ground surface. For this purpose of this analysis, these newly
261 constructed well are not included for the well outage risk analysis to provide a consistent set of
262 wells for evaluations in 2015 and 2023, and at MT.

Butte GSP Appendix - Well Failure Discussion

Table 4: Summary Statistics of Construction Information by Major Planned Well Use

Planned Use	Statistic	Total Completed Depth (ft bgs)	Top of Perforation (ft bgs)	Bottom of Perforation (ft bgs)	Perforated Length (ft)
agriculture	Min.	29	0	20	8
	1st Qu.	119	46	124	58
	Median	216	71	204	120
	Mean	332	148	317	169
	3rd Qu.	407	154	400	200
	Max.	1818	943	1626	995
	NA count	0	75	75	75
	Percent NA	0	51	51	51
domestic	Min.	32	0	23	4
	1st Qu.	90	38	90	20
	Median	125	62	128	40
	Mean	180	99	173	74
	3rd Qu.	202	128	181	79
	Max.	1450	541	1433	1342
	NA count	0	91	91	91
	Percent NA	0	56	56	56
missing	Min.	29	20	30	2
	1st Qu.	60	31	58	16
	Median	102	47	118	20
	Mean	158	89	131	42
	3rd Qu.	200	120	172	42
	Max.	805	321	341	170
	NA count	0	66	66	66
	Percent NA	0	85	85	85
public	Min.	77	58	78	9
	1st Qu.	111	85	105	20
	Median	143	92	132	20
	Mean	329	119	149	30
	3rd Qu.	241	99	159	40
	Max.	1236	261	270	60
	NA count	0	1	1	1
	Percent NA	0	17	17	17

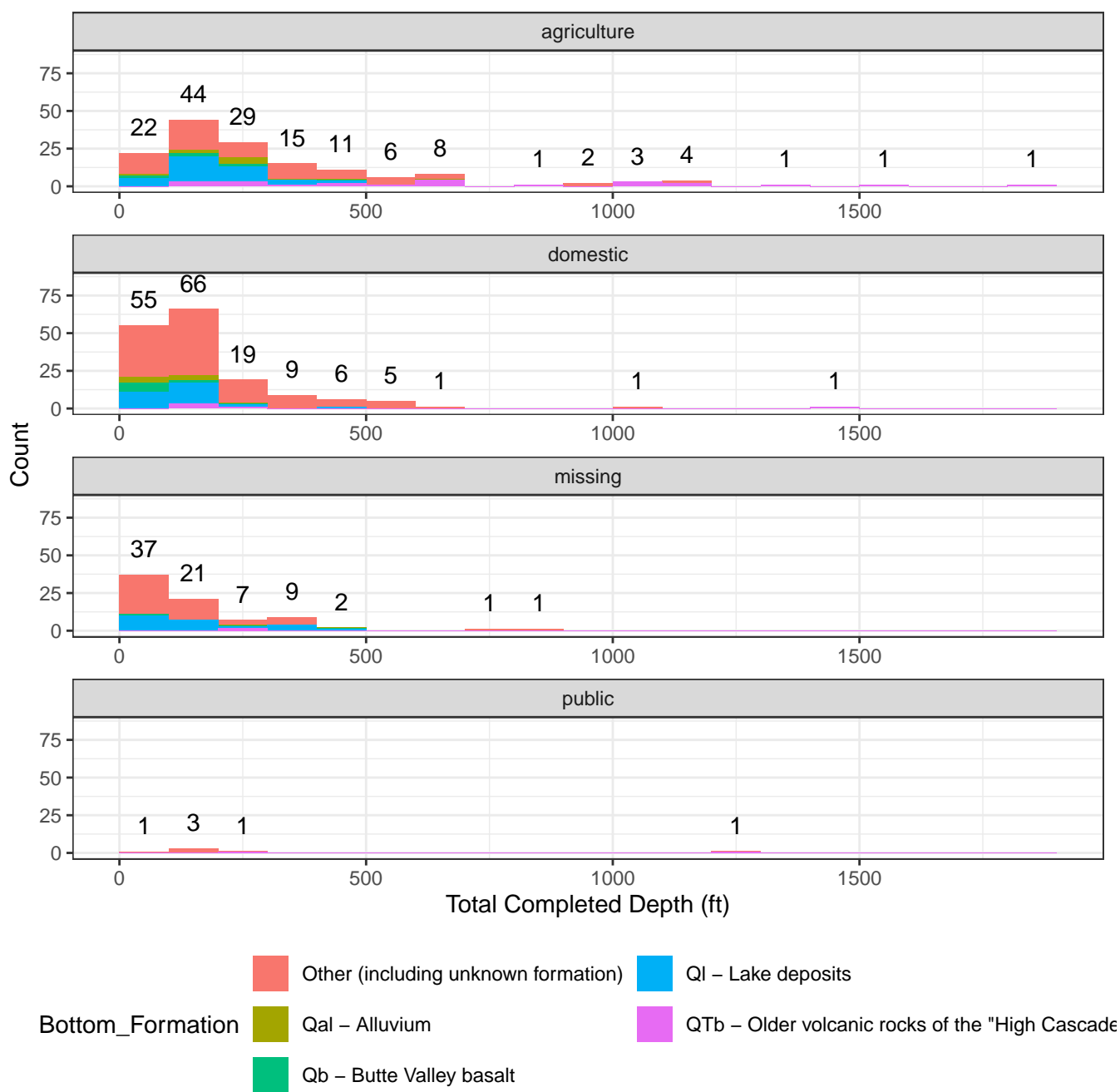


Figure 3: Histogram of Total Completed Depth of Domestic, public supply and agricultural Wells (including the 'missing' planned use wells that were assumed domestic wells in the analysis).

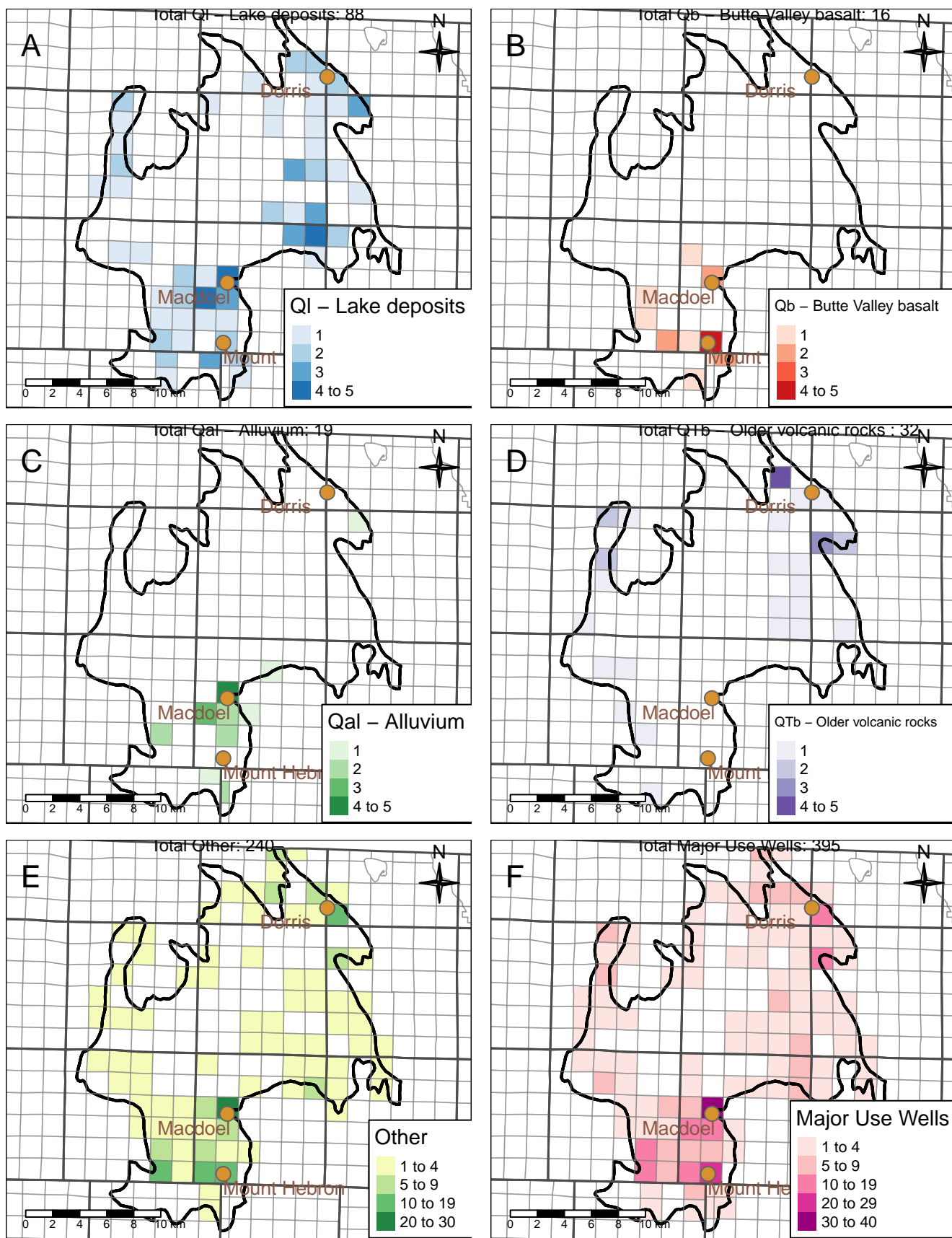


Figure 4: Butte Valley choropleth map of domestic, public supply and agricultural wells by bottom formations.

263 Well Outage Risk Analysis

264 Domestic Wells

265 **Estimated Outages by Direct Comparison** The interpolated groundwater elevation contours
266 within the Butte Valley B118 boundary are constructed with the best available groundwater level
267 measurements for fall 2015 and 2023, and are presented in Figure 5 and Figure 6 respectively.
268 Histograms of the calculated wet depth to bottom of well and top of perforation using the reported
269 well information and the interpolated groundwater level at the reported location are presented for
270 fall 2015 and 2023 in Figure 8 and Figure 9 respectively.

271 When using wet depth to 10 ft above bottom of wells as the criterion for well outage, Figure 8 (right
272 panel) indicates that in 2015, approximately 19 percent of wells, or 45 out of 241 domestic wells,
273 are estimated to have been experiencing dry conditions (well outage). This may represent older
274 wells that are inactive or abandoned, wells that have been inactive since 2015, and wells that have
275 experienced temporary well failure.

276 Using the wet depth to top of perforation as well outage criterion is done on a much smaller subset
277 of wells (84 out of 241). Nearly half of those wells (40 of 84) meets this alternative well outage
278 criterion in 2015. It is unlikely that nearly half of the domestic wells reported in OSWCR was already
279 dry in 2015. This indicates that the analysis using the wet depth to top of perforation as well outage
280 criterion is limited by the data available for well perforation information in Butte Valley, and possibly
281 many domestic wells have pumps installed below reported top of perforations.

282 For purposes of the well failure analysis, the estimated number of dry wells in 2015 provides a
283 baseline against the estimated additional well outages in a future year (i.e., 2023). The estimated
284 additional well outages between 2015 and 2023 was determined by comparing the number of well
285 outages due to the change of water levels between 2015 and 2023 across the basin.

286 Using the depth to 10 ft above bottom as well outage criterion, 14 additional well outages occurred
287 between 2015 and 2023, which is 6% of the total domestic wells analyzed (right panel of Figure 8
288 and Figure 9). Alternatively, using wet depth to top of perforation as well outage criterion, an
289 additional 4% of wells were estimated to be at risk for failure between 2015 to 2023 (left panel of
290 Figure 8 and Figure 9). Hence, similar estimates of well failures are obtained from both well outage
291 criteria.

292 When applying the direct comparison to the water level contour representing MT conditions
293 throughout the Basin (Figure 7), results for the depth to 10 ft above bottom criterion indicate that a
294 water level decline from 2023 conditions (right panel of Figure 9) to MT conditions (right panel of
295 Figure 10) causes an estimated 14 additional well outages, or say, 28 or 12% additional domestic
296 well outage from 2015. The evaluation using wet depth to top of perforation criterion indicates
297 an additional 3% wells at the risk of dewatering from 2023 to MT (6% of wells between 2015
298 conditions and MT conditions), again, a slightly lower number of well outages than with the first
299 well outage criterion, but essentially confirming the results (Figure 10).

300 The spatial distribution of the well outages estimated using the 10 ft to well bottom criterion is
301 shown in Figure 11. Most of the 2015-2023 outages are near Dorris, Macdoel, and Mount Hebron,
302 with scattered outages throughout rural areas. Additional outages, were water levels to decline to
303 the MT, would occur mostly in the Mt. Hebron area with additional outages scattered across rural
304 areas.

305 In summary, 45 domestic wells are estimated to be dry in 2015. From 2015 to 2023, an estimate
306 of 10 to 14 additional wells go dry (4-6% of the total). From 2023 to MT (were it reached), an
307 estimated 8 to 14 additional wells will go dry, bring the total number of dry wells after 2015, at MT
308 conditions to an estimated 15 to 28 wells (6-12%).

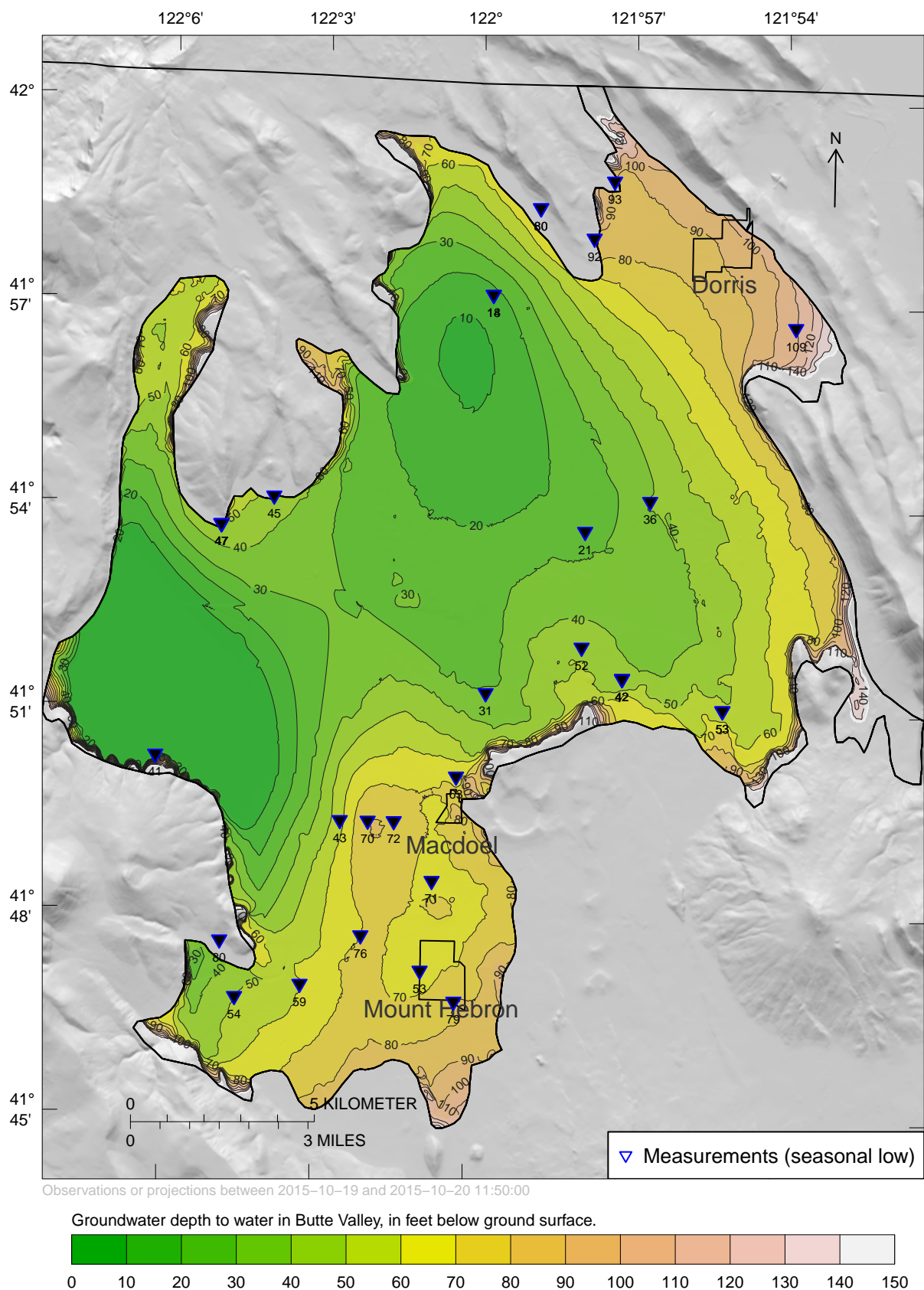


Figure 5: Butte Valley groundwater elevations reported as approximate depth to groundwater, fall low of 2015 and well failure estimates based on recent water level observations. Approximate basin-scale groundwater depths are shown.

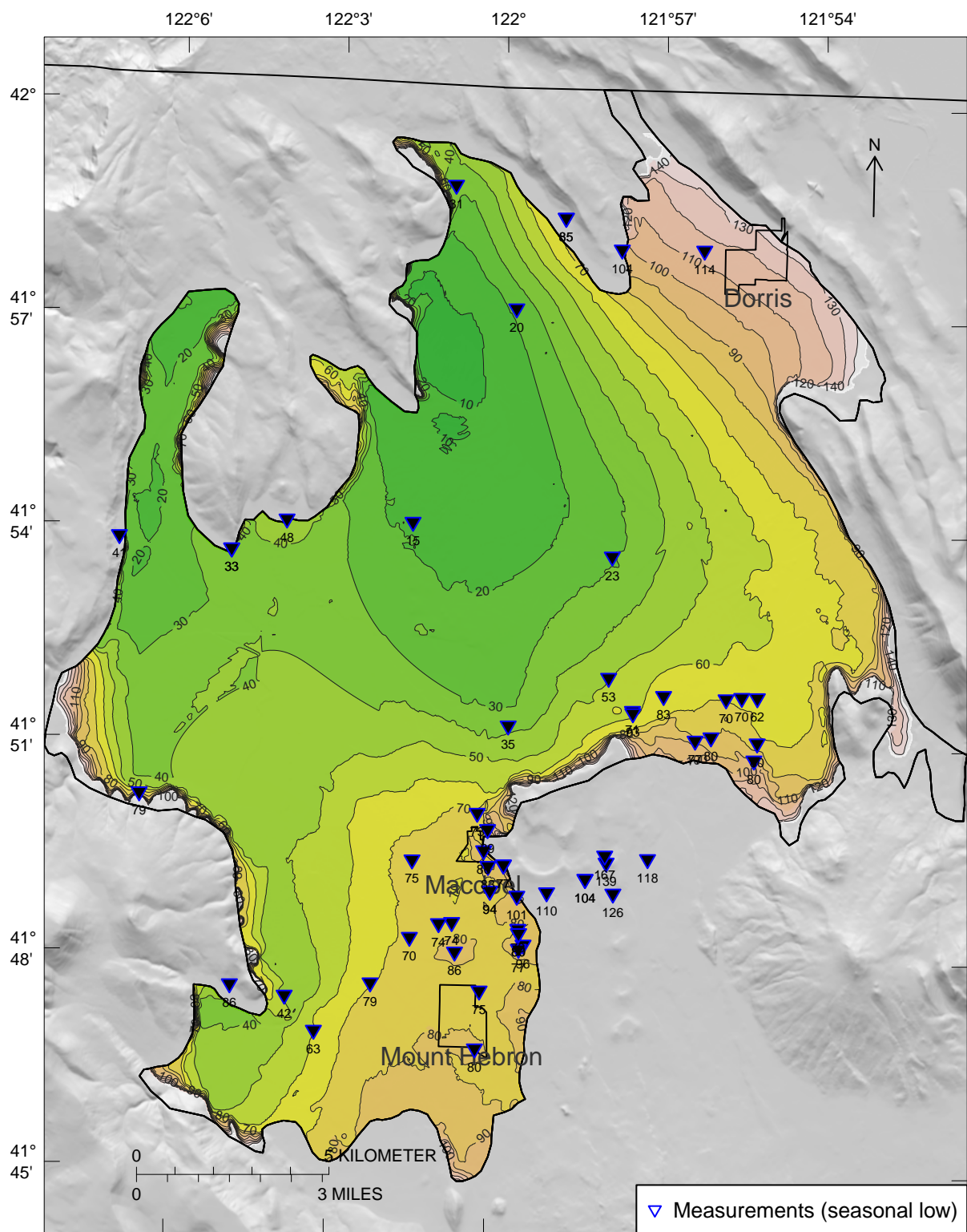


Figure 6: Butte Valley groundwater elevations reported as approximate depth to groundwater, fall low of 2023 and well failure estimates based on recent water level observations. Approximate basin-scale groundwater depths are shown.

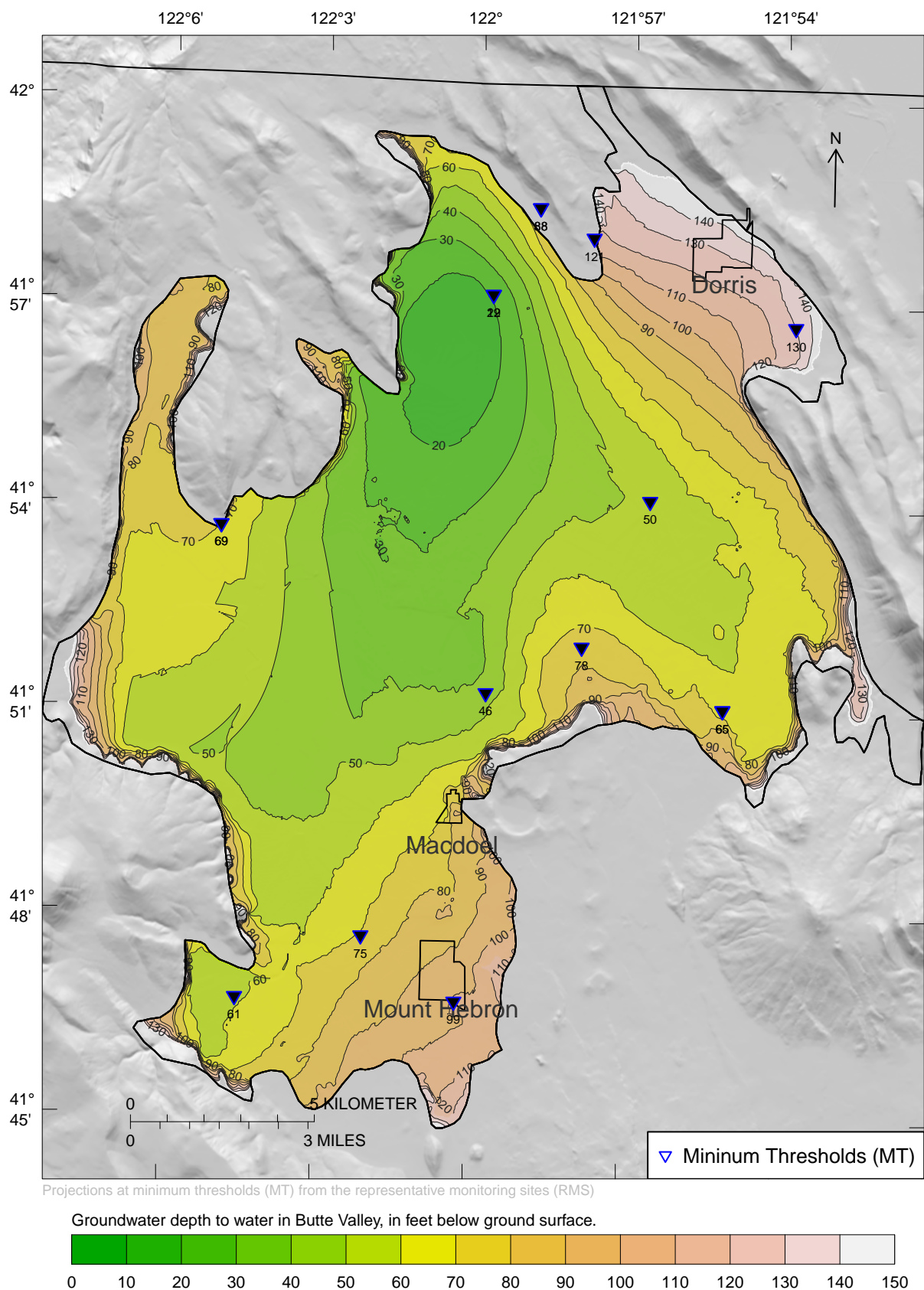


Figure 7: Contour of the predicted Butte Valley groundwater elevations if minimum thresholds were reached at representative monitoring points. Approximate basin-scale groundwater depths are shown.

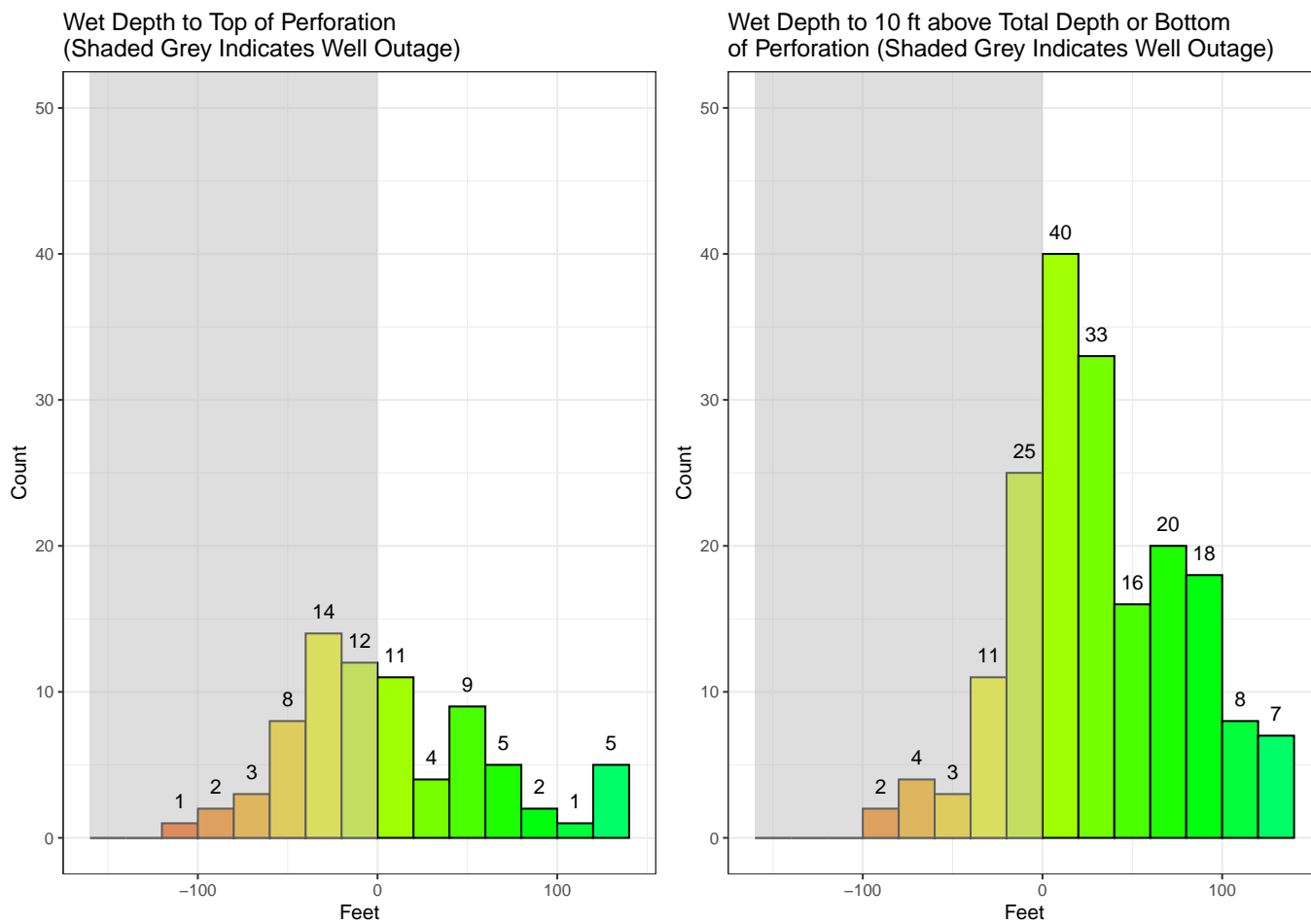


Figure 8: Histogram of wet depth to well perforations for domestic wells based on contoured groundwater elevations, fall 2015. Note: only the wet depth that is negative and less than 140 ft are shown for better illustration. A positive wet depth indicate the water level is above the bottom of well or its top of perforation, indicating the well is relatively deep and not at risk of any outage.

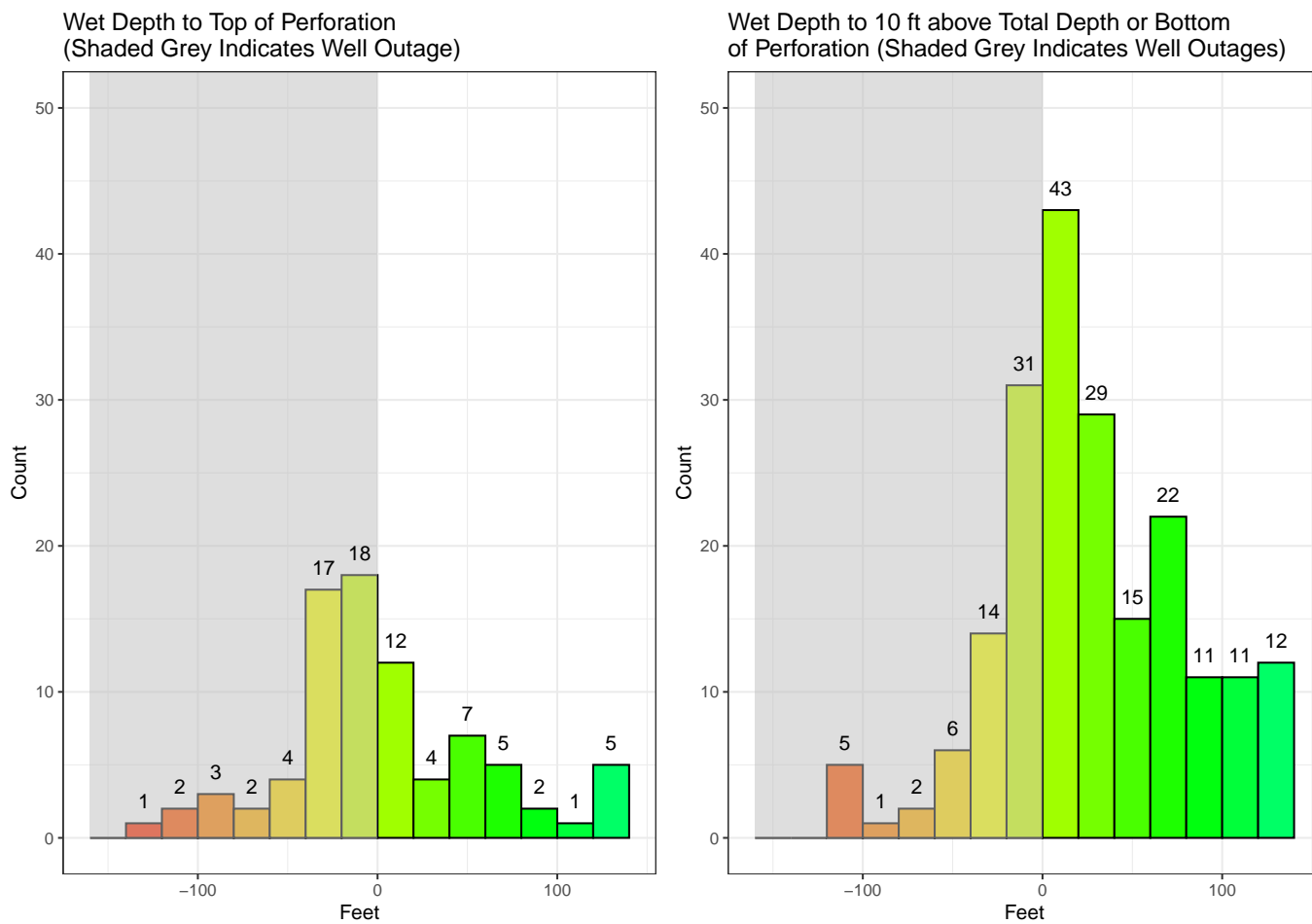


Figure 9: Histogram of wet depth to well perforations for domestic wells based on contoured groundwater elevations, fall 2023. Note: only the wet depth that is negative and less than 140 ft are shown for better illustration. A positive wet depth indicate the water level is above the bottom of well or its top of perforation, indicating the well is relatively deep and not at risk of any outage.

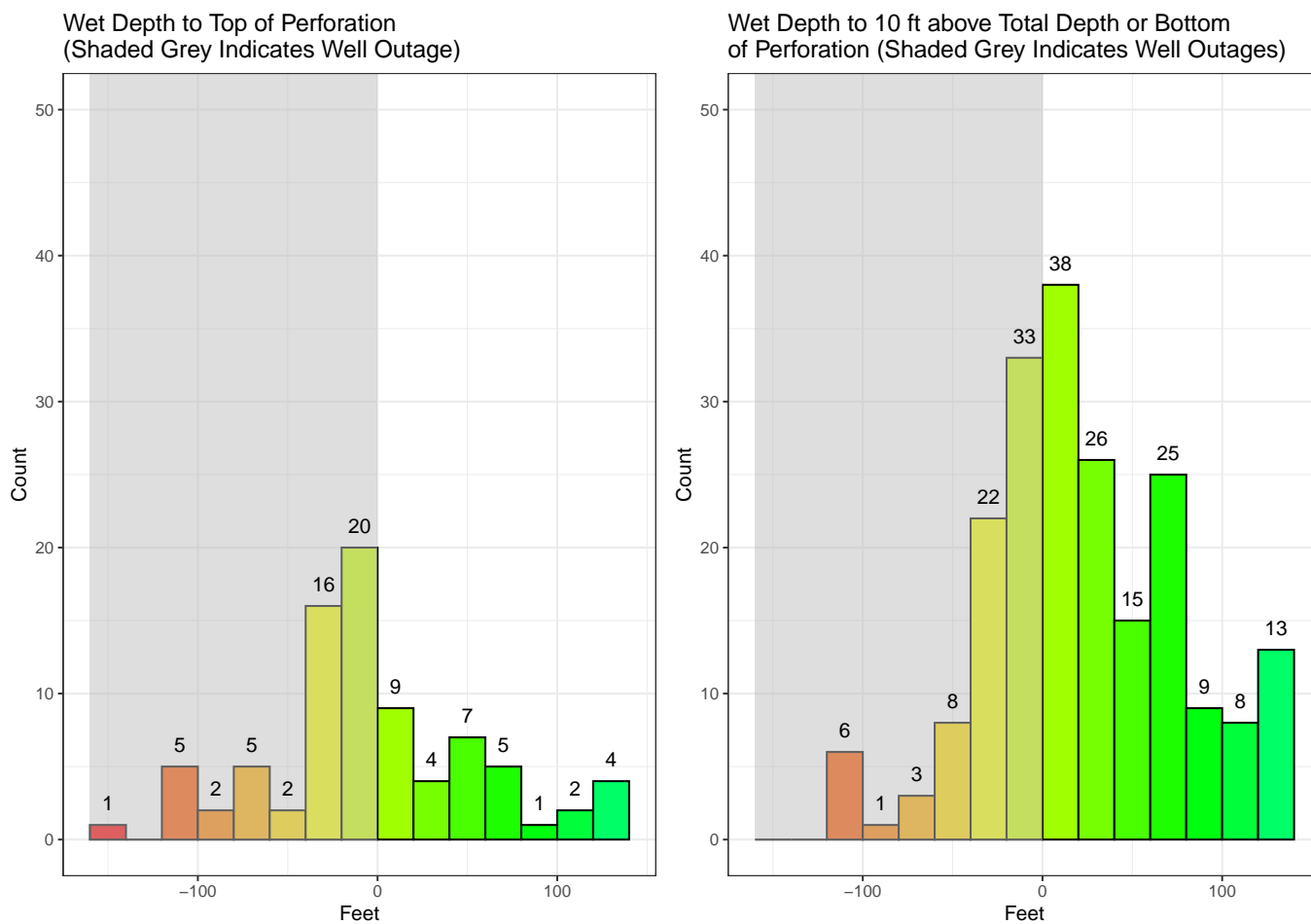


Figure 10: Histogram of wet depth to well perforations for domestic wells based on the predicted contoured groundwater elevations at minimum thresholds. Note: only the wet depth that is negative and less than 140 ft are shown for better illustration. A positive wet depth indicate the water level is above the bottom of well or its top of perforation, indicating the well is relatively deep and not at risk of any outage.

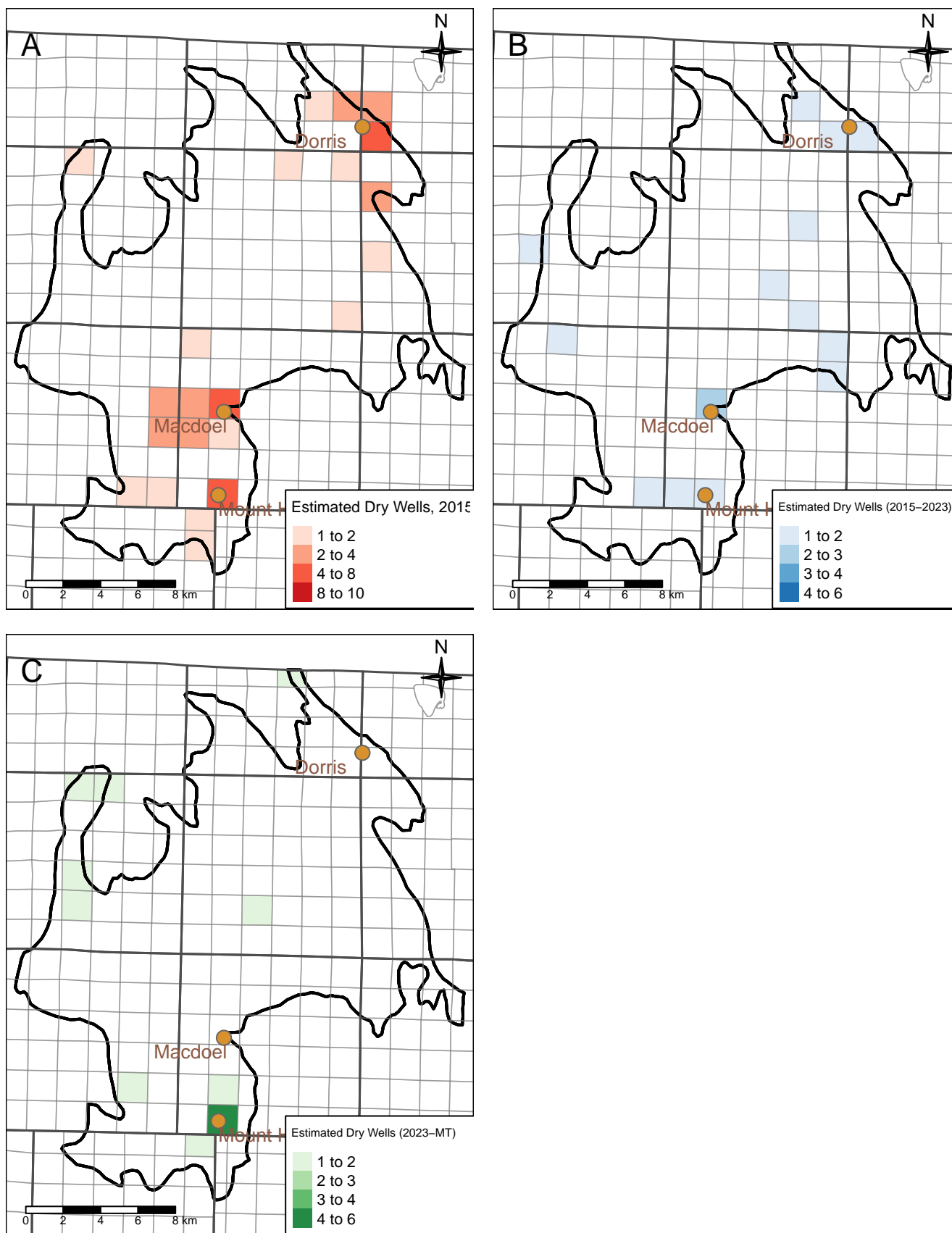


Figure 11: Butte Valley choropleth map of domestic wells indicating the number of estimated well outages in 2015 (panel A), additional well outages from 2015 to 2023 (panel B), and additional well outages from 2023 to MT Triggered across Basin (panel C).

309 **Estimated Outages by Wet Depth Trend Analysis** The cumulative distributions of the wet depth
310 to top of perforation and of the wet depth to 10 ft above bottom of well are shown in Figure 12 for
311 fall 2015 conditions, fall 2023 conditions and for MT conditions across the basin. The cumulative
312 distributions of wet depth to top of perforations and wet depth to bottom of well have very similar
313 shapes and show a consistent left shift across the entirety of the distribution. The latter is a result
314 of the fact that water table depth in 2023 is deeper than 2015 across the entire basin. Similarly,
315 MT conditions are deeper than 2023 across the entire basin.

316 All cumulative distribution functions are relatively flat at their left tail, indicating a few wells with
317 widely spaced negative depths. Once the cumulative distribution functions reach approximately
318 5% to 10% of wells, the slope steepens to its maximum up to approximately 60% of wells, beyond
319 which it slowly flattens out – fewer and fewer wells are deeper and deeper. The trend analysis takes
320 advantage of the relatively consistent slope in the 5th to 35th percentile range of the cumulative
321 distribution that is also intersecting with the zero wet depth threshold. Since it is the steepest part
322 of the cumulative distribution function, it is also the most conservative estimate, that is it provides
323 an upper limit for the estimate of well outages per 10 ft basin-wide decline in water levels.

324 Importantly, the absolute value of the wet depth of an individual well may have errors of less than
325 +/- 5% to as much as +/- 20%. To the degree that the average of the error is near 0% (i.e.,
326 unbiased), this estimation error does not affect the shape or relative position (on the wet depth axis)
327 of the cumulative distribution function of wet depths. Given the range over which the cumulative
328 distribution function has a nearly consistent slopes, the slope value is much less sensitive than
329 the specific estimated wet depth at wells to well outage analysis. If we further assume that the
330 minimum wet depth to either the bottom of the well or to the top of perforations is similar for most
331 domestic wells, then this slope is a relatively robust estimator for the risk for well outages with
332 additional water level decline below historically low values.

333 Importantly, this approach to estimating well outage risk does not require knowledge of specific well
334 information about pumping bowl elevation relative to the screen location, or about a minimum wet
335 water level depth needed to pump properly. It only assumes that some well outages occur if water
336 levels fall below historic lows and, hence, the selected slope is representative of the one-third of
337 wells at most risk to well outage.

338 The slope analysis across the two well outage indicators and the three water level conditions indi-
339 cate that a 10 ft average decline in water levels results in 4% to 6.5% of domestic wells going dry
340 across the Basin.

341 This slope estimate allows for an estimate of the number of well outages that occur due to a lowering
342 of the water table from the minimum measurable objective (MO, which corresponds to the lowest
343 observed water level between 1991 and 2014) and the MT. The basin-wide average difference
344 between the minimum MO and the MT is 15 ft. The trend analysis suggests that 6% to 10% (per
345 15 ft, equivalent to the 4% to 6.5% per 10 ft in Figure 12) or (15 to 24) of domestic wells are at risk
346 of well failure between MO conditions and MT conditions.

347 This result is consistent with the direct comparison method. The consistency of results is due to the
348 similarity of the slope for 2015, 2023 and MT conditions from their cumulative distribution functions,
349 which results in similarity of the intersects of these three regressions with zero wet depth. The trend
350 method is considered slightly more robust due to fitting of the slope to a broader range of wells
351 rather than just considering the difference in the cumulative distribution function specifically at a
352 wet depth of zero.

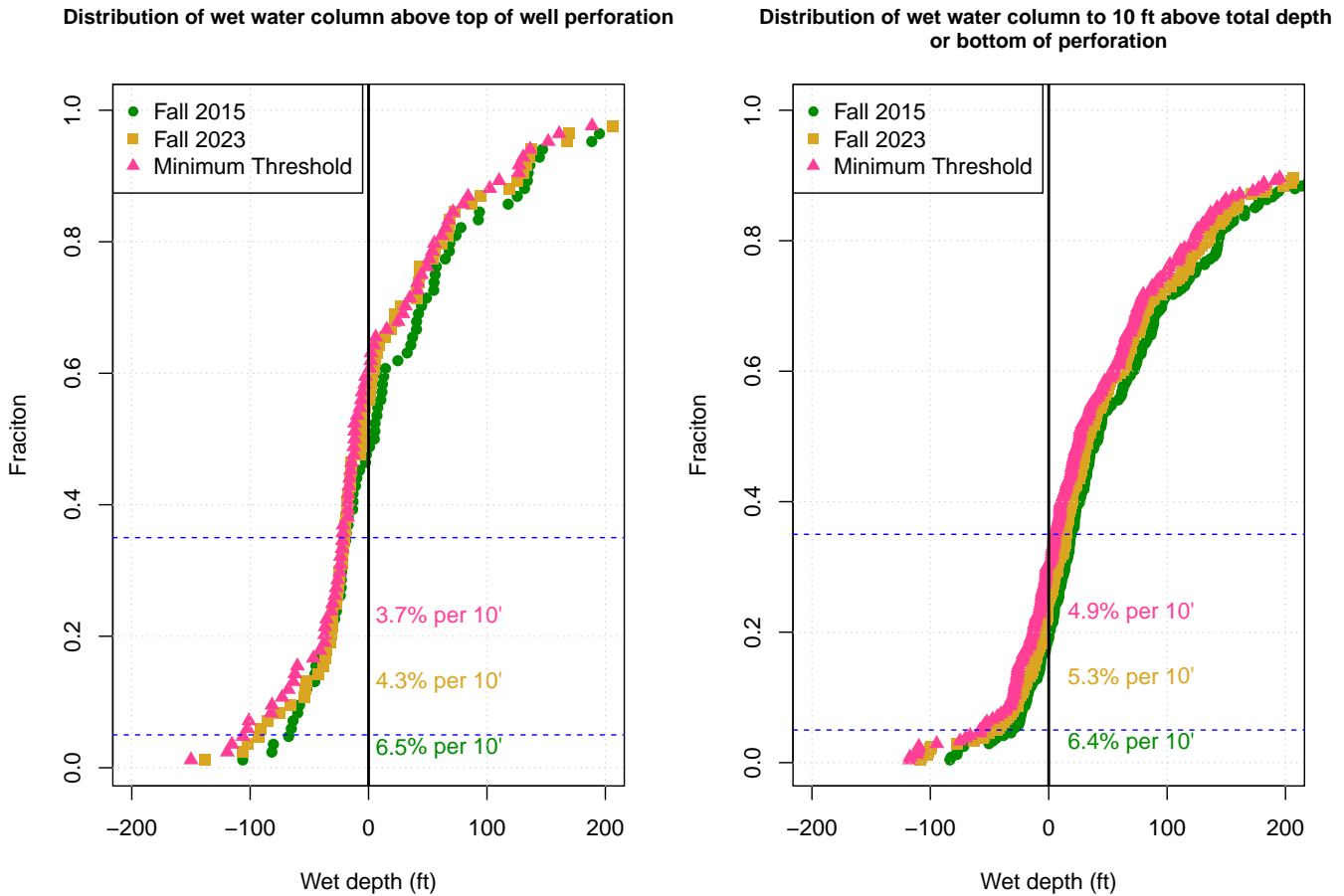


Figure 12: Cumulative distribution function of domestic well wet depth to top of perforations in all formations based on contoured groundwater elevations during Fall of 2015 and 2023, and prediction at minimum thresholds. Interpolation computed as a best fit linear slope to the data between the 5th and 35th percentile (blue dash line). Note: only the wet depth that is negative and less than 200 ft are shown for better illustration. A positive wet depth indicate the water level is above the bottom of well or its top of perforation, indicating the well is relatively deep and not at risk of any outage.

353 Public Wells

354 Outage analysis is performed for public wells with the same approach as domestic wells in the
355 previous section. Through the “direct comparison” approach, the public well outage is 0 in 2015,
356 and 0 additional well outage is identified from 2015 to 2023 and to MT. The analysis indicates that
357 public wells in Butte Valley groundwater basin is less likely to experience outage from the chronic
358 lowering groundwater level. The less likelihood of adverse impact on public wells is because they
359 were constructed with deeper depth compared to other types of wells (see Table 4).

360 Agricultural Wells

361 Outage analysis is performed for agricultural wells with the same approach as domestic wells in
362 the previous section. The percent outage identified through “trend analysis” for agricultural wells
363 fall within the range identified for domestic wells. Through the “direct comparison” approach, the
364 agricultural well outage is 7 in 2015 (out of 148 agricultural wells, 5%). 3 additional well outage
365 is identified from 2015 to 2023. And 7 additional well outage is identified from 2023 to MT. These
366 results are illustrated in the choropleth maps in Figure 13.

367 Reported Well Outages

368 As of June 2024, the DWR Dry Well Report database contains four reports of dry wells with con-
369 firmed locations within the Butte Valley basin. Two of the reported dry wells are domestic wells
370 within the city of Mt. Hebron. In both wells, the issue was reportedly resolved by lowering the
371 pump bowl. One of the reported dry wells is in the city of Macdoel, and the last dry well is north-
372 west of Dorris. All four wells are domestic wells. The reports were filed with DWR in the summer of
373 2021 (1 report) and in the spring to fall of 2023 (3 reports). Additional wells may have experienced
374 outages, but not been reported.

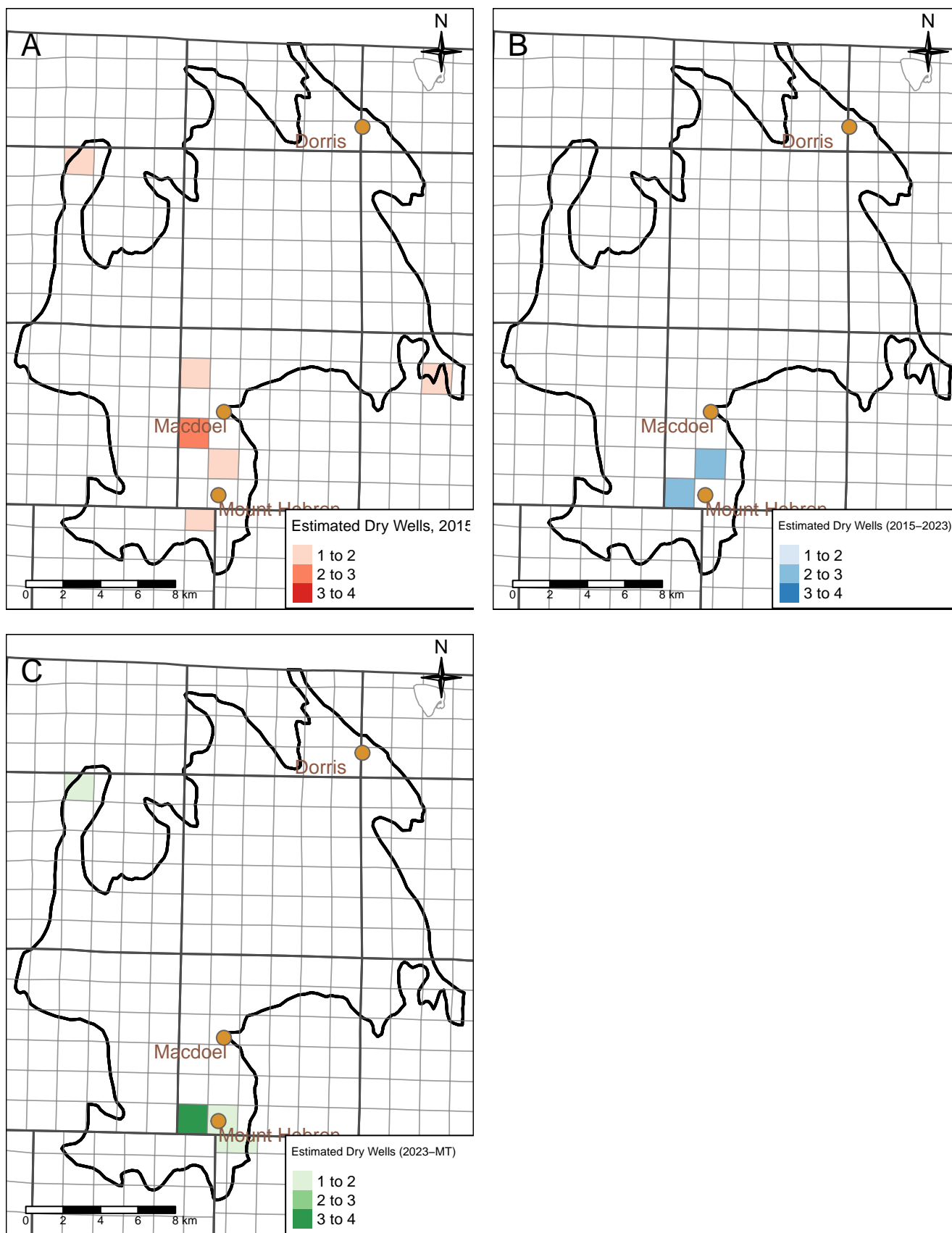


Figure 13: Butte Valley choropleth map of agricultural wells indicating the number of estimated well outages in 2015 (panel A), additional well outages from 2015 to 2023 (panel B), and additional well outages from 2023 to MT Triggered across Basin (panel C).

375 **Conclusion**

376 We identified three key findings with respect to well outages:

377 **Majority of wells unlikely to be affected by dewatering.**

378 **Uncertainty affects analysis quality.** The analysis is relatively uncertain due to the lack of wells
379 with both water level measurements and known well construction. Hence, we relied on interpolated
380 water level data, which may be several feet or even tens of feet incorrect in some areas.

381 **The number of wells affected by groundwater elevations at the Minimum Threshold can**
382 **be mitigated.** Well outage analyses by direct comparison and by wet depth trend analysis show
383 relatively consistent results of additional well outages. If water levels across the basin fall to the
384 minimum threshold as compared to 2015 conditions, that is, 6 - 12% of additional wells through
385 direct comparison, and 6 - 10% of additional wells through trend analysis. This estimated range
386 falls within the percent mitigatable wells margin set by the GSA. Further, a well replacement PMA
387 will be set to address well outage issues that occur below the minimum threshold.

388 Supplementary Information

389 A detailed characterization of construction info for the domestic, public and agricultural well can
390 be demonstrated through cumulative distribution plots. The distribution of depth to the top of the
391 perforated interval follows a similar pattern as well depth: shallow-most top of screens are found in
392 domestic wells, across all formation Figure 14. Figure 15 shows the distribution of total completed
393 depth, and Figure 16 shows the resulting perforation length.

394 Few pumping test data provided on Well Completion Reports submitted to the Department of Water
395 Resources show that both domestic wells and public supply wells have low well yields, by design.
396 As for comparison, agricultural wells tested are generally high production wells with 1000 to 5000
397 gpm (Figure 17). Agricultural wells have casing diameters of typically 12 to 18 inches, while do-
398 mestic wells are mostly of smaller (2 to 8 inch) diameter with 10 inch diameter domestic wells in
399 the Butte Valley Basalt (Qb), perhaps owing to miss-classification (Figure 18).

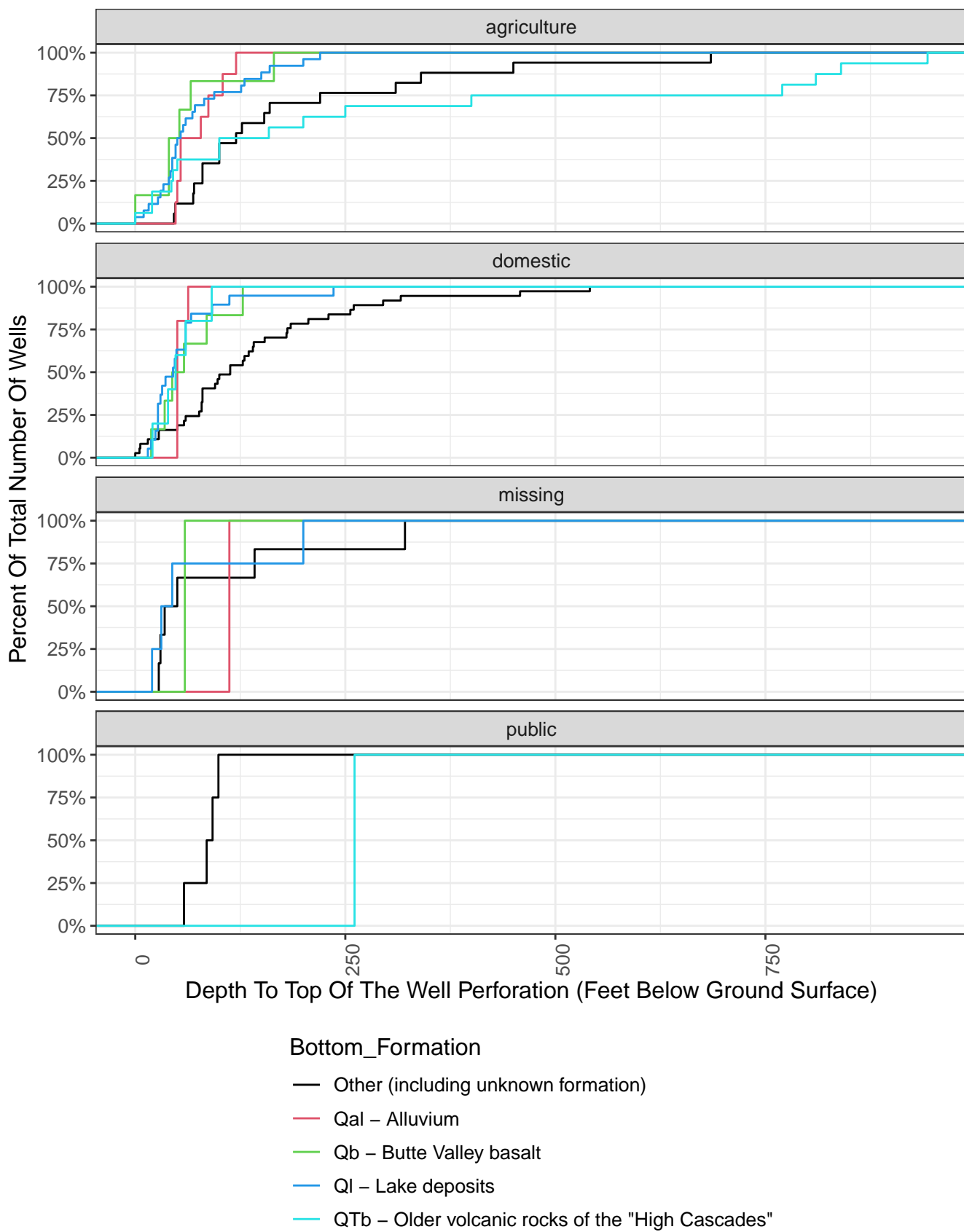


Figure 14: Butte Valley well perforation top. Sub-graphs show cumulative distribution graphs by well type and each graph shows major formations.

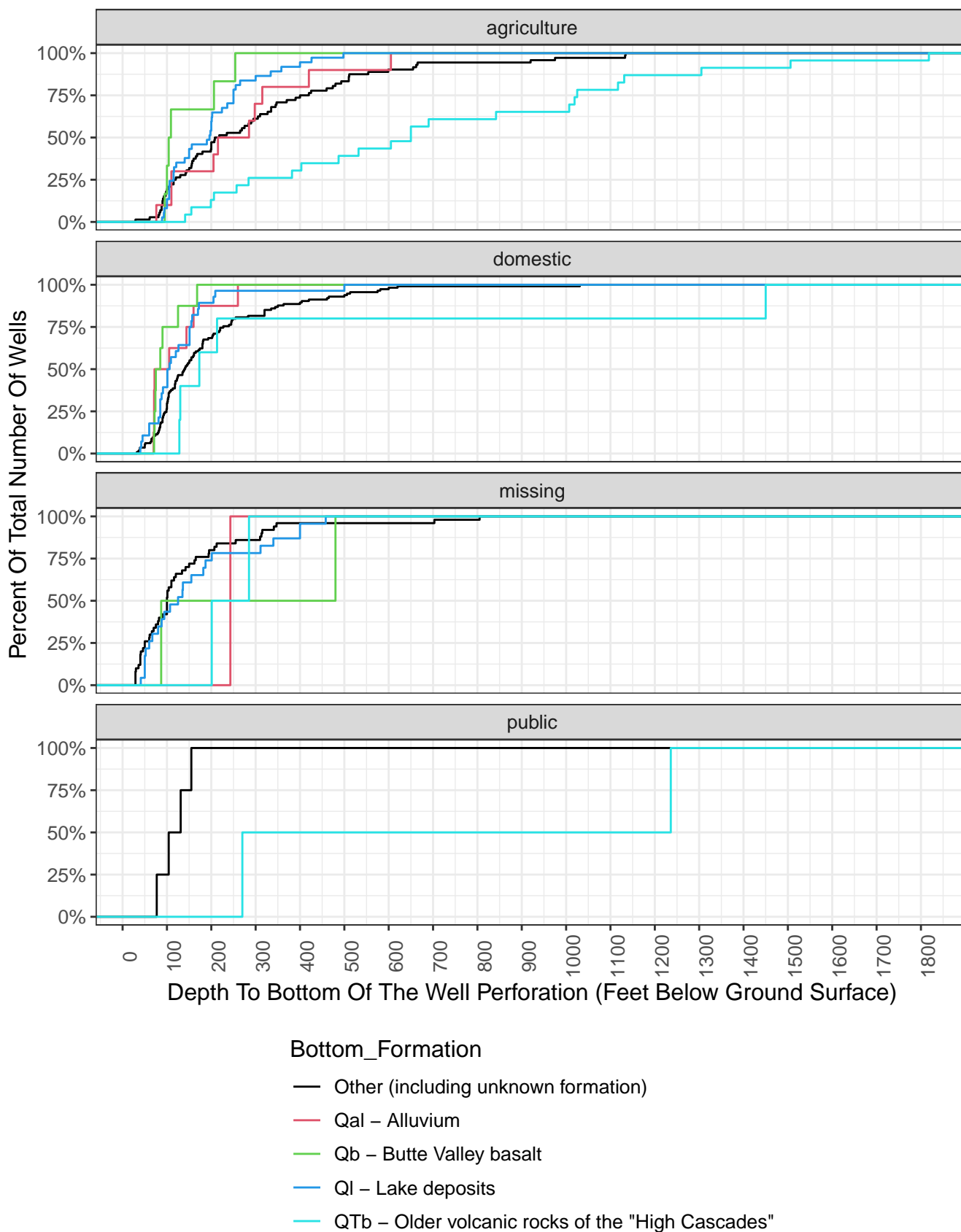


Figure 15: Butte Valley total completed depth for all wells in the valley, including those which have no data on perforated interval. Sub-graphs show cumulative distribution graphs by well type and each graph shows major formations.

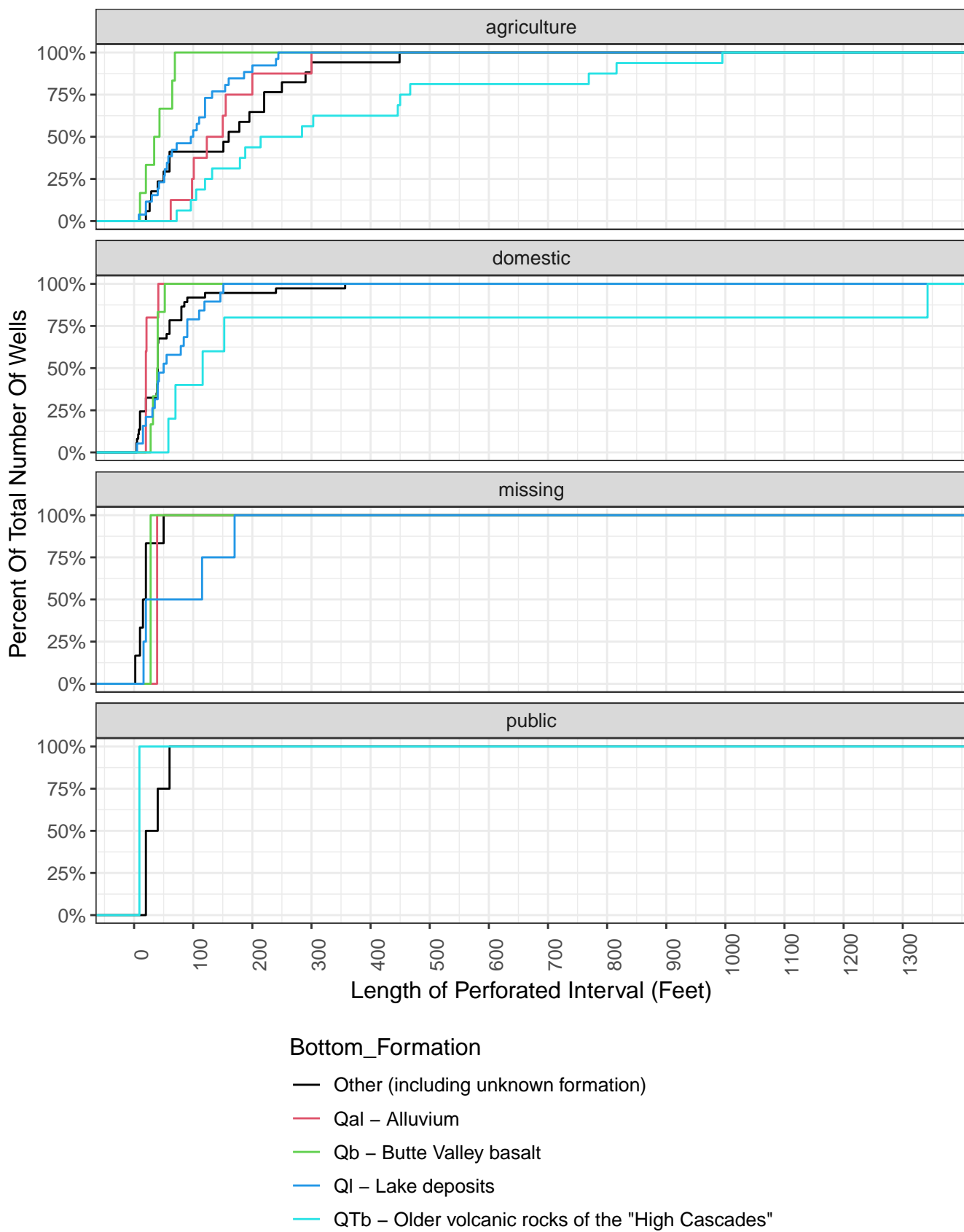


Figure 16: Butte Valley well perforation length. Sub-graphs show cumulative distribution graphs by well type and each graph shows major formations.

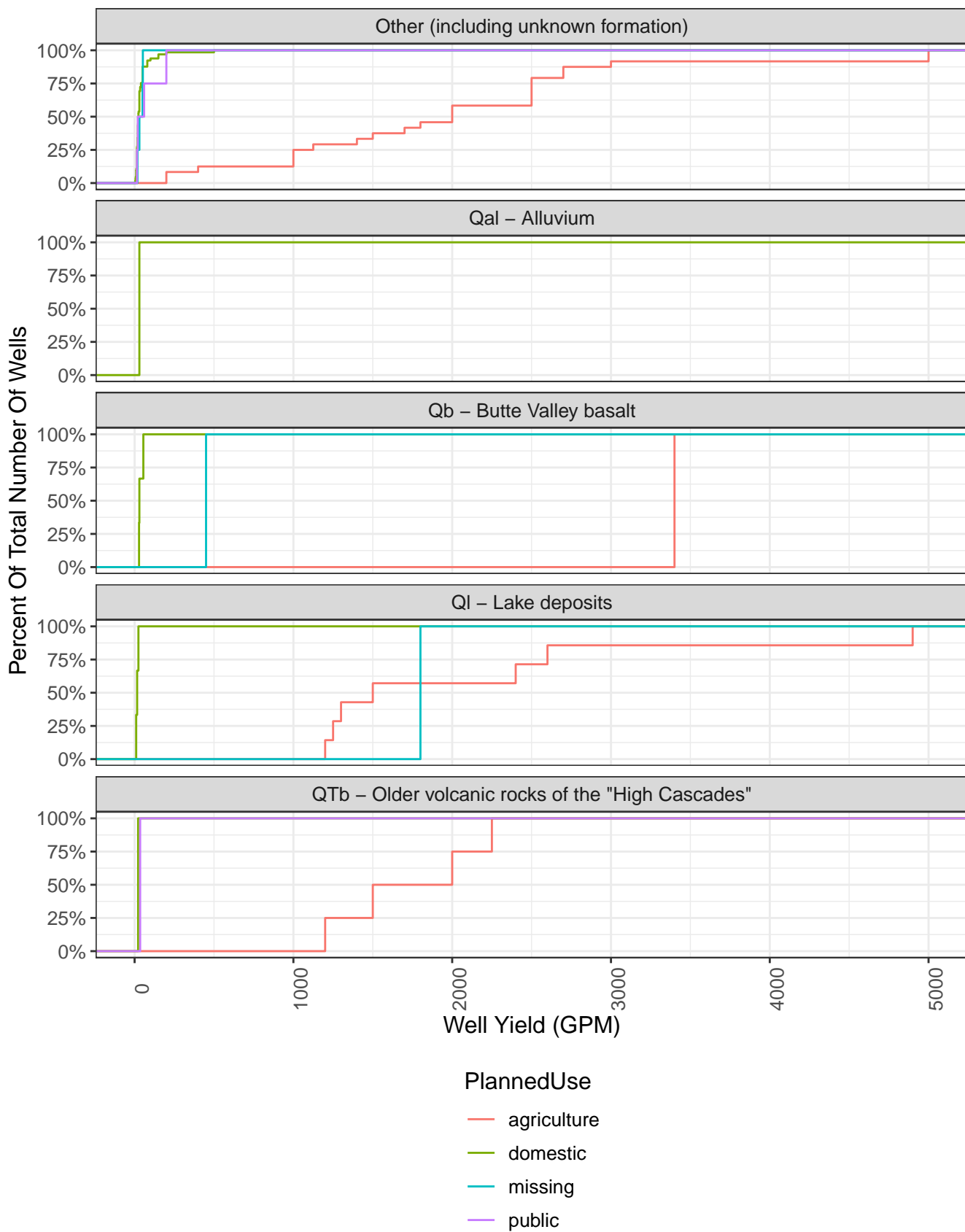


Figure 17: Butte Valley well yield by formation at the bottom of the well comparing major well types

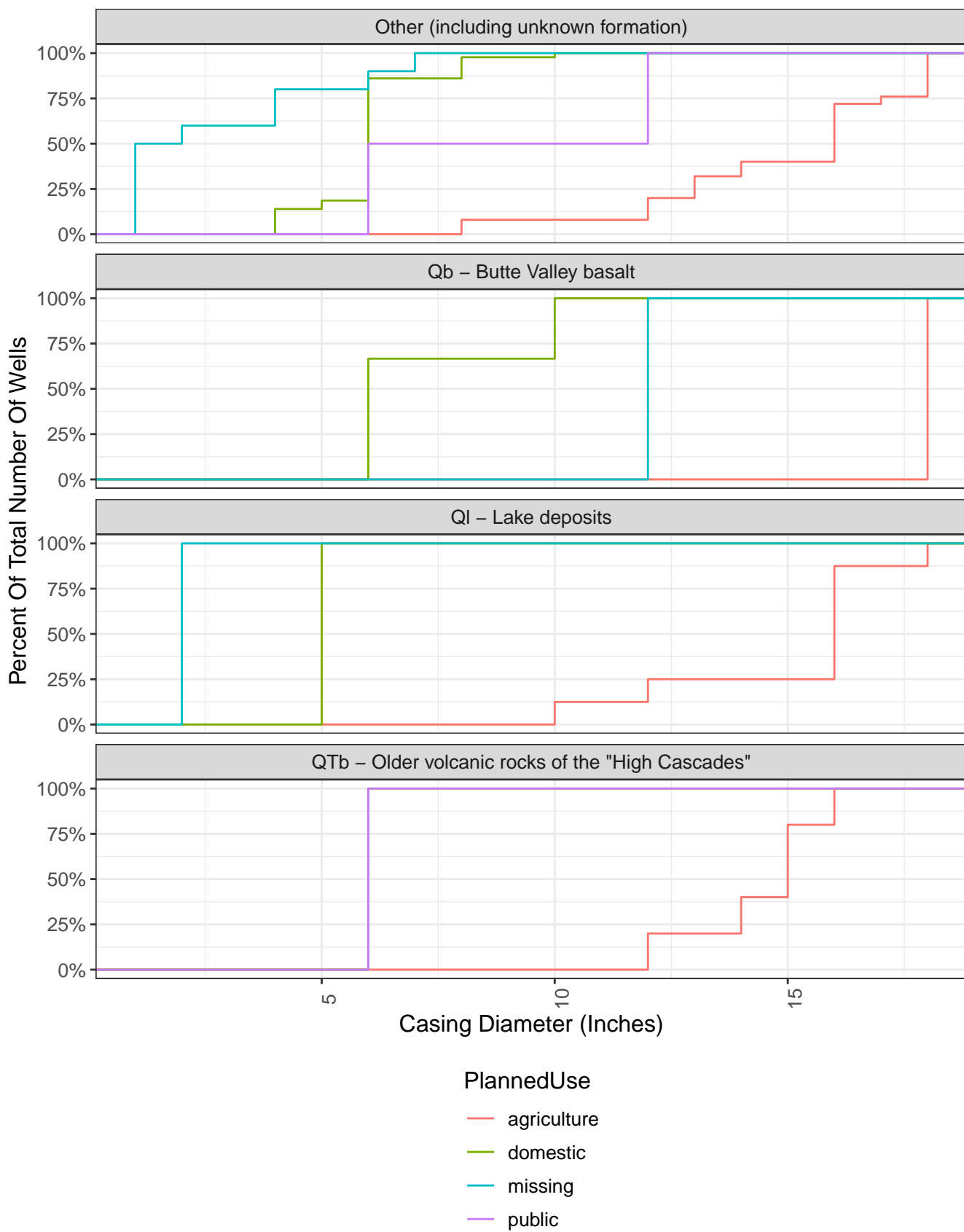


Figure 18: Butte Valley well casing diameter by formation at the bottom of the well comparing major well types