Exhibit 21

Tarawa Terrace Flow and Transport Model Post-Audit

Prepared for
Bell Legal Group
219 Ridge Street
Georgetown, SC 29440

Prepared by

Norman L. Jones
Norm Jones Consulting LLC
4174 N 430 E
Provo, UT 84604

R. Jeffrey Davis
integral
Integral Consulting Inc.
2231 E Murray Holladay Road
Suite 201
Salt Lake City, UT 84117

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CONTENTS

LIST OF FIGURES

LIST OF TABLES

ACRONYMS AND ABBREVIATIONS

ATSDR	Agency for Toxic Substances and Disease Registry
PCE	tetrachloroethylene
GMS	Groundwater Modeling System
MAE	mean absolute error
ME	mean error
NGWA	National Groundwater Association

EXECUTIVE SUMMARY

This post-audit report evaluates the performance of groundwater flow and transport models developed for the Tarawa Terrace region of Camp Lejeune by the Agency for Toxic Substances and Disease Registry (ATSDR). The models were originally designed to simulate the migration of tetrachloroethylene (PCE) contamination from the ABC Cleaners site, located adjacent to the northern boundary of Tarawa Terrace. The audit extends the original model's simulation period from 1995 to 2008 and assesses the accuracy of its predictions by comparing simulated PCE concentrations to actual concentrations measured at monitoring wells during this extended period.

The first step of the audit involved updating the original models, which were created using MODFLOW 96 and MT3DMS software. Both models covered a period between 1951 and 1994. These were successfully updated to MODFLOW 2000 and MT3DMS v5.3, ensuring compatibility with current software versions. Importantly, no significant discrepancies were detected between the original and updated models, confirming that the update process did not alter the results.

The simulation period was then extended to cover the years from 1995 through 2008. During this update, new rainfall and recharge data were incorporated in the MODFLOW model based on nearby weather stations, as the original station's data was incomplete. Additionally, the pumping rates for a set of remediation wells were included, as these wells played a role in altering groundwater flow during this period. The PCE source, which originated from ABC Cleaners and was terminated in the original model at the end of 1983, was left unchanged.

The extended MT3DMS model was found to perform well in simulating PCE concentrations at monitoring wells across the study area. The errors are remarkably well balanced, indicating a good overall fit between simulated and observed concentrations. There were localized discrepancies in error magnitude, particularly in areas where monitoring wells showed significant temporal and spatial variability. Some wells exhibited large fluctuations in measured concentrations over time, which likely resulted from natural subsurface variability, sampling errors, or differences in analytical methods. In other cases, wells showed significant differences in the magnitude of measured concentrations despite being adjacent to one another.

Despite these localized anomalies, the extended MT3DMS model captured the broader patterns of PCE plume migration with reasonable accuracy, particularly during the later years of the simulation. The largest errors were concentrated in a few monitoring wells that were already noted for irregularities in the observed data, but the model's predictions were generally consistent with observed concentrations at most well locations.

In summary, this post-audit found that the original Tarawa Terrace groundwater flow and transport models were developed using sound methodology and continue to provide reliable insights into the migration of PCE contamination. Despite the inherent challenges in simulating complex subsurface conditions and dealing with incomplete data, the model effectively simulates long-term trends in contaminant migration. Based on this post-audit, we can find no significant evidence that would invalidate the analyses performed by ATSDR with the original model.

1 INTRODUCTION

Our names are Norman L. Jones and R. Jeffrey Davis, and we have been asked to provide a post-audit of groundwater flow and transport models originally developed by the Agency for Toxic Substances and Disease Registry (ATSDR). This post-audit included extending both models from 1995 through 2008. Based on this review, effort, and analysis, as more fully described herein, we have reached the conclusions and opinions set forth below. A complete list of all materials relied upon to form the opinions in the report will be produced within seven days of the report's submittal. Our conclusions are subject to any new materials, data, or other information provided to us prior to depositions or trial at which time our opinions and conclusions may be updated.

In July 2007, the ATSDR, U.S. Department of Health and Human Services, published a report on a groundwater flow and transport model of the Tarawa Terrace region of the Camp Lejeune military base (Maslia et al. 2007; Faye and Valenzuela 2008; Faye 2008). The model was developed to simulate groundwater flow in the aquifers beneath Tarawa Terrace and to simulate the migration of tetrachloroethylene (PCE)[1] in the aquifers resulting from the release of PCE by ABC Cleaners, which is directly adjacent to the northern boundary of the Tarawa Terrace property. The original model was developed using the MODFLOW 96 software (USGS 1996) to simulate groundwater flow and the MT3DMS software (Zheng and Wang 1999) to simulate contaminant transport. MODFLOW and MT3DMS are companion programs where the groundwater flow field computed by MODFLOW is used by MT3DMS to simulate the fate and transport of PCE.

The original Tarawa Terrace flow model was designed to simulate flow conditions over a period from 1951 to 1994. The computation grid used by the model consisted of 270 rows and 200 columns, resulting in a uniform grid cell size of 50 ft x 50 ft. In the vertical direction, the model contained seven layers corresponding to a series of hydrogeologic units, including the Tarawa Terrace aquifer and the underlying Castle Hayne aquifer system. Model features include recharge resulting from vertical percolation of water from rainfall, general head boundary conditions on the north simulating exchange (primarily inflow) of water with the aquifer north of Tarawa Terrace, no-flow boundary conditions on the west representing a no-flow boundary along a topographic divide, and specified head boundary conditions on the south and east representing Northeast Creek. The model also included the withdrawal of groundwater via pumping wells and a drain representing potential discharge of groundwater to the channel of Frenchmans Creek on the west side of the model.

For the transport model, PCE was introduced through a single cell corresponding to the ABC Cleaners spill location at a mass loading rate of 1,200 g/day for a period from January 1953 to December 1983, and the resulting plume migration was simulated through the end of the flow

[1] PCE is also known by other names, including tetrachloroethene. In this report we refer to it as tetrachloroethylene.

and transport simulation period in December of 1994. Transport processes simulated include advection, dispersion, sorption, and biodegradation.

The original flow and transport models were calibrated using a multi-stage process. In the first stage, the flow model was calibrated to steady state flow conditions representing a pre-development state prior to the introduction of groundwater extraction wells. It was then converted to a transient model with pumping wells and time-varying recharge over the period of 1951 to 1994. The transient model was calibrated to transient water levels measured at monitoring wells in the region. In the final stage, the MT3DMS transport model was included, and the parameters of both the flow and transport model were adjusted until both the heads simulated by MODFLOW and the concentrations simulated by MT3DMS matched the field-observed heads, flows, and PCE concentrations within a reasonable range.

The objective of the post-audit is to extend the range of the groundwater flow and transport models from 1995 to 2008 and compare the output of the transport model with concentrations sampled at monitoring wells in Tarawa Terrace during the 1995–2008 period to assess the performance of the model as an interpretive and predictive tool. This comparison involved both a quantitative analysis of simulated versus observed concentrations and a qualitative analysis of the shape and migration of the simulated PCE plume over that period.

In the following sections, we described the steps we took to a) import the original model and update it to work with recent versions of MODLOW and MT3DMS, b) extend the flow model to 1995–2008 conditions, c) extend the transport model to 1995–2008 conditions, and d) compare the simulated PCE concentrations to field-observed PCE concentrations over the extended simulation period.

2 IMPORTING AND RUNNING THE ORIGINAL MODEL

To begin the post-audit, we were provided with a copy of the MODFLOW96 and MT3DMS input files used in the original model. We elected to use the Groundwater Modeling System (GMS) software, version 10.8 (Aquaveo LLC 2024) to perform the model updates. The GMS software is developed and distributed by Aquaveo LLC in Provo, Utah. GMS is a graphical user interface for the MODFLOW and MT3DMS codes and works as a pre- and post-processor (Owens et al. 1996). GMS can be used to build new models from scratch, or to import and modify existing models. The model data are then saved by GMS to input files that can be read by MODFLOW/MT3DMS. The model results output by MODFLOW/MT3DMS are then read by GMS where they can be displayed graphically and analyzed numerically.

We began by attempting to import the MODFLOW 96 files. MODFLOW has been continuously updated and improved since it was initially launched in 1984 (McDonald and Harbaugh 1984), resulting in numerous versions. MODFLOW 96 was released in 1996 and was widely used but was updated to MODFLOW 2000 (Harbaugh et al. 2000) and MODFLOW 2005 (Harbaugh 2005) in 2000 and 2005, respectively. More recent versions include MODFLOW-USG (Panday et al. 2013) and MODFLOW 6 (Langevin et al. 2017). While newer versions provide some new capabilities, both MODFLOW 2000 and MODFLOW 2005 are widely used and provide access to all of the model features used in the original Tarawa Terrace model. However, MODFLOW 96 has been mostly discontinued and is not supported by the GMS software. GMS does provide the capability to import MODFLOW 96 files and convert them to newer versions. When we attempted to import the original MODFLOW 96 files to GMS, we discovered that the files would not import properly, and GMS displayed an error message. After some exploration, we determined that we had to make a minor edit to the original WEL (wel.dat). Lines 4 through 13 were changed from a “-1” value to a value of “0.” Once the model was imported, we saved a copy of the model in MODFLOW 2000 format. To import the MT3DMS files, we had to manually update the mass loading of 1,200 g/day in GMS from January 1953 through December 1983. This was due to an outdated version of the Source Sink Mixing (SSM) package used in the original simulation. The MT3DMS files were saved in an updated format compatible with the current version of MT3DMS (v5.3) used by GMS.

After importing and converting the MODFLOW and MT3DMS files and saving them to the newer formats, we re-ran the flow and transport simulations and imported the solutions to GMS. At this point, we performed a qualitative analysis to ensure that the process of converting the files and updating to the newer versions did not change the model outputs. First, the simulated head contours from the updated flow model were compared to the head contours described in the ATSDR modeling report (Faye and Valenzuela 2008) as shown in Figure 1. The results of the updated model seem to match the results of the original model. Next, we compared PCE concentrations simulated by the updated MT3DMS model and to the concentrations simulated by the original MT3DMS model (Figure 2). Once again, the results seem to match well, indicating that no errors were introduced to the model in the conversion process.

3 EXTENDING THE FLOW MODEL

After confirming that the flow and transport simulations were properly imported and updated, we proceeded to modify both the flow and transport simulations for the post-audit. The changes made to the MODFLOW model are described in this section. The only changes made to the MODFLOW model were to extend the simulation period, update recharge values over the new period, and modify the pumping rates at remediation wells. No other changes were made to simulation settings or boundary conditions and sources/sinks.

3.1 SIMULATION PERIOD

The original simulation was from January 1951 through December 1994. We extended the simulation period through December 2008 so that the simulation included the period from 1995 to 2008. For the new simulation, no changes were made to the inputs for the original 1951–1994 period and thus the model solution for that period remained unchanged in the new model. For 1995–2008, we used the same stress period interval used in the original model, with monthly stress periods and one time step per stress period.

3.2 RAINFALL-RECHARGE

For the original flow model, the primary source of water to the aquifer was input from precipitation that infiltrated to the water table, which is simulated in MODFLOW as recharge where the units are length/time (feet/day). In the original model, a single annual recharge rate was used for each year of the simulation as illustrated in Table C7 of Faye and Valenzuela (2008). The recharge rate was found by applying a recharge coefficient of 0.235 to the annual precipitation to find an effective recharge rate representing the fraction of rainfall that percolates to the water table. This recharge rate is then entered into the Recharge Package in MODFLOW, and the package applies water to the top active cell during each stress period.

The precipitation values used in the original simulation were obtained from the Maysville-Hofman Forest station, which is north of Tarawa Terrace. For the post-audit, we attempted to obtain precipitation data from the same station. We found three different precipitation data sets that were purported to be from the Hofman Forest station, but each of these data sets was determined to be unusable. None of the data sets had a complete set of precipitation data for the 1995 to 2008 period. Furthermore, for the partial data during the period of interest, one of the data sets contained some extreme anomalies in monthly precipitation that did not appear in neighboring rain gauge stations. As a result, we elected to use rain gauge data from other stations in the vicinity of Tarawa Terrace. Using the National Oceanic and Atmospheric Administration National Weather Service website (National Weather Service 2024), we located three rain gauges near Tarawa Terrace that had a complete set of rainfall measurements during the period 1995 to 2008. The locations of these gauges relative to Tarawa Terrace are shown in

Figure 3. The mean rainfall for each of these gauges over the 1951 to 1994 period is similar to the mean rainfall for the Hofman Forest station over the same period, and the annual variations were in a consistent range. Thus, we took a simple average of each of the three stations over the 1995 to 2008 period to estimate the average annual rainfall at Tarawa Terrace and multiplied these averages by 0.235 to get the effective recharge rate and converted it to units of feet/day for use in the extended MODFLOW simulation. The rainfall values, averages, and effective recharge rates are summarized in Table 1.

3.3 PUMPING AT WELLS

Another change to the MODFLOW model over the extended simulation period was related to pumping associated with a set of remediation wells. These wells withdraw water from the aquifer, thus impacting both the flow field and the subsequent movement of contaminants simulated by the MT3DMS simulation. We were provided with a list of remediation wells and their pumping history for a period beginning in 1999 and continuing through the end of 2008. The well names, coordinates, model layers, and pumping histories over the period of interest are shown in Table 2. In each case, the pumping rates were turned on for each well at the rates shown on the corresponding dates and held constant at that rate until the next rate change or until the wells were turned off. All the other pumping wells in the model had zero pumping rates during the extended simulation period. The locations of the remediation wells are shown in Figure 4.

4 EXTENDING THE TRANSPORT MODEL

For the transport model, no changes were required to the MT3DMS inputs for the extended simulation period, except for enabling the Transport Observation package. The same dynamic transport step options used in the original model were applied to the new stress periods from 1995 to 2008. The PCE source at the location of the ABC Cleaners facility was turned off at the end of 1983, matching the original model.

4.1 OBSERVED CONCENTRATIONS

The main objective of extending the flow and transport simulation was to assess the performance of the model in simulating the migration of the PCE plume over the extended period and to compare the simulated PCE concentrations to PCE concentrations observed at monitoring wells during the 1995–2008 period. A list of the monitoring wells is shown in Table 3, the PCE concentrations observed at the wells in Table 4, and the locations of the wells in Figure 5. As presented in Table 4, the samples were all taken at 12 distinct dates beginning in 1997 and ending in 2008. The model layers associated with each well were determined by comparing the well screen depths with the grid cell top and bottom elevations for the grid cells containing the monitoring well locations and confirmed by documents provided by counsel (Weston ABC One-Hour Cleaners Dataset).

The monitoring well locations and the observed concentrations were imported as observation points in an “observation” coverage (spatial features layer) in the Map Module of the GMS software. This information was then linked by GMS to the MT3DMS Transport Observation package, which was turned on and used in the simulation. This allows MT3DMS to calculate the simulated PCE concentrations at the cells containing the observation wells and output the results in a format that we could easily access and use in our analysis.

4.2 TEMPORTAL AND SPATIAL ANOMALIES

While the observed concentrations at each monitoring well listed in Table 4 are generally consistent over time, there are some exceptions that should be noted. For Well C13 in Model Layer 3, the observed concentration of 5,400 μg/L in 2002 is an order of magnitude higher than any subsequent concentrations observed at the same well and is substantially higher than all other concentrations but one. The highest concentration of 6,900 μg/L was measured at Well RWS-4A in Layer 1. The observed concentrations at this well showed extreme fluctuations over time. The observed concentration of 280 μg/L in January 2002 was followed only 3 months later by an observed concentration of 6,900 μg/L—the highest value measured. Then for the sequence of observations from 2003 to 2007, the concentrations oscillated from 1,100 → 0 → 1,000 → 92 → 1,600. This high degree of fluctuation could be due to sampling errors, differences in analytical techniques, and/or extreme heterogeneity in aquifer properties near the well.

In addition to variations over time, there are spatial variations in the observed concentrations. Well FWS-13 has zero or low (<5 μg/L) observed concentrations over the entire range of sampling dates. However, as shown in Figure 5, it is immediately adjacent to FWS-12, RWS-3A, and RWS-4A, all of which show high concentrations over the entire range of sampling dates. Likewise, in Model Layer 3, monitoring well C12 has low observed concentrations despite being adjacent to RWC-2, which has high concentrations. Furthermore, Wells FWC-11 and C5 have zero or low (<5 μg/L) observed concentrations over all sampling dates and are relatively close to C3, which has high concentrations over most dates. C14 has high concentrations over the four dates sampled despite being directly adjacent to C13, C15-S, C15-D, and C16, all of which have low concentrations on those dates.

This temporal and spatial variability in concentrations at selected wells illustrates the extreme variability often seen when dealing with concentration data from monitoring wells. It highlights why focusing on absolute concentrations at specific dates and locations when analyzing the performance of a flow and transport model is less important than assessing the overall distribution of simulated concentrations and comparing the shape of the simulated plume with the general spatial distribution of observed concentrations. Each of these sites with high variability is generally correlated with higher model error, as shown below in the Results section.

5 RESULTS

The main objective of this post-audit is to assess the performance of the flow and transport model over the extended period of 1995 to 2008 using PCE concentrations observed in monitoring wells over that period. Before presenting the results, it is helpful to remember that when simulating the migration of a PCE contaminant plume using MODFLOW and MT3DMS, achieving a close match between simulated and observed concentrations can be challenging for several reasons:

1. **Complex Subsurface Conditions**: The subsurface environment is inherently complex, with variations in soil heterogeneity, permeability, porosity, and hydraulic conductivity. These properties vary spatially in ways that are not fully captured in the model, affecting how the contaminant plume moves through the groundwater system.
2. **Temporal Variability**: The concentration of contaminants can change over time due to factors like seasonal variations in groundwater flow, biodegradation, and chemical reactions. Simulating these dynamic processes accurately over the entire simulation period is challenging.
3. **Limitations in Model Resolution**: MODFLOW and MT3DMS rely on discretizing the subsurface into numerical grids consisting of cells that represent a subset of the aquifer. The resolution of these grids can limit the model's ability to capture fine-scale variations in plume behavior, particularly in areas with sharp concentration gradients, small-scale heterogeneities, or preferential pathways.
4. **Measurement Variability**: The observed concentrations at observation wells may contain some degree of measurement error or uncertainty. Field data collection is subject to variability, which adds another layer of complexity when trying to match it closely with model outputs. As outlined above in Section 4.2, extreme variations were observed in some of the measured concentrations used in this post-audit.

Each of these challenges was highlighted in the Faye (2008) report on pp. F44–45. It was reported that at several sites, measured concentrations varied by several orders of magnitude over a few feet of depth.

Given these challenges, it is important to qualitatively assess the overall behavior of the simulated plume in addition to quantitatively analyzing the differences in simulated and observed concentrations at specific times and locations. A qualitative evaluation helps ensure that the model captures the key processes governing plume migration, such as its general direction, spread, and interaction with sources, sinks, and aquifer boundaries. This broader perspective can offer valuable insights into the overall value of the model as an interpretive or predictive tool.

After running both the extended MODFLOW and MT3DMS simulations, we analyzed the resulting PCE concentrations at a set of monitoring well locations and compared them to the observed concentrations. In the MT3DMS simulation, the spill at ABC Cleaners was simulated using a mass loading rate of 1,200 g/day at a single cell from January 1953 to December 1983 as described in Faye (2008). We did not alter this mass loading rate for the extended simulation. The resulting concentrations computed by the MT3DMS model are in units of grams/cubic foot. We converted these concentrations to units of micrograms/liter by multiplying the MT3DMS concentrations by a conversion factor of 35,314.7. We chose to present the simulated concentrations in micrograms/liter to match the units used in the original Faye (2008) report. This was applied to both the simulated concentrations at monitoring well locations and to the gridded data used to display the migration of the PCE plume.

5.1 MONITORING WELLS

A complete list of the observed and simulated concentrations at the monitoring well locations is shown in Table 5. The “Error” column represents the difference between the simulated and observed concentrations, and the “Abs(Error)” column is the absolute value of the error. These observations were sampled at a unique set of time periods as shown in Table 4. Taking all values into consideration, the mean error (ME) = 21 μg/L, indicating that the positive and negative errors are well balanced. The mean absolute error (MAE) = 334 μg/L.

These concentration values are displayed on a scatter plot of simulated concentrations versus observed concentrations in Figure 6. Because this is a log-log plot, it does not show values where either the simulated or observed concentrations are zero. The results are similar to the results for the original model shown in Figure F12 on p. F33 of the Faye (2008) report; although in this case, there are far more samples to compare. The dashed line in Figure 6 indicates a perfect match between the simulated and observed values. The points on the plot are mostly centered on the line, but as was the case with the original model, the simulated values appear to be biased on the high side, with the simulated values greater than the observed values. However, when the sites with zero observed or simulated concentrations (not shown on Figure 6) are factored in, the errors are balanced, as indicated by the low ME (21 μg/L) reported above.

We calculated a scatter plot of simulated versus observed concentrations for each monitoring well location where both the simulated and observed concentrations are non-zero, and the plots are shown in Figure 7. While there is high variability at some sites, most of the sites show good agreement.

Next, we generated time series plots of simulated versus observed concentrations at monitoring well locations. The results are shown in Figure 8. For Sites C1, S8, and S11, both simulated and observed concentrations were zero for all measurement dates. In general, the simulated and observed curves become closer as the simulation progresses. It should be noted that the vertical scale on each plot is variable, and the magnitude of the differences between simulated and observed concentrations can vary greatly from one plot to the next.

5.2 MIGRATION OF PCE PLUME

To get a qualitative understanding of the of the spatial distribution of the simulated PCE plume versus time and how it correlates with the temporal and spatial distribution of the observed PCE concentrations, we next generated a series of maps showing the simulated PCE plume in Model Layers 1, 3, and 5 at selected sampling dates (Figures 9–13). For each date, we overlaid the monitoring wells that were sampled on that date in each layer. The intervals and colors for the simulated PCE plume contours were selected to match those used in Figures F18–F25 in the Faye (2008) report. The monitoring well symbols are colored based on the relative magnitude of the absolute error at that date.

The results for each of the sampling dates are generally consistent. The spatial distribution of green and yellow symbols at monitoring well locations shows good overall fit of the simulated plume relative to observed concentrations, especially at the later sampling dates. The larger errors tend to be concentrated in the center of the plume where the simulated concentrations are greater. This is somewhat expected because comparing larger numbers will organically result in larger differences. Furthermore, the high errors generally coincide with the monitoring wells exhibiting high temporal and spatial variation, as described in Section 4.2. The wells identified in that section with extreme variability include FWS-13, RWS-4A, RWC-2, FWC-11, C5, and C14, all of which exhibit high errors. Other wells, such as S3 and S5, have high errors in the earlier dates but are in better agreement at later dates when the high simulated concentrations in the center of the plume dissipate over time.

To further compare the spatial distribution of the PCE plume with the PCE concentrations observed at monitoring wells, we took the errors and absolute errors from Table 5 and calculated the ME and MAE at each monitoring well location. The results are tabulated in Table 6. These MAE values were then used to create the maps shown in Figures 14–16. There is a separate map for each of the Model Layers 1, 3, and 5. In each figure, the MAE magnitudes for each monitoring well are displayed at the monitoring well locations and are superimposed on contour plots of the simulated PCE plume. The MAE error norm represents errors from multiple sampling dates, and the footprint of the plume migrated over time as illustrated previously in Figures 9–13. However, the intent here is to illustrate the spatial distribution of the error relative to the overall plume footprint, and the plume footprint is at the largest state at this point in the simulation, so it represents a useful basis of comparison.

The PCE plume for December 2008 for Model Layer 1 and the MAE at monitoring wells located in Layer 1 are shown in Figure 14. The errors at the wells are color-coded for three ranges, as shown in the figure legend. The spatial distribution of the errors indicates that there is a good overall agreement between the shape of the plume and the observed PCE concentrations at the monitoring wells. The wells with the highest errors are Wells FWS-13 and RWS-4A, which were noted in Section 4.2 as having high temporal and spatial anomalies. The simulated PCE plume for Layer 3 for the same date and the errors for monitoring wells in Layer 3 are shown in Figure 15. Once again, most of the wells on the fringes of the plume are in good agreement.

The highest errors are at Wells FWC-11, C5, C13, C14, and RWC-2, which were identified in Section 4.2 as having high anomalies. The simulated PCE plume and errors for Layer 5 are shown in Figure 16. This layer contained only two monitoring wells, and the errors are low.

In summary, the 7 wells identified as having anomalies in the observed data have high errors while the remaining 30 wells exhibit low or moderate errors, indicating good overall agreement between the simulated PCE plume and the observed concentrations over the range of the extended simulation.

6 CONCLUSIONS

Our conclusions from the post-audit analysis are as follows:

1. **Model Import and Update**: The original MODFLOW and MT3DMS models were successfully imported and updated to modern versions (MODFLOW 2000 and MT3DMS v5.3), ensuring compatibility with current software. The updated models matched the original model outputs, validating the update process.

2. **Extended Simulation Period**: The flow and transport models were extended from the original period (1951–1994) to cover the period from 1995 to 2008. Modifications included updating the recharge data based on new precipitation data and incorporating pumping rates for the remediation wells. The PCE source at ABC Cleaners was left unchanged, consistent with the original simulation ending in 1983.

3. **Observed vs. Simulated Concentrations**: The post-audit revealed that the updated MT3DMS model adequately simulated PCE concentrations at monitoring wells over the extended period. While there was a high variability at some monitoring well locations, the errors are remarkably well balanced, indicating a good overall fit between simulated and observed concentrations.

4. **PCE Plume Migration**: The extended model captured the overall migration of the PCE plume between 1995 and 2008. Simulated plumes were consistent with observed concentrations at most monitoring wells, especially during the latter stages of the simulation. The largest discrepancies occurred at a relatively small subset of wells that exhibited high temporal and spatial variability in observed concentrations. This variability may be due to sampling errors, aquifer heterogeneity, or variations in analytical methods.

5. **Model Performance**: The model performance was evaluated using both qualitative and quantitative methods. Despite challenges inherent in simulating subsurface flow and transport, such as soil heterogeneity, data uncertainty, and model resolution limits, the model reasonably captured the key behaviors of the PCE plume. The high variability in certain well measurements introduced some error but did not significantly undermine the model's overall accuracy.

In summary, the extended model demonstrates that the original model was developed using sound methods, and the model remains a reliable tool for understanding the general trends of contaminant migration in the Tarawa Terrace region. Based on this post-audit, we can find no significant evidence that would invalidate the analyses performed by ATSDR with the original model.

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[2] Reference will be updated.

8 QUALIFICATIONS

I, **R. Jeffrey Davis**, P.E., CGWP, have almost 30 years of experience with civil and environmental engineering, hydrogeology, groundwater fate and transport modeling, and software and model development. I have both undergraduate and graduate degrees from Brigham Young University in civil engineering. I currently serve on the board of directors for the National Ground Water Association (NGWA), as well as on NGWA's per- and polyfluoroalkyl substances and Managed Aquifer Recharge advisory groups. I was one of the leads for NGWA's Groundwater Modeling Advisory Panel. I have developed and used numerous groundwater models for the agricultural industry and the mining industry, including projects involving environmental impact statements, environmental assessments, water management, groundwater–surface water interaction and contamination, dewatering, and water treatment. I also have extensive experience with the oil and gas industry, including water supply, hydraulic fracturing, and groundwater protection for the upstream market, and worked on a variety of oil release projects. I have extensive knowledge of groundwater flow-and-transport principles and have led numerous workshops and classes in the United States and around the world. I have taught several classes and workshops in association with NGWA and other professional organizations and universities for the past 3 decades. I also share my research and project work regularly with the professional societies with which I am affiliated. I frequently use groundwater models to explain fate and transport of contaminants or groundwater supplies and availability. Recent such examples include groundwater impacts from agricultural activities in Minnesota; aqueous film-forming foam contamination impacts to groundwater in Martin County, Florida; a pipeline of produced water spill in North Dakota; and groundwater availability and surface water impacts in Ventura County, California. I am regularly asked to provide opinions or participate on panels to discuss groundwater, water supply, or contaminated groundwater issues.

I, **Norman L. Jones**, Ph.D., have 33 years of experience in civil and environmental engineering. I graduated with a B.S. degree in civil engineering from Brigham Young University and with M.S. and Ph.D. degrees in civil engineering from the University of Texas at Austin. I have been a faculty member in the Civil and Construction Engineering Department at Brigham Young University since January 1991 where I currently hold the rank of Professor. I have taught university courses in a variety of subjects, including computer programming, soil mechanics, seepage and slope stability analysis, and groundwater modeling. The primary focus of my research has been groundwater flow and transport modeling, software development, remote sensing, groundwater sustainability analysis, and hydroinformatics. I was the original developer of the GMS software, which is a graphical user interface for MODFLOW and MT3DMS and is used by thousands of organizations all over the world. GMS is now developed and maintained by Aquaveo, LLC in Provo, Utah, a company that I helped found in 2007. I have taught numerous short courses on groundwater flow and transport modeling over my career. I am a member of the Hydroinformatics Research Laboratory at Brigham Young University. I have been the principal or co-investigator on more than $20M of externally funded research. I have authored 179 technical publications, including 88 peer-reviewed journal articles, and 1 book. I am a recipient of the Walter L. Huber Civil Engineering Research Prize from the American Society of Civil Engineers and the John Hem Award for Science and Engineering from NGWA. I have been involved in a number of consulting projects, including work as a technical expert in litigation cases. I am an active member of the American Water Resources Association, the NGWA, the American Geophysical Union, and the American Society of Civil Engineers.

9 COMPENSATION

My, **R. Jeffrey Davis**, experience is summarized in my resume, which is included as Exhibit 1. I am being compensated at a rate of $498 an hour for my time in preparation of this report and $498 an hour for my deposition and trial testimony, if necessary. My compensation is not contingent upon the opinions I developed or the outcome of this litigation case.

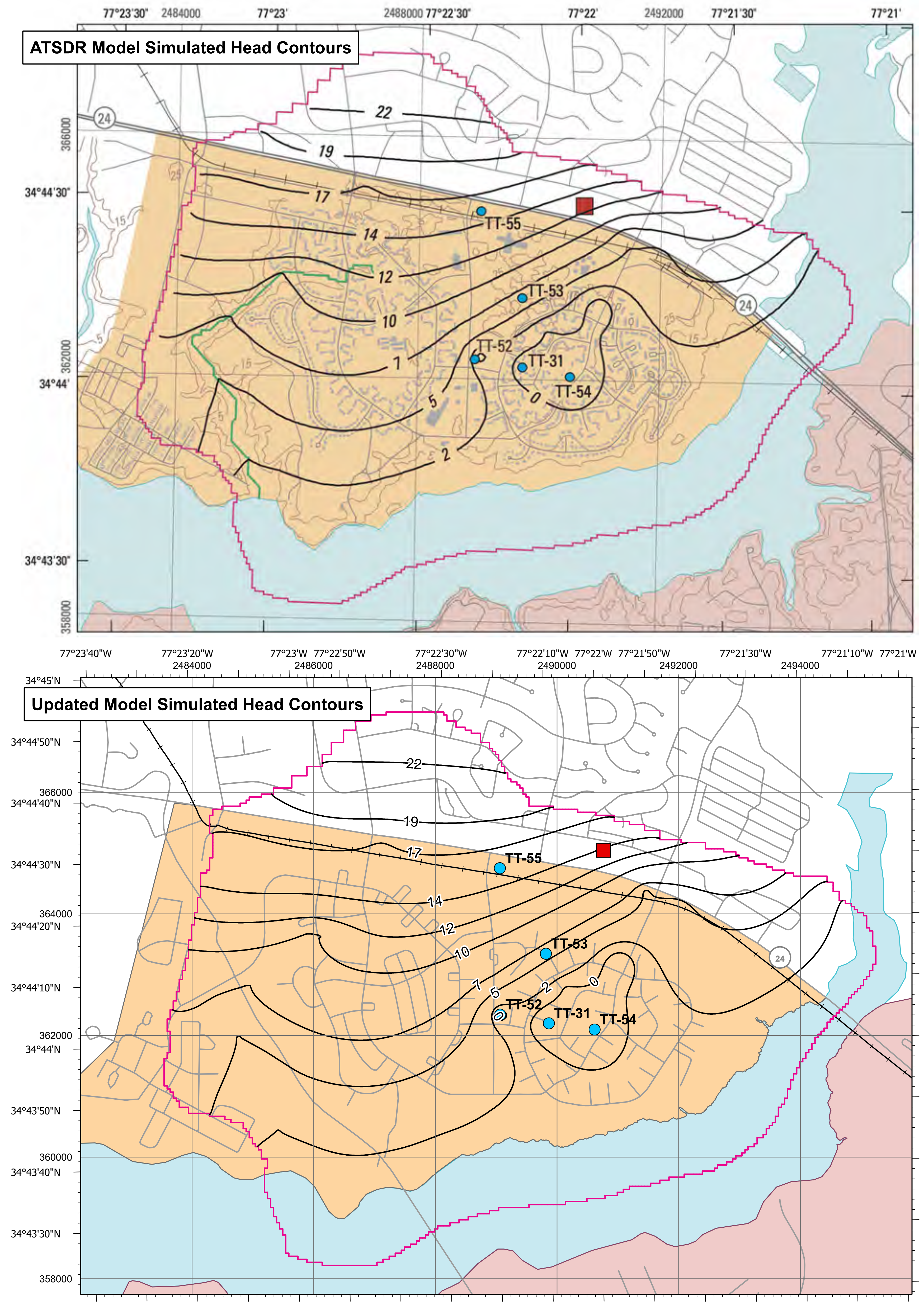
My, **Norman L. Jones**, experience is summarized in my resume, which is included as Exhibit 2. I am being compensated at a rate of $500 an hour for my time in preparation of this report and $1,000 an hour for my deposition and trial testimony, if necessary. My compensation is not contingent upon the opinions I developed or the outcome of this litigation case.

10 PREVIOUS TESTIMONY

I, **R. Jeffrey Davis**, have not given any deposition or trial testimony in the last 4 years.

I, **Norman L. Jones**, gave deposition testimony on October 20, 2021, in MICHAEL YATES and NORMAN L. JONES vs TRAEGER PELLET GRILLS LLC, in the United States District Court for the District of Utah Central Division, Case No. 2:19-cv-00723-BSJ. With the exception of this case, I have not given any deposition or trial testimony in the last 4 years.

Figures



Historical Water Supply Area

- Holcomb Boulevard
- Tarawa Terrace
- Model Boundary

- Simulated Potentiometric Contour (ft)
- Pumping Water Supply Well
- ABC One-Hour Cleaner
- Road

0 1,000 2,000
Feet

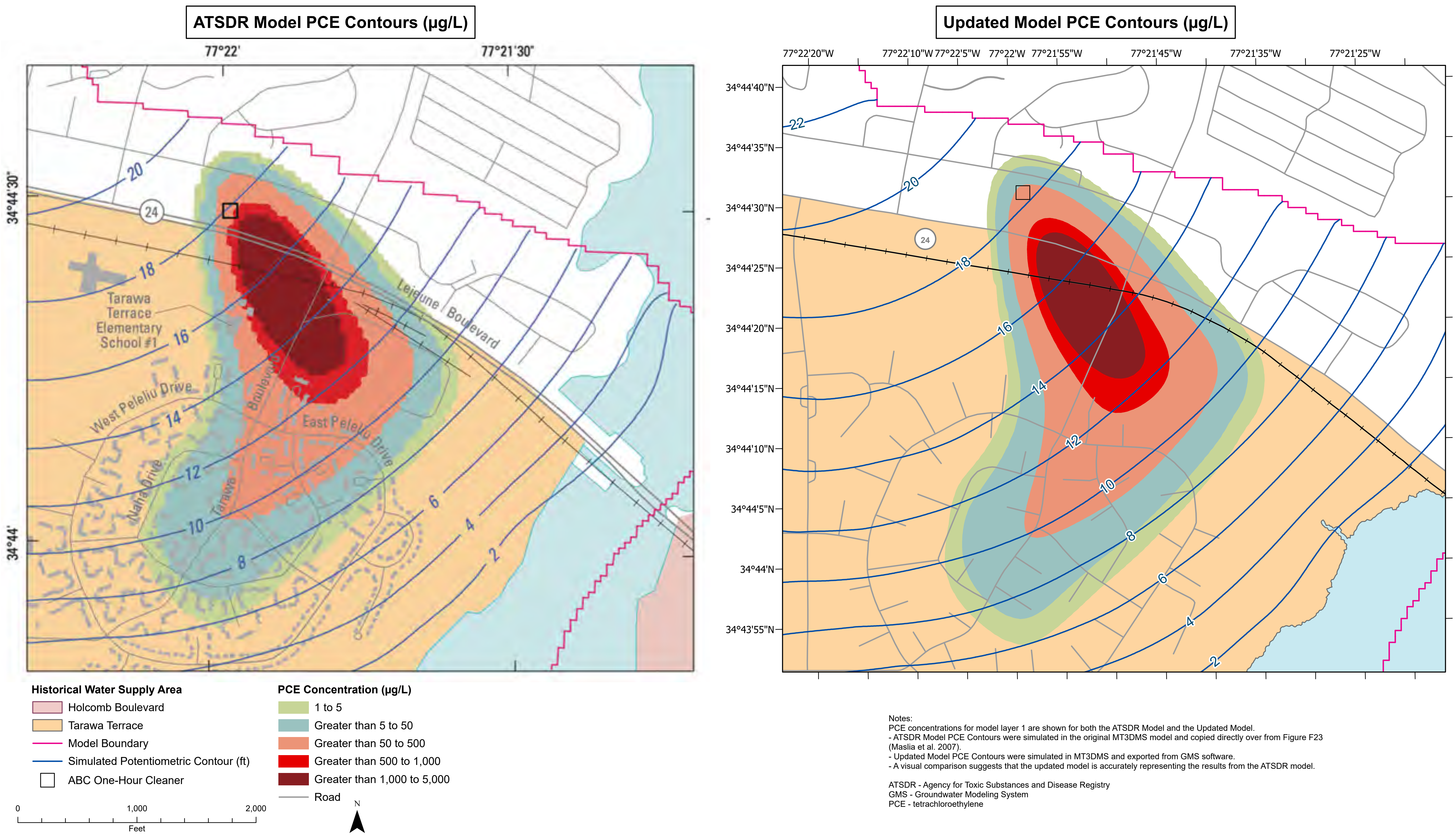
N

Notes:
- Head contours for model layer 1, stress period 408 - December 1984 are shown for both the ATSDR Model and the Updated Model.
- ATSDR Model-Simulated Head Contours were simulated in MODFLOW 96 and copied directly over from Figure C.18 (Maslia et al. 2007).
- Updated Model-Simulated Head Contours were simulated in MODFLOW 2000 and exported from GMS software.
- A visual comparison suggests that the updated model is accurately representing the results from the ATSDR model.
- Historic water supply areas were estimated from Figure C.18.

ATSDR = Agency for Toxic Substances and Disease Registry
GMS = Groundwater Modeling System

integral consulting inc.

Figure 1.
Comparison of Original Model-Simulated Head Contours to Updated Model-Simulated Head Contours
Tarawa Terrace Flow and Transport Model Post-Audit



Notes:
PCE concentrations for model layer 1 are shown for both the ATSDR Model and the Updated Model.
- ATSDR Model PCE Contours were simulated in the original MT3DMS model and copied directly over from Figure F23 (Maslia et al. 2007).
- Updated Model PCE Contours were simulated in MT3DMS and exported from GMS software.
- A visual comparison suggests that the updated model is accurately representing the results from the ATSDR model.

ATSDR - Agency for Toxic Substances and Disease Registry
GMS - Groundwater Modeling System
PCE - tetrachloroethylene

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Figure 2.
Comparison of Original Model-Simulated PCE Concentrations
to Updated Model-Simulated PCE Concentrations
Tarawa Terrace Flow and Transport Model Post-Audit

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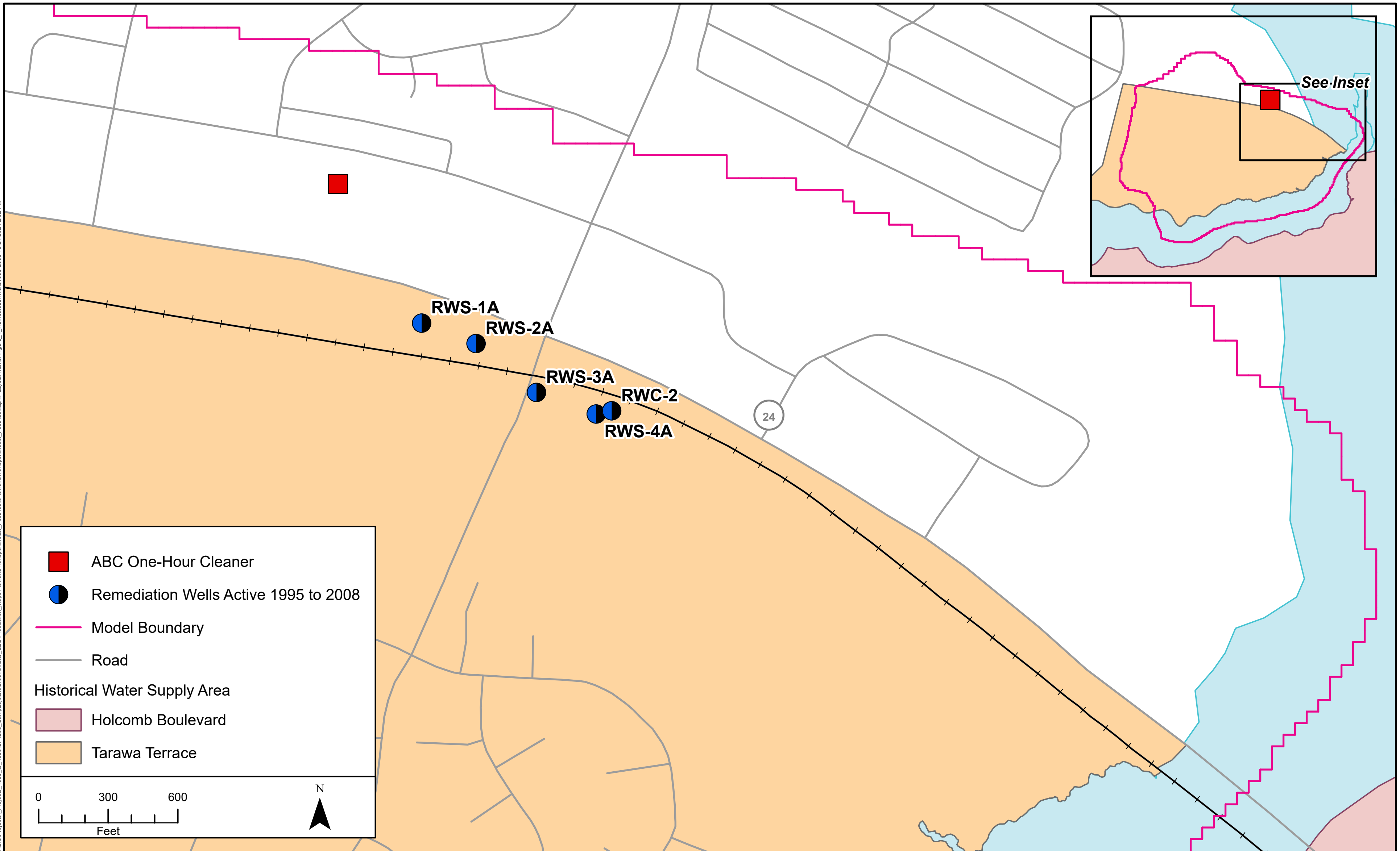
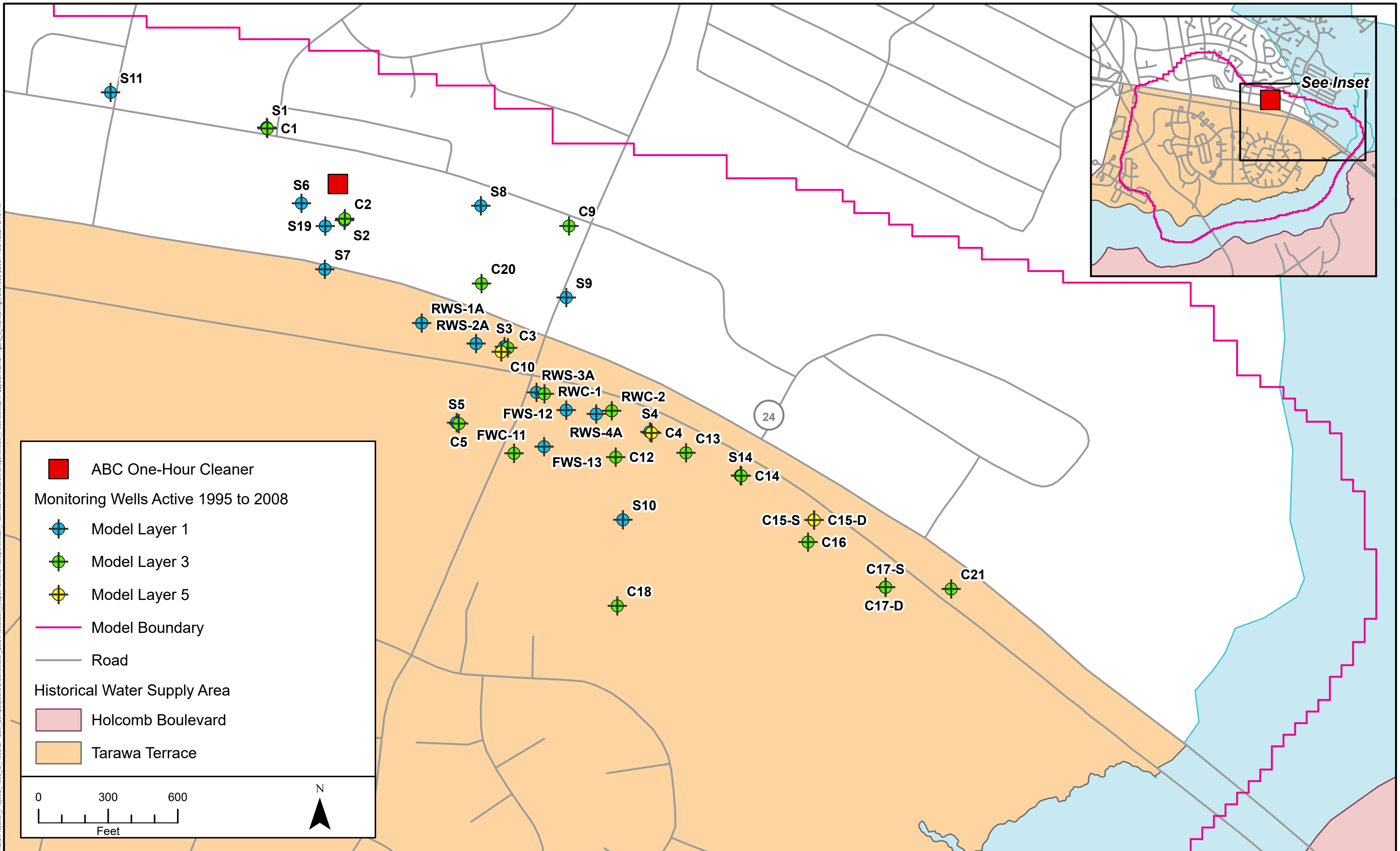
integral consulting inc.

Figure 3.
National Weather Service Rain Gauge Locations Selected for Extended Simulation
Tarawa Terrace Flow and Transport Model Post-Audit



integral consulting inc.

Figure 4.
Location of Remediation Wells Active During the 1995 to 2008 Period
Tarawa Terrace Flow and Transport Model Post-Audit



integral consulting inc.

Figure 5.
Location of Monitoring Wells Active During the 1995 to 2008 Period
Tarawa Terrace Flow and Transport Model Post-Audit

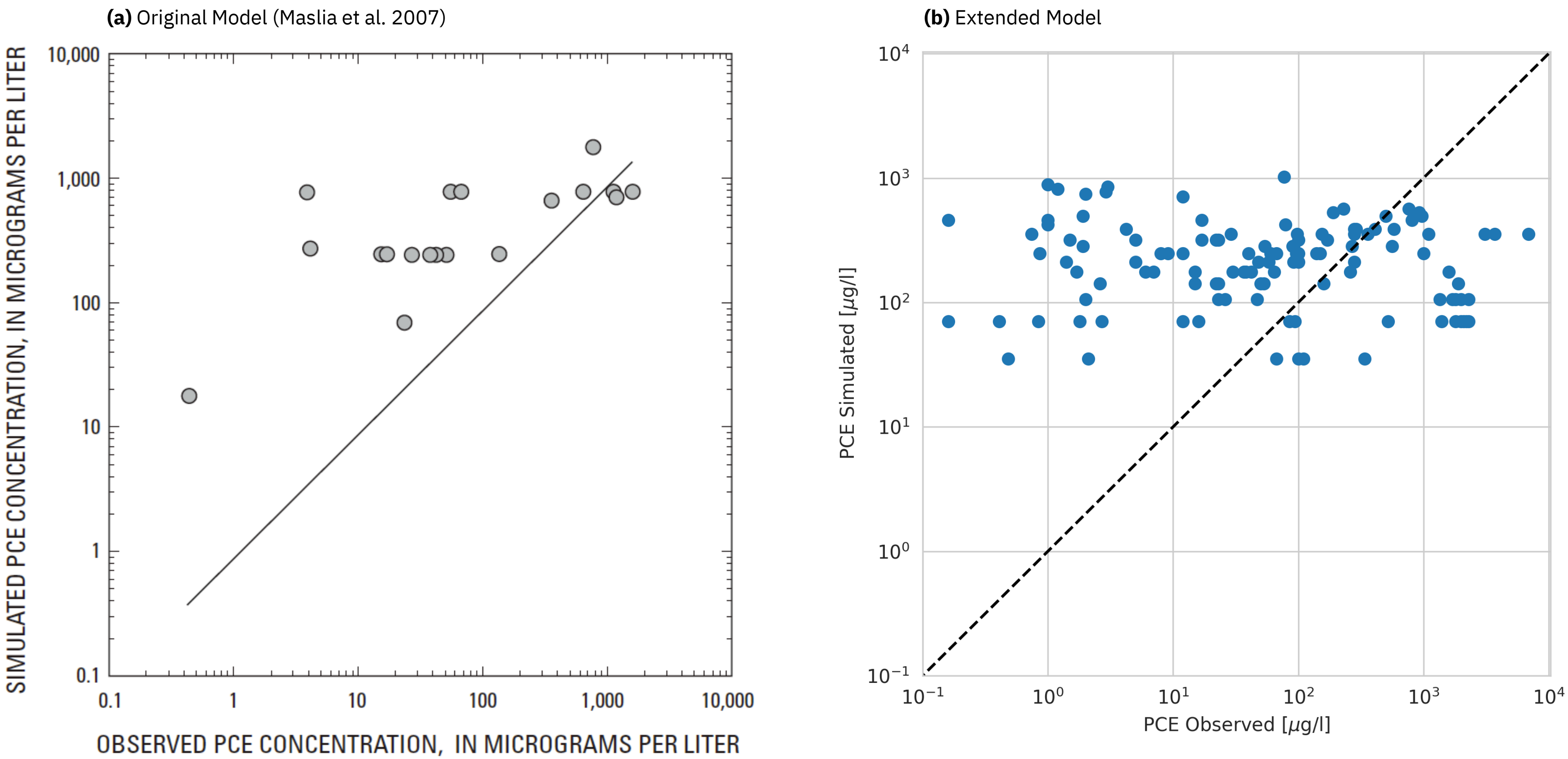


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Figure 6.
Simulated vs. Observed PCE Concentrations from (a) Original Model and (b) Extended Model
Tarawa Terrace Flow and Transport Model Post-Audit

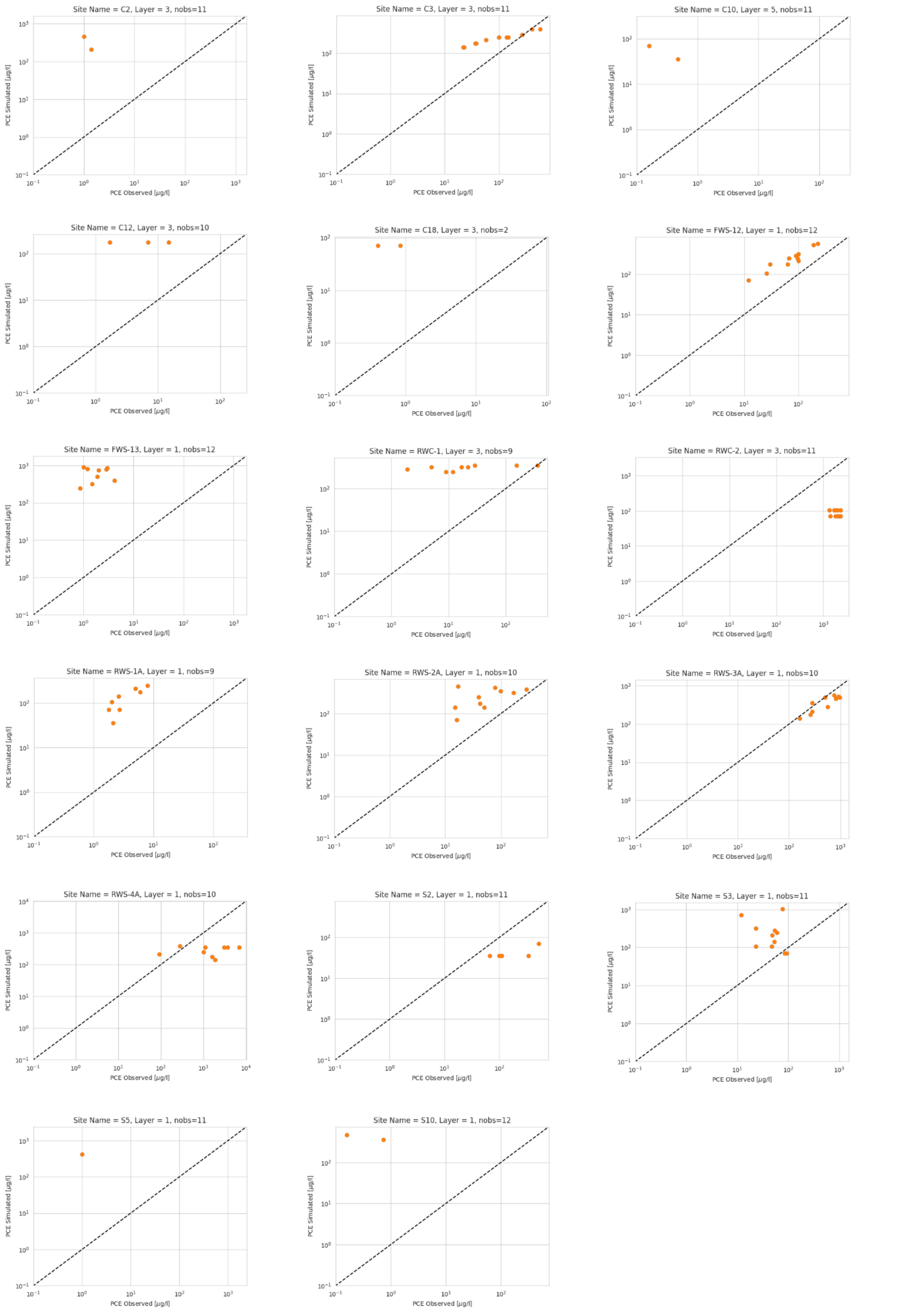

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Figure 7.
Simulated vs. Observed PCE Concentrations for Monitoring Well Locations
Tarawa Terrace Flow and Transport Model Post-Audit

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Figure 8a.
Time Series Plots of Simulated and Observed PCE Concentrations at Monitoring Well Locations
Tarawa Terrace Flow and Transport Model Post-Audit

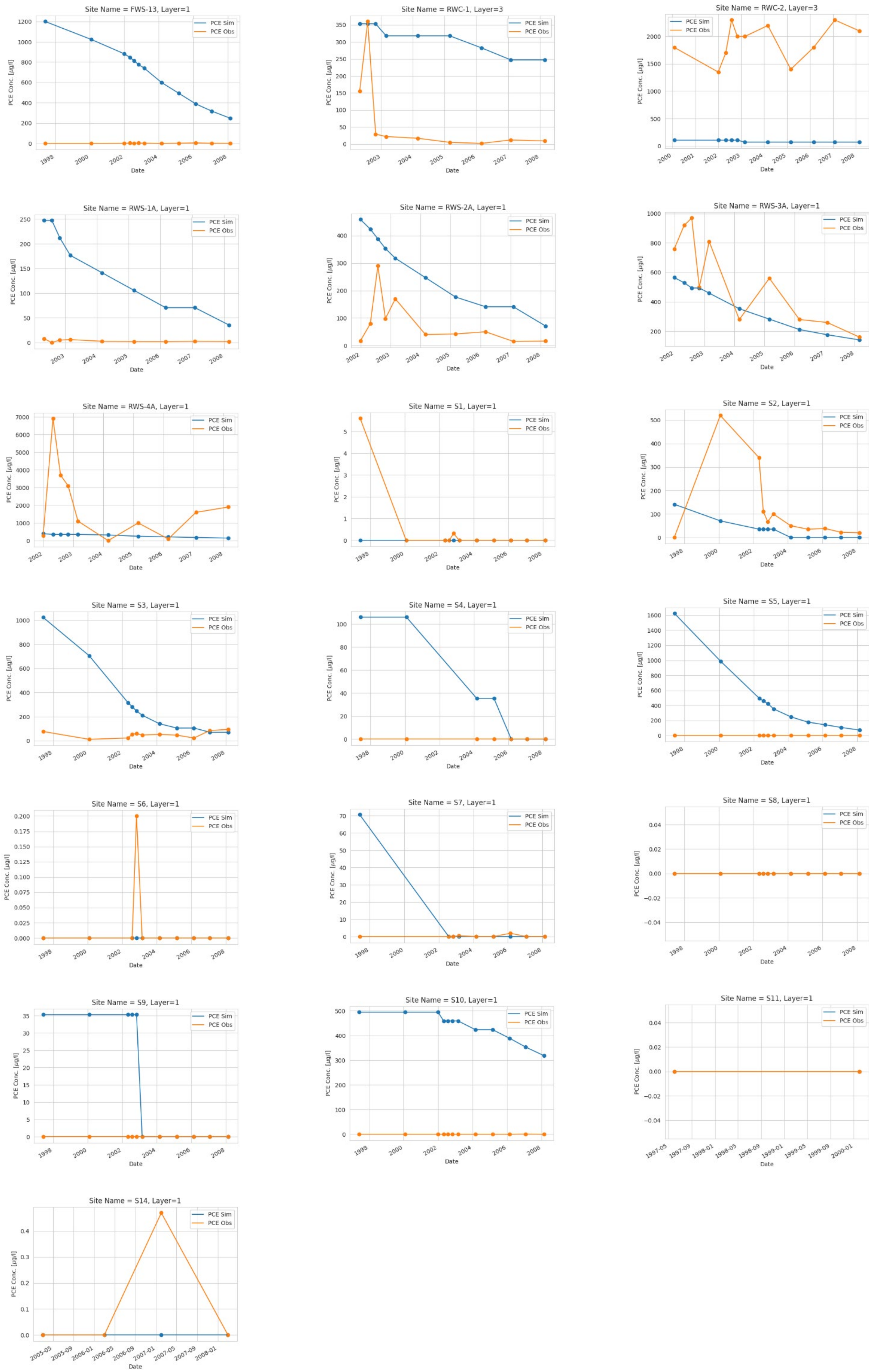

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Figure 8b.
Time Series Plots of Simulated and Observed PCE Concentrations at Monitoring Well Locations
Tarawa Terrace Flow and Transport Model Post-Audit

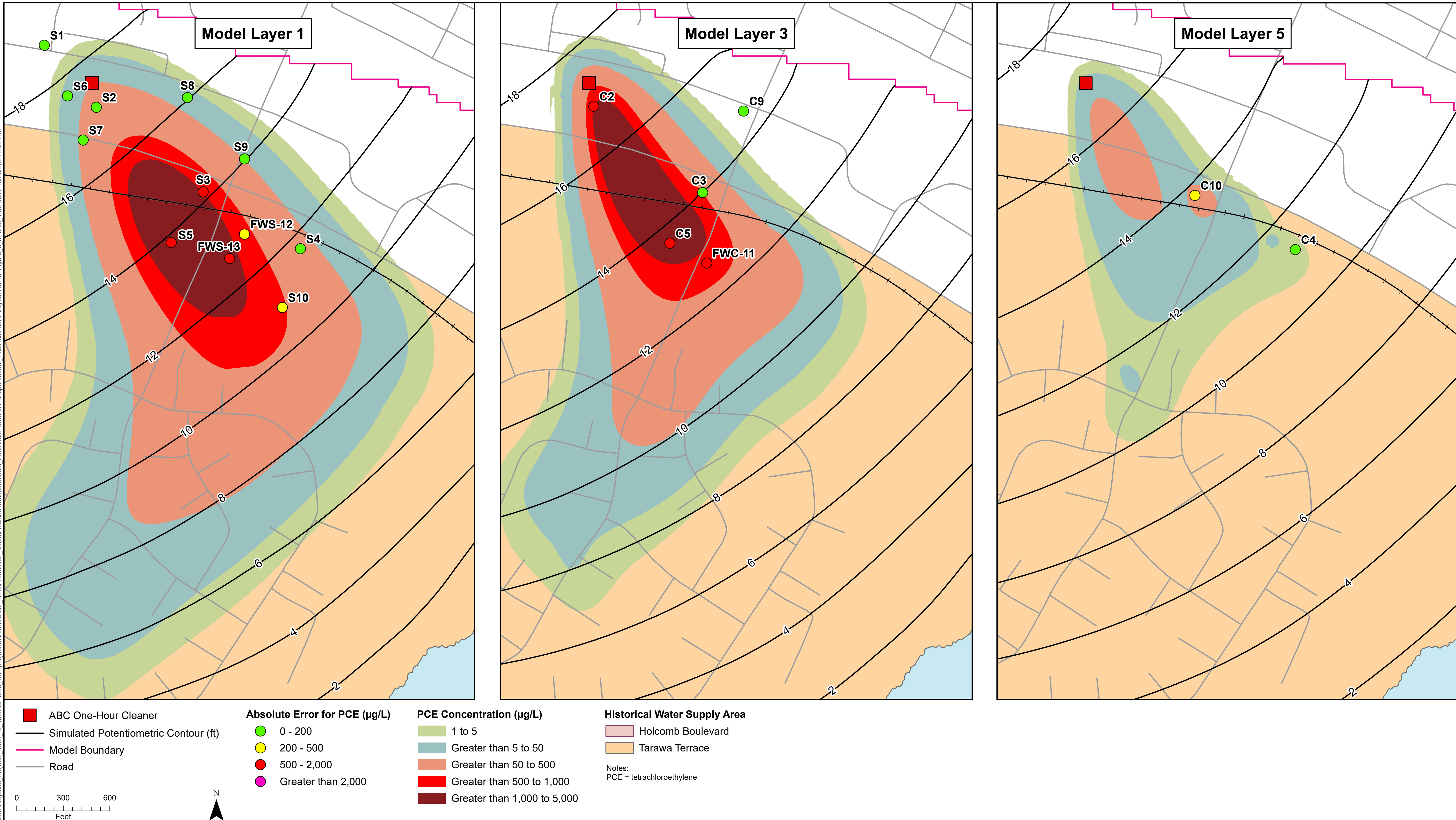

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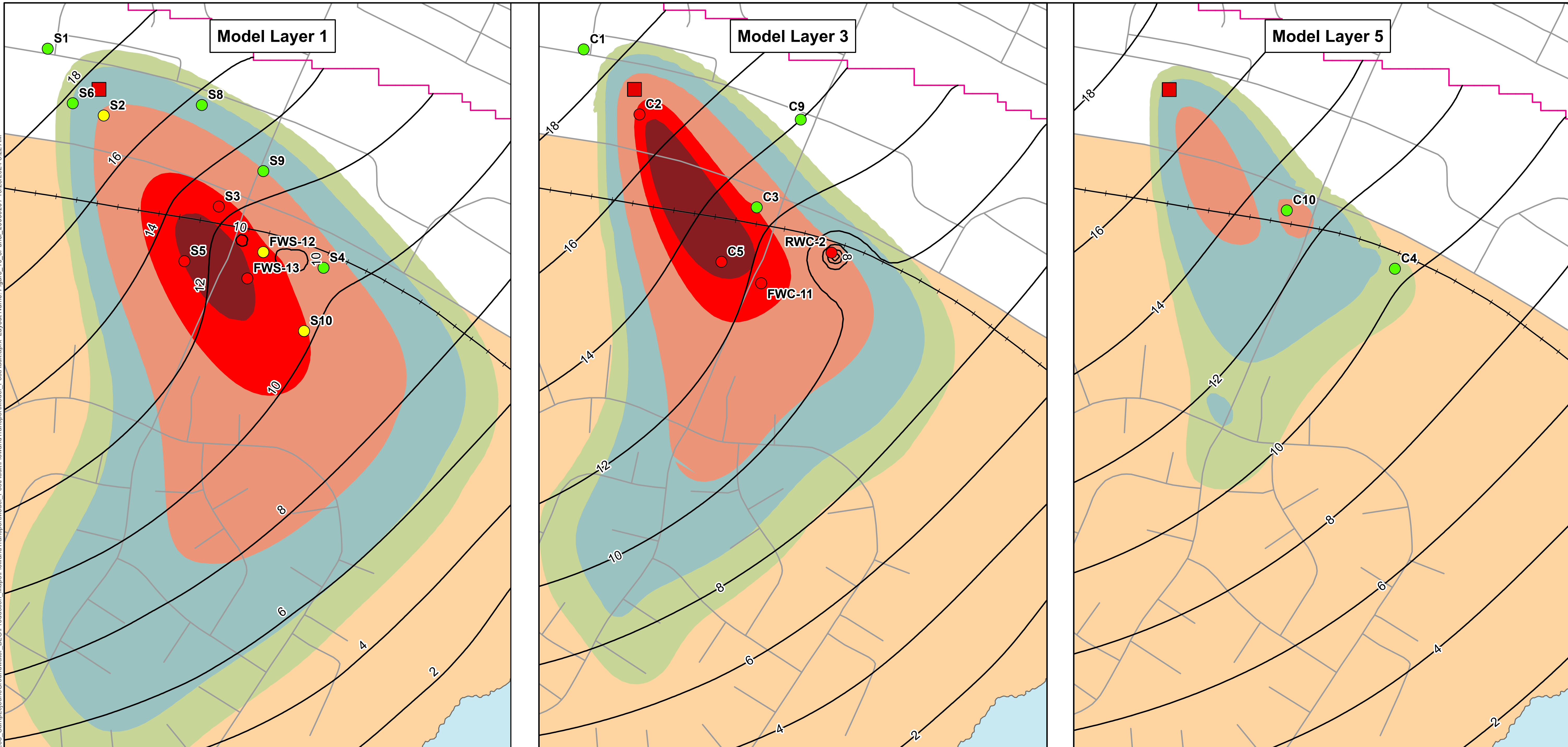
Figure 9.
Simulated PCE Concentration for Three Model Layers
Compared to Measured Values, June 1997
Tarawa Terrace Flow and Transport Model Post-Audit



ABC One-Hour Cleaner
Simulated Potentiometric Contour (ft)
Model Boundary
Road

0 300 600
Feet

N

Absolute Error for PCE (µg/L)
- 0 - 200
- 200 - 500
- 500 - 2,000
- Greater than 2,000

PCE Concentration (µg/L)
- 1 to 5
- Greater than 5 to 50
- Greater than 50 to 500
- Greater than 500 to 1,000
- Greater than 1,000 to 5,000

Historical Water Supply Area
- Holcomb Boulevard
- Tarawa Terrace

Notes:
PCE = tetrachloroethylene

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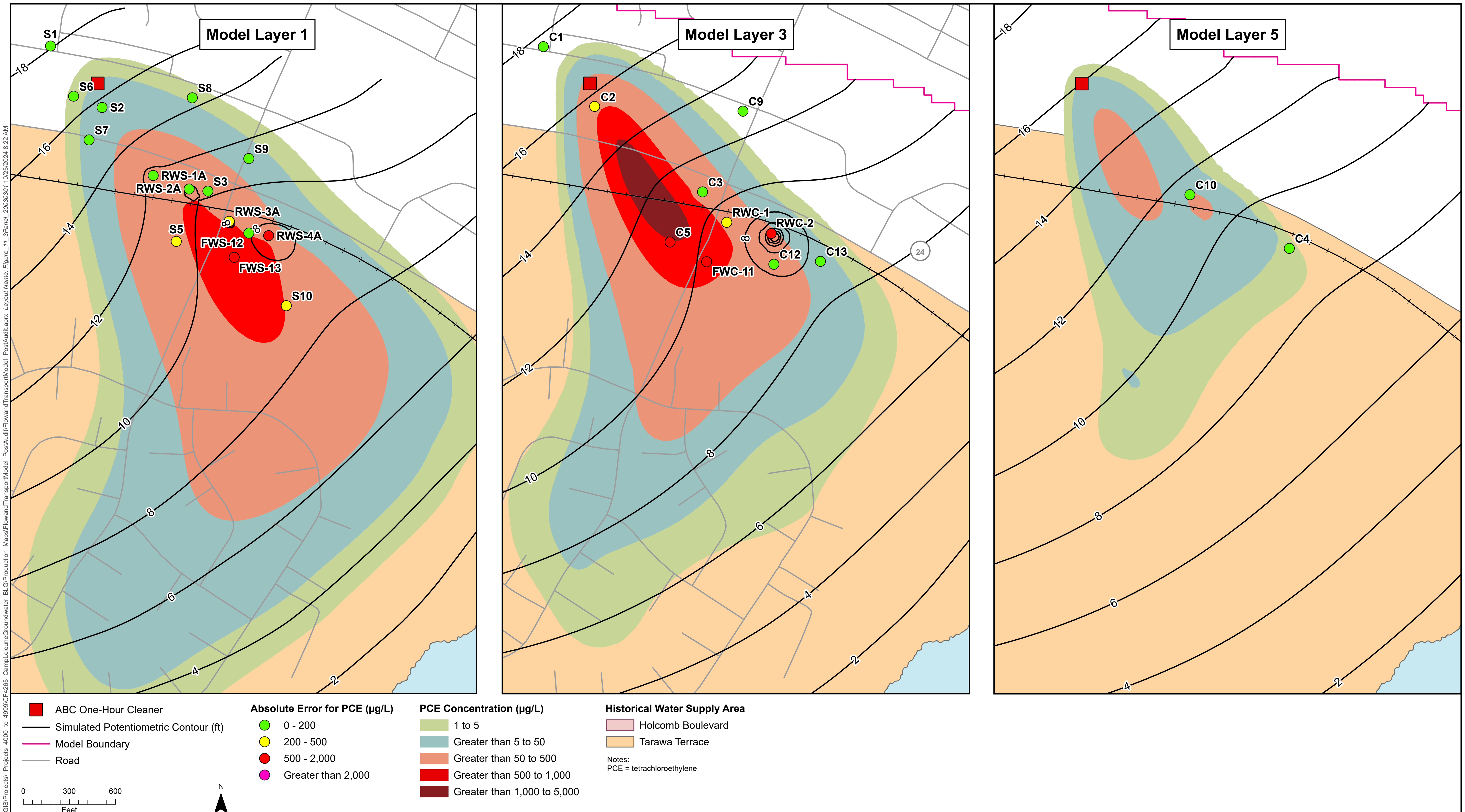
integral consulting inc.

Figure 10.
Simulated PCE Concentration for Three Model Layers
Compared to Measured Values, February 2000
Tarawa Terrace Flow and Transport Model Post-Audit



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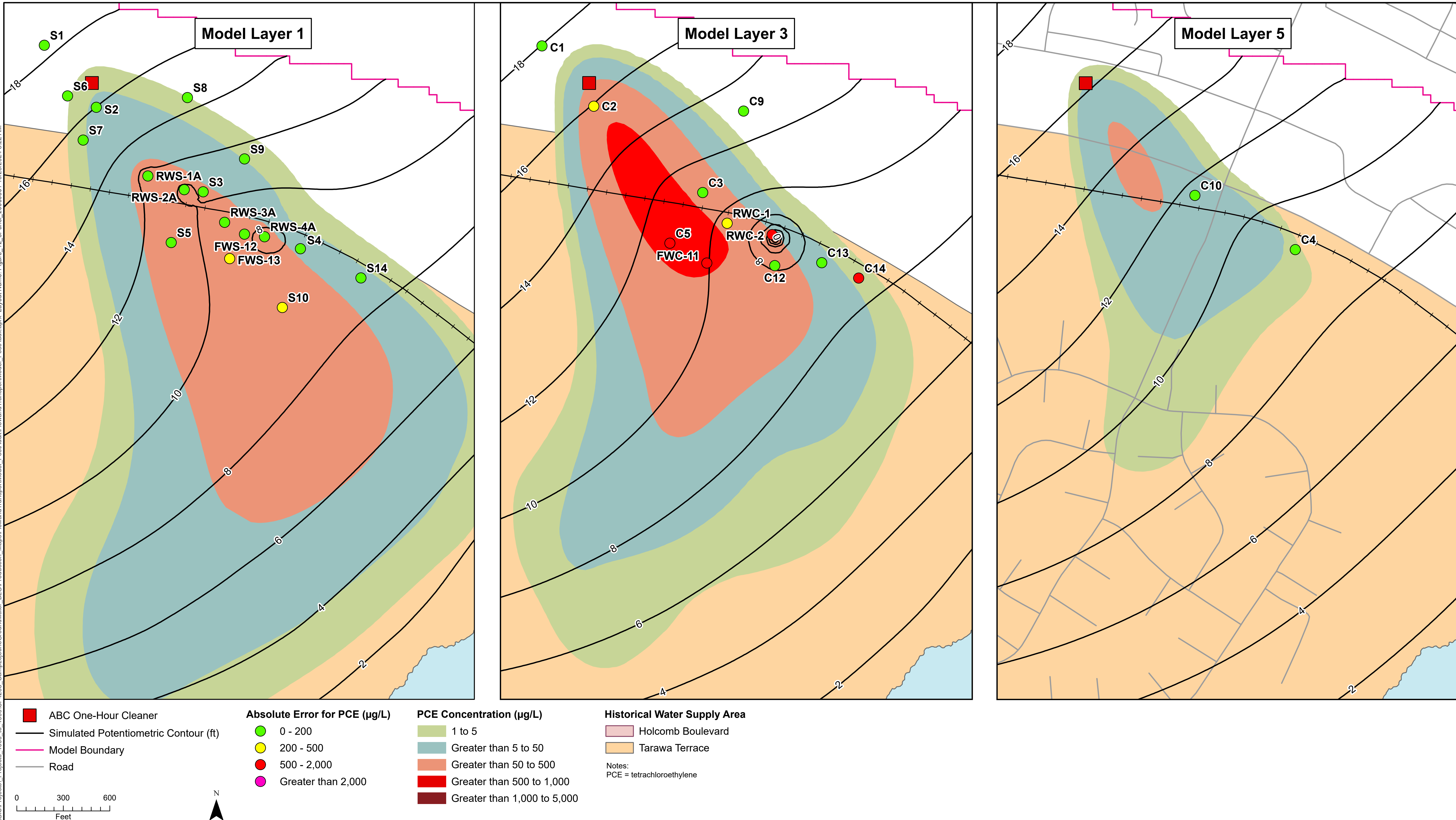
integral consulting inc.

Figure 11.
Simulated PCE Concentration for Three Model Layers
Compared to Measured Values, March 2003
Tarawa Terrace Flow and Transport Model Post-Audit



integral consulting inc.

Figure 12.
Simulated PCE Concentration for Three Model Layers
Compared to Measured Values, March 2006
Tarawa Terrace Flow and Transport Model Post-Audit

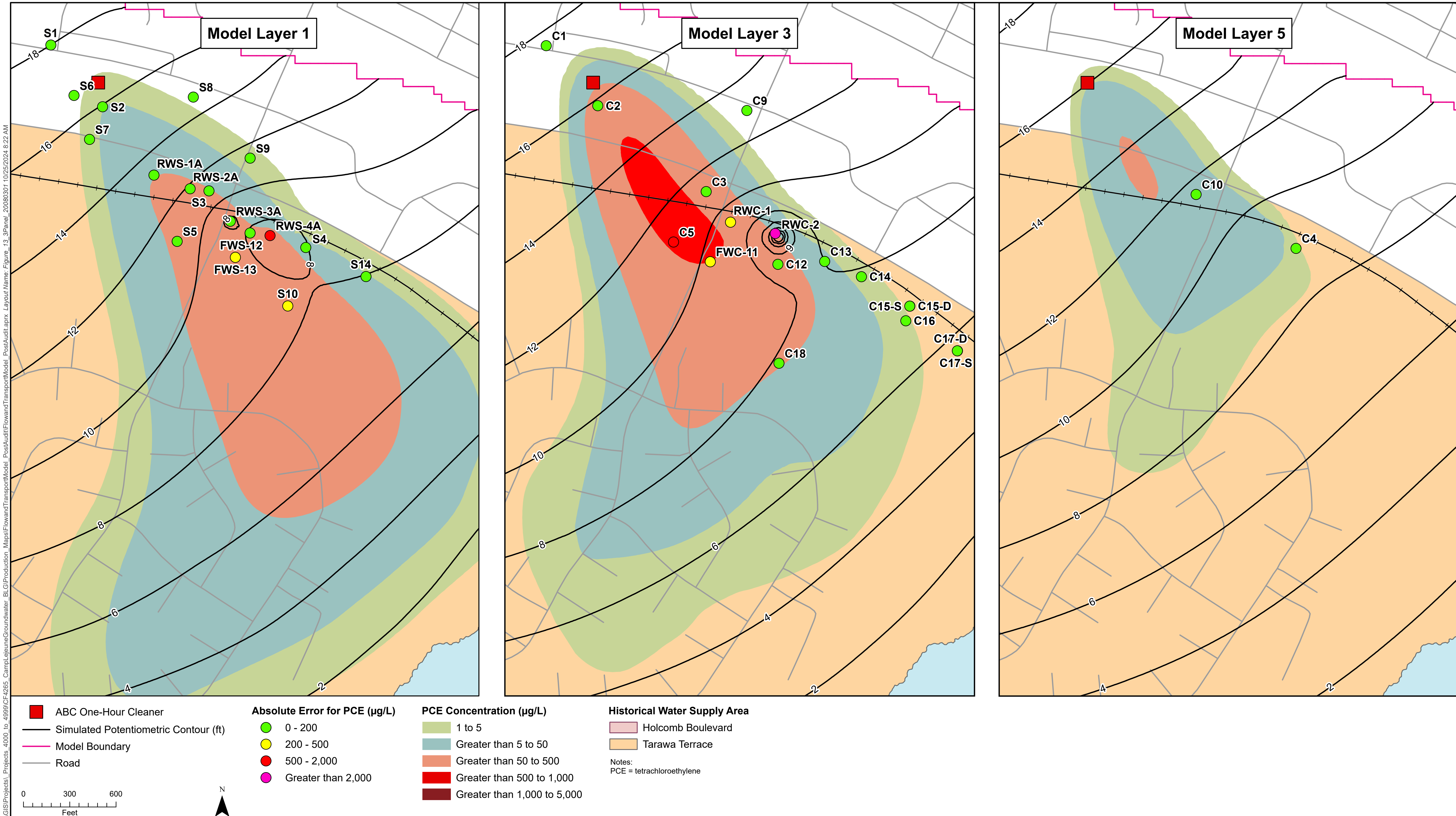


Figure 13.
Simulated PCE Concentration for Three Model Layers
Compared to Measured Values, March 2008
Tarawa Terrace Flow and Transport Model Post-Audit

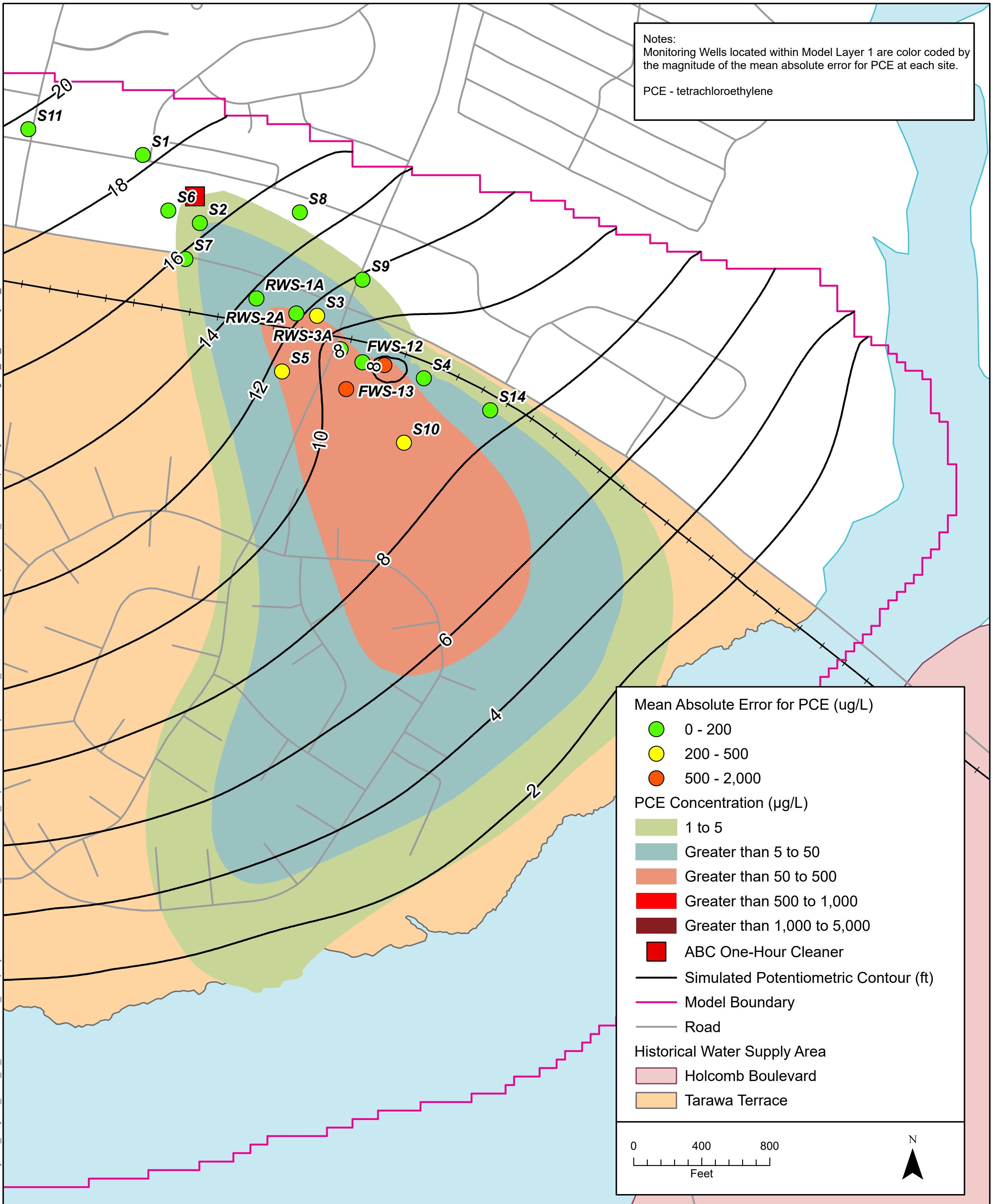


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Figure 14.
Simulated PCE Plume for December 2008 for Model Layer 1
Tarawa Terrace Flow and Transport Model Post-Audit

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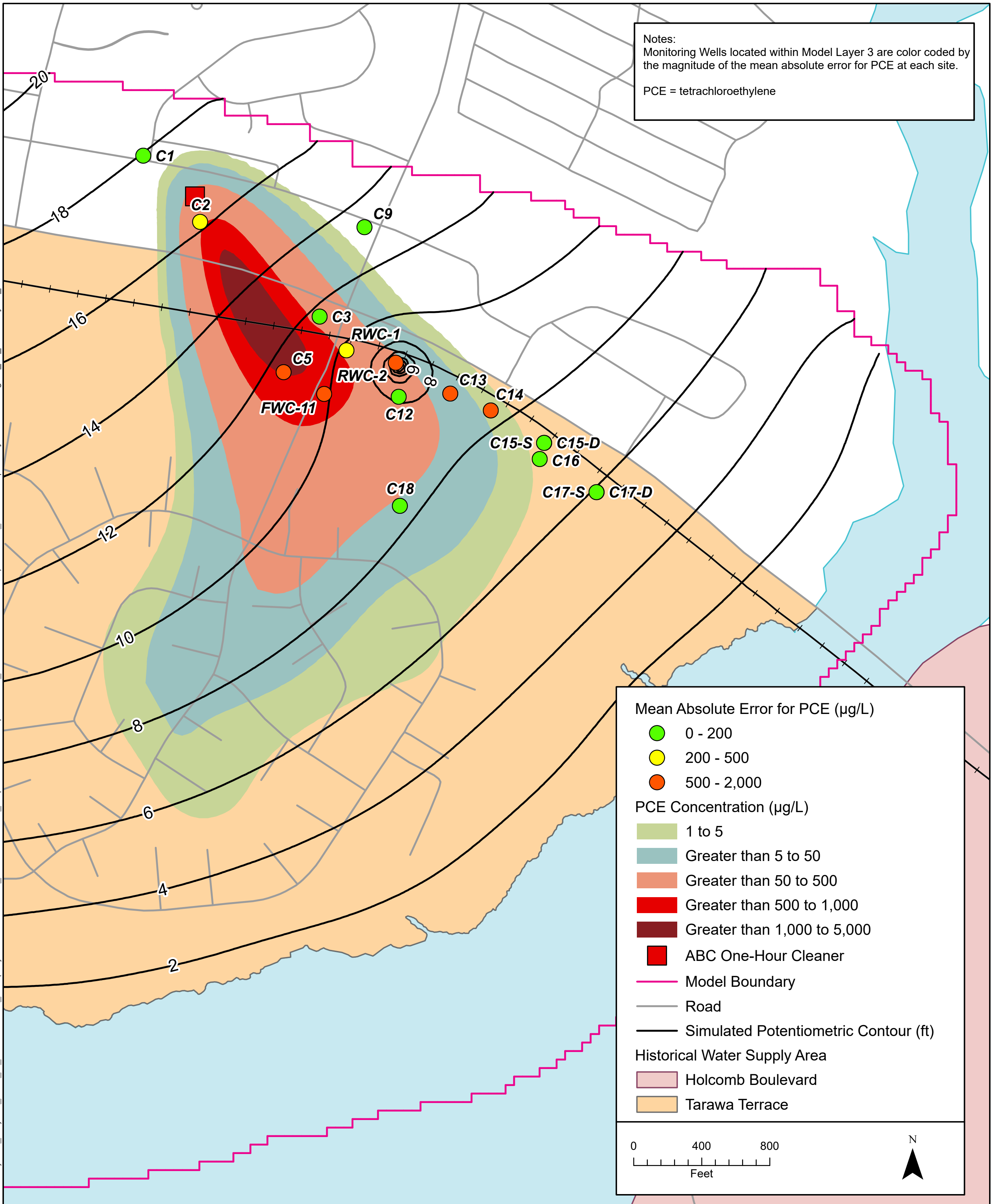

integral consulting inc.

Figure 15.
Simulated PCE Plume for December 2008 for Model Layer 3
Tarawa Terrace Flow and Transport Model Post-Audit

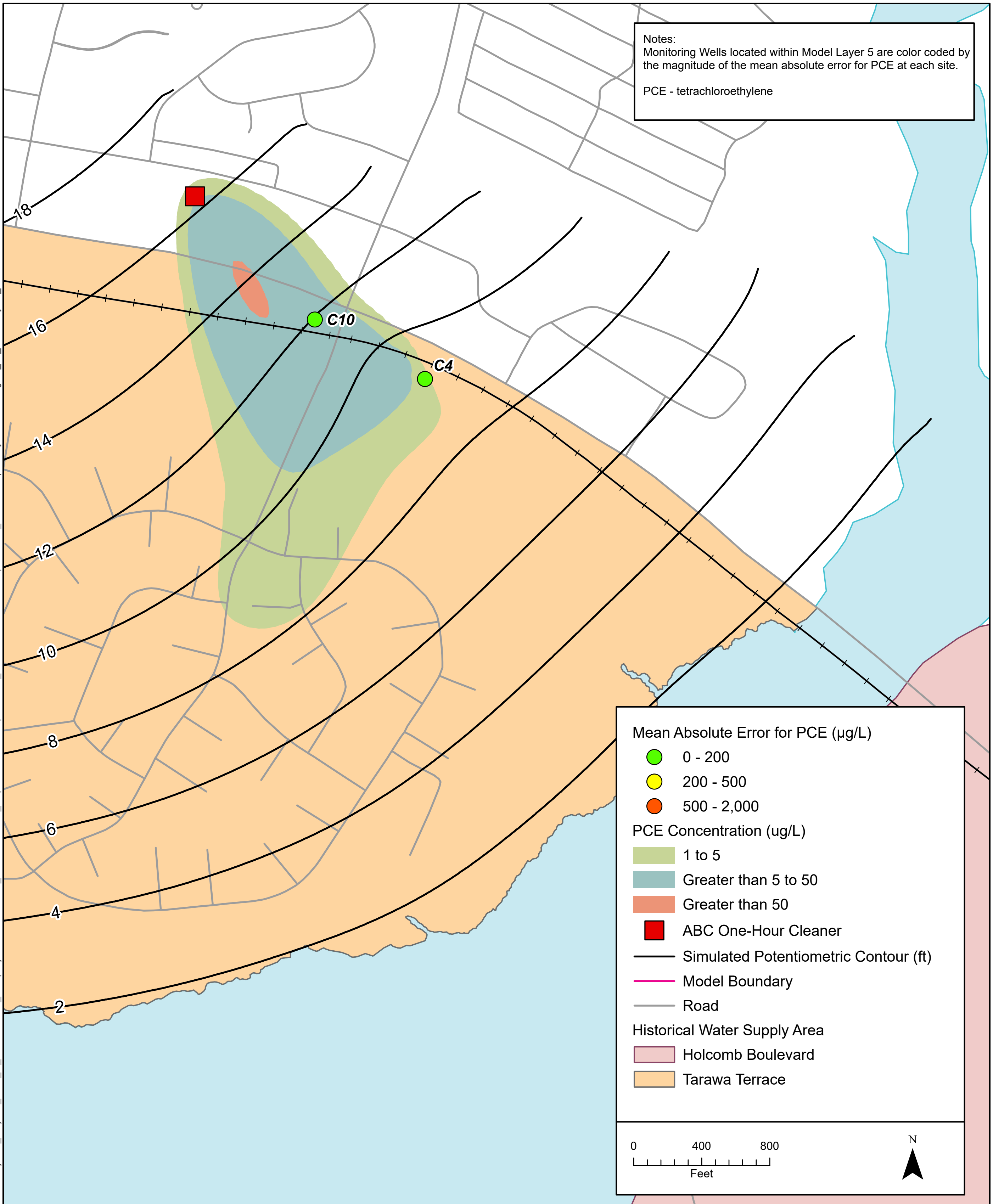

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Figure 16.
Simulated PCE Plume for December 2008 for Model Layer 5
Tarawa Terrace Flow and Transport Model Post-Audit

Tables

Table 1. Annual Rainfall and Effective Recharge Rates

	Rainfall (in./yr)				Effective Recharge	
Year	Wilmington Airport	Wilmington 7N	New River MCAF	Average Rainfall	(in./yr)	(ft/day)
1995	65.1	64.4	48.6	59.3	13.94	0.00318
1996	64.4	52.7	75	64	15.04	0.00343
1997	49.6	51	53.6	51.4	12.07	0.00276
1998	64.2	77.2	70.1	70.5	16.55	0.00378
1999	72.1	82.1	63.2	72.5	17.02	0.00389
2000	53.8	59.2	50.4	54.5	12.79	0.00292
2001	38	57.4	43.5	46.3	10.87	0.00248
2002	49.3	56.9	49.4	51.9	12.18	0.00278
2003	63.6	72.8	50.5	62.3	14.64	0.00334
2004	50.7	71.7	51.7	58.1	13.63	0.00311
2005	69.3	68.4	59.2	65.6	15.41	0.00352
2006	63.8	62.7	62.5	63	14.8	0.00338
2007	33.4	37.3	60.4	43.7	10.26	0.00234
2008	60.8	48.4	56.4	55.2	12.96	0.00296
2009	59.7	59.4	53.6	57.6	13.53	0.00309

Notes:

Data publicly available at: https://www.weather.gov/wrh/Climate?wfo=ilm

Annual rainfall data were available for three locations proximal to the Tarawa Terrace: Wilmington Airport, Wilmington 7N, and New River MCAF.

Table 2. Pumping Rates for Remediation Wells Operating 1995 to 2008

Well	Northing	Easting	Model Layer	Pumping Rate (gpm)							
				11/1/1999	11/6/2001	3/7/2004	12/16/2004	3/31/2005	3/6/2006	2/20/2007	3/11/2008
RWS-1A	364445.7	2491125	1	5.5	18	20.8	12.1	20	20	0	0
RWS-2A	364351.5	2491359	1	3.8	18	3.5	2.34	28	24	0	0
RWS-3A	364146.8	2491620	1	29.2	24	18	1.07	15	30	30	30
RWS-4A	364053.7	2491878	1	13.3	24	24	22.5	28	25	30	25
RWC-2	364067.5	2491842	3	28.2	40	40	32.1	40	42	40	40

Notes:

Northing and easting values are given in NAD 1983 HARN North Carolina State Plane FIPS 3200 (US Feet)

gpm = gallons per minute

Table 3. Monitoring Wells Included in Extended Simulation

Monitoring Well	Northing	Easting	Model Layer	Well Completion Date	Borehole Depth (ft)	Finished Well Depth (ft)	Well Type
C1	365285.0	2490460.1	3	4/4/1992	104	100	Monitoring Well
C2	364895.7	2490794.3	3	4/8/1992	87	84.5	Monitoring Well
C3	364338.9	2491496.9	3	4/9/1992	90.5	89.4	Monitoring Well
C4	363971.9	2492116.1	5	4/3/1992	200	130	Monitoring Well
C5	364012.1	2491285.3	3	4/7/1992	92.5	90.5	Monitoring Well
C9	364864.6	2491760.5	3	9/10/1993	76.5	76	Monitoring Well
C10	364321.6	2491468.6	5	9/28/1993	80	0	Monitoring Well
C12	363867.4	2491961.7	3	11/6/2001	84	70	Monitoring Well
C13	363886.1	2492264.8	3	11/6/2001	83	76	Monitoring Well
C14	363787.1	2492503.0	3	5/12/2005	87	84.9	Monitoring Well
C15-D	363596.3	2492817.1	3	2/9/2007	110	110	Monitoring Well
C15-S	363596.3	2492816.1	3	2/9/2007	110	89	Monitoring Well
C16	363501.3	2492790.7	3	2/13/2007	95	94	Monitoring Well
C17-D	363306.6	2493125.4	3	2/13/2007	117	95	Monitoring Well
C17-S	363306.6	2493124.4	3	2/13/2007	117	85	Monitoring Well
C18	363226.0	2491968.6	3	2/15/2007	87	84	Monitoring Well
FWC-11	363884.0	2491523.5	3	--	89	88.6	--
FWS-12	364070.4	2491748.5	1	--	40	39.6	Monitoring Well
FWS-13	363912.7	2491653.1	1	--	38.5	38.2	Monitoring Well
RWC-1	364140.6	2491654.6	3	1/3-4/1998	91.5	--	Recovery Well
RWC-2	364067.5	2491944.6	3	1/5-6/1998	90	--	Recovery Well
RWS-1A	364445.7	2491125.4	1	--	55.5	55.5	Recovery Well
RWS-2A	364357.4	2491359.9	1	--	56	48.5	Recovery Well
RWS-3A	364146.8	2491620.4	1	--	60	55	Recovery Well
RWS-4A	364053.7	2491877.8	1	--	58.2	53	Recovery Well
S1	365289.2	2490457.3	1	3/22/1992	28	25.5	Monitor Well
S2	364889.0	2490792.7	1	3/26/1992	39.7	39.7	Monitor Well
S3	364343.6	2491482.1	1	4/2/1992	39.5	39.5	Monitor Well
S4	363976.4	2492109.4	1	4/3/1992	34	34	Monitor Well
S5	364016.2	2491275.9	1	4/1/1992	28	28	Monitor Well
S6	364962.4	2490607.3	1	3/26/1992	40.5	40.5	Monitor Well
S7	364677.4	2490707.9	1	4/5/1992	30.3	30.3	Monitor Well
S8	364951.7	2491380.5	1	4/4/1992	28	28	Monitor Well
S9	364555.9	2491748.8	1	3/21/1992	40	28.3	Monitor Well
S10	363597.3	2491992.8	1	3/20/1992	40	35	Monitor Well
S11	365440.7	2489784.3	1	9/11/1993	31	--	Monitor Well
S14	363788.1	2492499.8	1	5/10/2005	87	29	Monitor Well

Notes:

Northing and easting values are given in NAD 1983 HARN North Carolina State Plane FIPS 3200 (US Feet).

-- = information not available

[a] Estimated value

Table 4. Observed PCE Concentrations at Monitoring Wells, 1995 to 2008

Monitoring Well	Model Layer	PCE Concentration (µg/L)											
		6/1/1997	2/1/2000	1/1/2002	5/1/2002	8/1/2002	11/1/2002	3/1/2003	3/1/2004	3/1/2005	3/1/2006	2/1/2007	3/1/2008
C1	3	--	<DL	--	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL
C2	3	<DL	<DL	--	1	<DL	<DL	<DL	<DL	<DL	1.4	<DL	<DL
C3	3	580	410	--	270	140	100	150	58	37	38	23	22
C4	5	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	0.51	<DL	<DL
C5	3	<DL	<DL	--	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL
C9	3	<DL	<DL	--	1	<DL	0.48	<DL	1.9	7.4	18	20	18
C10	5	<DL	<DL	--	<DL	<DL	0.16	<DL	<DL	<DL	<DL	0.48	<DL
C12	3	--	--	15	7	1.7	<DL	<DL	<DL	<DL	<DL	<DL	<DL
C13	3	--	--	5,400	140	68	44	6	3	2.8	2.5	2.7	7.8
C14	3	--	--	--	--	--	--	--	--	1,800	1,300	320	120
C15-D	3	--	--	--	--	--	--	--	--	--	--	1.9	0.27
C15-S	3	--	--	--	--	--	--	--	--	--	--	3.8	3.8
C16	3	--	--	--	--	--	--	--	--	--	--	0.36	<DL
C17-D	3	--	--	--	--	--	--	--	--	--	--	0.77	<DL
C17-S	3	--	--	--	--	--	--	--	--	--	--	1.2	0.19
C18	3	--	--	--	--	--	--	--	--	--	--	0.41	0.84
FWC-11	3	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL
FWS-12	1	230	190	100	92	90	67	96	100	64	30	26	12
FWS-13	1	<DL	<DL	1	3	1.2	2.9	2	<DL	1.9	4.2	1.5	0.86
RWC-1	3	--	--	--	155	360	29	22	17	5	1.9	12	9.1
RWC-2	3	--	1,800	1,350	1,700	2,300	2,000	2,000	2,200	1,400	1,800	2,300	2,100
RWS-1A	1	--	--		8	<DL	5	6	2.6	2	1.8	2.7	2.1
RWS-2A	1	--	--	17	79	290	98	170	40	42	50	15	16
RWS-3A	1	--	--	760	920	970	500	810	280	560	280	260	160
RWS-4A	1	--	--	280	6,900	3,700	3,100	1,100	<DL	1,000	92	1,600	1,900
S1	1	5.6	<DL	--	<DL	<DL	0.32	<DL	<DL	<DL	<DL	<DL	<DL
S2	1	0	520	--	340	110	67	100	50	35	38	22	20
S3	1	77	12	--	23	54	60	48	53	47	23	85	94
S4	1	<DL	<DL	--	--	--	--	--	<DL	<DL	<DL	<DL	<DL
S5	1	<DL	<DL	--	<DL	<DL	1	<DL	<DL	<DL	<DL	<DL	<DL
S6	1	<DL	<DL	--	--	<DL	0.2	<DL	<DL	<DL	<DL	<DL	<DL
S7	1	<DL	--	--	--	<DL	<DL	0.5	<DL	<DL	1.9	<DL	<DL
S8	1	<DL	<DL	--	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL
S9	1	<DL	<DL	--	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL

Table 4. Observed PCE Concentrations at Monitoring Wells, 1995 to 2008

Monitoring Well	Model Layer	PCE Concentration (µg/L)											
		6/1/1997	2/1/2000	1/1/2002	5/1/2002	8/1/2002	11/1/2002	3/1/2003	3/1/2004	3/1/2005	3/1/2006	2/1/2007	3/1/2008
S10	1	<DL	<DL	<DL	<DL	<DL	0.16	<DL	<DL	<DL	<DL	0.74	<DL
S11	1	<DL	<DL	--	--	--	--	--	--	--	--	--	--
S14	1	--	--	--	--	--	--	--	--	<DL	<DL	0.47	<DL

Notes:

-- = no sample collected

<DL = sample result reported below the detection limit

PCE = tetrachloroethene

Table 5. Observed and Simulated PCE Concentrations at Monitoring Well Locations

Date	Monitoring Well	PCE Observed Concentration (µg/L)	PCE Simulated Concentration (µg/L)	Error	Abs(Error)
2/1/2000	C1	<DL	<DL	0	0
5/1/2002		<DL	<DL	0	0
8/1/2002		<DL	<DL	0	0
11/1/2002		<DL	<DL	0	0
3/1/2003		<DL	<DL	0	0
3/1/2004		<DL	<DL	0	0
3/1/2005		<DL	<DL	0	0
3/1/2006		<DL	<DL	0	0
2/1/2007		<DL	<DL	0	0
3/1/2008		<DL	<DL	0	0
6/1/1997	C2	<DL	1095	1095	1095
2/1/2000		<DL	742	742	742
5/1/2002		1	459	458	458
8/1/2002		<DL	459	459	459
11/1/2002		<DL	424	424	424
3/1/2003		<DL	388	388	388
3/1/2004		<DL	318	318	318
3/1/2005		<DL	247	247	247
3/1/2006		1.4	212	210	210
2/1/2007		<DL	177	177	177
3/1/2008		<DL	141	141	141
6/1/1997	C3	580	388	-192	192
2/1/2000		410	388	-22	22
5/1/2002		270	283	13	13
8/1/2002		140	247	107	107
11/1/2002		100	247	147	147
3/1/2003		150	247	97	97
3/1/2004		58	212	154	154
3/1/2005		37	177	140	140
3/1/2006		38	177	139	139
2/1/2007		23	141	118	118
3/1/2008		22	141	119	119
6/1/1997	C4	<DL	<DL	0	0
2/1/2000		<DL	<DL	0	0
1/1/2002		<DL	<DL	0	0
5/1/2002		<DL	<DL	0	0
8/1/2002		<DL	<DL	0	0
11/1/2002		<DL	<DL	0	0
3/1/2003		<DL	<DL	0	0
3/1/2004		<DL	<DL	0	0
3/1/2005		<DL	<DL	0	0
3/1/2006		0.51	<DL	-1	1
2/1/2007		<DL	<DL	0	0
3/1/2008		<DL	<DL	0	0

Table 5. Observed and Simulated PCE Concentrations at Monitoring Well Locations

Date	Monitoring Well	PCE Observed Concentration (μg/L)	PCE Simulated Concentration (μg/L)	Error	Abs(Error)
6/1/1997	C5	<DL	1307	1307	1307
2/1/2000		<DL	1165	1165	1165
5/1/2002		<DL	989	989	989
8/1/2002		<DL	989	989	989
11/1/2002		<DL	953	953	953
3/1/2003		<DL	918	918	918
3/1/2004		<DL	812	812	812
3/1/2005		<DL	777	777	777
3/1/2006		<DL	671	671	671
2/1/2007		<DL	600	600	600
3/1/2008		<DL	530	530	530
6/1/1997	C9	<DL	<DL	0	0
2/1/2000		<DL	<DL	0	0
5/1/2002		1	<DL	-1	1
8/1/2002		<DL	<DL	0	0
11/1/2002		0.48	<DL	0	0
3/1/2003		<DL	<DL	0	0
3/1/2004		1.9	<DL	-2	2
3/1/2005		7.4	<DL	-7	7
3/1/2006		18	<DL	-18	18
2/1/2007		20	<DL	-20	20
3/1/2008		18	<DL	-18	18
6/1/1997	C10	<DL	212	212	212
2/1/2000		<DL	177	177	177
5/1/2002		<DL	71	71	71
8/1/2002		<DL	71	71	71
11/1/2002		0.16	71	70	70
3/1/2003		<DL	71	71	71
3/1/2004		<DL	35	35	35
3/1/2005		<DL	35	35	35
3/1/2006		<DL	35	35	35
2/1/2007		0.48	35	35	35
3/1/2008		<DL	35	35	35
1/1/2002	C12	15	177	162	162
5/1/2002		7	177	170	170
8/1/2002		1.7	177	175	175
11/1/2002		<DL	177	177	177
3/1/2003		<DL	177	177	177
3/1/2004		<DL	177	177	177
3/1/2005		<DL	177	177	177
3/1/2006		<DL	177	177	177
2/1/2007		<DL	177	177	177
3/1/2008		<DL	141	141	141

Table 5. Observed and Simulated PCE Concentrations at Monitoring Well Locations

Date	Monitoring Well	PCE Observed Concentration (µg/L)	PCE Simulated Concentration (µg/L)	Error	Abs(Error)
1/1/2002	C13	5400	<DL	-5400	5400
5/1/2002		140	<DL	-140	140
8/1/2002		68	<DL	-68	68
11/1/2002		44	<DL	-44	44
3/1/2003		6	<DL	-6	6
3/1/2004		3	<DL	-3	3
3/1/2005		2.8	<DL	-3	3
3/1/2006		2.5	<DL	-3	3
2/1/2007		2.7	<DL	-3	3
3/1/2008		7.8	<DL	-8	8
3/1/2005	C14	1800	<DL	-1800	1800
3/1/2006		1300	<DL	-1300	1300
2/1/2007		320	<DL	-320	320
3/1/2008		120	<DL	-120	120
2/1/2007	C15-D	1.9	<DL	-2	2
3/1/2008		0.27	<DL	0	0
2/1/2007	C15-S	3.8	<DL	-4	4
3/1/2008		3.8	<DL	-4	4
2/1/2007	C16	0.36	<DL	0	0
3/1/2008		<DL	<DL	0	0
2/1/2007	C17-D	0.77	<DL	-1	1
3/1/2008		<DL	<DL	0	0
2/1/2007	C17-S	1.2	<DL	-1	1
3/1/2008		0.19	<DL	0	0
2/1/2007	C18	0.41	71	70	70
3/1/2008		0.84	71	70	70
6/1/1997	FWC-11	<DL	848	848	848
2/1/2000		<DL	812	812	812
1/1/2002		<DL	742	742	742
5/1/2002		<DL	742	742	742
8/1/2002		<DL	742	742	742
11/1/2002		<DL	706	706	706
3/1/2003		<DL	706	706	706
3/1/2004		<DL	671	671	671
3/1/2005		<DL	636	636	636
3/1/2006		<DL	600	600	600
2/1/2007		<DL	565	565	565
3/1/2008		<DL	494	494	494

Table 5. Observed and Simulated PCE Concentrations at Monitoring Well Locations

Date	Monitoring Well	PCE Observed Concentration (µg/L)	PCE Simulated Concentration (µg/L)	Error	Abs(Error)
6/1/1997	FWS-12	230	565	335	335
2/1/2000		190	530	340	340
1/1/2002		100	318	218	218
5/1/2002		92	283	191	191
8/1/2002		90	283	193	193
11/1/2002		67	247	180	180
3/1/2003		96	247	151	151
3/1/2004		100	212	112	112
3/1/2005		64	177	113	113
3/1/2006		30	177	147	147
2/1/2007		26	106	80	80
3/1/2008		12	71	59	59
6/1/1997	FWS-13	<DL	1201	1201	1201
2/1/2000		<DL	1024	1024	1024
1/1/2002		1	883	882	882
5/1/2002		3	848	845	845
8/1/2002		1.2	812	811	811
11/1/2002		2.9	777	774	774
3/1/2003		2	742	740	740
3/1/2004		<DL	600	600	600
3/1/2005		1.9	494	493	493
3/1/2006		4.2	388	384	384
2/1/2007		1.5	318	316	316
3/1/2008		0.86	247	246	246
5/1/2002	RWC-1	155	353	198	198
8/1/2002		360	353	-7	7
11/1/2002		29	353	324	324
3/1/2003		22	318	296	296
3/1/2004		17	318	301	301
3/1/2005		5	318	313	313
3/1/2006		1.9	283	281	281
2/1/2007		12	247	235	235
3/1/2008		9.1	247	238	238
2/1/2000	RWC-2	1800	106	-1694	1694
1/1/2002		1350	106	-1244	1244
5/1/2002		1700	106	-1594	1594
8/1/2002		2300	106	-2194	2194
11/1/2002		2000	106	-1894	1894
3/1/2003		2000	71	-1929	1929
3/1/2004		2200	71	-2129	2129
3/1/2005		1400	71	-1329	1329
3/1/2006		1800	71	-1729	1729
2/1/2007		2300	71	-2229	2229
3/1/2008		2100	71	-2029	2029

Table 5. Observed and Simulated PCE Concentrations at Monitoring Well Locations

Date	Monitoring Well	PCE Observed Concentration (µg/L)	PCE Simulated Concentration (µg/L)	Error	Abs(Error)
5/1/2002	RWS-1A	8	247	239	239
8/1/2002		<DL	247	247	247
11/1/2002		5	212	207	207
3/1/2003		6	177	171	171
3/1/2004		2.6	141	139	139
3/1/2005		2	106	104	104
3/1/2006		1.8	71	69	69
2/1/2007		2.7	71	68	68
3/1/2008		2.1	35	33	33
5/1/2002	RWS-2A	79	424	345	345
1/1/2002		17	459	442	442
8/1/2002		290	388	98	98
11/1/2002		98	353	255	255
3/1/2003		170	318	148	148
3/1/2004		40	247	207	207
3/1/2005		42	177	135	135
3/1/2006		50	141	91	91
2/1/2007		15	141	126	126
3/1/2008		16	71	55	55
1/1/2002	RWS-3A	760	565	-195	195
5/1/2002		920	530	-390	390
8/1/2002		970	494	-476	476
11/1/2002		500	494	-6	6
3/1/2003		810	459	-351	351
3/1/2004		280	353	73	73
3/1/2005		560	283	-277	277
3/1/2006		280	212	-68	68
2/1/2007		260	177	-83	83
3/1/2008		160	141	-19	19
1/1/2002	RWS-4A	280	388	108	108
5/1/2002		6900	353	-6547	6547
8/1/2002		3700	353	-3347	3347
11/1/2002		3100	353	-2747	2747
3/1/2003		1100	353	-747	747
3/1/2004		<DL	318	318	318
3/1/2005		1000	247	-753	753
3/1/2006		92	212	120	120
2/1/2007		1600	177	-1423	1423
3/1/2008		1900	141	-1759	1759

Table 5. Observed and Simulated PCE Concentrations at Monitoring Well Locations

Date	Monitoring Well	PCE Observed Concentration (µg/L)	PCE Simulated Concentration (µg/L)	Error	Abs(Error)
6/1/1997	S1	5.6	<DL	-6	6
2/1/2000		<DL	<DL	0	0
5/1/2002		<DL	<DL	0	0
8/1/2002		<DL	<DL	0	0
11/1/2002		0.32	<DL	0	0
3/1/2003		<DL	<DL	0	0
3/1/2004		<DL	<DL	0	0
3/1/2005		<DL	<DL	0	0
3/1/2006		<DL	<DL	0	0
2/1/2007		<DL	<DL	0	0
3/1/2008		<DL	<DL	0	0
6/1/1997	S2	<DL	141	141	141
2/1/2000		520	71	-449	449
5/1/2002		340	35	-305	305
8/1/2002		110	35	-75	75
11/1/2002		67	35	-32	32
3/1/2003		100	35	-65	65
3/1/2004		50	<DL	-50	50
3/1/2005		35	<DL	-35	35
3/1/2006		38	<DL	-38	38
2/1/2007		22	<DL	-22	22
3/1/2008		20	<DL	-20	20
6/1/1997	S3	77	1024	947	947
2/1/2000		12	706	694	694
5/1/2002		23	318	295	295
8/1/2002		54	283	229	229
11/1/2002		60	247	187	187
3/1/2003		48	212	164	164
3/1/2004		53	141	88	88
3/1/2005		47	106	59	59
3/1/2006		23	106	83	83
2/1/2007		85	71	-14	14
3/1/2008		94	71	-23	23
6/1/1997	S4	<DL	106	106	106
2/1/2000		<DL	106	106	106
3/1/2004		<DL	35	35	35
3/1/2005		<DL	35	35	35
3/1/2006		<DL	<DL	0	0
2/1/2007		<DL	<DL	0	0
3/1/2008		<DL	<DL	0	0

Table 5. Observed and Simulated PCE Concentrations at Monitoring Well Locations

Date	Monitoring Well	PCE Observed Concentration (µg/L)	PCE Simulated Concentration (µg/L)	Error	Abs(Error)
6/1/1997	S5	<DL	1624	1624	1624
2/1/2000		<DL	989	989	989
5/1/2002		<DL	494	494	494
8/1/2002		<DL	459	459	459
11/1/2002		1	424	423	423
3/1/2003		<DL	353	353	353
3/1/2004		<DL	247	247	247
3/1/2005		<DL	177	177	177
3/1/2006		<DL	141	141	141
2/1/2007		<DL	106	106	106
3/1/2008		<DL	71	71	71
6/1/1997	S6	<DL	<DL	0	0
2/1/2000		<DL	<DL	0	0
8/1/2002		<DL	<DL	0	0
11/1/2002		0.2	<DL	0	0
3/1/2003		<DL	<DL	0	0
3/1/2004		<DL	<DL	0	0
3/1/2005		<DL	<DL	0	0
3/1/2006		<DL	<DL	0	0
2/1/2007		<DL	<DL	0	0
3/1/2008		<DL	<DL	0	0
6/1/1997	S7	<DL	71	71	71
8/1/2002		<DL	<DL	0	0
11/1/2002		<DL	<DL	0	0
3/1/2003		0.5	<DL	-1	1
3/1/2004		<DL	<DL	0	0
3/1/2005		<DL	<DL	0	0
3/1/2006		1.9	<DL	-2	2
2/1/2007		<DL	<DL	0	0
3/1/2008		<DL	<DL	0	0
6/1/1997	S8	<DL	<DL	0	0
2/1/2000		<DL	<DL	0	0
5/1/2002		<DL	<DL	0	0
8/1/2002		<DL	<DL	0	0
11/1/2002		<DL	<DL	0	0
3/1/2003		<DL	<DL	0	0
3/1/2004		<DL	<DL	0	0
3/1/2005		<DL	<DL	0	0
3/1/2006		<DL	<DL	0	0
2/1/2007		<DL	<DL	0	0
3/1/2008		<DL	<DL	0	0

Table 5. Observed and Simulated PCE Concentrations at Monitoring Well Locations

Date	Monitoring Well	PCE Observed Concentration (µg/L)	PCE Simulated Concentration (µg/L)	Error	Abs(Error)
6/1/1997	S9	<DL	35	35	35
2/1/2000		<DL	35	35	35
5/1/2002		<DL	35	35	35
8/1/2002		<DL	35	35	35
11/1/2002		<DL	35	35	35
3/1/2003		<DL	<DL	0	0
3/1/2004		<DL	<DL	0	0
3/1/2005		<DL	<DL	0	0
3/1/2006		<DL	<DL	0	0
2/1/2007		<DL	<DL	0	0
3/1/2008		<DL	<DL	0	0
6/1/1997	S10	<DL	494	494	494
2/1/2000		<DL	494	494	494
1/1/2002		<DL	494	494	494
5/1/2002		<DL	459	459	459
8/1/2002		<DL	459	459	459
11/1/2002		0.16	459	459	459
3/1/2003		<DL	459	459	459
3/1/2004		<DL	424	424	424
3/1/2005		<DL	424	424	424
3/1/2006		<DL	388	388	388
2/1/2007		0.74	353	352	352
3/1/2008		<DL	318	318	318
6/1/1997	S11	<DL	<DL	0	0
2/1/2000		<DL	<DL	0	0
3/1/2005	S14	<DL	<DL	0	0
3/1/2006		<DL	<DL	0	0
2/1/2007		0.47	<DL	0	0
3/1/2008		<DL	<DL	0	0

Notes:

<DL = sample result reported below the detection limit
PCE = tetrachloroethene

Table 6. Mean Error and Mean Absolute Error for Monitoring Wells

Monitoring Well	Model Layer	Mean Error	Mean Absolute Error	Mean Absolute Error Category
C1	3	0	0	0-200
C2	3	423.6	423.6	200-500
C3	3	74.6	113.3	0-200
C4	5	0	0	0-200
C5	3	882.9	882.9	500-2,000
C9	3	-6.1	6.1	0-200
C10	5	77	77	0-200
C12	3	170.7	170.7	0-200
C13	3	-567.7	567.7	500-2,000
C14	3	-885	885	500-2,000
C15-D	3	-1.1	1.1	0-200
C15-S	3	-3.8	3.8	0-200
C16	3	-0.2	0.2	0-200
C17-D	3	-0.4	0.4	0-200
C17-S	3	-0.7	0.7	0-200
C18	3	70	70	0-200
FWC-11	3	688.6	688.6	500-2,000
FWS-12	1	176.4	176.4	0-200
FWS-13	1	693	693	500-2,000
RWC-1	3	242.1	243.6	200-500
RWC-2	3	-1817.9	1817.9	500-2,000
RWS-1A	1	141.8	141.8	0-200
RWS-2A	1	190.2	190.2	0-200
RWS-3A	1	-179.2	193.8	0-200
RWS-4A	1	-1677.6	1786.9	500-2,000
S1	1	-0.5	0.5	0-200
S2	1	-86.3	111.9	0-200
S3	1	246.2	253.1	200-500
S4	1	40.4	40.4	0-200
S5	1	462.2	462.2	200-500
S6	1	0	0	0-200
S7	1	7.6	8.1	0-200
S8	1	0	0	0-200
S9	1	16.1	16.1	0-200
S10	1	435.5	435.5	200-500
S11	1	0	0	0-200
S14	1	-0.1	0.1	0-200

Notes:

Northing and easting values are given in NAD 1983 HARN North Carolina State Plane FIPS 3200 (US Feet).

Exhibit 1

Resume for R. Jeffrey Davis

R. Jeffrey Davis, P.E., CGWP

Principal, Water Resources

(385) 955-5184

Salt Lake City, UT

jdavis@integral-corp.com

Mr. Jeff Davis is a licensed civil and environmental engineer, hydrogeologist, and certified groundwater professional with almost 30 years of global experience working on every continent except Antarctica. He currently serves on the Board of Directors for the National Ground Water Association. Mr. Davis has supported numerous litigation cases involving groundwater impacts and has experience as an expert witness. He has spent much of his career solving complicated water problems involving mining, oil and gas, and water resources. These projects include the clean water supply side as well as the remediation of contaminated sites. The contaminated sites include coal combustion residual (CCR) landfills and other waste impoundments, mining remediation sites, and industrial cleanup sites—both RCRA and CERCLA sites. In working with per- and polyfluoroalkyl substance (PFAS) compounds, MTBE, chlorinated solvents, hydrocarbons, nitrates, and road salt, he has developed and used numerous groundwater models for the mining, energy, chemical, and agricultural industries. Other projects have involved environmental impact statements, environmental assessments, water management, groundwater–surface water contamination, dewatering, and water supply and treatment. He has extensive knowledge of groundwater flow-and-transport principles and has taught numerous workshops and classes in the U.S. and around the world. His current focus is on water and groundwater sustainability and drought resiliency. Mr. Davis has extensive experience in the design and implementation of aquifer storage and recovery (ASR) projects across the country.

Education & Credentials

M.S., Civil & Environmental Engineering, Brigham Young University, Provo, Utah, 1998

B.S., Civil & Environmental Engineering, Brigham Young University, Provo, Utah, 1993

Professional Engineer, Utah (License No. 189690-2202), Texas (License No. 125406), Florida (License No. 74838), Colorado (License No. 0051575), Alabama (License No. PE52096), Idaho (License No. P-21839), Oregon (License No. 104270PE)

Certified Groundwater Professional, NGWA (2023)

Continuing Education

Certificate of Specialization in Leadership and Management, Harvard Business School Online (2023)

MSHA certified (2020)

First Aid and CPR certified (2020)

Professional Affiliations

National Ground Water Association

Utah Groundwater Association

Groundwater Resources Association of California

Relevant Experience

WATER MANAGEMENT

ASR Feasibility, Utah County, Utah — Served as principal investigator for a feasibility study for an ASR project. During the spring runoff of 2023, the team measured the runoff in several rivers, creeks, and ditches, and constructed a new infiltration basin, all in an effort to advance aquifer storage projects within the county.

ASR Feasibility, Utah County, Utah — Served as principal for a feasibility study for an ASR project. Former agricultural water rights were converted for industrial use and the effluent was being considered for aquifer replenishment. Both infiltration and direct injection of the treated water were considered as part of the feasibility study.

Provo ASR, Provo, Utah — Served as the project manager and engineer of record for the current Provo ASR project. Five sites (three infiltration and two direct injection) are currently permitted for pilot studies that have been ongoing since 2020. Final engineering design and permitting have been completed for all five sites.

Water Reuse and Aquifer Sustainability, Eagle Mountain, Utah — Served as the client manager and engineer of record for the current Eagle Mountain City, Utah, water-reuse planning and aquifer sustainability project. Water rights for Eagle Mountain were evaluated along with the groundwater system to understand aquifer sustainability for the city, which is expecting tremendous future growth, including large industrial water demands.

ASR Evaluation, Weber County, Utah — Served as the project manager and engineer of record for the current evaluation of the Weber Basin Water Conservancy District, Utah, ASR project. This project has been actively operating for more than 10 years. Hired to evaluate the storage capacity of the program and obtain greater recovery volumes from the system, working with the Utah Division of Water Rights.

Drainage Reuse Initiative, Harris County, Texas — Served as part of a team for the development of the Drainage Reuse Initiative for Harris County Flood Control District in Harris County, Texas. The project investigated the feasibility of alternative methods of flood mitigation by conveying stormwater to the subsurface, including natural infiltration to groundwater, enhanced infiltration or injection into aquifers, and mechanical injection to deep aquifers.

Roseville ASR, Roseville, California — Served as one of the groundwater leads for the development of an ASR program for the city of Roseville, California. Initial efforts involved developing a regional- scale conceptualization for the major portion of the Central Valley area. Developed a subsequent regional multilayer groundwater model, followed by a number of local-scale transport models to simulate pilot tests and understand the ASR process.

COAL COMBUSTION FACILITIES

Coal Combustion Residual Waste and Disposal, Bonanza, Utah — Served as the engineer of record for a coal power plant. Oversaw all efforts related to the monitoring and compliance of the facility's CCR waste and disposal. This included semiannual reporting, development of alternative source demonstrations, and annual groundwater monitoring reports.

Hexavalent Chromium Investigation, United States — Served as the principal investigator for a study to understand and evaluate the proposed EPA changes to hexavalent chromium (Cr(VI)) as it would apply to the monitoring and management of CCR landfill facilities. The work included examining potential regulatory levels from a human health perspective.

Alternate Water Sources Investigation, United States — Served as the principal investigator for a study to understand and evaluate differences at CCR facilities between upgradient and downgradient sources, and locate potential evidence of alternate sources using isotopes and microbial fingerprinting. After development of a sampling and analysis plan, advanced statistical and multivariate methods were used to document analyses that show potential for distinguishing source water from alternate sources.

OIL AND GAS WASTE MANAGEMENT

Oil and Gas Waste Facility, De Beque, Colorado — Served as the principal engineer for the permitting and operating of an 800-acre oil-and-gas waste-disposal facility southeast of De Beque, Colorado. Involved in several aspects of the permitting process, including the hydrogeological study and groundwater investigations; stormwater design; pond liner design and construction; closure certification; and submittal of the revised engineering design and operation plan.

Remedial Investigation, Billings, Montana — Served as the groundwater lead for the Yale Oil of South Dakota Facility in Billings, Montana. The Superfund site facility is in the remedial investigation phase; the risk-assessment work plan has been submitted to the Montana Department of Environmental Quality, and the client is waiting for comments before proceeding with the risk assessment.

EPA Study, Washington, DC — Served as participant and technical reviewer for EPA's "Study of Hydraulic Fracturing for Oil and Gas and Its Potential Impact on Drinking Water Resources." Participated in technical roundtables and technical workshops and completed a peer review of the EPA's five retrospective case studies.

Fate and Transport Modeling, Texas — Served as groundwater lead for fate-and-transport modeling and analysis of chloride contamination in southern Texas near the Gulf of Mexico. As part of the site mitigation phase, modeling was used to determine the potential migration of the chloride through the shallow aquifer system and nearby receptors.

Lockwood Solvent Groundwater Plume Site, Billings, Montana — Served as one of the groundwater leads performing groundwater modeling for the Lockwood Solvent Groundwater Plume site, an EPA Superfund site in Billings, Montana. The site spans 580 acres, and much of the groundwater there is contaminated with volatile organic compounds, including tetrachloroethene, trichloroethene, cis-1,2- dichloroethene, and vinyl chloride.

PLANNING AND PERMITTING

Beverage Can Manufacturing and Filling, Salt Lake City, Utah — Served as principal investigator for wastewater, stormwater, and Utah Pollutant Discharge Elimination System permitting, monitoring, and compliance for an aluminum can manufacturing and filling facility. Worked closely with the client, its operations team, and state and municipal regulators to regularly monitor and report all discharges from the facility.

Ely Energy Center EIS, White Pine County, Nevada — Served as principal lead for the development of a regional groundwater model for Steptoe Valley in White Pine County, Nevada. The investigation and model were part of the EIS for construction of the Ely Energy Center.

Haile Gold Mine EIS, Kershaw, South Carolina — Served as groundwater lead as the third-party contractor developing an EIS for the proposed Haile Gold Mine near Kershaw, South Carolina. The EIS analyzed the potential direct, indirect, and cumulative environmental effects of the proposed project and its alternatives. Work included project-team coordination for geology, groundwater, and surface water resources areas; review of applicant-supplied information; agency coordination; and public involvement.

Four Corners Power Plant EIS, Farmington, New Mexico — Served as groundwater lead as the third- party contractor in developing an EIS for the Four Corners Power Plant and Navajo coal mine in Farmington, New Mexico. The EIS analyzed the potential direct, indirect, and cumulative environmental effects of the proposed project and its alternatives. The groundwater portion included analyzing field investigations, pump tests, conceptual and numerical modeling of the project and surrounding area, and remediation and reclamation activities.

Iron Ore Operations Cumulative Impact Assessment, Pilbara, Western Australia — Served as one of the groundwater leads for a cumulative impact assessment for a proposed expansion of iron ore operations in the Pilbara in Western Australia. Work included identifying the methodology and developing the conceptual models to perform the assessment. The groundwater modeling included both quantitative and qualitative approaches.

LITIGATION SUPPORT

Expert Witness for PFAS Litigation, Martin County, Florida — Served as the groundwater expert witness for a litigation case in Martin County. The multidistrict litigation bellwether case involved PFAS contamination of groundwater affecting public drinking water. Opinions were given regarding PFAS sourcing, and fate and transport in groundwater, and regarding public water supply planning.

Water Resources Litigation, Grand County, Colorado — Served as principal investigator for a litigation case involving flooding damages caused by a canal breach. Surface water modeling was used to determine amount and extent of erosion and sedimentation from the flooding.

Water Resources Litigation, Northwest Minnesota — Served as principal investigator and expert witness for a litigation case involving agricultural water rights and pumping near tribal lands. Developed a conceptual model to understand the hydrogeological conditions and constructed a groundwater model to determine possible impacts due to the agriculture activities.

Groundwater Litigation, Ventura County, California — Served as the groundwater expert for a litigation case in Ventura County. The case includes the development of a basin-wide groundwater- surface water model, not only for purposes of litigation but also for compliance with Sustainable Groundwater Management Act requirements. The groundwater basin in question is currently listed as a priority basin by the State of California.

Pipeline Spill Litigation, Williston, North Dakota — Provided litigation services for groundwater and surface water contamination from a pipeline spill in North Dakota. A large spill of produced water (brine) impacted surface streams as well as the shallow aquifer system. Work included groundwater modeling, field investigations, and remedial strategies.

Road Salt Contamination Litigation, Vandalia, Ohio — Performed fate-and-transport modeling and analysis of sodium chloride contamination of an aquifer in Vandalia, Ohio. Stored road salt caused limited contamination of a shallow aquifer that supplied drinking water to nearby residential homes. The groundwater model included the local domestic pumping wells, which helped determine the possible extent of chloride impacts. Largely due to the conceptual site model and transport modeling results, litigation was settled out of court to the satisfaction of the client.

GROUNDWATER MODELING

Subsidence Monitoring/Modeling, Fort Bend and Harris Counties, Texas — Served as the groundwater lead and engineer on several groundwater development projects in Fort Bend and Harris counties. Groundwater withdrawals are strictly curtailed due to historical subsidence. The Subsidence Districts have installed GPS Port-A-Measure (PAM) units and used InSAR mapping. Using this data plus the output from the models PRESS and MODFLOW-SUB to measure subsidence impacts.

Groundwater Model Development, New Jersey — Led a team of hydrogeologists to construct a groundwater flow and fate and transport model of perfluorononanoic acid and other contaminants. The model will be used to design a pump and treat system and possible aquifer replenishment with the treated groundwater.

Hydrogeological Services, Montgomery County, Texas — Provided modeling and hydrogeological consulting services for the Lone Star Ground-water Conservation District's (Montgomery County, Texas) update of its desired future conditions and groundwater management plans. Also provided litigation services for the district.

Groundwater Model Development, Havana, Florida — Provided consulting services for Northwest Florida Water Management District as it updated its regional groundwater model—an integrated groundwater-surface water model that provides regulatory control of the groundwater withdrawals and manages saltwater intrusion in the Floridan aquifer due to pumping.

Crop Production Services, Various Locations, U.S. — Served as the groundwater lead to provide modeling and hydrogeological consulting services for a number of crop production services legacy sites. The groundwater at the sites was contaminated with nitrates from long-term fertilizer use. Groundwater modeling was used to determine the fate and transport of the nitrates and to develop a remedial strategy for cleanup.

Legacy Way Tunnel Design, Brisbane, Australia — Provided senior oversight and technical review for all hydrogeologic assessments related to the Legacy Way tunnel design project, a 4.6 km underground tunnel in northern Brisbane, Australia. Work included evaluating field tests, preparing geotechnical and environmental reports, and modeling the entire project area.

Mercury Fate and Transport, Cincinnati, Ohio — Served as the groundwater lead for performing fate and-transport modeling and analysis of a mercury spill at a municipal landfill in Cincinnati, Ohio. As part of the project management phase, modeling was used to determine the potential migration of mercury through the landfill to the leachate collection system. Modeling efforts examined both the spatial distribution and the temporal component of the mercury transport.

Due Diligence Environmental Review, Pascagoula, Mississippi — Served as the environmental lead for performing an environmental assessment at a chemical plant in Pascagoula, Mississippi, as part of a due diligence effort. A number of groundwater and surface water contamination issues due to spills, leaks, and storage of hazardous materials were addressed. The location of the plant on the Gulf of Mexico makes possible environmental impacts from operation of the chemical plant a sensitive issue.

MINING

Bingham Canyon Mine Closure Planning, Copperton, Utah — Completed an independent third-party audit for a closure-plan pit-lake study for Bingham Canyon Mine. Reviewed the consultant scope of work for the pit-lake study and discussed the study, methodology, and pathway to completion with consultant staff. An independent audit report was compiled and submitted to the client.

Hooker Prairie Mine, Bartow, Florida — Served as the model expert to develop a contaminant and water budget and management model for the Hookers Prairie Mine in Florida using the GoldSim modeling software. The purpose of the model was to evaluate the probabilities of the mine meeting its current and future nutrient NPDES loading limits for certain contaminants. The project also included an evaluation of current monitoring data within the mine operations and at discharge locations, and the development of a complete monitoring plan integrated into a GIS as part of the model calibration and validation.

Bridger Coal Mine Investigation, Rock Springs, Wyoming — Served on a technical team to reevaluate groundwater conditions, and treatment and discharge alternatives at the Bridger coal mine in southwest Wyoming. Previous studies' predicted maximum flows into the mine had been exceeded. Reassessed the situation and provided solutions.

EMERGENCY RESPONSE

Emergency Response to Battery Fire, Confidential Location — Served as the principal in charge leading a team of multidisciplinary scientists, engineers, toxicologists, and risk assessors for an environmental emergency response at a large-scale battery power storage unit at a solar farm. A thermal incident where several cargo container boxes caught fire and burned required immediate action to assess the environmental and human health impacts.

ECOLOGICAL RESTORATION

Ecological Restoration, Northeast Idaho — Serves as the principal in charge leading a team of scientists, engineers, and ecologists for an ecological restoration effort in northeast Idaho. The project has involved restoring flow to a creek and working with a number of state and federal agencies to develop and implement a conceptual restoration plan and a mitigation and monitoring plan. The project will also include obtaining the necessary permits and overseeing the restoration in an area of critical habitat.

PROJECT MANAGEMENT

GMS Software Development, Utah — Served as chief engineer for the original development of the software Groundwater Modeling System (GMS) at the Environmental Modeling Research Laboratory at Brigham Young University. A sophisticated graphical environment for groundwater model pre- and post-processing, 3-dimensional site characterization, and geostatistics, GMS is the official groundwater application of the U.S. Department of Defense and is also used by the U.S. Department of Energy, EPA, and thousands of users across the world.

NATURAL RESOURCE DAMAGE ASSESSMENT

Natural Resources Damage Assessment, Southeastern Idaho — Served as the groundwater expert determining groundwater damages in southeastern Idaho due to decades of phosphate mining. Led a team of hydrogeologists evaluating the impacts of selenium and other contaminants and changes in natural groundwater flows across the entire region. The damage assessment included a number of mining areas as well as the facilities where the phosphate material was processed.

Presentations / Posters

Davis, R.J. 2023. Challenges limiting managed aquifer recharge (MAR) adoption in the West. National Ground Water Association Groundwater Summit. December 5–7. Las Vegas, NV.

Davis, R.J. 2023. Water, AI, and us: What does the future hold for solving Utah's water challenges. Hint: It can't be solved without you and me. Salt Lake County Watershed Symposium. November 15–16. Salt Lake City, UT.

Davis, R.J. 2023. Building climate resilience through sustainable remediation in the western region. Groundwater Resources Association of California Western Groundwater Congress. September 12–14. Burbank, CA.

Davis, R.J. 2023. Water in Utah: Navigating the present and shaping the future. American Groundwater Trust. August 14–15. Provo, Utah.

Davis, R.J. 2023. More managed aquifer recharge and saving the Great Salt Lake—A balancing act. Idaho Water Users Association. June 12–13. Sun Valley, ID.

Davis, R.J. 2023. More managed aquifer recharge: Deliberate resiliency to combat droughts and climate change in the West. Association for Environmental Health of Soils. March 20–23. San Diego, CA.

Davis, R.J. 2023. Resilient and sustainable remediation. ESG|Climate Resilient & Sustainable Remediation Symposium. Groundwater Resources Association of California Western Groundwater Congress. February 6–7. San Diego, CA.

Davis, R.J. 2022. More managed aquifer recharge: Solutions to combat droughts and climate change in the West. National Ground Water Association Groundwater Summit. December 6–8. Las Vegas, NV.

Davis, R.J. 2022. Saving our aquifers: Climate change and managed aquifer recharge. Salt Lake County Watershed Symposium. November 16–17. Salt Lake City, UT.

Davis, R.J. 2022. More managed aquifer recharge—A solution to combat droughts and climate change in the West. Groundwater Resources Association of California Western Groundwater Congress. September 21–23. Sacramento, CA.

Davis, R.J. 2022. Saving our aquifers—Climate change, sustainability, and managed aquifer recharge. International Water Holdings. August 24–25. Salt Lake City, UT.

Davis, R.J. 2022. More managed aquifer recharge (MMAR) a solution to combat droughts and climate change in the West. Groundwater Protection Council Annual Forum. June 21–23. Salt Lake City, UT.

Davis, R.J. 2022. Aquifer storage and recovery—Hydrogeologic considerations. American Water Resources Association. May 17. Salt Lake City, UT.

Davis, R.J. 2022. Utah hydrology—What you do and don't know about Utah hydrogeology. National Ground Water Association. May 4, 2022. Virtual.

Davis, R.J. and B. Lemon. 2022. Provo, Utah: From planning to pilot to a final aquifer storage and recovery (ASR) program. Utah Water Users Workshop. March 21–23. St. George, UT.

Davis, R.J. 2021. Provo, Utah, from planning to pilot to a final managed aquifer recharge (MAR) program. National Ground Water Association Groundwater Summit. December 7–8. Virtual.

Davis, R.J. 2021. Provo City aquifer storage and recovery project. Ground Water Protection Council Annual Forum, September 27–29. Virtual.

Davis, R.J. 2021. Provo, Utah, from planning to pilot to a final managed aquifer recharge (MAR) program. American Public Works Association Utah Section Annual Conference. September 21–22. Sandy, UT.

Davis, R.J. 2021. Provo City aquifer storage and recovery project. Utah Water Users Workshop. May 17–19. St. George, UT.

Davis, R.J. 2021. Provo, Utah: From planning to pilot to a final managed aquifer recharge (MAR) program. ASR for Texas, Virtual Webinar. May 4–5.

Davis, R.J. 2021. Provo aquifer storage and recovery—From planning to pilot. American Water Works Association Virtual Summit on Sustainable Water, PFAS, Waterborne Pathogens. February 10–11.

Davis, R.J. 2020. Update on Provo's aquifer storage and recovery program. American Water Works Association Virtual Intermountain Section Annual Conference. October 21–23. Sun Valley, ID.

Davis, R.J. 2020. Are you prepared for the new federal permit process for CCR facilities? Second Annual Coal Ash and Combustion Residual Management Webinar, October 7–8. Virtual.

Invited Participant, Expert Panels, and Workshops

Bulk Water Innovation Partnership (BWIP): More managed aquifer recharge: Deliberate resiliency to combat droughts and climate change in the West. December 6, 2023. Virtual.

Rocky Mountain Association of Environmental Professionals (RMAEP): Great Salt Lake of Utah: watershed, legislative, and community issues surrounding it. September 20, 2023.

Salt Lake Chamber: Utah Water Outlook. April 13, 2022.

EDCUtah Webinar: Water: Constraints and Opportunities for Development in Utah panel. June 11, 2021.

ULI Utah: Trends Conference—Water: Constraints and Opportunities for Development in Utah panel. October 27, 2021.

Exhibit 2

Resume for Norman L. Jones

Norman L. Jones, Ph.D.

Professor
Department of Civil & Construction Engineering
Brigham Young University

Education

Ph.D.	Civil Engineering, University of Texas at Austin, 1990
M.S.	Civil Engineering, University of Texas at Austin, 1988
B.S.	Civil Engineering, Brigham Young University, 1986

Academic Experience

Department Chair, Civil & Construction Engineering, Brigham Young University (BYU), 2018-2024
Professor, Civil & Construction Engineering, BYU, 2002–present
Associate Professor, Civil & Environmental Engineering, BYU, 1997–2002
Assistant Professor, Civil & Environmental Engineering, BYU, 1991–1996

Current Membership in Professional Organizations

American Society of Civil Engineers (ASCE)
American Water Resources Association (AWRA)
National Ground Water Association (NGWA)
American Geophysical Union (AGU)

Professional Committees

AWRA 2014 GIS in Water Resources Technical Program Chair
NGWA Groundwater Modeling Interest Group Committee
American Society of Civil Engineers
EWRI Groundwater Management Committee
EWRI Emerging Technologies Committee
International Editorial Board for the Journal of HydroInformatics
Editor of AQUAmundi Journal
Great Salt Lake Basin Integrated Plan - Groundwater Technical Advisory Team
Tethys Geoscience Foundation - Board Member

Selected Honors and Awards

2001 Walter L. Huber Civil Engineering Research Prize
2002 College of Engineering & Technology Special Commendation Award
2003 Brigham Young University Technology Transfer Award
2007 Utah Engineering Educator of the Year – ACEC
2012 Brigham Young University Karl G. Maeser Research and Creative Arts Award
2016 AWRA Educator of the Year – Utah Section
2021 NGWA John Hem Award for Science and Engineering
2023 Brigham Young University Sponsored Research Award

University Courses Taught

CE En 101 - Introduction to Civil and Environmental Engineering
CE En 201 - Infrastructure
CE En 270 – Computer Methods in Civil Engineering
CE En 341 – Elementary Soil Mechanics
CE En 540 – Geo-Environmental Engineering
CE EN 544 - Seepage and Slope Stability Analysis
CCE 547 – Ground Water Modeling

CE En 641 – Advanced Soil Mechanics

Software

Led the development of the Groundwater Modeling System (GMS) software. GMS is a state-of-the-art three-dimensional environment for ground water model construction and visualization. It includes tools for site characterization including geostatistics and solid modeling of soil stratigraphy. GMS is the most comprehensive and sophisticated groundwater modeling software available and is used by over 10,000 organizations in over 100 countries. Currently managed and distributed by Aquaveo, LLC, a company I co-founded in 2007.

External Research Grants

1. Automated Mesh Generation For the TABS-2 System, $19,000, 2/90 - 11/90, U.S. Army Engineer Waterways Experiment Station
2. A Geometry Pre-Processor for HEC-1 Employing Triangulated Irregular Networks, $20,048, 3/91 - 10/91, U.S. Army Engineer Waterways Experiment Station
3. Real-Time Visualization for the TABS-2 Modelling System, $14,123, 4/91 - 8/91, U.S. Army Engineer Waterways Experiment Station
4. An Investigation of X-Windows Interface Tools, $49,556, 1/92 - 8/92, U.S. Army Engineer Waterways Experiment Station
5. Descriptive Geometry and Solid Rendering, $24,000, 1/92 - 10/92, U.S. Army Engineer Waterways Experiment Station
6. An Investigation of Automated Pre-processing Schemes for TIN-Based Drainage Analysis, $34,750, 4/92-10/92, U.S. Army Engineer Waterways Experiment Station
7. A Comprehensive Graphical User Environment for Groundwater Flow and Transport Modeling, $246,526, 6/93-9/94, U.S. Army Engineer Waterways Experiment Station
8. An Integrated Surface Flow Modeling System, $131,848, 1/94-1/95, U.S. Army Engineer Waterways Experiment Station
9. Productivity and Management Tools for Groundwater Flow and Transport Modeling, $207,404, 5/94-4/95, U.S. Army Engineer Waterways Experiment Station
10. Enhanced Tools for Quality Control in Automated Groundwater Transport Modeling, $246,553, 1/95-12/95, U.S. Army Engineer Waterways Experiment Station
11. Visualization for Two-Dimensional Surface Runoff Modeling, $98,221, 1/95-10/95, U.S. Army Engineer Waterways Experiment Station
12. Visualization Tools for Two-Dimensional Finite Element Hydrologic Modeling, $93,933, 11/95-10/96, U.S. Army Engineer Waterways Experiment Station
13. A Graphical Environment for Multi-Dimensional Surface Water Modeling, $49,789, 3/96-9/96, U.S. Army Engineer Waterways Experiment Station
14. A Conceptual Modeling Approach to Pre-processing of Groundwater Models, $475,743, 11/95-11/97, U.S. Army Engineer Waterways Experiment Station
15. Hydrosystems Modeling, $2,458,083, 5/97-4/02, U.S. Army Engineer Waterways Experiment Station
16. Second Generation Hydroinformatics Research, $4,958,127. U.S. Army Engineer Research and Development Center.
17. Flux Calculations and 3D Visualization for the SCAPS Piezocone and GeoViz System, $34,931, U.S. Navy.
18. Development of modeling methods and tools for predicting coupled reactive transport processes in porous media under multiple scales. $949,000. US Dept. of Energy. 1/07-12/09.
19. CI-WATER: Cyberinfrastructure to Advance High Performance Water Resource Modeling, $3,435,873. National Science Foundation - EPSCoR. 9/11-8/14.

20. Comprehensive Streamflow Prediction and Visualization to Support Integrated Water Managment, $599,823. NASA SERVIR, 8/16-8/19.
21. Daniel P. Ames, E. James Nelson, Norman L. Jones, An AmeriGEOSS Cloud-based Platform for Rapid Deployment of GEOGLOWS Water and Food Security Decision Support Apps, $540,658, NASA GEO, 1/2018-12/2020
22. Geospatial Information Tools That Use Machine-Learning to Enable Sustainable Groundwater Management in West Africa, $657,232. NASA SERVIR, 11/19-11/22.
23. Advancing the NASA GEOGloWS Toolbox for Regional Water Resources Management and Decision Support. $1.2M. NASA GEOGLOWS. 2022-2025. Dan Ames, Jim Nelson, Gus Williams, Norm Jones.
24. CIROH: National Cyberinfrastructure Framework for Engaging the Hydrologic Community (NCF). $1,822,418. National Oceanographic and Atmospheric Administration. 2022-2025. Dan Ames, Jim Nelson, Gus Williams, Norm Jones.
25. CIROH: Advancing Science to Better Characterize Drought and Groundwater-Driven Low-Flow Conditions in NOAA and USGS National-Scale Models. $801,221. 2023-2025. Norm Jones, Gus Williams, T. Prabhakar Clement, Donna Rizzo.
26. Improved Hydrologic Prediction Services for Resilience with GEOGLOWS, $1,889,627, National Oceanic and Atmospheric Administration (NOAA), 4/1/2024-3/31/2027. Norm Jones, Jim Nelson, Andrew South.

Summary: PI or Co-PI on 26 projects totaling $22,026,639.

Peer-Reviewed Publications in the Past 10 Years

1. Jones, N., Nelson, J., Swain, N., Christensen, S., Tarboton, D. Dash, P. Tethys: A Software Framework for Web-Based Modeling and Decision Support Applications. In: Ames, D.P., Quinn, N.W.T., Rizzoli, A.E. (Eds.), Proceedings of the 7th International Congress on Environmental Modelling and Software, June 15-19, San Diego, California, USA. ISBN: 978-88-9035-744-2
2. Jones, N., Griffiths, T., Lemon, A., Kudlas, S. Automated Well Permitting in Virginia's Coastal Plain Using SEAWAT and GIS Geoprocessing Tools. In: Ames, D.P., Quinn, N.W.T., Rizzoli, A.E. (Eds.), Proceedings of the 7th International Congress on Environmental Modelling and Software, June 15-19, San Diego, California, USA. ISBN: 978-88-9035-744-2
3. Y. Fan, S. Richard, R. S. Bristol, S. E. Peters, S. E. Ingebritsen, N. Moosdorf, A. Packman, T. Gleeson, I. Zaslavsky, S. Peckham, L. Murdoch, M. Fienen, M. Cardiff, D. Tarboton, N. Jones, R. Hooper, J. Arrigo, D. Gochis, J. Olson and D. Wolock (2014), DigitalCrust – a 4D data system of material properties for transforming research on crustal fluid flow, *GeoFluids*, Article first published online: 7 OCT 2014 | DOI: 10.1111/gfl.12114.
4. Swain, N.R., K. Latu, S.D. Christensen, N.L. Jones, E.J. Nelson, D.P. Ames, G.P. Williams (2015). "A review of open source software solutions for developing water resources web applications." Environmental Modeling & Software 67: 108-117.
5. Jones, David, Norm Jones, James Greer, and Jim Nelson, "*A cloud-based MODFLOW service for aquifer management decision support,*" Computers and GeoSciences, Vol. 78, pp. 81-87, 2015.
6. Dolder, H., Jones, N., and Nelson, E. (2015). "Simple Method for Using Precomputed Hydrologic Models in Flood Forecasting with Uniform Rainfall and Soil Moisture Pattern." *J. Hydrol. Eng.,*10.1061/(ASCE)HE.1943-5584.0001232 , 04015039.
7. Fatichi, S., Vivoni, E.R., Ogden, F.L., Ivanov, V.Y., Mirus, B., Gochis, D., Downer, C.W., Camporese, M., Davidson, J.H., Ebel, B., Jones, N., Kim, J., Mascaro, G., Niswonger, R., Restrepo, P., Rigon, R., Shen, C., Sulis, M., and Tarboton, D. (2016). *An Overview of Challenges, Current Applications and Future Trends of Distributed Process-based Models in Hydrology*.

Journal of Hydrology. Vol 537, 45-60. DOI:10.1016/j.jhydrol.2016.03.026

8. Snow, Alan D., Scott D. Christensen, Nathan R. Swain, E. James Nelson, Daniel P. Ames, Norman L. Jones, Deng Ding, Nawajish S. Noman, Cédric H. David, Florian Pappenberger, and Ervin Zsoter, 2016. *A High-Resolution National-Scale Hydrologic Forecast System from a Global Ensemble Land Surface Model*. Journal of the American Water Resources Association (JAWRA) 52(4):950–964, DOI: 10.1111/1752-
9. Perez, J. Fidel, Nathan R. Swain, Herman G. Dolder, Scott D. Christensen, Alan D. Snow, E. James Nelson, and Norman L. Jones, 2016. *From Global to Local: Providing Actionable Flood Forecast Information in a Cloud-Based Computing Environment*. Journal of the American Water Resources Association (JAWRA) 52(4):965–978. DOI: 10.1111/1752-1688.12392
10. Swain, N. R., S. D. Christensen, A. D. Snow, H. Dolder, G. Espinoza-Dávalos, E. Goharian, N. L. Jones, E. J. Nelson, D. P. Ames and S. J. Burian (2016). "A new open source platform for lowering the barrier for environmental web app development." Environmental Modelling & Software 85: 11-26.
11. Souffront Alcantara, Michael A.; Crawley, Shawn; Stealey, Michael J.; Nelson, E. James; Ames, Daniel P.; and Jones, Norm L. (2017) "Open Water Data Solutions for Accessing the National Water Model," Open Water Journal: Vol. 4 : Iss. 1 , Article 3.
12. Souffront Alcantara, Michael, C Kesler, M Stealey, J Nelson, D Ames, N Jones, 2017. Cyberinfrastructure and Web Apps for Managing and Disseminating the National Water Model, *Journal of the American Water Resources Association*, *JAWRA Journal of the American Water Resources Association* 54, no. 4 (2018): 859-871.
13. Christensen, Scott D., Nathan R. Swain, Norman L. Jones, E. James Nelson, Alan D. Snow, and Herman G. Dolder. "A Comprehensive Python Toolkit for Accessing High-Throughput Computing to Support Large Hydrologic Modeling Tasks." *JAWRA Journal of the American Water Resources Association* 53, no. 2 (2017): 333-343.
14. Nelson, E. J., Pulla, S. T., Matin, M. A., Shakya, K., Jones, N., Ames, D. P., Ellenberg, W.L., Markert, K.N., Hales, R. (2019). Enabling Stakeholder Decision-Making With Earth Observation and Modeling Data Using Tethys Platform. *Frontiers in Environmental Science*, *7*. https://doi.org/10.3389/fenvs.2019.00148
15. Purdy, A. J., David, C. H., Sikder, M. S., Reager, J. T., Chandanpurkar, H. A., Jones, N. L., & Matin, M. A. (2019). An Open-Source Tool to Facilitate the Processing of GRACE Observations and GLDAS Outputs: An Evaluation in Bangladesh. *Frontiers in Environmental Science*, 7. https://doi.org/10.3389/fenvs.2019.00155
16. Souffront Alcantara, M. A., Nelson, E. J., Shakya, K., Edwards, C., Roberts, W., Krewson, C., Ames, D. P., Jones, N. L., Gutierrez, A. (2019). Hydrologic Modeling as a Service (HMaaS): A New Approach to Address Hydroinformatic Challenges in Developing Countries. *Frontiers in Environmental Science*, 7. https://doi.org/10.3389/fenvs.2019.00158
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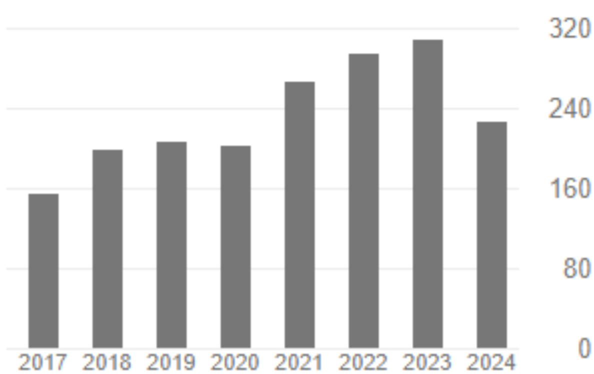
Google Scholar Metrics

	All	Since 2019
Citations	3287	1507
h-index	27	19
i10-index	51	30



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