

# Exhibit 28

In Re: Camp Lejeune Water Litigation  
Case No.: 7:23-CV-00897  
Date: February 14, 2025  
Reporter: Vickie Larsen, CCR/RMR

## WITNESS CERTIFICATE

State of Utah )  
ss.  
County of Salt Lake )

I, NORMAN L. JONES, HEREBY DECLARE:  
That I am the witness referred to in the  
foregoing testimony; that I have read the  
transcript and know the contents thereof;  
that with these corrections I have noted this  
transcript truly and accurately reflects my  
testimony.

PAGE-LINE	CHANGE / CORRECTION	REASON
-----	<u>See corrections listed in Attachment A</u>	-----
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-----	No corrections were made.	-----

I, NORMAN L. JONES, hereby declare under the  
penalties of perjury of the laws of the  
United States of America and the laws of the  
State of Utah that the foregoing is true and  
correct.

Dated this 21 day of March,  
2025.

  
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NORMAN L. JONES

# ATTACHMENT A

## Dr. Norm Jones Deposition Transcript Errata

Page	Line #, Correction	Reason
9	16 Q. Is the Traeger company the same	Spelling
19	12 Mississippi, Auburn, <del>and</del> a number of other	Clarity
20	5 participate in a two-day workshop, <del>listen to</del> 6 presentations, and then we would write a	Clarity
21	5 water that comes from rainfall <del>that as a</del> and is the 6 portion of that eventually percolates down	Clarity
22	22 A. <del>For water resource planning.</del> 23 Groundwater is one of our most	Clarity
24	8 <del>It was</del> 9 a very broad project. They looked at machine	Clarity
24	19 A. <del>I -- so I was the prime --</del> 20 This grant was through what's called the 21 EPSCoR project, E-P-S-C-O-R, the EPSCoR 22 program through the National Science 23 Foundation.	Clarity
25	14 A. They were <del>selected by the</del> 15 <del>they</del> were asked to serve on behalf of the	Clarity
27	2 that they provided, the papers that they 3 <del>were -- that they had -- they</del> were either 4 preparing to submit or publishing, and two 5 days of presentations that they would make	Clarity
28	14 A. They <del>they</del> described the 15 purpose, I believe, <del>that -- in -- in</del> for 16 the Louisiana model, it was to look at	Clarity
29	7 A. <del>They -- I -- what -- from</del> From what 8 I recall, it's been a while, it was <del>to</del> develop a 9 very sophisticated model of the aquifers in	Clarity
29	14 A. -- and <del>then</del> the dynamics of the 15 aquifer.	Clarity
35	21 model. In each case <del>where</del> for the 22 parameters you've selected, you perturb the	Clarity
	17 A. I put some tabs in for some 18 figures that I thought <del>primarily figures I</del> 19 <del>thought</del> might be useful <del>that I think are</del> 20 <del>important in the -- in the analysis --</del> in the 21 review of the work, one of which is 22 Figure A18, Chapter	Clarity
36	18 as being -- or considered to be possible. 19 variations of the model.	Single sentence
37	25 Figure F12, the scatter plot <del>of</del> simulated versus	Missing word
44	11 \$15 billion project, <del>and it</del> would have taken <del>an</del> 12 estimated 27 years to build. <del>It</del> would have been	Clarity

45	12. A. <del>It—they've—have—</del> 13 There's been a settlement in the last few 14 months, so it's <del>—I think it's</del> over.	Clarity
50	4 A. I <del>—if—</del> if there were not 5 any data— I know they had concentrations at 6 the <del>—at the</del> location where the water was 7 being pumped out. That was the whole basis	Clarity
56	9 A. This is <del>the resume</del> 10 that I am currently using when my resume is 11 requested.	Correction/Clarity
58	14 THE WITNESS: In terms of my 15 publications, <del>yeah, I've—my—I've</del> <del>16 done more research on—well,</del> in the 17 last ten years, the focus of my 18 research has been more shifted	Clarity
61	20 decided that we would work together, <del>so</del> we could	Missing word
62	2 post-processing and data analysis. Together 3 we <del>—we</del> reviewed the <del>—the</del> data, reviewed 4 the <del>—the</del> prior publications from ATSDR, and 5 then <del>we—</del> together we drafted and edited and 6 finalized this report.	Clarity
62	20 A. That's correct. It's what we 21 call a pre- and post-process <del>or</del> for MODFLOW 22 and MT3DMS. <del>The</del> input files to MODFLOW	Correction
63	3 You can modify 4 the input files through the GMS interface, 5 for example, save the modified files, <del>run—</del> 6 <del>and</del> then GMS will then launch MODFLOW and/or	Clarity
63	13 A. That's correct. <del>We were -- It</del> 14 was developed, <del>yeah,</del> in the early part of my 15 career.	Clarity
69	3 modeling <del>that's done that was documented</del> in Chapter A and	Correction/clarity
69	6 I'd be happy to share that <del>it</del> may not	Correction
80	4 A. Related to the case? I <del>—I've</del> 5 <del>reviewed the—several other—</del> I've 6 reviewed the expert reports by Morris Maslia,	Clarity
90	16 THE WITNESS: I read through 17 the portions of the <del>—carefully the</del> 18 Tarawa Terrace reports that I felt	Clarity
93	23 THE WITNESS: I <del>—like I say,</del> 24 I <del>—I don't—</del> I haven't read it. I	Clarity
95	23 textbook <del>that—</del> but I haven't used it as a	Clarity
96	17 A. <del>One of the things that—</del> <del>18 there's a—</del> Early in the book there's, <del>I</del> 19 <del>believe,</del> a chapter on the groundwater 20 modeling process, talks about forming	Clarity

	21 conceptual models or the different steps	
105	12 And that <del>typically</del> leads to a -- 13 <del>typically to a</del> very constructive discussion	Clarity
107	14 simulations using the models to -- 15 <del>with respect to determine</del> how the model output	Clarity
108	3 his report, and then <del>we were</del> most 4 recently <del>we</del> we did an analysis	Clarity
111	5 model was described in the Chapters A, C, and 6 F, and I reviewed it <del>as I</del> in that context.	Correction/clarity
112	2 yeah, I just -- I did not find anything 3 that <del>that I was</del> I would consider to be an 4 error in their process.	Clarity
113	17 they had two sets of data. They had PCE -- 18 <del>well</del> , and they had a large set of head and flow	Clarity
114	2 water at the <del>water</del> Tarawa Terrace water 3 treatment plant.	Clarity
114	5 it, <del>of the</del> original study was to do <del>a</del> historical	Missing words
114	12 at the <del>PCE</del> measured PCE <del>vs</del> observed PCE	Clarity, missing word
114	16 there <del>was</del> <del>were</del> high observed concentrations the	Clarity
116	12 some <del>some</del> high fluctuations in the 13 <del>area</del> <del>in the</del> error. However, the	Correction
115	11 THE WITNESS: The <del>they</del> 12 <del>they</del> <del>the</del> <del>the</del> model simulated	Clarity
117	2 And, therefore, <del>I</del> there's no	Clarity
117	9 there's nothing in the post-audit that 10 <del>would warrant</del> , I believe, <del>that</del> would 11 be strong evidence to say, hey, 12 there's something wrong with the 13 original model.	Clarity
118	15 any evidence <del>to</del> for that.	Correction
124	8 A. Yes -- well, let's see. The 9 black -- oh, yes, <del>the</del> Well TT-26 <del>was</del> not 10 operated <del>from</del> January '62 to February 1976, hence 11 there's a gap, yes.	Clarity, missing words
128	15 I'm generally familiar with 16 that discussion <del>that that</del> about the volatilization 17 issue <del>that</del> was addressed by Sabatini. That is not	Clarity
128	22 out of the aquifer, <del>that's what</del> the model	Clarity
135	5 A. Yeah, another factor is <del>the</del> 6 precipitation. <del>How</del> and snow melt, 7 <del>precipitation</del> , how much water is <del>is</del> 8 traveling through <del>what</del> we call that the vadose 9 zone between the ground surface and the water 10 table.	Clarity, missing word
139	3 consider significant. <del>There was</del> <del>if</del>	Clarity

	<del>4 you</del> During the very early years, 5 there was maybe a larger gap between	
142	5 specific point location, and <del>--and it</del> 6 <del>has</del> it's more susceptible to	Clarity
142	11 match where the simulated <del>vs</del> observed	Missing word
142	23 aquifer than when you take a <del>simple single</del>	Correction
143	4 you'd get with the individual <del>error</del> sample.	Correction
144	4 contexts are a little different. We	Clarity
151	2 A. One of which was the -- the -- 3 the middle line. The red line is the .0005, 4 which was what was used in the original ATSDR 5 model. And one of those, as I understand, 6 was a .0004 value that was suggested or used 7 by Faye. And then another one was a .0006 8 value, which was suggested by -- by Dr. Aral.	Correction. Missing digits.
156	21 results to get down that far. And <del>it's</del> 22 you're looking at <del>--there is a--</del> an early 23 arrival, but it's at a really small	Clarity
157	1 <del>So just the fact</del> And then 2 the Tarawa Terrace water treatment plant	Clarity
157	12 uncertainty analysis results, which <del>is</del> 13 results from the same phenomenon I'm	Correction
162	11 issue papers. And he has <del>published</del> a number of these	Clarity
181	14 A. Oh, I'm sure he would. But I 15 don't want <del>that to</del> my personal 16 relationship with him to impact <del>my--my--</del> 17 my work and my conclusions on this.	Clarity
182	23 TechFlowMP results. We focused mainly on the 24 MODFLOW and MT3DSMS <del>--MS as-- as that was</del> within the 25 context of the work were asked to do. <del>Was-We were</del>	Clarity/correction
185	5 A. Yeah. One in particular, you 6 may or may not be familiar with <del>is the--with</del> 7 the Woburn case near Boston, Massachusetts.	Correction
185	15 believe, in the -- in <del>a the</del> Woburn	Correction
194	10 defense. They had different models 11 and argued for the merits of each, and 12 that's <del>the--that-what</del> was bifurcated as 13 described in this <del>--in this</del> issue.	Clarity
195	3 now, and so <del>there</del> that was one of 4 <del>the--that was one of</del> the issues in 5 the case.	Clarity
195	22 where -- which specific neighborhoods and	Correction
196	8 A. That's -- I believe so. I 9 collected my calibration <del>data</del> -- I was also in	Missing word