

**P S O M A S**

July 18, 2008

VIA E-MAIL

CALIFORNIA ENERGY COMMISSION  
Attn: John Kessler  
1516 Ninth Street, MS-4  
Sacramento, CA 95814-5512

<b>DOCKET</b> <b>07-AFC-3</b>	
<b>DATE</b>	<b>JUL 18 2008</b>
<b>RECD.</b>	<b>JUL 18 2008</b>

**Re: CPV Sentinel Energy Project: Docket No. 07-AFC-3**

Dear Sir/Madam:

On behalf of Mission Springs Water District, Psomas is submitting comments on the following document submitted by CPV Sentinel, LLC attorney Latham and Watkins on June 30, 2008:

*Responses to Groundwater Workshop Data Requests – Application for Certification (07-AFC-3) for CPV Sentinel Energy Project, Riverside County, California dated June 27, 2008 prepared by URS*

The comments are as follows:

**Questions and Responses Numbered 1 through 6.**

It is evident from the responses that better documentation as well as modifications to model were required to adequately address the questions posed by John L. Fio with HydroFocus, Inc. We feel that to maintain continuity and clarity that the original model report should be updated clarifying the issues raised by John Fio as well as providing a single document where all the work was completely documented.

**Additional Documentation – Evaluation of Possible Impacts to Local Wells**

This section describes what water level declines would occur to areas immediately adjacent to the proposed pumping well field as well as individual nearby existing wells that are currently active within the sub-basin.

3187 Red Hill Avenue  
Suite 250  
Costa Mesa, CA 92626-3444  
714.751.7373  
Fax 714.545.8883

[www.psomas.com](http://www.psomas.com)

The analysis goes on to state:

*"It is our view that individual wells would need to see a drawdown of 25 to 50 feet to see a presumed impact. Drawdowns of less than this amount are insignificant compared to the drawdowns that would occur from routine changes in the production patterns of the major production wells and the background fluctuations (decreases) that occur absent the CPV project."*

The authors fail to understand that water levels in the Mission Creek sub-basin have been in decline since the 1950s and that "any" decline over and above what is occurring could be considered significant.

The authors have failed to establish a criteria or even a basis for what is or is not a significant water level decline in the sub-basin. Moreover, they have failed to consider that where the well field is proposed and the potential impact to future users of groundwater in this area.

The "Additional Documentation" goes on to state:

*"On average, the water levels will be unchanged and average energy use for production will not be impacted. Under no plausible circumstances would impact 4 occur."*

We are unclear as to what "impact 4" is?

If you have any questions or need clarification, please feel free to contact me at your earliest convenience.

Sincerely,

**P S O M A S**



Michael P. Donovan, P.G., C.Hg.  
Senior Hydrogeologist

cc. Mission Springs Water District, Dan Patneaude