# Appendix 3-C. Water Level Sustainability Management Criteria

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## **Groundwater Level Sustainability Measurable Criteria**

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

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

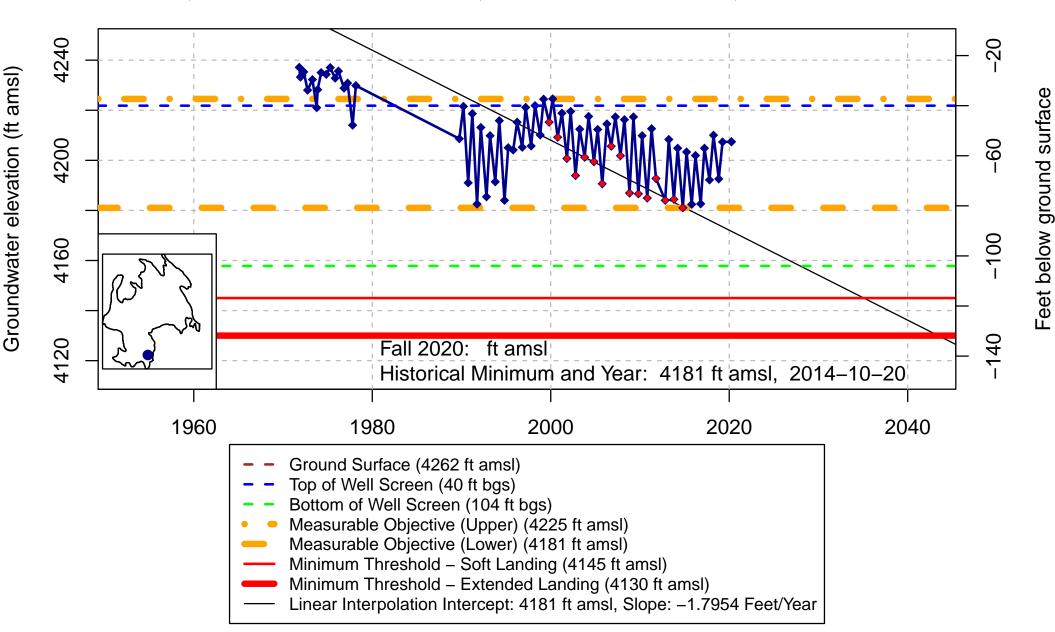
### Hydrographs

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

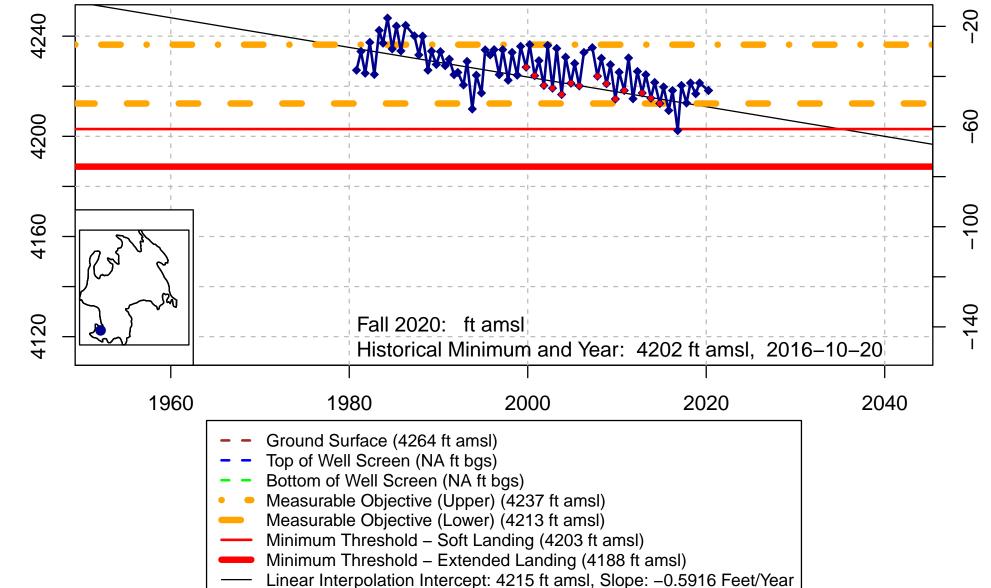
- Oil or other foreign substances were floating at the groundwater surface inside the well and the data had high uncertainty as a result.
- The well was pumped recently.
- During the minimum threshold process and generation of a regression equation, a data point was deemed an outlier, which may result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

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

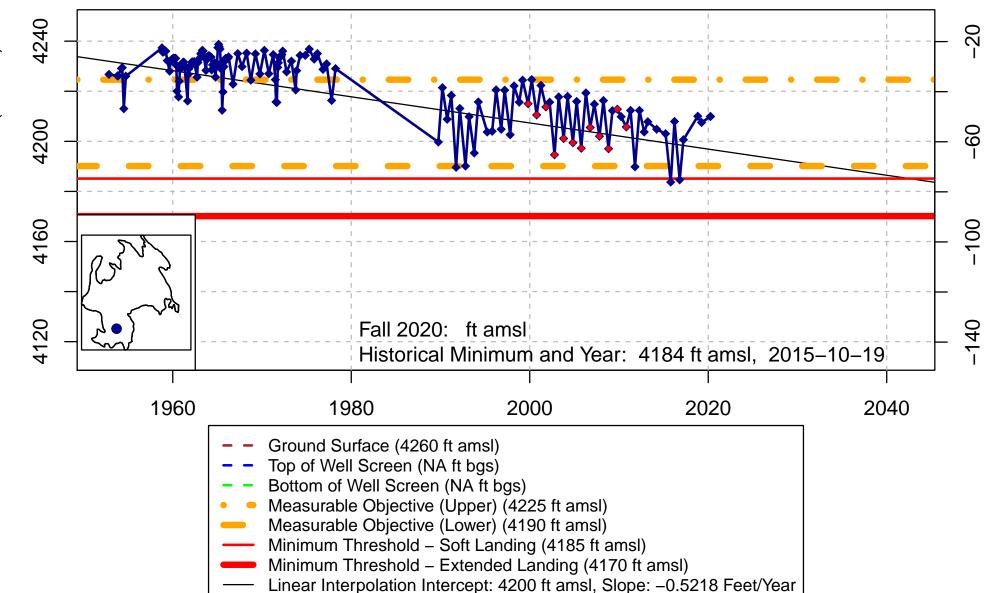
Well Name	Date	Removed WL	Reason
419451N1218967W001	2000-10-10	4157.23	Oil or foreign substance in casing
417944N1220350W001	2012-10-29	4203.73	Oil or foreign substance in casing
418512N1219183W001	1999-10-26	4208.79	Oil or foreign substance in casing
419451N1218967W001	1999-10-26	4159.73	Oil or foreign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



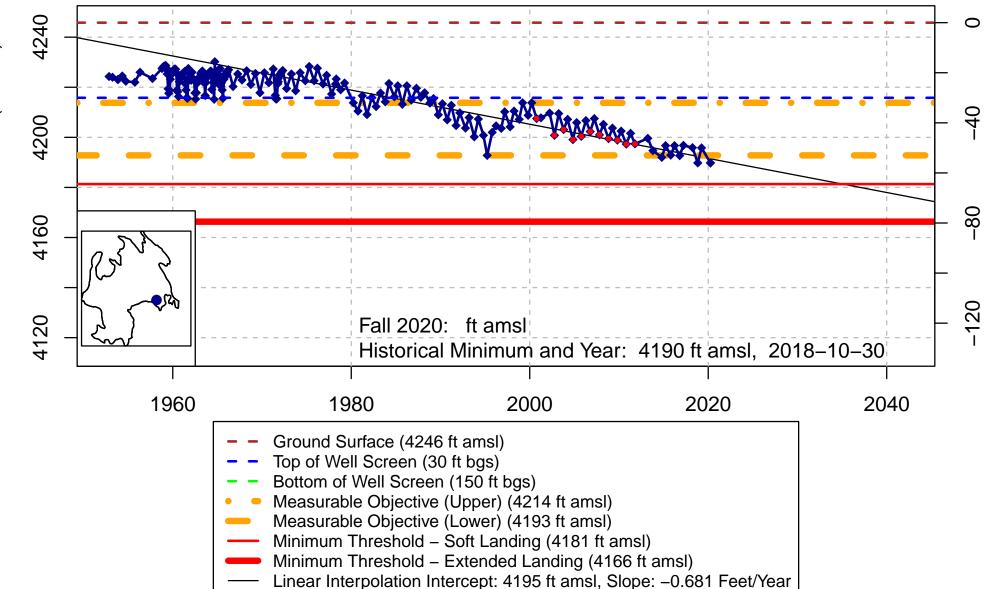




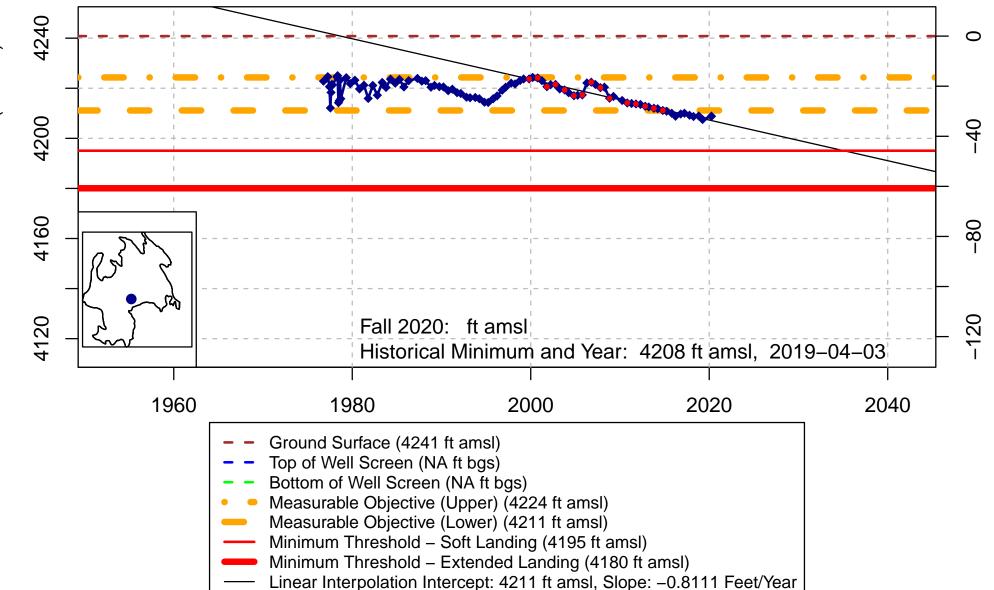
#### DWR Stn\_ID: ; well\_code: 417789N1220759W001; well\_name: 45N02W04B001M; well\_swn: 45N02W04B001M



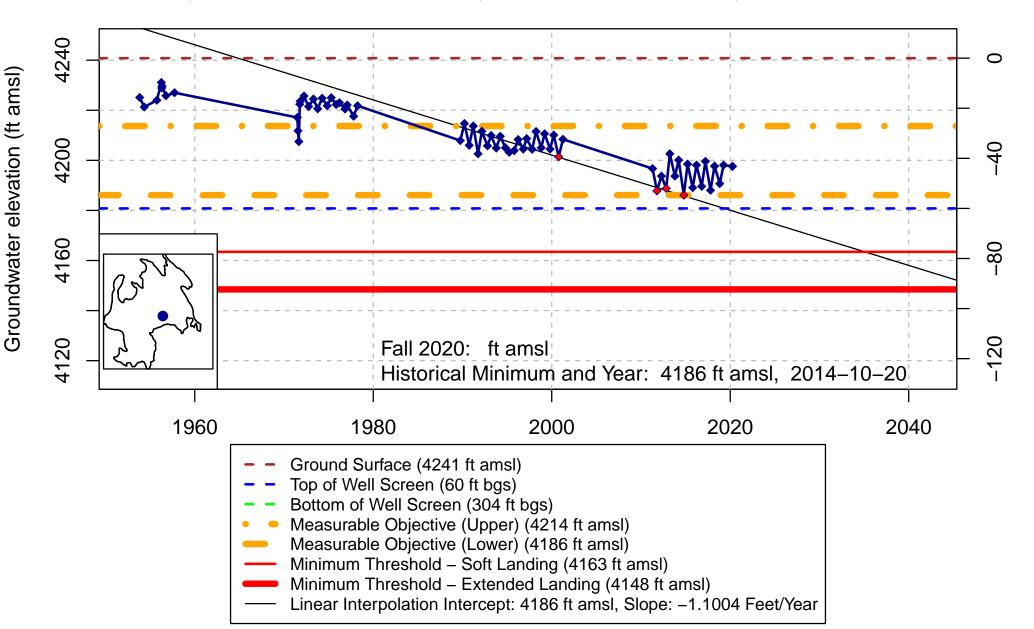




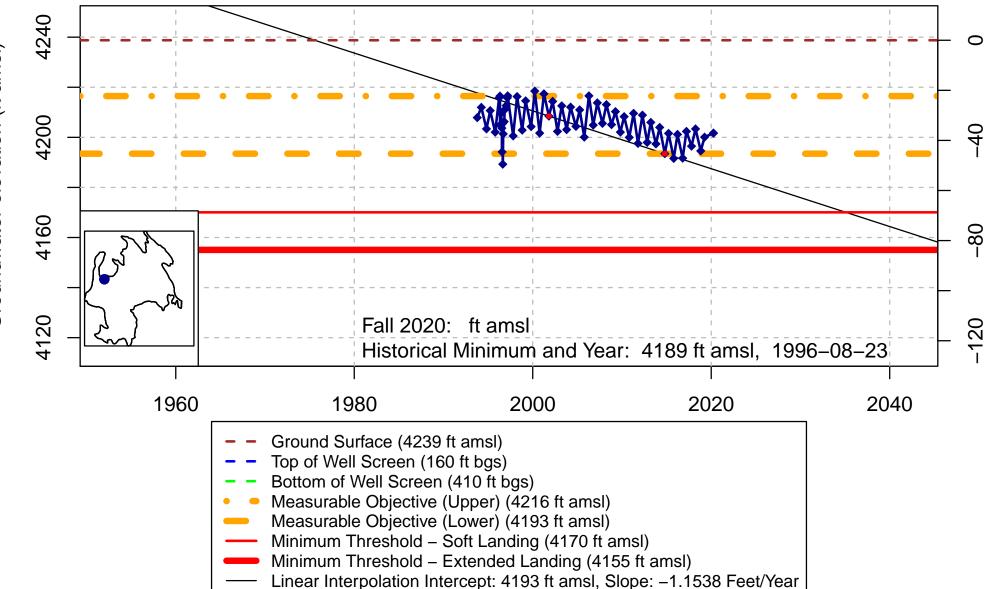
#### DWR Stn\_ID: ; well\_code: 418512N1219183W001; well\_name: 46N01E06N001M; well\_swn: 46N01E06N001M



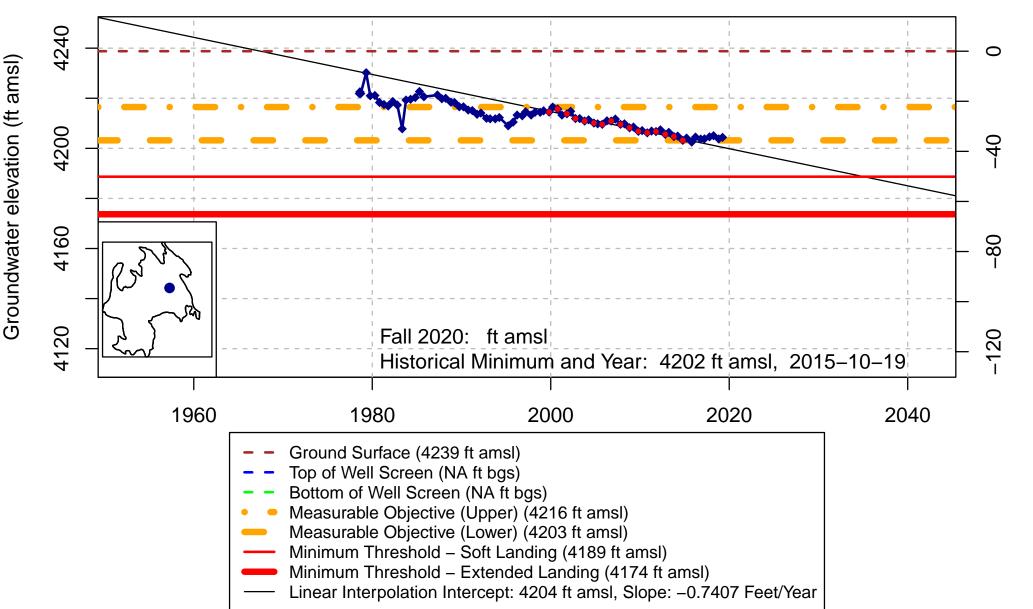
#### DWR Stn\_ID: ; well\_code: 418544N1219958W001; well\_name: 46N01W04N002M; well\_swn: 46N01W04N002M



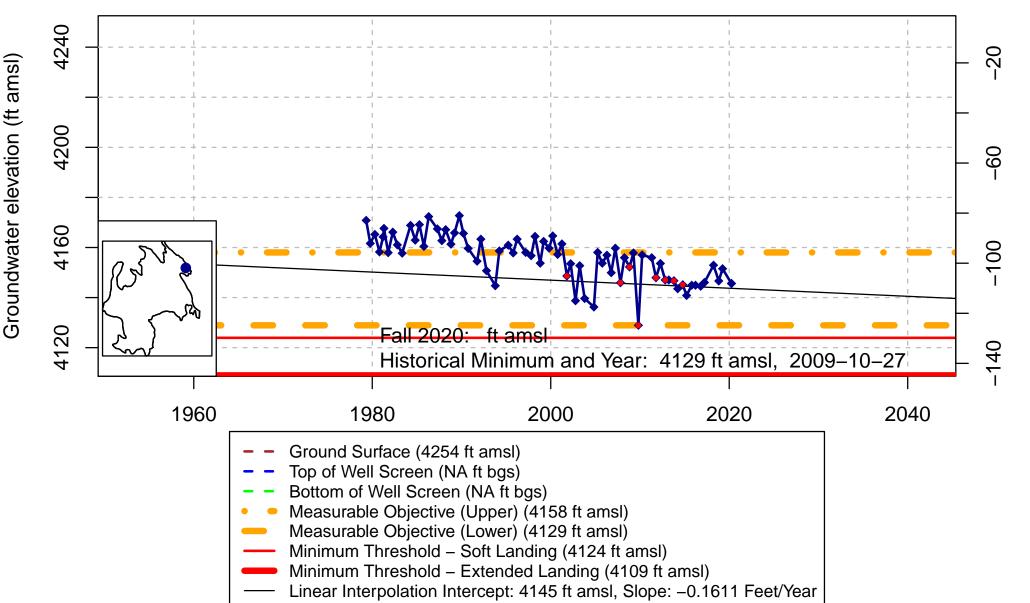
#### DWR Stn\_ID: ; well\_code: 418661N1219587W001; well\_name: 47N01W34Q001M; well\_swn: 47N01W34Q001M



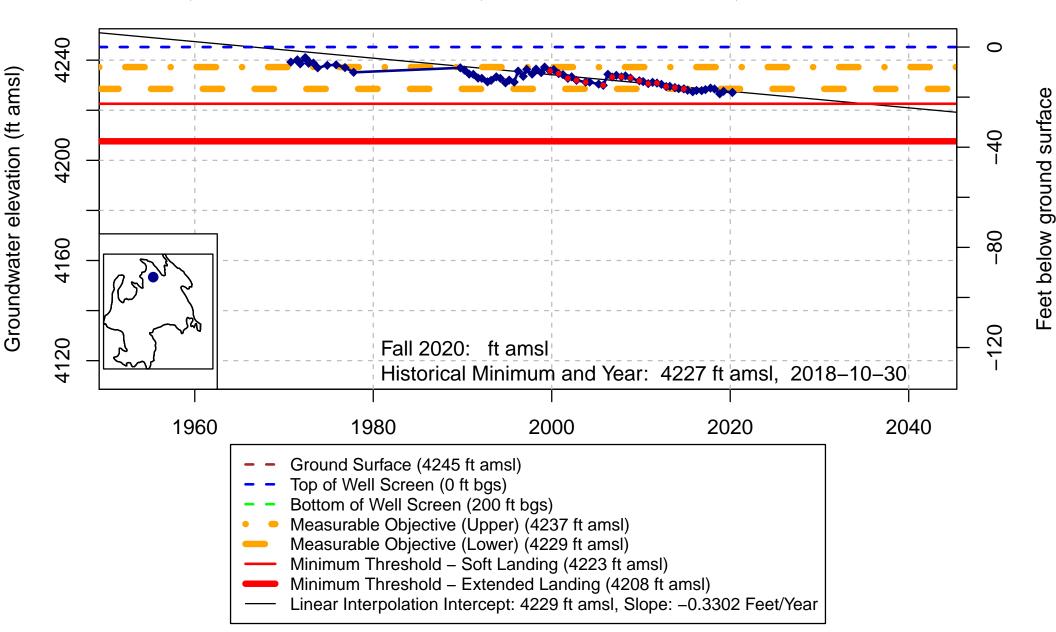




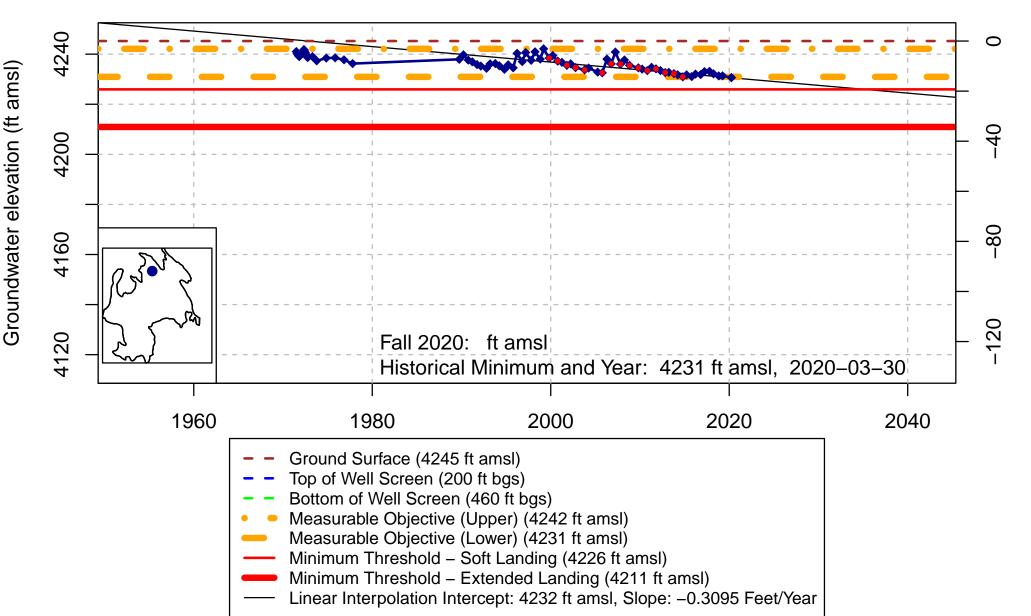
#### DWR Stn\_ID: ; well\_code: 419021N1219431W001; well\_name: 47N01W23H002M; well\_swn: 47N01W23H002M



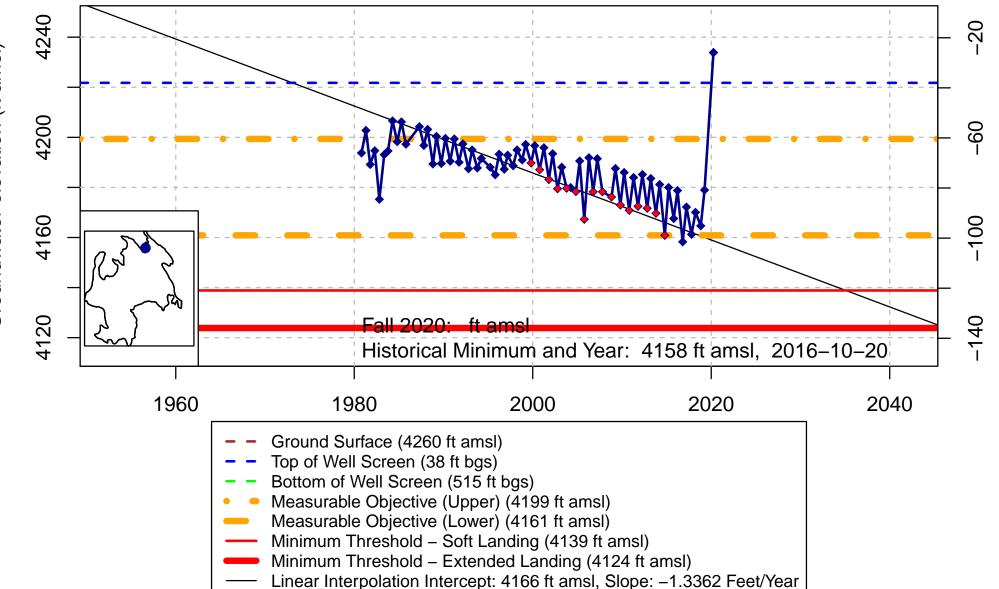
#### DWR Stn\_ID: ; well\_code: 419451N1218967W001; well\_name: 47N01E05E001M; well\_swn: 47N01E05E001M



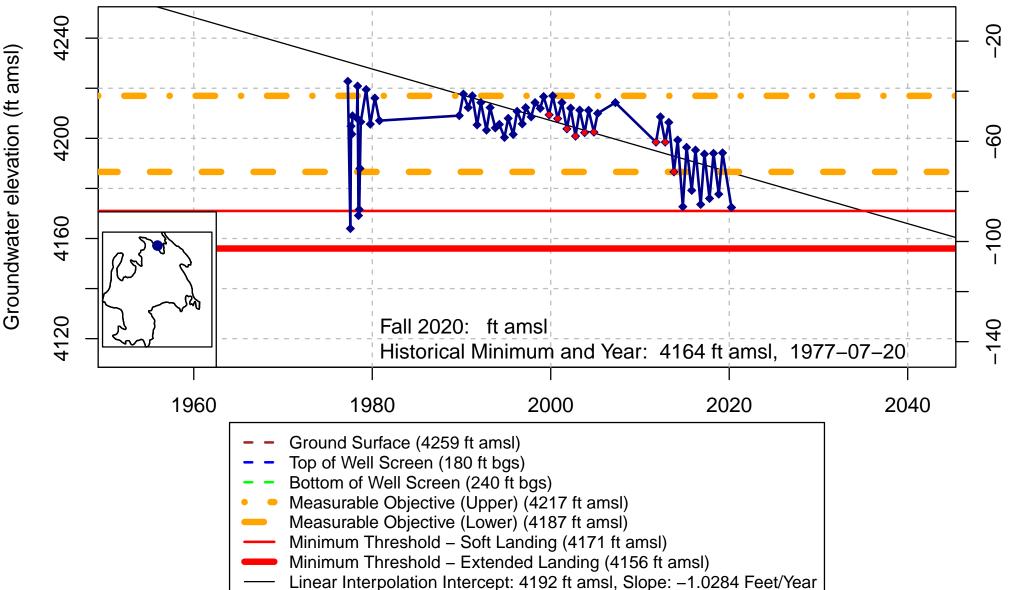
#### DWR Stn\_ID: ; well\_code: 419519N1219958W001; well\_name: 47N01W04D002M; well\_swn: 47N01W04D002M



#### DWR Stn\_ID: ; well\_code: 419520N1219959W001; well\_name: 47N01W04D001M; well\_swn: 47N01W04D001M



#### DWR Stn\_ID: ; well\_code: 419662N1219633W001; well\_name: 48N01W34B001M; well\_swn: 48N01W34B001M



#### DWR Stn\_ID: ; well\_code: 419755N1219785W001; well\_name: 48N01W28J001M; well\_swn: 48N01W28J001M

Feet below ground surface

## Well Failure Analysis

# **Butte Valley Well Failure Discussion**

Bill Rice Dr. Thomas Harter Larry Walker Associates & UC Davis

11/30/2021

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### <sup>13</sup> Introduction

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

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

- Well depth and perforated intervals, on one hand, and water level observations on the other
   have been collected by multiple organizations/agencies.
- For most wells associated with water level measurements, the corresponding well construction
- <sup>25</sup> information is not readily available, making a direct comparison of water levels and depth to
- top of perforation (or well depth) impossible without significant further reconnaissance.

<sup>27</sup> Consequently, rather than comparing groundwater elevations with depth to top of perforations, this

<sup>28</sup> analysis focuses on interpolated groundwater elevation data to assess the aggregated risk of wells

<sup>29</sup> not being able to pump water due to low water levels ("well outages"). The risk analysis necessarily

<sup>30</sup> utilizes basic information that is readily available and is therefore limited in its specificity. Future

<sup>31</sup> analysis may provide a more refined risk assessment.

## 32 Methods

### **Butte Well Data Statistics**

A total of 461 well logs were analyzed in the Butte Valley Bulletin 118 basin boundary. These wells 34 were classified by the dominant geologic formation identified at the bottom of the perforated interval 35 during geologic model development. Formations are described in greater detail in the Basin Setting 36 section of the GSP. Major formations and the number of wells identified are the QI - Lake deposits, 37 QTb - Older volcanic rocks of the "High Cascades", Qal - Alluvium, and Qb - Butte Valley basalt, 38 with 94, 36, 22, and 16, wells each respectively. Formations with fewer than 10 wells or where the 39 formation was unknown were not considered for this analysis due to the sparsity of data. In total, 40 168 well logs out of 461, or 36 percent of the available wells, belong to one of the major formations 41

<sup>42</sup> and have sufficient data to describe perforation construction. Well locations are shown in Figure 1.

Paired top of well perforation and water level measurements were not available in most wells.
 Table 1 shows wells in the California Statewide Groundwater Elevation Monitoring Program (CAS GEM) dataset with associated top of perforation data. This data is not sufficiently spatially dis-

tributed or representative of well type, depth, and construction to be used alone in establishing

<sup>47</sup> well failure risk. Similarly, Table 2 shows the number of wells in each major formation.

Depth, Obs., Perf. Available?	Well Info Source	No. of Wells
None (location only)	LWA GWO	82
Total Depth Only	LWA GWO	7
Observations Only	Volunteer Monitoring	24
Observations Only	DWR	9
Observations Only	LWA GWO	10
Perforation Only	-	0
Observations and Depth	DWR	17
Observations and Depth	LWA GWO	23
Depth, Obs. and Perf.	DWR	23
Depth, Obs. and Perf.	LWA GWO	26
Depth, Obs. and Perf.	-	0

Table 1: Available information for Butte Valley wells.

Table 2: Wells used in Butte Valley Well Outage Analysis

Bottom Formation	Top of Perforation (Depth in Feet)
Qal - Alluvium	22
Qb - Butte Valley basalt	16
QI - Lake deposits	94
QTb - Older volcanic rocks of the "High Cascades"	36

### 48 Well Outage Risk Analysis

Estimating the elevation datum for each well is based on the USGS reported elevation at the lo-49 cation of the well reported by the respective program agency (mostly DWR). The accuracy of the 50 elevation is estimated to be within 3% of one-half mile, i.e., 80 feet, where 3% represents a general 51 maximum landscape slope within the Butte groundwater basin and one-half mile represents the 52 maximum distance of the actual well location from the reported well location. Some areas within 53 the Butte Valley basin have steeper slopes. There, estimated well elevations may be even less 54 accurate. For comparison of estimated water level elevation with well construction information, not 55 being able to determine elevation of a well at its approximate location with an accuracy much better 56 than 10 feet is potentially very problematic. 57 Unfortunately, a direct comparison of water levels to screened interval or well depth is not currently

<sup>58</sup> Unfortunately, a direct comparison of water levels to screened interval of well depth is not currently <sup>59</sup> possible for the overwhelming majority of Butte Valley wells. A future effort to match water level <sup>60</sup> data with well construction information will help connect some of the wells (from Well Completion <sup>61</sup> Reports) with wells that have recent water level observations. This will provide an aggregated <sup>62</sup> analysis of well outage risk within the network of wells with known water levels.

Instead, the analysis here focuses a) on a review of overall well construction information in Butte
 Valley and b) a preliminary, highly approximative estimate of the depth of water above the top of
 well perforations below the water table and its statistical distribution.

This second step relies on comparing the interpolated water level at the reported well location, obtained by mapping measured water levels in Butte Valley, against the elevation of the top of perforations at each well for which construction information is available, at the reported location. The estimate of the elevation of the top of perforations is obtained from the estimated elevation of the well at the reported location and well construction information (depth to top of perforations). The difference between estimated water level elevation and estimated elevation of the top of perforations is herein referred to as the "wet depth to top of perforations":

```
<sup>73</sup> [reported depth to top of perforations] - [interpolated depth to groundwater
<sup>74</sup> at reported location] = [wet depth to top of perforations]
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Note: By using the USGS reported elevation at the reported well location as the reference elevation
 for both terms on the left-hand-side, the wet depth to top of perforations can also be expressed as:

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77 [interpolated water table elevation at reported location] - [reported elevation
78 of top of perforations] = [wet depth to top of perforations]
```

For the interpolated depth to water table two maps were constructed from measured depth to groundwater: in the fall of 2015 (dry year) and in the fall of 2017 (wet year). Water level maps were constructed using spline interpolation. The maps of depth to water table were used to digitally determine the interpolated depth to water table at the reported location of each well considered.

## **Results and Discussion**

### **Well Construction Information**

<sup>85</sup> Well types show different depths to the bottom of the well below ground surface as shown in fig-

<sup>86</sup> ure Figure 2. Domestic wells are relatively shallow and vary similarly across various formations.

<sup>87</sup> Depths range from less than 100 ft to more than 400ft. Agricultural wells have a similar depth <sup>88</sup> range to domestic wells (less than 100 ft to over 400 ft), but with most wells deeper within that <sup>89</sup> range than domestic wells. Across formations, agricultural wells follow a similar depth distribution <sup>90</sup> except in the older volcanic rocks of the High Cascades (QTb). In the QTb, the agricultural well <sup>91</sup> depth ranges from about 200 ft to about 1400 ft.

The distribution of depth to the top of the perforated interval follows a similar pattern as well depth: 92 shallow-most top of screens are found in domestic wells, across all formation. A wide range to 93 top of screen is found for agricultural wells in the Older Volcanic Rocks of the High Cascades 94 formation Figure 3. Figure 4 shows the resulting perforation length. Significant differences are 95 observed in the length of agricultural well screens between formations. Agricultural wells in the 96 older volcanic rocks of the Older Volcanic Rocks of the High Cascades (QTb) have the broadest 97 range of perforation lengths (50 ft to 1000 ft) and agricultural wells in the Butte Valley Basalt (Qb) 98 have the most narrow range (less than 10 ft to 40 ft). Domestic well screens in alluvium (Qal) and 99 in Butte Valley basalt (Qb) are generally 40 ft or less, and upt to 150 ft in lake deposits (QI) and in 100 older volcanics (QTb) 101

Few pumping test data provided on Well Completion Reports submitted to the Department of Water 102 Resources show that both domestic wells and public supply wells have low well yields, by design. 103 Agricultural wells tested are generally high production wells with 1000 to 5000 gpm (Figure 5). 104 Agricultural wells have casing diameters of typically 12 to 18 inches. Domestic wells are mostly of 105 smaller (2 to 8 inch) diameter with 10 inch diameter domestic wells in the Butte Valley Basalt (Qb). 106 perhaps owing to miss-classification. During pump testing the Older volcanic rocks of the Older 107 Volcanic Rocks of the High Cascades (QTb) show a narrow range of drawdown between 30 and 108 60 feet which is deeper than wells completed in the Butte Valley Basalt (Qb). Wells completed in 109 the Lake Deposits (QI) show a wide range of values between almost no observed drawdown to 110 over 100 feet. Figure 7 summarizes the results of drawdown testing. 111

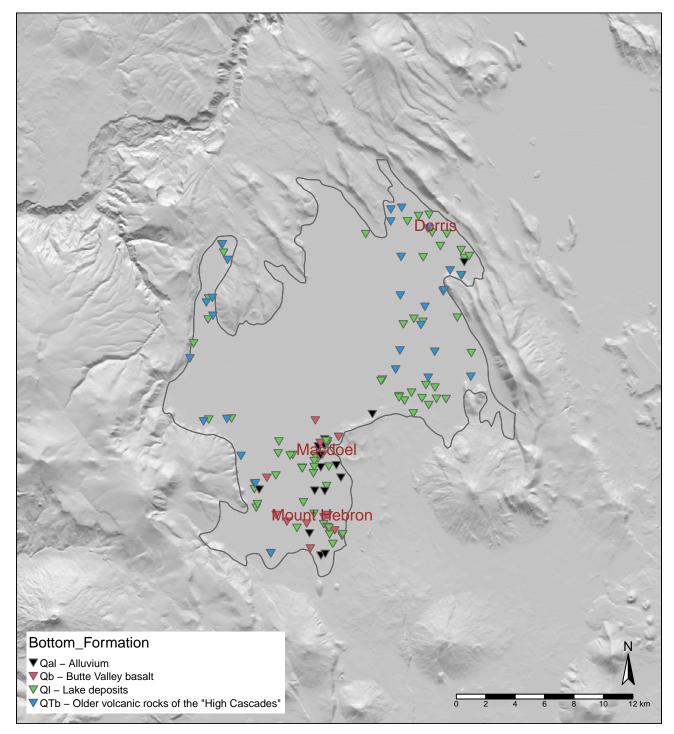


Figure 1: Butte Valley well map of domestic, public supply, and agricultural wells colored by major formation with locations of water wells are given as colored triangles.

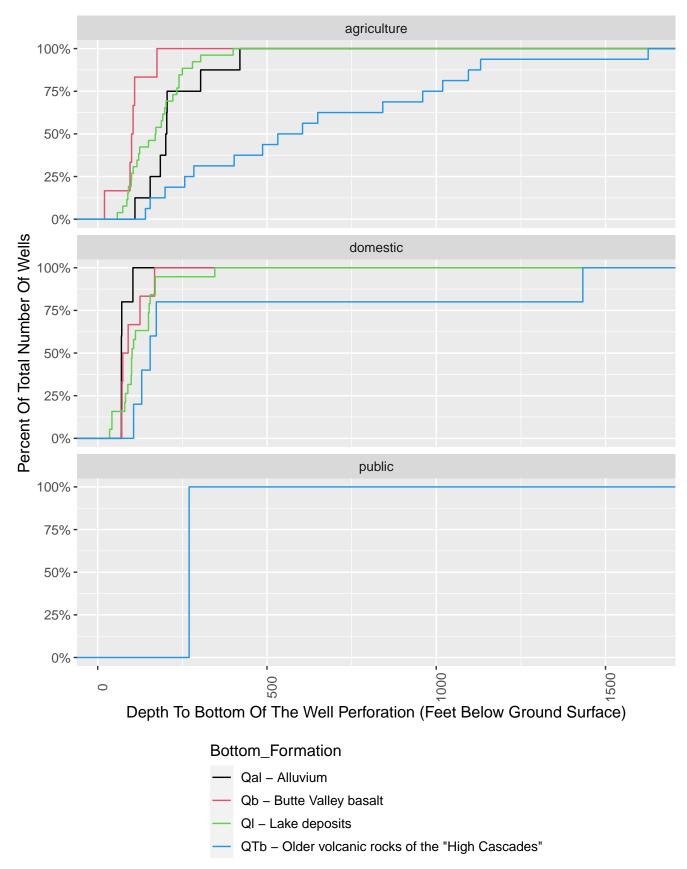


Figure 2: Butte Valley well perforation bottom. Sub-graphs show cumulative distribution graphs by well type and each graph shows major formations.

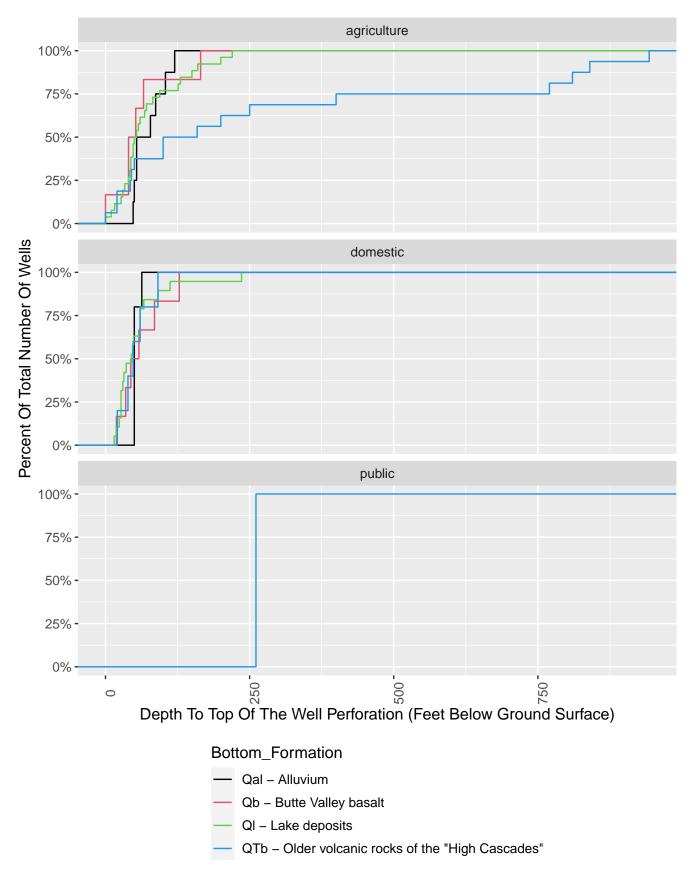


Figure 3: Butte Valley well perforation top. Sub-graphs show cumulative distribution graphs by well type and each graph shows major formations.

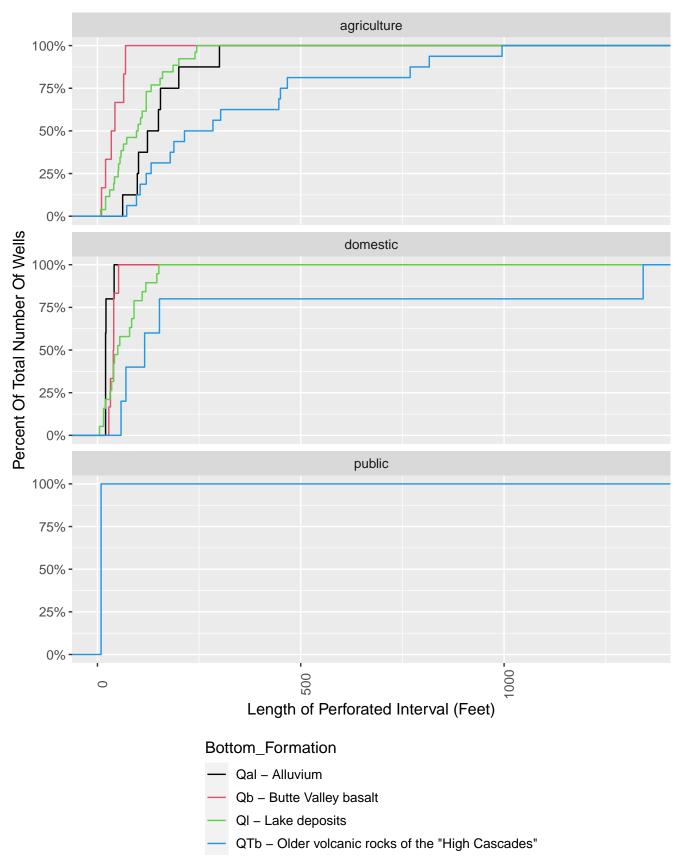


Figure 4: Butte Valley well perforation length. Sub-graphs show cumulative distribution graphs by well type and each graph shows major formations.

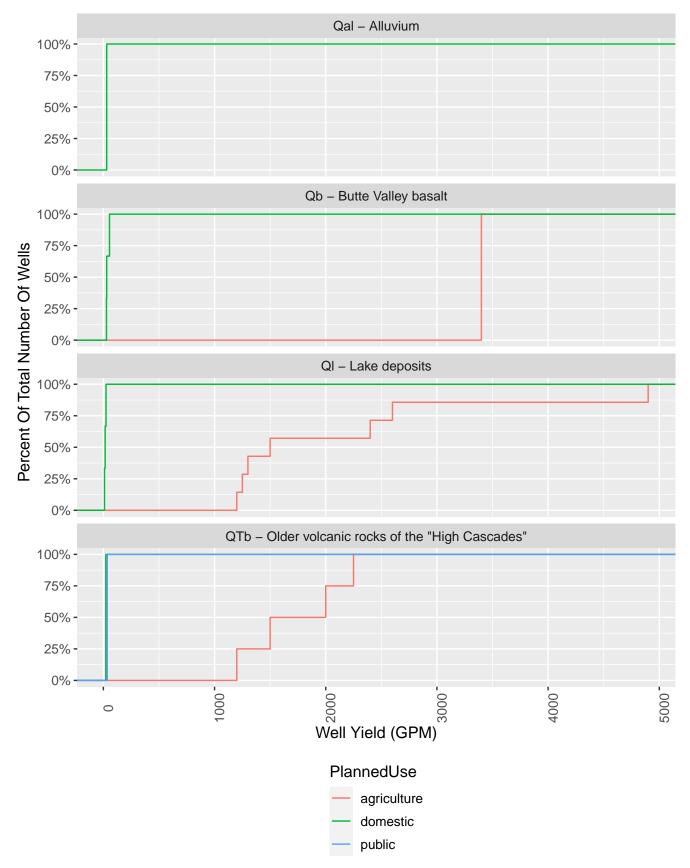


Figure 5: Butte Valley well yield by formation at the bottom of the well comparing major well types

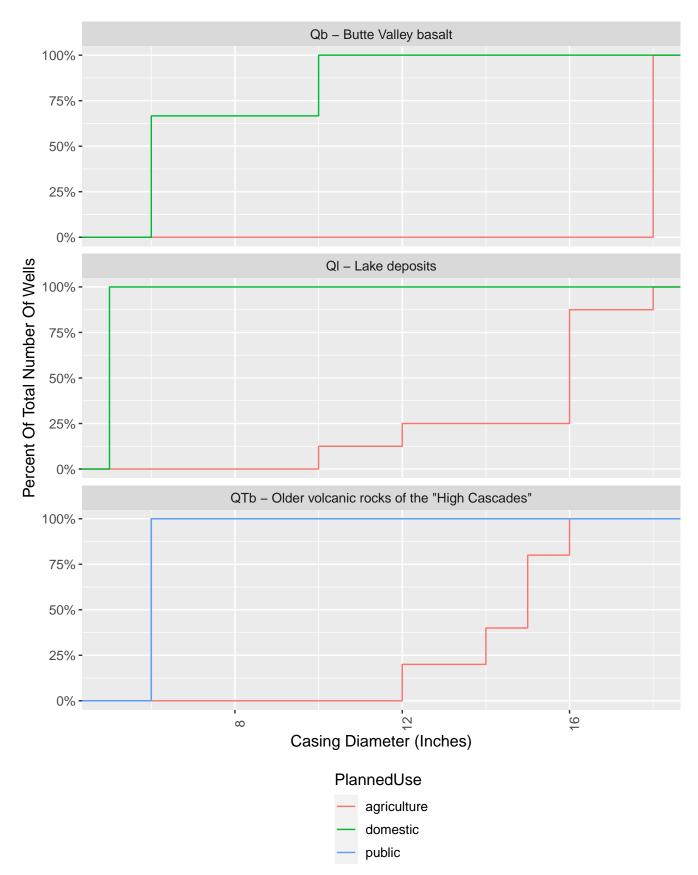


Figure 6: Butte Valley well casing diameter by formation at the bottom of the well comparing major well types

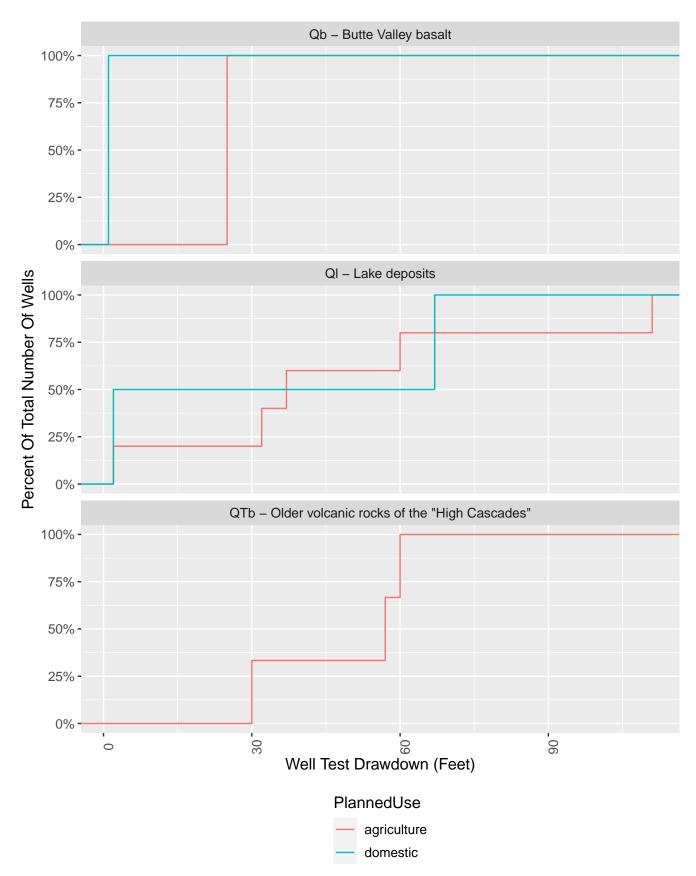


Figure 7: Butte Valley well test drawdown by formation at the bottom of the well comparing major well types

### **Estimated Wet Depth to Top of Perforations**

The interpolated, contoured water table depth in fall of 2015 is shown in 8, together with the location of those wells with water level measurements that are used for the water table depth interpolation. Estimates of water table depths are most accurate near the locations of the measured wells. The accuracy of estimates deteriorates with distance from a measured well (also see Chapter 2 in the Butte Valley Groundwater Sustainability Plan).

The estimated wet depth to top of perforations is shown in the following map (Figure 9). If the 118 interpolated water level elevation was below the top of perforations, the difference shown is a 119 negative number. These wells are color-coded orange and yellow in Figures 9 and 10. In 2015 120 (dry year) more than one-half of wells have an estimated wet depth to top of perforations that is 121 negative. About one-third of wells are estimated to have a wet depth to top of perforations of less 122 than 200 feet (but not negative). Few wells have a wet depth to top of perforations of more than 123 200 feet. The wells most vulnerable to well outage are those with the least (or negative) wet depth 124 to top of perforations. Approximately 98 percent of wells have between negative 100 and positive 125 200 feet of water predicted above the well perforations. 126

<sup>127</sup> A negative wet depth to top of perforations may be the result of a real event, e.g., the well is old and <sup>128</sup> has been dry for some time, or the well is pumping from below the top of perforations. A negative <sup>129</sup> wet depth to top of perforations may also be the result of estimation errors:

1) the interpolated water table depth used to estimate wet depth to top of perforations can be associated with significant error, from few feet to few tens of feet, due to limitations of the interpolation algorithm. The algorithm cannot account for localized changes in water table depth, especially in hilly terrains, where depth to water table may change rapidly as a function of terrain and well location.

<sup>135</sup> 2) depth to top of perforations is inaccurately reported.

The absolute value of the wet depth to top of perforations is therefore thought to be of poor accuracy. 136 However, its cumulative distribution is indicative of the relative distribution of wet depth to top of 137 perforations across wells in Butte Valley. The cumulative distribution of the wet depth to top of 138 perforations is shown in Figure 11 for both years, 2015 and 2017. A zoomed-in version of this 139 Figure, focused on wet depth to top of perforations from 0 feet to 200 feet is shown in Figure 140 12. Wet depth to top of perforations are shown for fall 2015, following a dry winter and fall 2017, 141 following a wet winter, for comparison purposes. The cumulative distribution of wet depth to top 142 of perforations indicates that fall 2017 water level conditions actually had less wet depth to top of 143 perforation across many wells in Butte Valley than 2015 (in other words, the brown curve is above 144 - shallower than - the green curve). This is consistent with the observation that water levels in 145 2015 were higher in many wells than in 2017. The difference between the two years is least where 146 (estimated) wet depth to top of perforations is very shallow or negative. From -20 feet to 80 feet 147 wet depth to top of perforations, the difference between fall of 2015 and fall of 2017 is about 10 -148 20 feet (most of wells). 149

The absolute value of the wet depth to top of perforations is, as indicated, highly uncertain. However, the slopes of the cumulative distributions shown are relatively uniform at either end of the distribution and are therefore much less sensitive to the above listed uncertainties. Figure 12 indicates that the slope of the CD is approximately 4% to 17% (in x-axis direction) per 10 feet (in y-axis direction), for the range of wet depth to top of perforations from -30 feet to 30 feet. Hence, this

slope is representative for the approximately one-third of Butte Valley wells that have the least es-155 timated wet depth to top of perforations and would be most susceptible to well outages. Given the 156 range over which the slope applies, the slope value is much less sensitive to the specific estimated 157 wet depth to top of perforations at a well. Rather, it applies to all wells with shallow (or negative) 158 values. If we further assume that the minimum wet depth to top of perforations needed for proper 159 pumping is similar for most domestic wells (or most agricultural wells) in the Lake Deposits (QI) 160 formation, then the slope can be interpreted as the risk for well outage with additional water level 161 decline below historically low values: The slope indicates that 2% - 31% of Butte Valley wells are 162 likely to experience well outage for every 10 feet of water level decline below the historically lowest 163 measured water levels. Figure 15 shows potential well outages in the Alluvium (Qal) formation, the 164 most sensitive to well outages in our analysis. 165

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

This allows for an estimate of the undesirable result that would occur if water levels declined to the 171 minimum threshold. The depth to water level at the minimum threshold is defined as 110% of the 172 deepest depth to water level observed, but never more than 10 ft below the deepest observed water 173 level. In most areas of the groundwater basin, the deepest depth to the water level observed over 174 time is less than 100 feet (see above), hence the minimum threshold in most areas would allow 3 175 to 8 feet, at most 10 feet of additional lowering of water levels. Given that a 10 foot decline puts 176 about 3% to 8% of Butte Valley wells at risk of well outage, the selection of the minimum threshold 177 poses some risk of at least temporary well outage: about 30-80 wells out of approximately 1,000 178 wells would be at risk of well outage if water levels lowered to the minimum threshold everywhere 179 in Butte Valley. 180

The well outage risk may be unevenly distributed across Butte Valley (Figures 13, 14, 15, and 16): The slopes indicate a lower risk (2%-4%) for wells in the Older Volcanic Rocks of the High Cascade Volcanics, but higher risks elsewhere (up to 31%).

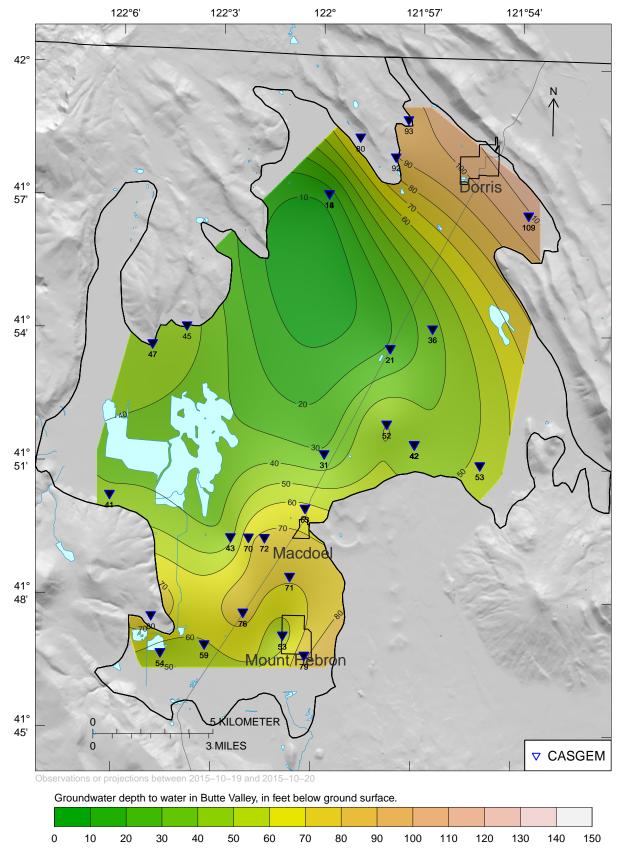


Figure 8: Butte Valley groundwater elevations reported as approximate depth to groundwater, fall 2015 and well failure estimates based on recent water level observations. Approximate basin-scale groundwater depths are shown.

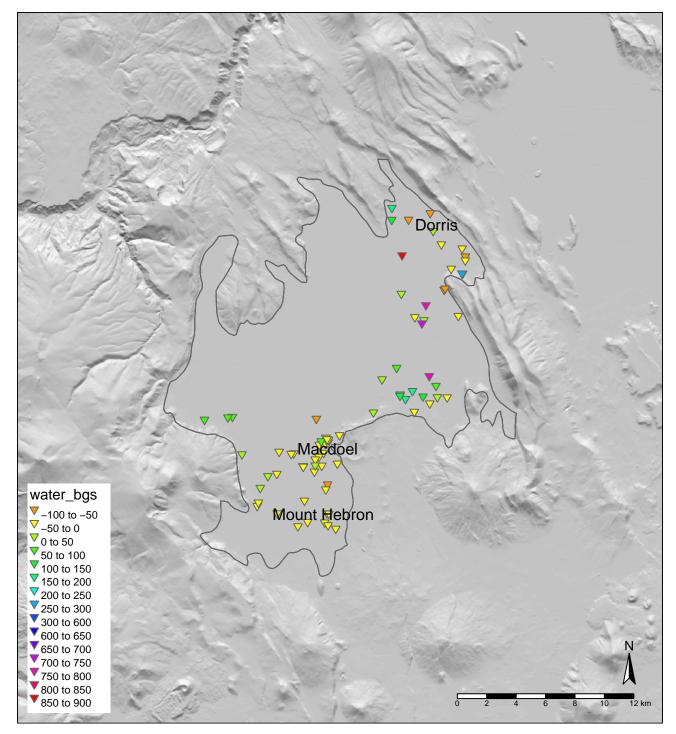
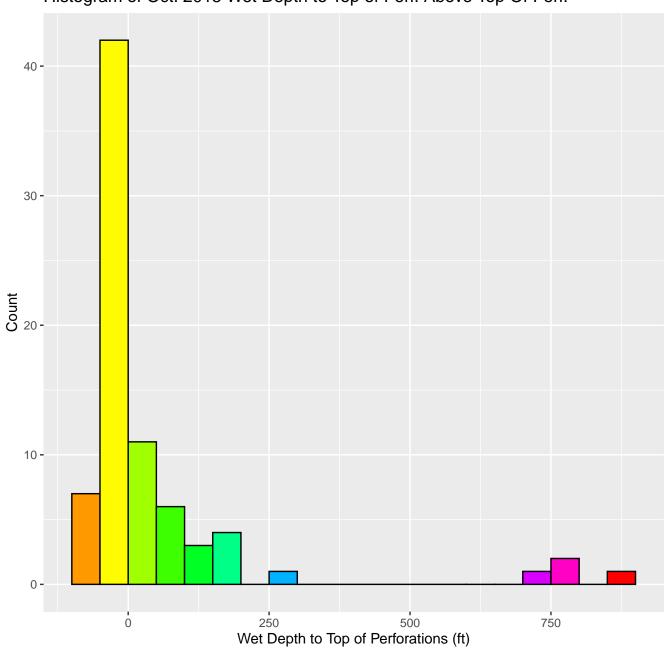
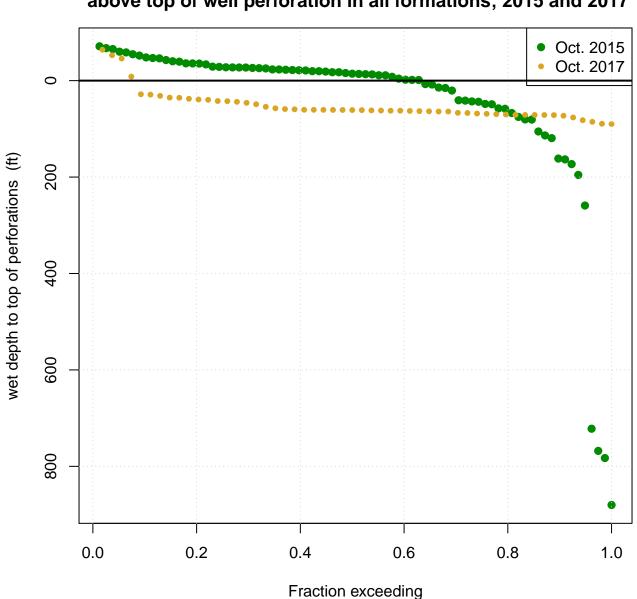


Figure 9: Butte Valley wet depth to top of perforations based on contoured groundwater elevations, October 2015.



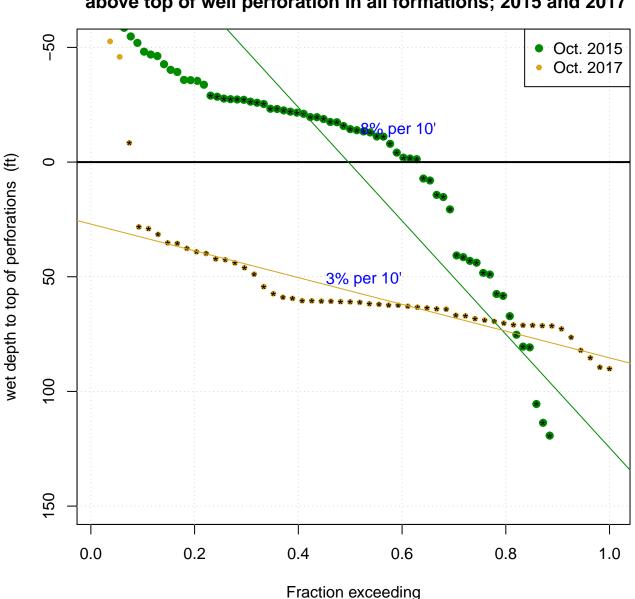
Histogram of Oct. 2015 Wet Depth to Top of Perf. Above Top Of Perf.

Figure 10: Histogram of wet depth to top of perforations based on contoured groundwater elevations, October 2015.



Distribution of Oct. wet water column above top of well perforation in all formations; 2015 and 2017

Figure 11: Cumulative distribution function of all well wet depth to top of perforations based on contoured groundwater elevations, Octobers of 2015 and 2017.



Distribution of Oct. wet water column above top of well perforation in all formations; 2015 and 2017

Figure 12: Focused graph of cumulative distribution function of all well wet depth to top of perforations feet based on contoured groundwater elevations, Octobers of 2015 and 2017, -50 to 150 feet. Black dots indicate the wells with water columns betwen -30 and 30 feet used for interpolating the well failure slope. Interpolation computed as a best fit linear slope to the data between the 5th and 35th percentile (LINEST function in Excel: 10\* LINEST (fraction range, feet range).

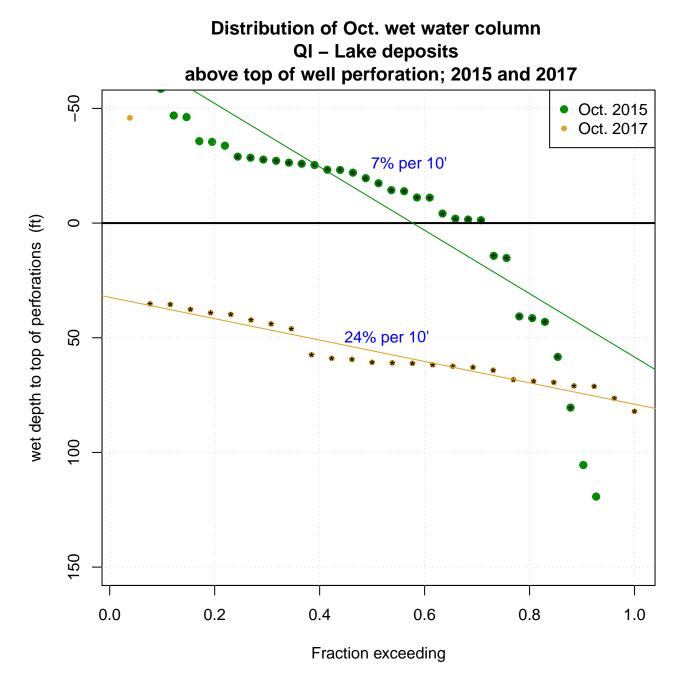


Figure 13: Focused graph of cumulative distribution function of all well wet depth to top of perforations feet based on contoured groundwater elevations, Octobers of 2015 and 2017, -50 to 150 feet. Black dots indicate the wells with water columns betwen -30 and 100 feet used for interpolating the well failure slope. Interpolation computed as a best fit linear slope to the data between the 5th and 35th percentile (LINEST function in Excel: 10\* LINEST (fraction range, feet range).

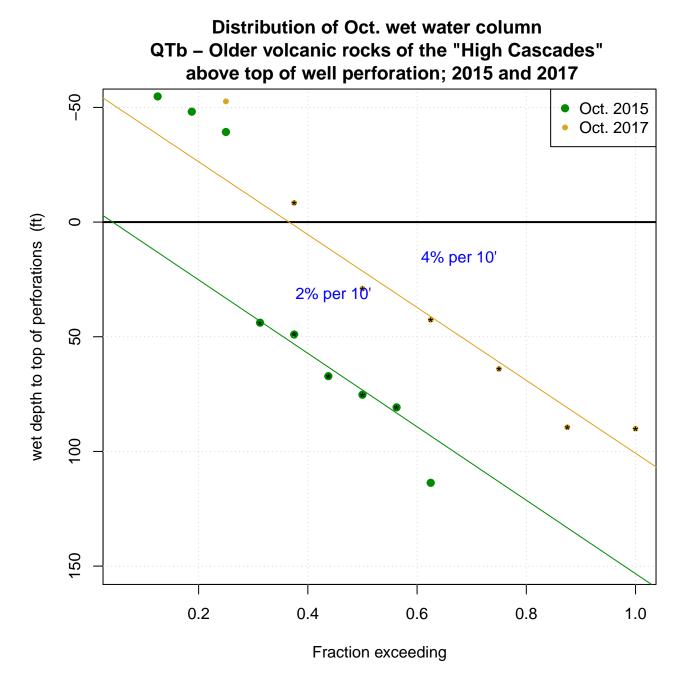


Figure 14: Focused graph of cumulative distribution function of all well wet depth to top of perforations feet based on contoured groundwater elevations, Octobers of 2015 and 2017, -50 to 150 feet. Black dots indicate the wells with water columns betwen -30 and 100 feet used for interpolating the well failure slope. Interpolation computed as a best fit linear slope to the data between the 5th and 35th percentile (LINEST function in Excel: 10\* LINEST (fraction range, feet range).

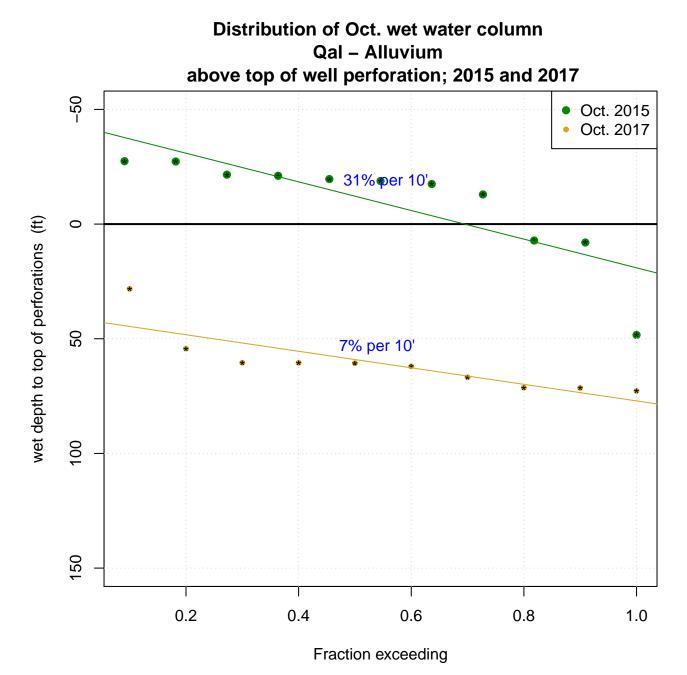


Figure 15: Focused graph of cumulative distribution function of all well wet depth to top of perforations feet based on contoured groundwater elevations, Octobers of 2015 and 2017, -50 to 150 feet. Black dots indicate the wells with water columns betwen -30 and 100 feet used for interpolating the well failure slope. Interpolation computed as a best fit linear slope to the data between the 5th and 35th percentile (LINEST function in Excel: 10\* LINEST (fraction range, feet range).

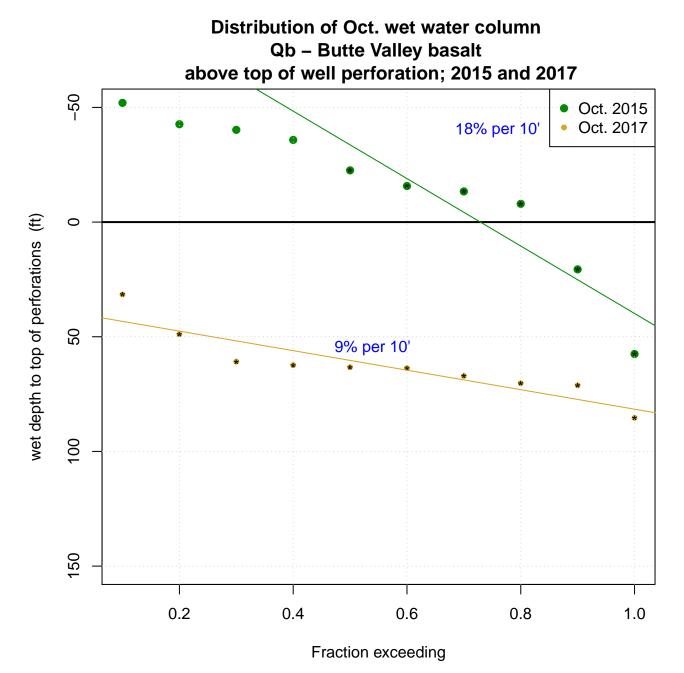


Figure 16: Focused graph of cumulative distribution function of all well wet depth to top of perforations feet based on contoured groundwater elevations, Octobers of 2015 and 2017, -50 to 150 feet. Black dots indicate the wells with water columns betwen -30 and 30 feet used for interpolating the well failure slope. Interpolation computed as a best fit linear slope to the data between the 5th and 35th percentile (LINEST function in Excel: 10\* LINEST (fraction range, feet range).

## **Conclusion**

<sup>185</sup> We identified three key findings with respect to well outages:

Majority of wells unlikely to be affected by dewatering. Most wells in Butte Valley have well
 depths of 50 feet or more below the interpolated groundwater elevations depths of 2015 (at least
 65%).

Uncertainty affects analysis quality. The analysis is relatively uncertain due to the lack of wells 189 with both water level measurements and known well construction. Hence, we relied on interpolated 190 water level data, which may be several feet or even tens of feet incorrect in some areas. This may 191 be the case regarding the one third of wells with top of perforations above the interpolated water 192 level depth (Figure 12) in 2015 (dry year) and 2017 (wet year) however many of those wells are 193 also in the south east portion of the basin near Macdoel and Mount Hebron where some of the 194 greatest water level declines since the 1980s has occurred. These wells may simply be operating 195 at degraded capacity or are already out of operation seasonally. 196

<sup>197</sup> In wells for which the wet depth to top of perforations is negative or exceedingly shallow, either:

- 1) the well goes dry in the fall, regardless of water year type, or,
- <sup>199</sup> 2) the well pumps from below the top of perforations, or
- 3) the depth to water table interpolation is erroneous (most likely in hilly areas), or
- 4) well depth is inaccurately reported.

Due to the uncertainties arising from (3) and (4), we relied instead on the slope of the cumulative distribution of estimated wet water column depth, which is a more stable indicator of how many additional wells fall dry per 10 foot decline in water levels below historically low water levels. We find that:

The number of wells affected by groundwater elevations at the Minimum Threshold is prob-206 ably very small. The minimum threshold is 10% lower than the minimum measured depth to the 207 water table (see Chapter 3). In most Butte Valley areas, where depth to the water table is less than 208 70 feet, water levels at the minimum threshold would be less than 7 feet lower than at their historic 209 low. A small number of wells would be affected by that, as shown in Figure 12. Considering Table 210 6 Chapter 3, the minimum threshold is at most 10 ft below the historically deepest measured water 211 level. This much lowering to the MT would occur only in wells that already have a depth to water 212 of 100 feet or more. Based on Figure 12, a ten foot lowering of the water level would affect about 213 3%-8% of wells (30 - 80 wells), if such low water level conditions occurred throughout the Butte 214 Valley. 215