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January 3, 2001

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 DIRECTOR OF
 LAND MANAGEMENT
 PUBLIC RESOURCE AREA
 NEEDLES, CALIFORNIA

Mr. Ken Downing
Bureau of Land Management
101 W. Spikes Road
Needles, CA 92363

B9

Dear Mr. Downing:

On behalf of our Client, TETRA Technologies, Inc., our company Geothermal Surveys, Inc. (dba GSi/water) is pleased to comment regarding the CADIZ GROUNDWATER STORAGE and DRY-YEAR SUPPLY PROGRAM in re REPORT NO. 1169.

OUR COMMENTS

Our comments relate only to our Client's concerns regarding the Bristol and Cadiz Dry Lakes (Playas). There are no implications as to our being either in favor of or against the Cadiz Project.

We are pleased that the Cadiz Project recognizes the need for monitoring the ground water conditions before, during, and after the Project in order to identify processes that impact or may potentially impact present operations and planned changes in future operations on the Playas. The Cadiz Project specifies certain numbers, types, and locations of monitoring wells in order to accomplish that purpose. The Cadiz Project also proposes corrective actions if indicated by the monitoring.

B9-1

That being said, we prefer not to comment at this time on the Cadiz Project's monitoring plans vis-a-vis the Bristol and Cadiz Playas as stated in the Draft EIR/EIS and Supplement. However, at a later time we will further review the proposed monitoring, and we will make recommendations that we consider appropriate.

B9-2

The Question of Recharge to the Bristol Playas

There are critical processes that we must comment on that relate to the Cadiz Project and the question of its potential for impact on the Playas. These processes stem from whether or not

B9-3

Mr. Ken Downing
January 3, 2001
Page Two

there is recharge to the Playas by ground water moving from the Cadiz Project area; and if there is recharge, how much.

From our own work, we concur with the Cadiz Project that a continuous, irregular potentiometric gradient occurs, sloping downward from the Cadiz Project area to the Playas. If this is true, there is recharge from the Project area to the Playas. If this is not true, there is no recharge from the Project area to the Playas.

In closed, arid-region basins a playa represents, by evaporation, the exit for at least some of the ground water — leaving salts and concentrated fluids behind as evaporation takes place. This is a simplistic statement about a very complex series of phenomena that provide a delicate balance between the fluid levels in the playa and the surrounding hydrological processes.

It is this delicate balance that we are concerned about, and about which our Client would want to be sure that the operations on the Playas are not negatively impacted if the balance is modified. Each of the two alternatives — recharge or no recharge — carries with it a different set of processes that help determine the occurrence, the nature, and the movement of the fluid within the Playas.

At this time, we think that there will be little or no impact on the fluid levels in the Playas by the Cadiz Project. However, we will continue to examine the Project's design of the monitoring systems, and we will make our own recommendations should we think it necessary based on our experience especially with the Bristol Playa and its surroundings.

Air Quality

Given the nature and settings of the Bristol and Cadiz Playas and the occurrence of the fluids within them, it is difficult to see how the Cadiz Project could cause an increase in whatever dust conditions may already be ongoing. We note, however, that the Cadiz Project will be monitoring for dust mobilization should that occur if water levels decline because of the Cadiz Project.

Requests for Continuing Information

TETRA Technologies, Inc. would like to be kept on the distribution list of whatever new studies are being done by any parties regarding the Cadiz Project and its potential short-term and long-term effects on the surroundings especially as related to the hydrology of the two Playas.

B9-3

B9-4

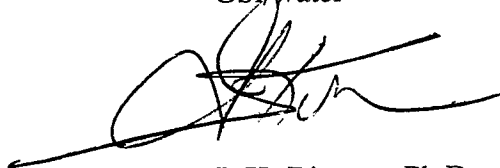
B9-5

Mr. Ken Downing
January 3, 2001
Page Three

TETRA Technologies, Inc. would also like to know if on-file reports of such studies, including the Public Comments, are available to be read, but which may not be available for outside distribution.

B9-6

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J. H. Birman, Ph.D.
RG #994, HG #125
President

cc: Mr. Kim Harden, TETRA Technologies, Inc.

Mr. Ken Downing
January 3, 2001
Page Four

ADDENDUM

The following is presented in order to explain our experience in the Bristol Basin and our relationship to TETRA Technologies, Inc.

WHO WE ARE

Geothermal Surveys, Inc. (dba GSi/water) is a geological/geophysical company specializing for forty years in the exploration and development of ground water resources in the arid regions of southern California, Nevada, and elsewhere. The company name refers to the use of earth temperatures as one of our techniques in tracing the movement of ground water.

BACKGROUND

Our company began working in the Bristol Basin in 1962 for the Southern California Edison Company. The work has been as follows:

(1) For Southern California Edison Company in 1962,63

For Southern California Edison Company, the objective was to investigate whether there was a large amount of ground water flow out of Fenner Valley and entering the eastern part of the Bristol Basin via Fenner Gap. We interpreted that a large amount of water was indicated. After some test hole drilling, the Edison Company did not continue the project for which the investigation had been done.

(1a) For Olenellus, Inc. and AridTech, the predecessors of Cadiz Land Company, Inc

After a hiatus of approximately 20 years, a new entity was formed in order to re-investigate the ground water potential of the area. The owner of Geothermal Surveys, Inc. was one of the founders of and a participant in the new entity. The original investigations were repeated and expanded. Our company remained with the Project through the drilling of the first few wells, when it became evident that a large amount of ground water did indeed underlie the eastern Bristol Basin, and that significant recharge appeared to be entering through Fenner Gap.

B9-7

Mr. Ken Downing
January 3, 2001
Page Five

(2) For Leslie Salt Company, Cargill Corporation, and currently TETRA Technologies, Inc.

Our company was retained by the Leslie Salt Company to help them locate, design, and construct brine wells and to make other investigations on and near the Bristol Dry Lake (Bristol Playa). Our company's work on Bristol Dry Lake began in the early 1960s and has continued on an as-needed basis to the present time.

During Cargill Corporation's ownership, one of our tasks was to assess potential effects of Waste Management's RailCycle's proposed mega-landfill operations on the hydrology of the Dry Lake.

Our work on the Bristol Playa continues for TETRA Technologies, Inc. Some of our work is to investigate the fresh, brackish, and brine processes that go on around, upon, and beneath the surface of the Playa.

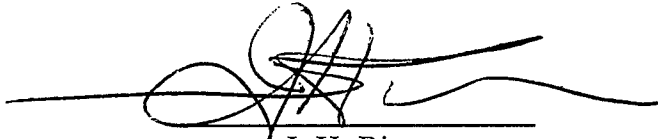
OUR RELATIONSHIP TO CADIZ LAND COMPANY, INC. AND OTHERS

Our company has done no work for the predecessors of Cadiz Land Company, Inc. or for Cadiz Land Company, Inc. since 1984.

The president of GSi/water, as one of the original founders of the organization that became Cadiz Land Company, held financial participation in the original company, subsequently transferred to shares in Cadiz Land Company, Inc. He has divested his ownership of all but a tiny fraction of his original holdings.

Our company has no contractual relationship with any person or organization anywhere in or doing work in the Bristol Basin other than with our present client TETRA Technologies, Inc.

Our position with respect to the Cadiz Land Project is: Neutral.


J. H. Birman

B9-7