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January 28, 2015

SENT VIA E-MAIL AND U.S. MAIL

Andrew Altevogt
Assistant Executive Officer
e-mail: brett.stevens@waterboards.ca.gov
Central Valley Regional Water Quality Control Board

Re: Heritage Ranch, LLC
Madera, California
Administrative Civil Complaint R5-2015-0500

Dear Mr. Altevogt:

Our office will be representing Heritage Ranch, LLC ("heritage") respecting the above referenced Administrative Civil Liability Complaint. Today Amrik Basra met with me and provided me with your January 20, 2015 letter and its attachments. Mr. Basra has very limited English language skills and does not read the English language well. From my discussion with Mr. Basra today, it has been his understanding that, since Heritage does not have any discharge of water from its ranch at all, it was not necessary to complete any documents. The entire Heritage ranch is irrigated via drip system and there is no discharge whatsoever from the Heritage ranch. This appears to be an agreed to fact, because I note that, in Item No. 13 on Page 2 of the complaint, after two onsite inspections there was a determination that there were and are no surface water discharges from the ranch. Evidently this complaint appears to be based only on Heritage not timely completing and submitting a Report of Waste Discharge form (ROWD).

Please immediately forward to my office the forms for the documents that Heritage needs to complete in order to bring Heritage into conformity and I will assist Heritage in completing and submitting the forms.

I enclose some photographs that Mr. Basra has recently taken, which will clarify the pictures that were included with your letter. For example, the picture with the white plastic pipe inside the steel pipe shows the hole cut in the steel pipe with the elbow in the white pipe that transfers irrigation water under the driveway road. The steel pipe simply runs under the driveway road and protects the plastic irrigation pipeline that transfers water to the orchard on the other side of the driveway road. Some of the pictures show the pumps and wells and filtration system for the drip irrigation.

Respecting the administrative process concerning the above referenced complaint, Mr. Basra and I will attend any hearings on behalf of Heritage. At this time, we do not have any objection to the hearing procedure provided we are both timely noticed respecting any matters that could negatively impact Heritage.

Frankly, if this complaint is simply due to the untimely filing of an application by Heritage, I don't know why the matter should proceed to a hearing, etc. We will immediately

complete any documents required for Heritage to be placed in good standing and if there is a reasonable penalty for a late filing, I will advise my client to pay the penalty in order that there are no more expenses and time expended on a matter as simple as this. This letter is also being sent via mail in order that the color photographs will be clear.

Very truly yours,



William L Cowin

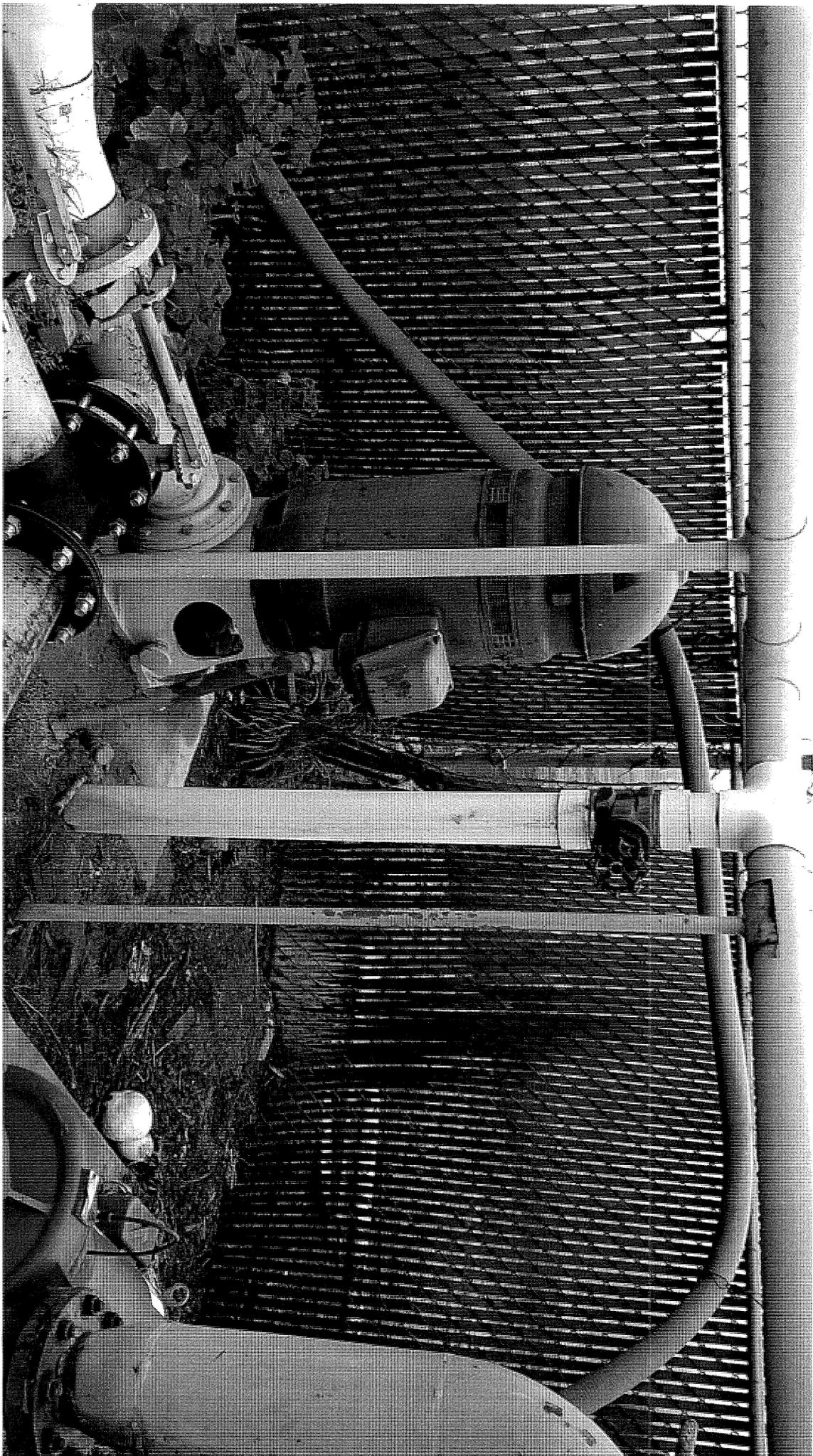
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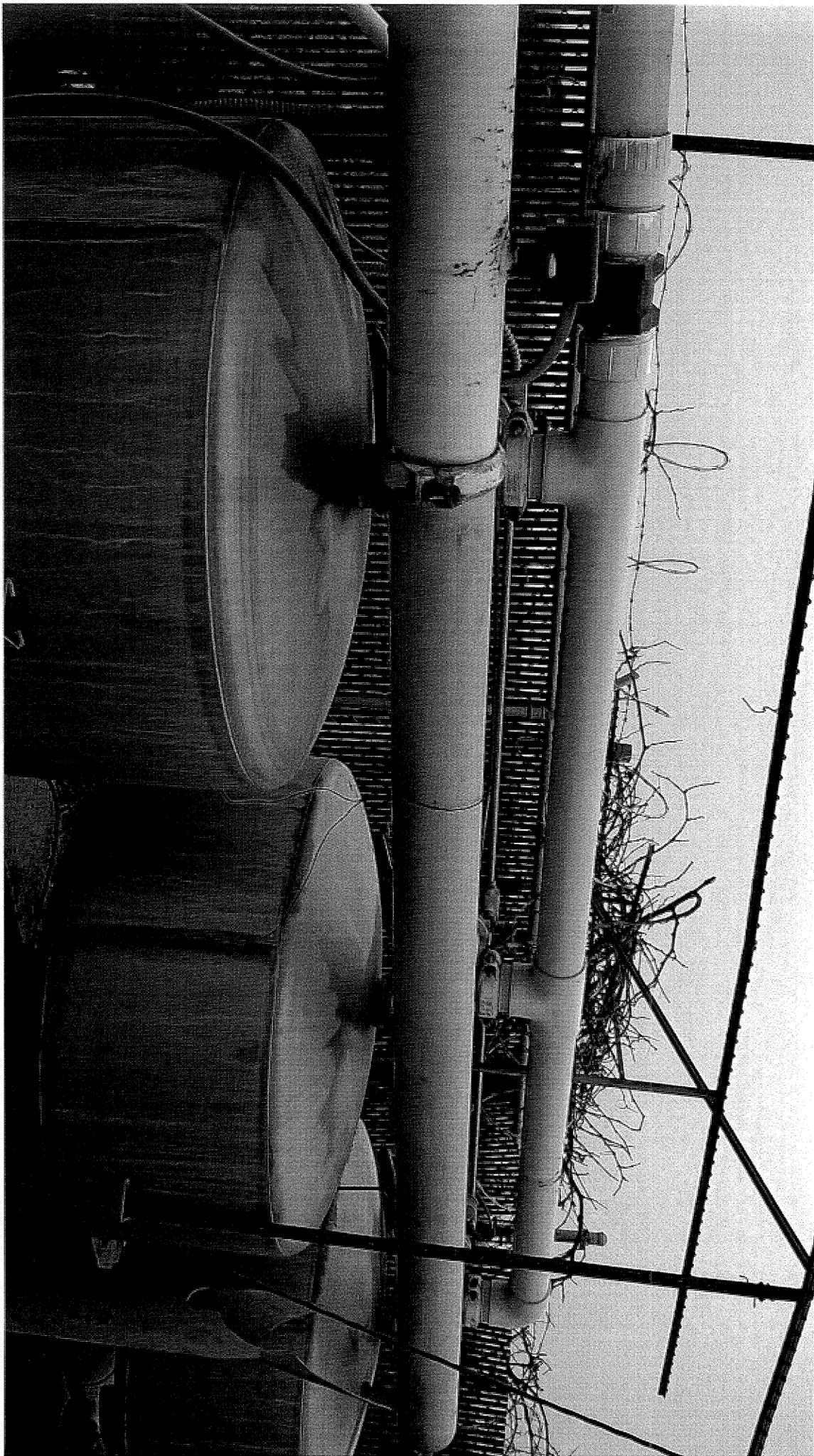
cc: Client



Her Tag e, Same Picture
Shows Water Meter Elbow



Handing picture
Pump & well
Closed system



Heating Picture
Dr. System Filters

Photo Site 1, Southwest Field, Almond Orchard, Photo 1

Plainville Active
Shaws No Ranch
Ran off water
Possible

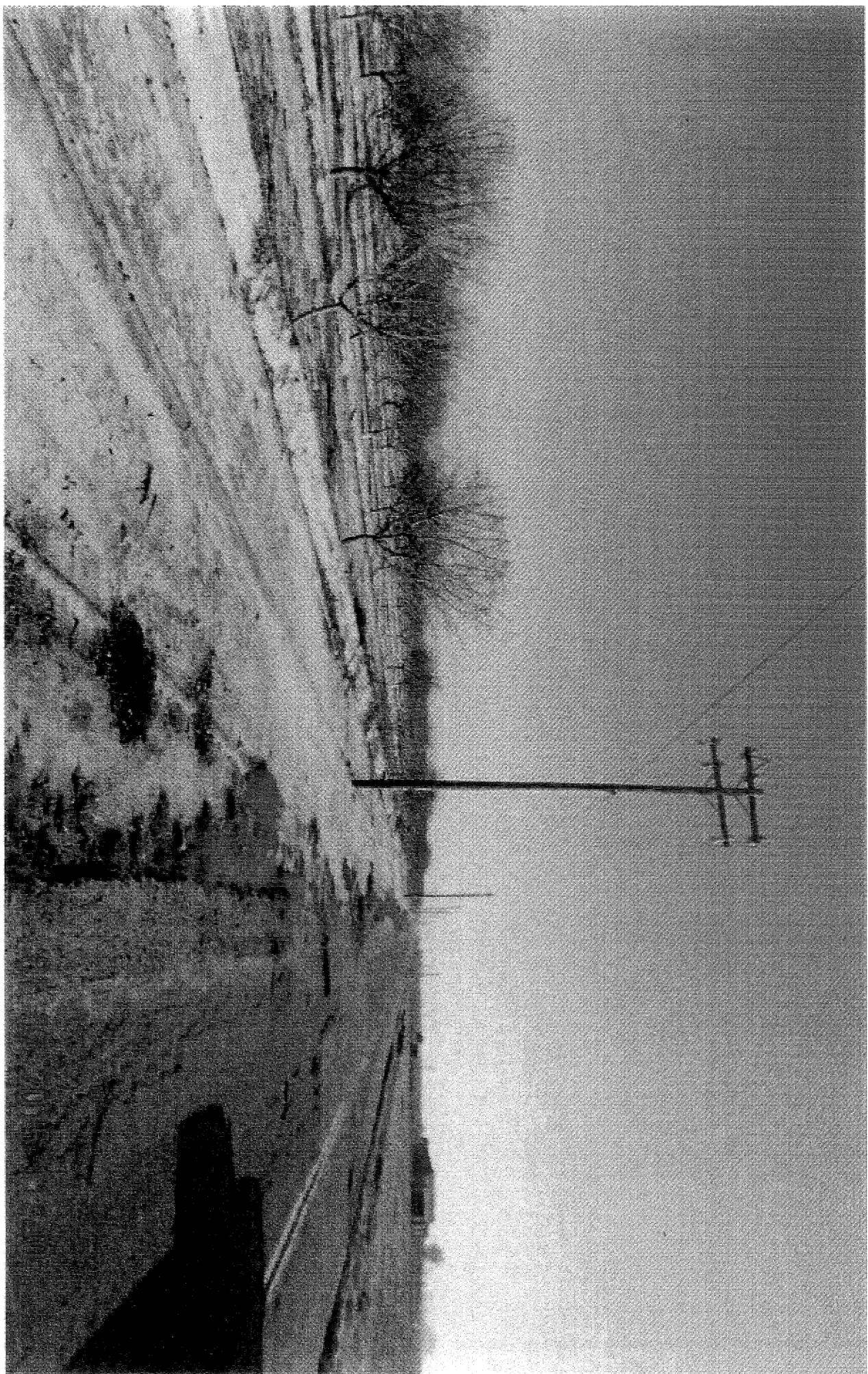


Photo Site Central of North Fields, Orchard Side, Photo 1



Plaintiff's Picture
white vertical pipe
is just a marker for
side of driveway

09-07-2016