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**IN THE OFFICE OF THE STATE ENGINEER  
OF THE STATE OF NEVADA**

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IN THE MATTER OF APPLICATIONS  
53987 THROUGH 53992, INCLUSIVE,  
AND 54003 THROUGH 54021,  
INCLUSIVE, FILED TO APPROPRIATE  
THE UNDERGROUND WATERS OF  
CAVE VALLEY, DRY LAKE VALLEY,  
DELAMAR VALLEY AND SPRING  
VALLEY (HYDROGRAPHIC BASINS  
180, 181, 182, AND 184), LINCOLN  
COUNTY AND WHITE PINE COUNTY,  
NEVADA.

**DECLARATION OF ASHOK K.  
SINGH**

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1 I, ASHOK K. SINGH, do hereby declare under penalty of perjury that the following is true and  
2 correct:

3 1. I am over the age of 18, and not a party within this administrative hearing. I am  
4 submitting this declaration for the purpose of documenting my anticipated testimony that might be  
5 considered to be expert opinions, within the applicable statutes, rules and regulations, and which may  
6 be expressed during hearing testimony. This declaration and the related and referenced documents  
7 also provide a summary of the basis for those opinions and a summary of the data and information I  
8 considered in forming my opinions.

9 2. I am a Professor of Statistics at the University of Nevada, Las Vegas. A copy of my  
10 curriculum vitae (“CV”) is a Southern Nevada Water Authority (“SNWA”) exhibit for these  
11 proceedings.

12 3. I received my doctorate in statistics from Purdue University in 1977.

13 4. I have previously performed statistical data analysis for SNWA. This involved fitting  
14 different probability models to data provided by SNWA.

15 5. I have previously testified and given depositions in various litigations, providing  
16 statistical data analysis. These are listed in my CV.

17 6. SNWA is using a simple and practical statistical method to identify triggers in Spring  
18 Valley, Dry Lake Valley, Delamar Valley, Cave Valley, and adjacent basins within the analysis area  
19 as part of its Clark, Lincoln, and White Pine Counties Groundwater Development Project (“GDP”)   
20 monitoring, management and mitigation (“3M”) program.

21 7. SNWA required a statistical method to quantify changes in baseline data in order to  
22 establish trigger limits at various sites using a statistical methodology which can be applied  
23 throughout the life of the GDP 3M program.

24 8. A robust baseline data set is required to reduce errors and identify trends.

25 9. With my assistance, SNWA performed a multiple linear regression using ordinary  
26 least-squares to construct a model to fit time-series data for various sites within the 3M program.

1           10.    SNWA modeled seasonal trends using the seasonally adjusted linear regression  
2 (“SALR”) method.

3           11.    SNWA set a prediction interval for a control limit at 99.7%, which is a commonly  
4 used interval based on 3-times the standard deviation.

5           12.    The SALR method accounts for seasonal variability and when combined with a  
6 prediction interval for a control limit at 99.7%, is a reasonable choice to establish triggers.

7           13.    A prediction interval calculated using the SALR method based upon data which  
8 demonstrates no seasonality and has no linear trend is equivalent to the 3-times standard deviation  
9 about the mean of the same data.

10          14.    In collaboration with SNWA, I have developed a method protocol for identifying a  
11 trigger using prediction intervals to estimate whether a statistically significant departure from a  
12 hydrologic baseline time series data set has been observed and have demonstrated the effectiveness  
13 of using the method protocol.

14          15.    This method is used by SNWA for setting triggers at monitoring well sites or springs  
15 within the 3M program.

16          16.    I reviewed regional hydrologic and baseline data to apply the method protocol, and  
17 have demonstrated the effectiveness of using the prediction interval.

18          17.    I reviewed Appendix A of SNWA’s report titled “Technical Analysis Report  
19 Supporting the Spring Valley and Delamar, Dry Lake, and Cave Valleys, Nevada, 3M Plans.” Based  
20 on that review, I determined that SNWA applied the statistical procedures correctly while adhering  
21 to standard methods and that SNWA’s final processed data coincides with industry standards.

22          18.    I reviewed sections of SNWA’s report titled “Technical Analysis Report Supporting  
23 the Spring Valley and Delamar, Dry Lake, and Cave Valleys, Nevada, 3M Plans” regarding  
24 statistical methods for setting triggers for shrubland resources. SNWA set a prediction interval for a  
25 control limit at 95%, which is a commonly used interval based on 2-times the standard deviation.  
26 This is a reasonable choice to establish triggers for the shrubland resources within the 3M program.  
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19. I am prepared to testify and respond to any questions or examination within the scope of the work as described herein.

FURTHER YOUR DECLARANT SAYETH NAUGHT

Dated this 22<sup>nd</sup> day of June, 2017 in Las Vegas, Nevada.



**ASHOK K. SINGH**