May 9, 2016

Mr. Ronald Holcomb
Central Valley Water Board
1685 E. Street
Fresno, CA 93706

RE: Certified Mail 7015 1730 0000 9937 4046, received May 5, 2016;
Order/California Water Code section 13267

Mr. Holcomb;

Please find attached documentation that is required under the above referenced order.

Attachments:
1. Spreadsheet identified as: Modus, Inc. total volume of produced water
   provided for irrigation since 1 January of 2014

2. Material Safety Data Sheets provided Modus, Inc. by Terra Chem for
   the two chemicals/additives used in petroleum production, treatment
   and transportation processes that generate produced water that is
   used for irrigation of crops.

   2a. A description of the purpose of each chemical or additive can be found
       in the above Material Safety Data Sheets.

   2b. The chemicals or additives are injected into the production fluid
       stream.

   2c. The frequency of use: daily
2d. The total volumes of each chemical or additive used during each quarter from 1 January 2014 to this present day: See the attached spreadsheet previously identified above, (Attachment 1).

Per the provided delineated words for submittal of "Certification", I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely;

[Signature]

Mary E. Filippi
Modus, Inc.
### Modus, Inc.

**Total volume of produced water provided for Irrigation since 1 January of 2014**

<table>
<thead>
<tr>
<th>Yr.</th>
<th>Quarter</th>
<th>Total Produced Water Barrels</th>
<th>Total Produced Water Gallons</th>
<th>Total Produced Water Available For Irrigation</th>
<th>Total Produced Water Used For Irrigation</th>
<th>Chemical Water Clarifier WC 4984 Gallons</th>
<th>Chemical Emulsion Breaker EB 527 Gallons</th>
</tr>
</thead>
<tbody>
<tr>
<td>2014</td>
<td>Jan-March</td>
<td>307,123</td>
<td>12,899,166</td>
<td>9,674,375</td>
<td>0</td>
<td>22.5</td>
<td>11.25</td>
</tr>
<tr>
<td>2014</td>
<td>April-June</td>
<td>308,030</td>
<td>12,937,260</td>
<td>9,702,945</td>
<td>0</td>
<td>22.75</td>
<td>16.375</td>
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<tr>
<td>2014</td>
<td>July-Sept.</td>
<td>275,833</td>
<td>11,584,986</td>
<td>8,688,739</td>
<td>3,823,045</td>
<td>23</td>
<td>11.5</td>
</tr>
<tr>
<td>2014</td>
<td>Oct-Dec.</td>
<td>216,747</td>
<td>9,103,374</td>
<td>6,827,530</td>
<td>3,004,113</td>
<td>23</td>
<td>11.5</td>
</tr>
<tr>
<td>2015</td>
<td>Jan-March</td>
<td>154,655</td>
<td>6,495,510</td>
<td>4,871,632</td>
<td>0</td>
<td>15.75</td>
<td>7.875</td>
</tr>
<tr>
<td>2015</td>
<td>April-June</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>2015</td>
<td>July-Sept.</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
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<tr>
<td>2015</td>
<td>Oct-Dec.</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>2016</td>
<td>Jan-March</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>2016</td>
<td>April-May 9</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>
Section One: Product Identification

Trade Name
Chemical Family
Chemical Formula
CAS Number

EB 527
Emulsion Breaker
Confidential
Proprietary Blend

Section Two: Composition Information on Hazardous Ingredients

<table>
<thead>
<tr>
<th>CAS Number</th>
<th>Component Common Name</th>
<th>TWA</th>
<th>STEL</th>
<th>PEL</th>
<th>Weight Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>1330-20-7</td>
<td>Xylene</td>
<td>100ppm</td>
<td>150ppm</td>
<td>100ppm</td>
<td>40-60%</td>
</tr>
<tr>
<td>100-41-4</td>
<td>Ethyl Benzene</td>
<td>100ppm</td>
<td>125ppm</td>
<td>100ppm</td>
<td>10-20%</td>
</tr>
<tr>
<td>Confidential</td>
<td>Proprietary Ingredients</td>
<td>NE</td>
<td>NE</td>
<td>NE</td>
<td>20-40%</td>
</tr>
</tbody>
</table>

Section Three: Hazards Identification

Routes of Entry
Skin contact, eye contact, inhalation, ingestion.

Potential Health Effects
This product may cause eye, skin, or respiratory irritation.

Carcinogenicity (NTP)
This product is not believed to be carcinogenic.

Carcinogenicity (IARC)
IARC has classified ethylbenzene a possible human carcinogen (group 2B)

Carcinogenicity (OSHA)
This product is not believed to be carcinogenic.

Section Four: First Aid Measures

Eyes
Flush eyes with water for at least 15 minutes. Seek medical attention.

Skin
Remove contaminated clothing. Flush skin with water.

Ingestion
Drink 3-4 glasses of water. Do not induce vomiting. Seek medical help immediately.

Inhalation
Remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen and call a physician.

Section Five: Fire Fighting Measures

Flammable Limits, Flash Point
<100°F, PMCC

Flammable Limits in Air - LEL
ND

Flammable Limits in Air – UEL
ND

Auto Ignition Temperature
Not available.

General Hazards
None known.

Extinguishing Media
Foam, dry chemical, carbon dioxide, water spray to cool containers.

Fire Fighting Equipment
Wear self-contained breathing apparatus and protective clothing.

Fire and Explosion Hazards
Containers may explode from internal pressure if confined to fire.

Hazardous Combustion Products
Not available.

Sensitivity to Mechanical Impact
Not expected.

Sensitivity to Static Discharge
Not expected.

Additional Information
No additional information available.

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Section Six: Accidental Release Measures

Accidental Release Measures: Avoid sparks or open flames. Contain spill and salvage as much material as possible. Then pick up the remaining with absorbent and store as hazardous waste.

Section Seven: Handling and Storage

Handling and Storage Guidelines: Keep container tightly closed. Do not consume food, drink, or tobacco in areas where they may become contaminated by this material.
Use proper grounding/bonding techniques when transferring material.

Section Eight: Exposure Control/Personal Protection

Personal Protective Equipment: Wear appropriate equipment to prevent probability of exposure.
Eye Protection: Goggles or glasses with side shields.
Skin Protection: Wear impervious gloves as a standard handling procedure.
Respiratory Protection: Use NIOSH approved respiratory protection where exposure levels exceed regulatory limits.
Engineering Controls: Do not aerosolize.
Mechanical Exhaust: Required in confined spaces.
Local Exhaust: Recommended to keep fumes from concentrating.
Emergency Response Protection: No additional specialized equipment should be required.

Section Nine: Physical and Chemical Properties

Physical Form: Liquid
Color: Clear to Dark Amber
Odor: Solvent
Boiling Point: >250° F
Melting Point: NA
Freezing Point: <10° F
Specific Gravity: 0.89-0.90 (+/- 0.02)
Bulk Density: 7.4 lbs./gallon
pH: NA (5% in IPA/Water)
Solubility in Water: Insoluble
Evaporation Rate: NA (n-Butyl Acetate = 1)
Vapor Pressure: NA (mm Hg @ 68° F)
Vapor Density: >1 (Air = 1)
Volatile Organic(s): NA

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Section Ten: Stability and Reactivity

Stability: Stable at normal temperatures and operating conditions.
Incompatibilities: Strong acids and oxidizing agents.
Decomposition: None
Polymerization: Polymerization will not occur.

Section Eleven: Toxicological Information

Eye Irritation: Eye contact may be painful and irritating.
Skin Irritation: Prolonged and repeated skin exposure may be painful and irritating.
Inhalation Toxicity: Inhalation of this product during manufacturing may be irritating.
Sensitization: Not evaluated.
Chronic/Carcinogenicity: IARC has classified ethylbenzene as a possible human carcinogen (group 2B)
Reproduction: Not evaluated.
Mutagenicity: Not evaluated.
Acute Oral Effects: Not evaluated.
Acute Dermal Toxicity: Not evaluated.
Additional Information: Not evaluated.

Section Twelve: Ecological Information

Ecotoxicity: Not evaluated.
Biological Oxygen Demand (BOD): Not evaluated.
Chemical Oxygen Demand: Not evaluated.
Activated Sludge Respiration Inhibition Test: Not evaluated.
Additional Information: No additional information available.

Section Thirteen: Disposal Considerations

Container Disposal Management: Dispose of in accordance with local, state, and federal regulations.
Possible classes include but not limited to: D001-Incinerability, U239-Xylenes. Under RCRA, it is the responsibility of the user to determine, at the time of disposal, whether the material meets RCRA criteria for hazardous waste.
RCRA Hazard Class: Disposal of in accordance with local, state, and federal regulations.
Waste Disposal Method: Disposal of in accordance with local, state, and federal regulations.

Section Fourteen: Transport Information

DOT Hazard Class: Flammable Liquid
DOT Proper Shipping Name: RQ, UN1993, Flammable Liquid, N.O.S. (contains Ethyl Benzene, & Xylene), 3, PG III
Packaging Group: PG III
UN Number: UN1993
NA Number: NA
Packing Size: Carboys/Pails, Drums, and Bulk.

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Section Fifteen: Regulatory Information

<table>
<thead>
<tr>
<th>SARA 302/304 RQ</th>
<th>Yes, Xylene has an RQ of 100 lbs.</th>
</tr>
</thead>
<tbody>
<tr>
<td>SARA 302/304 TPQ</td>
<td>NA</td>
</tr>
<tr>
<td>SARA 311/312 Acute</td>
<td>Yes</td>
</tr>
<tr>
<td>SARA 311/312 Chronic</td>
<td>Yes</td>
</tr>
<tr>
<td>SARA 311/312 Fire</td>
<td>Yes</td>
</tr>
<tr>
<td>SARA 311/312 Pressure</td>
<td>NA</td>
</tr>
<tr>
<td>SARA 311/312 Reactivity</td>
<td>NA</td>
</tr>
<tr>
<td>SARA 313 List</td>
<td>Xylene</td>
</tr>
<tr>
<td>CERCLA RQ</td>
<td>Yes, Xylene has an RQ of 100 lbs</td>
</tr>
<tr>
<td>TSCA Status</td>
<td>All components are registered on TSCA inventory.</td>
</tr>
<tr>
<td>CAA</td>
<td>Yes</td>
</tr>
<tr>
<td>CWA</td>
<td>Yes</td>
</tr>
</tbody>
</table>

Additional Information: No additional information available.

Section Sixteen: Other Information

<table>
<thead>
<tr>
<th>HMIS Hazard Classification</th>
<th>Health</th>
<th>Flammability</th>
<th>Physical Hazard</th>
<th>Personal Protection</th>
</tr>
</thead>
<tbody>
<tr>
<td>Classification Code</td>
<td>2</td>
<td>3</td>
<td>0</td>
<td>G</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>NFPA Hazard Classification</th>
<th>Health</th>
<th>Flammability</th>
<th>Instability</th>
<th>Special Hazards</th>
</tr>
</thead>
<tbody>
<tr>
<td>Classification Code or Markings</td>
<td>2</td>
<td>3</td>
<td>0</td>
<td></td>
</tr>
</tbody>
</table>

Explanation of NFPA Special Symbols

**OX**: Oxidizer, a chemical that can increase the rate of combustion or fire.

**W**: Reactive with water; avoid using water when fighting a fire involving material.

**H**

Corrosive material(s); can be corrosive in either an acid or alkaline state.

**Ox**: Poison or highly toxic material(s).

**X**: Explosive material(s); redundant notation of instability.

**A**: Radioactive material(s); extremely harmful to handle or inhale.

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WC 4984
Date Effective 09/02/2014

Water Clarifier

Section One: Product Identification
Trade Name: WC 4984
Chemical Family: Cationic Brine Dispersion Polymer
Confidential
CAS Number: Proprietary Blend

Section Two: Composition Information on Hazardous Ingredients

<table>
<thead>
<tr>
<th>CAS Number</th>
<th>Component Common Name</th>
<th>TWA (mg/m³)</th>
<th>STEL (mg/m³)</th>
<th>PEL (mg/m³)</th>
<th>Weight Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>12125-02-9</td>
<td>Ammonium Chloride</td>
<td>10</td>
<td>20</td>
<td>10</td>
<td>&lt;1%</td>
</tr>
<tr>
<td>64-19-7</td>
<td>Acetic Acid</td>
<td>10 ppm</td>
<td>15 ppm</td>
<td>10 ppm</td>
<td>&lt;1%</td>
</tr>
<tr>
<td>9005-85-6</td>
<td>Sorbitan Mono-9-Octadeconate</td>
<td>NE</td>
<td>NE</td>
<td>NE</td>
<td>&lt;1%</td>
</tr>
<tr>
<td>64114-46-1</td>
<td>Polyamine</td>
<td>NE</td>
<td>NE</td>
<td>NE</td>
<td>&lt;10%</td>
</tr>
<tr>
<td>Confidential</td>
<td>Proprietary</td>
<td>NE</td>
<td>NE</td>
<td>NE</td>
<td>&lt;10%</td>
</tr>
</tbody>
</table>

Section Three: Hazards Identification
Routes of Entry: Skin contact, eye contact, inhalation, ingestion.
Potential Health Effects: This product may cause eye, skin, or respiratory irritation.
Carcinogenicity (NTP): This product is not believed to be carcinogenic.
Carcinogenicity (IARC): This product is not believed to be carcinogenic.
Carcinogenicity (OSHA): This product is not believed to be carcinogenic.

Section Four: First Aid Measures
Eyes: Flush eyes with water for at least 15 minutes. Seek medical attention.
Skin: Remove contaminated clothing. Flush skin with water.
Ingestion: Drink 3-4 glasses of water. Do not induce vomiting. Seek medical help immediately.
Inhalation: Remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen and call a physician.

Section Five: Fire Fighting Measures
Flammable Limits, Flash Point: >200°F, PMCC
Flammable Limits in Air - LEL: ND
Flammable Limits in Air - UEL: ND
Auto Ignition Temperature: Does not ignite
General Hazards: This product would not be expected to burn unless all the water is boiled away. The remaining organics may be ignitable.
Extinguishing Media: Dry chemical, carbon dioxide, water spray.
Fire Fighting Equipment: Wear self contained breathing apparatus and protective clothing.
Fire and Explosion Hazards: No unusual hazards expected.
Hazardous Combustion Products: Not available.

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WC 4984
Date Effective 09/02/2014

Sensitivity to Mechanical Impact Not expected.
Sensitivity to Static Discharge Not expected.
Additional Information No additional information available.

Section Six: Accidental Release Measures
Accidental Release Measures Contain spill and salvage as much material as possible. Then pick up the remaining with absorbent.

Section Seven: Handling and Storage
Handling and Storage Guidelines Keep container tightly closed. Do not consume food, drink, or tobacco in areas where they may become contaminated by this material.

Section Eight: Exposure Control/Personal Protection
Personal Protective Equipment Wear appropriate equipment to prevent probability of exposure.
Eye Protection Goggles or safety glasses with side shields.
Skin Protection Wear impervious gloves as a standard handling procedure.
Respiratory Protection Use NIOSH approved respiratory protection where exposure levels exceed regulatory limits.
Engineering Controls Do not aerosolize.
Mechanical Exhaust Required in confined spaces.
Local Exhaust Recommended to keep fumes from concentrating.
Emergency Response Protection No additional specialized equipment should be required.

Section Nine: Physical and Chemical Properties
Physical Form Liquid
Color Clear to Hazy emulsion
Odor Mild, Vinegar-like
Boiling Point >212°F
Melting Point NA
Freezing Point <32°F
Specific Gravity 1.01 (+/- 0.02)
Bulk Density 8.4 / gallon
pH 3.5 – 4.5
Solubility in Water Dispersible
Evaporation Rate ND (n-Butyl Acetate = 1)
Vapor Pressure ND (mm Hg @ 88° F)
Vapor Density NA (Air = 1)
Volatile Organic(s) ND

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Section Ten: Stability and Reactivity

Stability: Stable at normal temperatures and operating conditions.

Incompatibility: Strong Oxidizing agents.

Decomposition: Decomposition yields carbon dioxide.

Polymerization: Polymerization will not occur.

Section Eleven: Toxicological Information

Eye Irritation: Eye contact may be irritating; rinse with water and do not rub.

Skin Irritation: Skin contact may be irritating; wash affected area.

Inhalation Toxicity: Inhalation of this product during manufacturing may be irritating.

Sensitization: Not evaluated.

Chronic/Carcinogenicity: Not evaluated

Reproduction: Not evaluated

Mutagenicity: Not evaluated

Acute Oral Effects: Not evaluated

Acute Dermal Toxicity: Not evaluated

Additional Information: None

Section Twelve: Ecological Information

Ecotoxicity: Not evaluated.

Biological Oxygen Demand (BOD): Not evaluated

Chemical Oxygen Demand: Not evaluated

Activated Sludge Respiration Inhibition Test: Not evaluated

Additional Information: No additional information available.

Section Thirteen: Disposal Considerations

Container Disposal Management: Dispose of in accordance with local, state, and federal regulations.

RCRA Hazard Class: Under RCRA, it is the responsibility of the user to determine, at the time of disposal, whether the material meets RCRA criteria for hazardous waste.

Waste Disposal Method: Dispose of in accordance with local, state, and federal regulations.

Section Fourteen: Transport Information

DOT Hazard Class: Not Regulated

DOT Proper Shipping Name: DOT Not Regulated

Packaging Group: NA

UN Number: NA

NA Number: NA

Packaging Size: Carboys/Pails, Drums, and Bulk.

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Section Fifteen: Regulatory Information

SARA 302/304 RQ  NA
SARA 302/304 TPQ  NA
SARA 311/312 Acute  Yes
SARA 311/312 Chronic  NA
SARA 311/312 Fire  NA
SARA 311/312 Pressure  NA
SARA 311/312 Reactivity  NA
SARA 313 List  Ammonium Chloride, <1% by weight
CERCLA RQ  NA
TSCA Status  All components are registered on TSCA inventory.
CAA  Acetic Acid, Section 111
CWA  Ammonium Chloride & Acetic Acid, Section 311
Additional Information  Ammonium Chloride and Acetic Acid each has an RQ of 5000 lbs.; each at 5% max. places the RQ at 100,000 lbs. of product.

Section Sixteen: Other Information

HMIS Hazard Classification

<table>
<thead>
<tr>
<th>Classification Code</th>
<th>Health</th>
<th>Flammability</th>
<th>Reactivity</th>
<th>Personal Protection</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>D</td>
</tr>
</tbody>
</table>

NFPA Hazard Classification

<table>
<thead>
<tr>
<th>Classification Code or Markings</th>
<th>Health</th>
<th>Flammability</th>
<th>Instability</th>
<th>Special Hazards</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>Special Hazards</td>
</tr>
</tbody>
</table>

Explanation of NFPA Special Symbols

- **OX**: Oxidizer; a chemical that can increase the rate of combustion or fire.
- **W**: Reactive with water; avoid using water when fighting a fire involving material.
- **H**: Corrosive material(s); can be corrosive in either an acid or alkaline state.
- **W**: Poison or highly toxic material(s).
- **H**: Explosive material(s); redundant notation of instability.
- **W**: Radioactive material(s); extremely harmful to handle or inhale.

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