

BEFORE THE KANSAS DEPARTMENT OF AGRICULTURE

In The Matter of the Designation of the)
Groundwater Management District No. 4)
District-Wide Local Enhanced Management Area)
in Cheyenne, Decatur, Rawlins, Gove, Graham,) Case No. 002-DWR-LEMA-2017
Logan, Sheridan, Sherman, Thomas, and)
Wallace Counties in Kansas.)
_____)

**PETITION FOR ADMINISTRATIVE REVIEW OF THE
CHIEF ENGINEER’S ORDER ESTABLISHING A
LOCAL ENHANCED MANAGEMENT AREA IN THE
NORTHWEST KANSAS GROUNDWATER MANAGEMENT DISTRICT NO. 4**

COME NOW, the Petitioners, by and through their attorney, David M. Traster, Foulston Siefkin, Wichita, Kansas, and pursuant K.S.A. 2016 Supp. 82a-1901 and K.S.A. 77-501, *et seq.*, request that the Secretary of Agriculture conduct administrative review of the Chief Engineer’s April 13, 2018, Order that establishes a Local Enhanced Management Area (“LEMA”) within the boundaries of the Northwest Kansas Groundwater Management District No. 4 (“GMD4,” the “GMD,” or the “District”).

The Petitioners:

1. Jon and Ann Friesen, Friesen Farms, P.O. Box 763, Colby, KS 67701
2. Doyle Saddler, 1375 County Road 25, Colby, KS 67701
3. Justin Sloan, 1925 County Road 23, Colby, KS 67701
4. Tom Sloan, 545 Woofter Ave, Colby, KS 67701
5. Bert Stramel, 1267 Highway K25, Colby, KS 67701
6. Fred Albers, 2091 Rd. 34, Rexford, KS 67753

7. Marvin Albers, 744 County Road 31, Oakley, KS 67748
8. Frank Bouts, Box 166, Selden, KS 67757
9. Denise J. Burrows, Trustee of the Charles W. Schroeder Family Trust,
20606 E. Ida Circle, Centennial, CO 80015
10. Gary E. Cooper, P.O. Box 609, Colby, KS 67701
11. Elfriede U. Cooper, P.O. Box 609, Colby, KS 67701
12. Cameron Epard, 18171 N. 99th St., Scottsdale, AZ 85255
13. F. Doyle Fair, Trustee of the A.L. Abercrombie Marital Trust, 7309 E. 21st
N. #140, Wichita, KS 67206
14. Lois L. Ferguson, 760 York Street, Denver, CO 80206
15. Bryan Frahm, 375 S. Range Ave, Colby, KS 67701
16. Bryan Frahm, Meadow Lake Farms, 375 S. Range Ave, Colby, KS 67701
17. Lon Frahm, 375 S. Range Ave, Colby, KS 67701
18. Lon Frahm, Frahm Farmland, 375 S. Range Ave, Colby, KS 67701
19. Lon Frahm, Trustee of the Peggy Frahm Evans Trust, 375 S. Range Ave,
Colby, KS 67701
20. Sheila Frahm, 2149 W. Escondido Canyon Drive, Green Valley, AZ 85622
21. James Fritz, 7102 Road 8, Goodland, KS 67735
22. Vincent V. Glad & Tenley S. Glad, Glad Farms, 935 South Range Ave,
Colby, KS 67701

23. Pat J. Haffner, 7380 E. Road 105, Hoxie, KS 67740
24. Wilburn Holloway, 2266 County Road 12, Colby, KS 67701
25. David Houston, 1821 Road 330, Reading, KS 66868
26. Douglas Irvin, Irvin Farms, Inc., 915 Fountainview Ct., Goodland, KS

67735

27. Sharon K. Mann, 1411 Arcade Ave, Goodland, KS 67735,
28. John P. McKenna, #11-2500th Rd, Jennings, KS 67643
29. Brent Meranda, 8020 County Road BB, Quinter, KS 67752
30. Berwyn Petersen, c/o Jon Friesen, P. O. Box 763, Colby, KS 67701
31. Berwyn Petersen, SQI Farms, c/o Jon Friesen, P. O. Box 763, Colby, KS

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32. Paul Steele, 965 Prairie View, Colby, KS 67701
33. Richard A. Stefan, 615 North Chickanqua, Colby, KS 67701
34. Bert Stramel, Stramel Farms, 1267 Highway K25, Colby, KS 67701
35. Joseph G. Waldman, 5853 County Road Y, Park, KS 67751
36. Denise Walker, Walker Testing Co, Inc., 501 13th St., Hoxie, KS 66740
37. Kevin W. Wark, Box 384, Colby, KS 67701
38. Kevin W. Wark, Wark Properties LLC, Box 384, Colby, KS 67701
39. Kevin W. Wark, Prairie Dog Properties, Box 384, Colby, KS 67701

40. Kevin W. Wark, Trustee of the Berrie Family Trust, Box 384, Colby, KS
67701

41. Kevin W. Wark, Trustee of the Flipse Living Trust, Box 384, Colby, KS
67701

42. Darrel E. Wark, P.O. Box 384, Colby, KS 67701

43. Daniel Wayand, 519 West 6th Street, Quinter, KS 66552

44. Wendy Weishaar, 375 S. Range, Colby, KS 67701

There are numerous problems with the LEMA statute, the procedure that resulted in the April 13, 2018, Order, and with the Order itself. The Chief Engineer's decisions throughout the LEMA proceeding have been based on a statute that is unconstitutional on its face and as applied; the Chief Engineer has acted beyond the jurisdiction conferred by the LEMA statute, the Groundwater Management District Act, and the Water Appropriation Act; has erroneously interpreted and applied the law; engaged in an unlawful procedure; has failed to follow prescribed procedures; the Chief Engineer's actions were based on determinations of fact that are not supported to the appropriate standard of proof by evidence that is substantial when viewed in light of the record as a whole; and have been unreasonable, arbitrary, and capricious.

Without limiting the general basis of this Petition for Administrative Review, the Petitioners advise the Secretary as follows:

1. The Chief Engineer issued an Order establishing a Local Enhanced Management Area on April 13, 2018. The Order was provided to counsel for the Intervenor that day. The time limit for seeking Administrative Review pursuant to K.S.A. 2016 Supp. 82a-1901, is 15 days. K.S.A. 82a-527(b). This Petition for Administrative Review is timely if served on or before April 30, 2018.

2. Kansas public policy, unchanged since 1945, mandates the use of the prior appropriation doctrine when there is insufficient water available for all appropriators.

3. The prior appropriation doctrine permeates the Kansas Water Appropriation Act, K.S.A. 82a-701, *et seq.*, and is fundamental Kansas public policy that is binding on all water users and government agencies, including the Chief Engineer, the Division of Water Resources (“DWR”) and GMD4. K.S.A. 82a-703b(b); 82a-706; 82a-706b; 82a-706e; 82a-707(b), (c), and (d); 82a-708b; 82a-710; 82a-711(b)(3); 82a-711a; 82a-712; 82a-716; 82a-717a; 82a-742; 82a-745; 82a-1020; 82a-1028(n) and (o); 82a-1029; 82a-1039; and the April 13, 2018, Order, pp. 4-5, ¶ 4.

4. The Groundwater Management District Act, K.S.A. 82a-1020, *et seq.*, is subject to, controlled by, and does not amend the Kansas Water Appropriation Act making all of the GMD Act’s provisions subject to the prior appropriation doctrine. K.S.A. 82a-1020; 82a-1028(n) and (o); 82a-1029; 82a-1039; and the April 13, 2018, Order, p. 4-5, ¶ 4.

5. For example, the 1978 Legislature approved the corrective-control provisions set out in the 1978 Intensive Groundwater Use Control Area (“IGUCA”) legislation, K.S.A. 82a-1038. But not before the Legislature amended DWR’s proposed legislation to make it clear that the control provisions are limited by and subject to the prior appropriation doctrine by specifically stating that the duties and powers granted to the Chief Engineer in the Water Appropriation Act trump the IGUCA provisions. K.S.A. 82a-1039.

6. In fact, the application and enforcement of the prior appropriation doctrine is arguably the most important “duty or power of the chief engineer granted pursuant to the Kansas water appropriation act.” *Id.*

7. The April 13, 2018, Order ignores the prior appropriation doctrine making across-the-board reductions in the quantities of water that can be diverted.

8. The April 13, 2018, Order violates also K.S.A. 82a-707, which mandates allocation of water based on priority and not the purpose of use. In addition to violating the Water Appropriation Act, the Order denies irrigators equal protection of the law.

9. Reducing the quantity of water that can be diverted based on the acres actually irrigated during recent years, ignoring the right to irrigate all of the authorized acres, is a violation of the Water Appropriation Act in all of the same ways that reducing the quantities violates the Act.

10. The Chief Engineer does not have the authority to reduce the quantity of a water right, even if the reduction is limited in time. The Court in *Clawson v. DWR*, 49 Kan.App.2d 789, syl. 15, 315 P.3d 896 (2013), held that the Chief Engineer does not have the statutory power to reduce the authorized quantity of a water right after he has issued a Permit.

11. When the Chief Engineer issued each of the Permits affected by the April 13, 2018, Order, he made a finding of fact that the permitted quantity is reasonable.

12. Each Permit, when issued, is an administrative order and the time to challenge those orders has long since passed. The April 13, 2018, Order, is an unlawful collateral attack on the Chief Engineer's previous findings and administrative orders.

13. The LEMA corrective-control provisions violate the prior appropriation doctrine whether impairment is direct or regional.

14. Kansas public policy specifically permits groundwater mining in areas where there is little or no recharge even though it reduces the quantity of water available to senior users, the public, and future users. K.S.A. 82a-711 and 82a-711a. *See, e.g., Report on the Laws of Kansas Pertaining to the Beneficial Use of Water, Bulletin No. 3, November 1956, pp. 51, 85-91.*

15. DWR and GMD4 have implemented Kansas public policy that permits mining of groundwater in Northwest Kansas.

16. All of the water rights in GMD4 with a priority date before August 19, 1991, were created under the DWR approved GMD4 planned-depletion policy specifically authorized by K.S.A. 82a-711(c), K.S.A. 82a-711a, and the rules and regulations adopted by previous Chief Engineers applicable within GMD4.

17. Water Rights are real property. K.S.A. 82a-701(g). While the Legislature can always amend or repeal its own laws it cannot unring a bell. "The past cannot be recalled by the most absolute power." *United States v. Winstar*, 518 U.S. 839, 873 (1996) quoting *Fletcher v. Peck*, 6 Cranch 87, 3 L.Ed. 162 (1810).

18. Thus, in *Fletcher v. Peck*, the court held that the Legislature cannot undo a conveyance of real estate, divesting the owner of rights that the state has lawfully conveyed. *Id.* It can however, reacquire the property by condemning it. See *Young Partners, LLC v. Bd. of Educ., Unified Sch. Dist. No. 214, Grant Cnty.*, 284 Kan. 397, 403–405, 160 P.3d 830 (2007).

19. Reduction of the available quantity of water under water rights that the Chief Engineer has permitted and irrigators have perfected with significant investments of capital and hard work and upon which irrigators and their creditors have relied, is an unconstitutional taking of private property for public use giving rise to inverse condemnation claims against the Department of Agriculture.

20. The LEMA statute is not retroactive so even if the corrective-control provisions of the LEMA statute authorize reductions, only water rights created with

notice of those corrective-control provisions, i.e. water rights with priority dates after July 1, 2012, the effective date of the statute, could be reduced. Nevertheless, the Order exempts water rights that are still in their perfection periods. Order, p. 44, ¶ 1.(o).

21. The LEMA plan is unreasonable, arbitrary, and capricious for many reasons including:

a. it establishes reductions based on average depletion using sparse and unevenly spaced data; and

b. it establishes reductions based on average depletion across entire Townships solely for the ease, convenience, and exclusive benefit of GMD4 and DWR with no regard for the significant and unlawful impact on irrigators or the actual depletion experienced at individual well sites.

22. Brownie Wilson, M.A., with the Kansas Geological Survey testified:

GMD4 was provided a Microsoft Excel spreadsheet and GIS files of the PLSS sections within the District, each coded with their average land surface, bedrock, and 2004, 2009, and 2015 water table elevations. Because the water table elevations are based on interpolated surfaces from wells measured during each time period, the change in the water table between those years and the saturated thickness can be readily computed at the PLSS-section level.

23. The data provided by the KGS estimated depletion in 4,981 Sections in the District based on annual well measurements. The water-level measurements themselves are reliable. But only 307 water-level estimates were based on measurements that were “0.00” miles from the measurement wells. Only 745 estimates were based on

measurements within one-half mile and 3,082 estimates were based on measurements that were one mile or more away.

24. Even though the GMD had data that allowed it to “readily” compute depletion at the Section level, the GMD chose to average depletion across entire Townships breaking each Township into the following categories: average depletion of less than 0.5% between 2004 and 2015; between 0.5% and 1.0%; between 1.0% and 2.0%; and greater than 2.0%.

25. The Section-level data shows that average depletion in some Townships in the District is uniform but the majority have varying degrees of depletion. See Intervenor’s Ex. D.

26. For example, Intervenor’s Ex. I shows the calculated depletion, Section by Section, in Township 8 South, Range 33 West, which, according to the GMD had an average annual decline of between 1.0% and 2.0% between 2004 and 2015. However every irrigation right in the Township is treated the same even though 12 Sections have less than 1.0% calculated annual depletion and 6 Sections have greater than 2.0%. Fewer than half of the Sections in the Township, 17 Sections, have depletion levels between 1.0% and 2.0%.

27. The method used is also unreasonable, arbitrary, and capricious because it uses wholly artificial boundaries. For example, all water rights in Sections 1, 2, 3, 4, 5, and 6 along the North side of Township 7 South-Range 34 West, water rights in Sections

12, 13, 24, 25, and 36 along the East side and Sections 7, 18, 19, 30, and 31 along the West side of Township 7 South-Range 34 West are reduced to 15.6 inches per year. Adjacent Sections to the North, East, and West are reduced to just 18 inches per year giving them a significant economic advantage.

| | | | | | | | |
|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|
| 36-T6S- R35W | 31-T6S- R34W | 32-T6S- R34W | 33-T6S- R34W | 34-T6S- R34W | 35-T6S- R34W | 36-T6S- R34W | 31-T6S- R33W |
| 1-T7S- R35W | 6-T7S- R34W | 5-T7S- R34W | 4-T7S- R34W | 3-T7S- R34W | 2-T7S- R34W | 1-T7S- R34W | 6-T7S- R33W |
| 12-T7S- R35W | 7-T7S- R34W | | | | | 12-T7S- R34W | 7-T7S- R33W |
| 13-T7S- R35W | 18-T7S- R34W | | | | | 13-T7S- R34W | 18-T7S- R33W |
| 24-T7S- R35W | 19-T7S- R34W | | | | | 24-T7S- R34W | 19-T7S- R33W |
| 25-T7S- R35W | 30-T7S- R34W | | | | | 25-T7S- R34W | 30-T7S- R33W |
| 36-T7S- R35W | 31-T7S- R34W | | | | | 36-T7S- R34W | 31-T7S- R33W |

28. The Chief Engineer failed to address the applicable cannons of statutory construction to justify his clearly erroneous interpretation of the LEMA corrective-control provisions indicating that the April 13, 2018, Order was not the “proper place” to do so even though his interpretation of the statute was called directly and squarely into question. April 13, 2018, Order, p. 33, ¶ 14.

29. The Chief Engineer failed to indicate when and where he should or would explain how the cannons justify his erroneous interpretation.

30. It is unreasonable, arbitrary, and capricious to require the parties to speculate about how the Chief Engineer might attempt to justify his interpretation which has and will continue to increase the time, effort, and expense of this review and, if necessary, subsequent judicial review. The Chief Engineer's failure to explain how the cannons apply violates the requirement that Orders include conclusions of law that support agency action. K.S.A. 77-526(c).

31. The LEMA statute is unconstitutional on its face because it makes the April 13, 2018, Order designating a LEMA effective when it is entered into the Chief Engineer's records making no requirement that it be served on the parties who are subject to its provisions. K.S.A. 82a-1041(h); April 13, 2018, Order, p. 6, ¶ 1. In fact, the Order has not yet been served on all of the Petitioners.

32. The April 13, 2018, Order includes an erroneous finding of fact stating that "the appeals procedure . . . provides due consideration to water users who have already implemented reductions in water use resulting in voluntary conservation measures." Order, p. 38, ¶ 9.

33. The LEMA statute must be read to include Due Process protections to avoid constitutional problems. The Due Process Clause applies to LEMA proceedings because any orders issued are state action that adversely affect property rights.

34. The Chief Engineer refused to rule on the Intervenors' Motion for Continuance asserting that the statute does not require "adversarial hearings." The fact that the LEMA, as proposed and as designated in the April 13 Order, alters property rights on which many Kansas families rely for their livelihood is a clear indication that the proceedings are "adversarial."

35. Owners of water rights are entitled to representation by counsel, to review and understand the LEMA plan, to conduct discovery, and to otherwise prepare for the required hearings.

36. The Chief Engineer granted the Intervenors an opportunity to cross-examine witnesses at the second hearing but denied their request for time to gather and analyze the evidence and to adequately prepare for the November 4, 2017, hearing. For example, GMD5 produced numerous documents to counsel shortly before 5:00 p.m. on November 13, 2017, the day before the second hearing began.

37. The procedures to appeal the GMD's determination of the acreage and quantities allocated to each owner is a violation of basic due process. There are no provisions for hearings before a fair and impartial tribunal and no provisions for review of erroneous decisions.

38. While there is no good time of the year for this proceeding, the timing of this proceeding could not have been worse and precluded adequate preparation. The GMD sent its proposed LEMA Plan to the Chief Engineer in June. The first hearing was

held on August 23, 2017, at or near the end of the irrigation season making preparation and even participation in the first hearing problematic.

39. Nevertheless, the Chief Engineer was critical of the Intervenors for waiting “until just a month prior to the second hearing to hire an attorney.” Order, p. 9, ¶ 9.

40. The second hearing was held on November 14, 2018, in the middle of corn harvest, again making preparation and participation in the hearing problematic.

41. Moreover, the Order of designation was issued in mid-April well after 2018 planting decisions should have been made or were made. In a previous pleading, the Intervenors stated:

Planning for 2018 cropping is already underway and it would be grossly unfair to implement the LEMA for 2018 even if the Chief Engineer were to issue an order approving the plan shortly after the comment period closes. Since it is likely that a plan will not be implemented until 2019, no one will be prejudiced by a delay of a few months.

Memorandum in Support of Intervenors' Motion to Provide Due Process Protections for Irrigators, October 27, 2018, p. 14. The matter was further addressed in subsequent briefing but the Chief Engineer gave this significant concern no consideration.

42. The procedures carried a significant risk of, and have resulted in the erroneous deprivation of property interests and additional procedural safeguards would have dramatically increased the Intervenors' ability to safeguard their property interests.

43. Any additional burden caused by providing the Intervenors with their basic due process rights would have been minimal and, in fact, illumination of all of the facts, which is best accomplished in an adjudicative hearing, would have been to DWR's and GMD4's advantage.

44. Nevertheless, the Chief Engineer rushed through the procedure running rough-shod over significant property rights.

45. The April 13, 2018, Order contains multiple assertions that there was little or no evidence to support various objections. *See, e.g.,* April 13, 2018, Order, p. 8, ¶ 8; p. 9, ¶¶ 9 and 10; p. 10, ¶¶ 10 and 11; pp. 10-11, ¶ 12; p. 11, ¶ 13; p. 23, ¶ 2; p. 29, ¶ 7; p. 30, ¶ 8; p. 33, ¶ 13; and p. 34, ¶ 16.

46. It is unreasonable, arbitrary, and capricious to deny the parties an opportunity to gather and analyze the evidence and to adequately prepare for a hearing and then rely on a lack of evidence to support their objections.

47. The April 13, 2018, Order states that a Petition for Administrative Review by the Secretary must be filed within 30 days after service of the Order (p. 52) but the time limit to seek Administrative Review is 15 days. The LEMA proceeding commenced prior to July 1, 2017. April 13, 2018, Order, pp. 1-2, ¶¶ 1-3. The 2017 amendments to K.S.A. 82a-1901 were not effective until July 1, 2017, and are not retroactive. K.S.A. 82a-1901(e).

48. The Chief Engineer has failed to adopt rules and regulations as required by the statute. K.S.A. 82a-1041(k). His failure to comply with this directive placed the parties at a substantial disadvantage causing them to incur substantial attorney fees to prepare multiple motions and extensive briefing to figure out how this proceeding was to be conducted. Had the Chief Engineer complied with the legislative mandate to adopt rules and regulations, review of proposed rules by the Attorney General and public comments could have avoided this ad hoc, unreasonable, arbitrary, and capricious procedural nightmare. The Chief Engineer's refusal to follow the Legislature's mandate is now before the Stafford County District Court.

49. The Chief Engineer improperly delegated his responsibility to conduct the first public hearing. The statute specifically states that the "chief engineer shall conduct an initial public hearing" on the question of designating a proposed LEMA. K.S.A. 82a-1041(b). *See also*, April 13, 2018, Order p. 4, ¶ 3. There is no authority to delegate this statutory responsibility.

50. While Limited Irrigation Crop Insurance may be available from the Risk Management Agency, some producers are unable to find agents who will sell it because it has numerous problems and unknowns. With high input costs and low crop prices some bankers are unwilling to renew operating loans on uninsured crops.

51. The GMD's allegations and the Chief Engineer's statements in this and other Orders to the contrary, the process was less than open during the development of

the LEMA. The GMD Board was inaccessible and failed to consider comments unless staff approved. The plan was poorly explained to the public and was not made available for review before it was issued. Note especially the testimony of Bert Stramel:

This has probably been the most informational meeting we have had on this whole process the whole time. I don't know if that is because you are in charge or what the case is.

But as a farmer, we start everything with a process and we try and know everything we can about that process going forward when we pick out hybrids, when we pick out machinery that we use. We try and get as much knowledge and as much data about everything and we try and max it out to the absolute max that we can in order to be profitable and efficient.

And in this case, many of the things we asked for at the very beginning, like increased measuring points or increased data points so that we can actually find out where we can do the most good and do the most good, and to back up some of these maps have been ignored from the from the beginning.

Transcript pp. 267, line 20, 268, line 12.

It is like today, this was the first time the 25 -- no more than 25 percent reduction was actually explained to an extent that it could be understood.

We have never had a full explanation of how this appeals process is going to work. I have several of my personal water rights that I know are going to need to go through this appeal, and I am not sure how well I am going to be served by it without knowing the process, without knowing who is going to be in charge of it, if it is going to be this current board, if it is going to be the current staff. I mean, who knows what future staff or future boards are going to look like. And to just walk into this without having some of these questions answered is reckless. We wouldn't go into our fields and plant something without having some idea of what to expect.

Transcript, p. 269, lines 1-18.

52. The Intervenor's previous briefing in this matter is incorporated by reference, including: the October 27, 2017, Memorandum in Support of Motion for Due Process; the October 27, 2017, Memorandum in Support of Motion for Reconsideration; the November 2, 2017, Reply Memo in Support of Due Process; and the December 22, 2017, Intervenor's Submittal in Opposition to the proposed District-Wide LEMA.

Respectfully submitted,

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CERTIFICATE OF SERVICE

On this 29th day of April, 2018, I hereby certify that foregoing Petition for Administrative Review was sent by electronic mail to:

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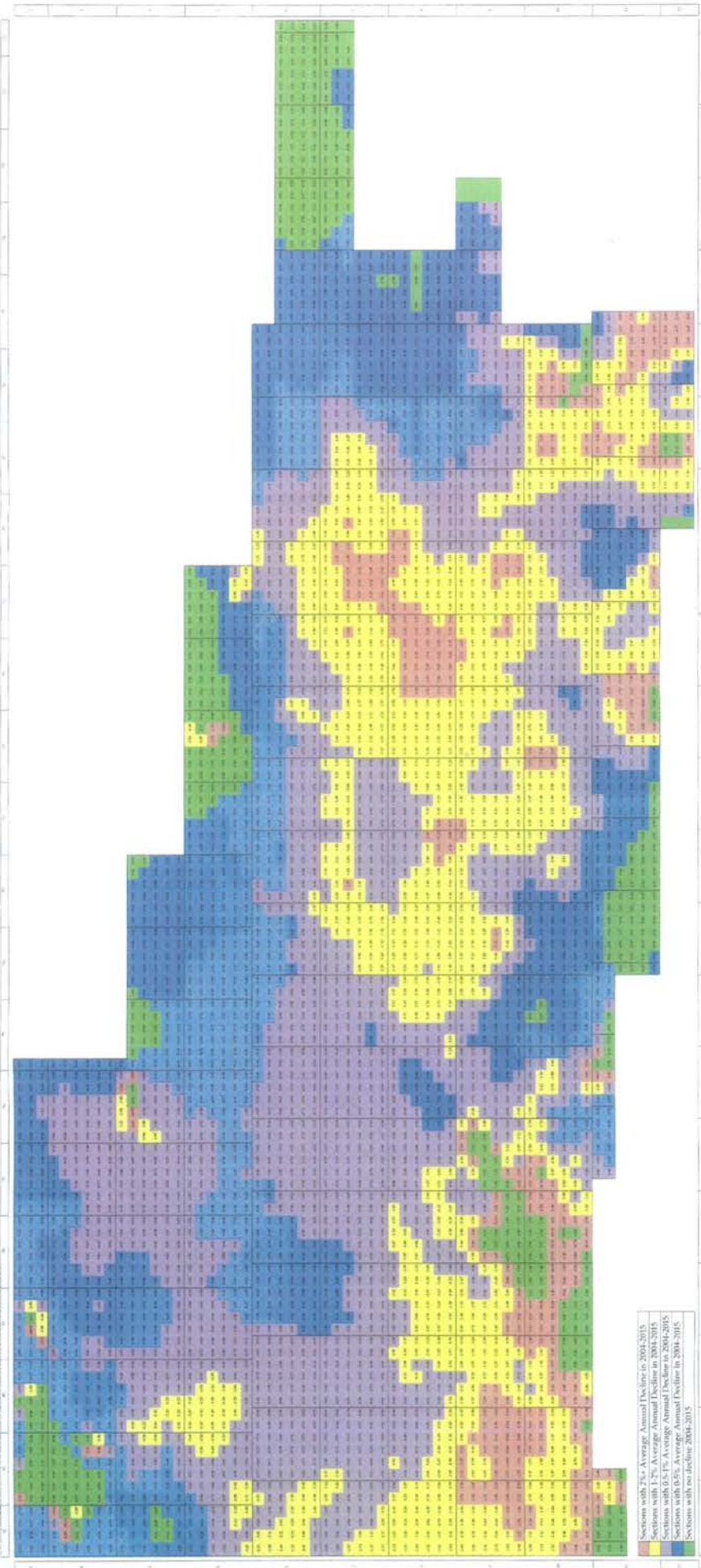
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David M. Traster, #11062

Average Annual Percent Decline 2004-2015



Township 8 South-Range 33 West

| Section | Township | Range | Bedrock Elevation | 2004 Ave. | 2015 Ave. | 2004 Sat. Thkness | 2015 Sat. Thknes | 2004-2015 change (feet) | 2004-2015 change (percent) | |
|---------|----------|-------|-------------------|-----------------------|-----------------------|-------------------|------------------|-------------------------|----------------------------|--------|
| | | | | Winter Table Elev. v3 | Winter Table Elev. v3 | | | | | |
| 1 | 8 | 33 | 2848.40 | 2975.87 | 2966.51 | 127.47 | 118.11 | -9.36 | -0.69 | Purple |
| 2 | 8 | 33 | 2855.86 | 2987.00 | 2977.74 | 131.14 | 121.88 | -9.26 | -0.66 | Purple |
| 3 | 8 | 33 | 2873.63 | 2997.82 | 2988.48 | 124.19 | 114.85 | -9.34 | -0.71 | Purple |
| 4 | 8 | 33 | 2891.93 | 3008.53 | 2998.96 | 116.60 | 107.03 | -9.56 | -0.78 | Purple |
| 5 | 8 | 33 | 2911.08 | 3019.33 | 3009.46 | 108.25 | 98.38 | -9.87 | -0.86 | Purple |
| 6 | 8 | 33 | 2904.86 | 3028.70 | 3018.58 | 123.84 | 113.72 | -10.12 | -0.77 | Purple |
| 7 | 8 | 33 | 2946.62 | 3026.33 | 3016.07 | 79.71 | 69.45 | -10.27 | -1.25 | Yellow |
| 8 | 8 | 33 | 2942.95 | 3016.51 | 3006.61 | 73.56 | 63.66 | -9.89 | -1.30 | Yellow |
| 9 | 8 | 33 | 2904.55 | 3006.36 | 2996.80 | 101.81 | 92.25 | -9.56 | -0.89 | Purple |
| 10 | 8 | 33 | 2879.95 | 2996.30 | 2986.95 | 116.35 | 107.00 | -9.35 | -0.76 | Purple |
| 11 | 8 | 33 | 2857.87 | 2986.13 | 2976.83 | 128.26 | 118.96 | -9.30 | -0.68 | Purple |
| 12 | 8 | 33 | 2847.77 | 2975.63 | 2966.21 | 127.86 | 118.44 | -9.42 | -0.69 | Purple |
| 13 | 8 | 33 | 2867.93 | 2976.06 | 2966.89 | 108.13 | 98.96 | -9.17 | -0.80 | Purple |
| 14 | 8 | 33 | 2882.11 | 2985.93 | 2976.83 | 103.82 | 94.72 | -9.10 | -0.83 | Purple |
| 15 | 8 | 33 | 2901.63 | 2995.79 | 2986.60 | 94.16 | 84.97 | -9.19 | -0.93 | Purple |
| 16 | 8 | 33 | 2921.92 | 3005.66 | 2996.18 | 83.74 | 74.26 | -9.48 | -1.09 | Yellow |
| 17 | 8 | 33 | 2944.37 | 3014.69 | 3004.78 | 70.32 | 60.41 | -9.91 | -1.37 | Yellow |
| 18 | 8 | 33 | 2955.17 | 3024.21 | 3013.73 | 69.04 | 58.56 | -10.48 | -1.49 | Yellow |
| 19 | 8 | 33 | 2951.86 | 3022.00 | 3011.44 | 70.14 | 59.58 | -10.56 | -1.47 | Yellow |
| 20 | 8 | 33 | 2947.75 | 3013.16 | 3003.37 | 65.41 | 55.62 | -9.79 | -1.46 | Yellow |
| 21 | 8 | 33 | 2941.06 | 3004.17 | 2995.00 | 63.11 | 53.94 | -9.17 | -1.42 | Yellow |
| 22 | 8 | 33 | 2936.73 | 2995.11 | 2986.28 | 58.38 | 49.55 | -8.82 | -1.48 | Yellow |
| 23 | 8 | 33 | 2938.44 | 2985.63 | 2976.89 | 47.19 | 38.45 | -8.74 | -1.85 | Yellow |
| 24 | 8 | 33 | 2938.93 | 2976.53 | 2967.74 | 37.60 | 28.81 | -8.79 | -2.39 | Red |
| 25 | 8 | 33 | 2965.89 | 2976.88 | 2968.51 | 10.99 | 2.62 | -8.37 | -12.23 | Red |
| 26 | 8 | 33 | 2961.34 | 2985.78 | 2977.46 | 24.44 | 16.12 | -8.32 | -3.71 | Red |
| 27 | 8 | 33 | 2956.02 | 2995.08 | 2986.79 | 39.06 | 30.77 | -8.29 | -2.14 | Red |
| 28 | 8 | 33 | 2953.26 | 3003.63 | 2994.95 | 50.37 | 41.69 | -8.67 | -1.70 | Yellow |
| 29 | 8 | 33 | 2950.34 | 3011.67 | 3002.15 | 61.33 | 51.81 | -9.53 | -1.52 | Yellow |
| 30 | 8 | 33 | 2949.75 | 3019.91 | 3009.52 | 70.16 | 59.77 | -10.39 | -1.45 | Yellow |
| 31 | 8 | 33 | 2950.19 | 3018.18 | 3008.02 | 67.99 | 57.83 | -10.16 | -1.46 | Yellow |
| 32 | 8 | 33 | 2954.23 | 3010.75 | 3001.36 | 56.52 | 47.13 | -9.38 | -1.64 | Yellow |
| 33 | 8 | 33 | 2958.21 | 3002.94 | 2994.58 | 44.73 | 36.37 | -8.36 | -1.86 | Yellow |
| 34 | 8 | 33 | 2954.30 | 2994.38 | 2986.45 | 40.08 | 32.15 | -7.93 | -1.98 | Yellow |
| 35 | 8 | 33 | 2955.53 | 2985.09 | 2977.02 | 29.56 | 21.49 | -8.07 | -2.86 | Red |
| 36 | 8 | 33 | 2959.76 | 2976.23 | 2968.15 | 16.47 | 8.39 | -8.08 | -5.95 | Red |
| | | | | | | | | AVERAGE | -1.81 | |

