

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

OKLAHOMA FARM BUREAU LEGAL
FOUNDATION, et al.

Petitioners,

v.

OKLAHOMA WATER RESOURCES BOARD,

Respondent,

v.

TISHOMINGO NATIONAL FISH HATCHERY,
et al.,

Other Parties of Record.

Case No. CV-2013-2414

District Judge Barbara Swinton

**PETITIONERS' MOTION TO COMPEL PRODUCTION OF UNREDACTED OWRB
MEMORANDUM AND BRIEF IN SUPPORT**

Petitioners Pontotoc County Farm Bureau, Oklahoma Farm Bureau Legal Foundation, Oklahoma Independent Petroleum Association, Oklahoma Aggregates Association, Environmental Federation of Oklahoma, Oklahoma Cattlemen's Association, TXI, and Arbuckle-Simpson Aquifer Protection Federation of Oklahoma, Inc. (collectively "Petitioners"), move the Court to compel the Oklahoma Water Resources Board ("OWRB") to produce an *unredacted* version of the September 14, 2012 Memorandum (the "Memo") from Mr. Jerry Barnett to the Hearing Examiner (Ms. Emily Meazell). In support hereof, Petitioners show the Court as follows:

FACTUAL BACKGROUND

1. After the May 15, 2012 hearing to determine the Maximum Annual Yield ("MAY") for the Arbuckle-Simpson Aquifer ("ASA"), and in response to Petitioners' Post-Hearing Brief, the OWRB attorney who participated in the MAY hearing, *i.e.* Mr. Jerry Barnett,

had *ex parte* communications with the Hearing Examiner. The existence of these communications was discovered through an Open Records Act request.

2. Many emails and other communications between the OWRB's attorneys (including Mr. Barnett) and the Hearing Examiner regarding the same subject were produced by the OWRB in response to the Open Records Act Request. However, the OWRB refused to produce the Memo.

3. At no time during the writ proceedings before the Oklahoma Supreme Court (held January 2013 through June 2013) did the OWRB contend that the Memo constituted a privileged communication or attorney work product.

4. On July 22, 2013, Petitioners filed a motion in the MAY proceeding below in which they sought a copy of the Memo from the Hearing Examiner and from the OWRB. Although refusing to produce same, at no time in the motion proceedings did the Hearing Examiner or the OWRB assert that the Memo constituted a privileged communication or attorney work product.

5. On April 29, 2014, Petitioners filed a Motion for Discovery and Hearing on Procedural Irregularities specifically referencing the Memo ("Procedural Irregularities Motion"). In its response filed on May 14, 2014, the OWRB did not assert any claim of work product or privilege with respect to the Memo.

6. On June 6, 2014, at the hearing on Petitioners' Procedural Irregularities Motion, Mr. Jerry Barnett alleged, *for the first time*, that the Memo constituted his privileged "work product". Mr. Barnett claimed that the memo was prepared by him "in anticipation of litigation", and that, therefore, it allegedly constitutes privileged work product. What litigation did he claim was anticipated - this appeal.

7. At that hearing, the Court ordered the OWRB to produce the Memo, subject to addressing any claims of privilege surrounding any redactions that the OWRB might make.

8. On June 16, 2014 the OWRB provided a copy of the Memo that was heavily redacted. A copy of the redacted Memo is attached hereto as Exhibit "B". No information was provided by the OWRB which supports any claim of work product or privilege with respect to the redacted portions of the Memo.

9. The redacted information specifically responds to three arguments raised in Petitioners' Post-Hearing Brief:

- 1) Proposition III (B) - The Amount of Water in Storage;
- 2) Proposition IV - Major Modeling Mistakes; and
- 3) Proposition V - The Tentative MAY Improperly Applies the Model Results Applicable Only to the Eastern Portion to the Entire Aquifer.

As revealed by emails that the OWRB previously produced, the Hearing Examiner was having trouble responding to these particular arguments raised by Petitioners, so the staff provided assistance. (Exhibit D to Exhibit 1 to Petitioners' Procedural Irregularities Motion, at pp. 7-8). This same OWRB email states that staff would provide references to the record *and* "provide staff's expertise to explain where necessary". The unredacted portions of the Memo are references to the record. It is presumed that the redacted portions are Mr. Jerry Barnett's explanation of how he thought the Hearing Examiner should interpret the evidence, which of course included the evidence he personally presented at the MAY hearing.

ARGUMENTS AND AUTHORITIES

The Memo has raised questions since its existence was discovered. Does the Memo suggest interpretations of the evidence that support the position Mr. Jerry Barnett advocated on behalf of the OWRB at the MAY Hearing? Does it make arguments or present new evidence

that could influence the Hearing Examiner's deliberative process against the arguments and positions asserted by Petitioners? Because Mr. Jerry Barnett actively participated in the MAY hearing as the OWRB's attorney therein (presenting witnesses on behalf of the OWRB in support of the Tentative MAY and calling rebuttal witnesses in opposition to Petitioners' evidence), it is inappropriate for him to make *ex parte* statements or submit new information or evidence to the Hearing Examiner that is not part of the record. This is particularly so if he attempted to sway the Hearing Examiner to support the proposed MAY or to reject Petitioners' position without notifying the Petitioners and providing an opportunity to respond.

Petitioners have good reason to believe that the Memo includes new evidence and arguments against their position. The OWRB's previous General Counsel explained to Petitioners' counsel that the Memo summarizes the responses of numerous staff members to the arguments contained in Petitioners' Post-Hearing Brief. (Exhibit 3 to Procedural Irregularities Motion). Some of these staff members were witnesses who testified at the MAY hearing in support of the proposed MAY. Their responses, which were produced in response to the Open Records Act Request, clearly contain new evidence that was not presented at the MAY hearing. These responses are supposedly summarized in the redacted portions of the Memo.

Neither the Court nor Petitioners can properly evaluate whether the Memo argues or presents new evidence or otherwise attempts to rebut Petitioners' arguments outside the record without actually seeing the Memo - all of it. The Court should order the OWRB to produce an unredacted version of the Memo. Only then can it be determined whether the Hearing Examiner received new arguments, authorities, or evidence that Petitioners were not shown or given an opportunity to respond.

I. THE OWRB HAS NOT SUSTAINED IT'S BURDEN OF PROOF REGARDING ITS PRIVILEGE CLAIM

“Because all privileges are ‘in derogation of the search for truth,’ both [a work product and attorney-client] are narrowly construed.” *Lindley v. Life Investors Ins. Co. of America*, 267 F.R.D. 382, 388 (N.D. Okla. 2010) (citing numerous cases). Therefore, “the party asserting the attorney-client privilege or work-product protection has the burden of clearly showing that either or both apply”. *Id.* Thus, the OWRB has the burden of establishing the privileged status of the redacted portions of the Memo. *Chandler v. Denton*, 1987 OK 38, 741 P.2d 855, 865, fn. 29 (citing numerous cases). The OWRB has offered no evidence to support its claim that the redacted material is privileged. No evidence has been submitted which demonstrates why the redacted information supposedly satisfies the criteria necessary to be considered protected work product, especially in light of the fact that it was furnished to the Hearing Examiner by the same attorney who represented the OWRB at the MAY hearing and actively participated therein in support of the proposed MAY.

II. THE OWRB'S FAILURE TO TIMELY ASSERT PRIVILEGE WAIVES ANY PRIVILEGE CLAIM

As explained above, throughout the proceedings below, at no time did the OWRB assert that the Memo (or any portions thereof) constituted privileged communications or work product. The OWRB never asserted any privilege in the writ proceedings before the Oklahoma Supreme Court, or in connection with Petitioners' motion for production of the Memo in the OWRB proceedings below, or in the OWRB's written response to Petitioners' Procedural Irregularities Motion filed herein.

Privilege claims must be *timely* asserted or they are waived. *See U.S. v. Ary*, 518 F.3d 775, 783-784 (10th Cir. 2008) (numerous cases cited therein). Having failed to timely assert the

work product privilege in the proceeding below, OWRB cannot raise such claim for the first time on appeal. The OWRB has waived any claim of privilege.

III. THE OWRB'S PRIOR DISCLOSURES HAVE WAIVED ANY POTENTIAL PRIVILEGE CLAIMS

The OWRB previously voluntarily produced communications between the Hearing Examiner and Mr. Jerry Barnett and other OWRB staff relating to the positions and issues raised in Petitioners' Post-Hearing Brief. For example, the OWRB produced Mr. Jerry Barnett's 9/14/12 email transmitting the Memo to the Hearing Examiner in which he discusses his analysis of the issues raised in Petitioners' Post-Hearing Brief and the evidence relating thereto. (See Exhibit D to Exhibit 2 of Petitioners' Procedural Irregularities Motion filed herein on 4/29/14, at p. D-10, "I have noted many issues raised in Mr. Walker's brief, but it seems to me many of them are legally argumentative, or factual issues which are not particularly material or necessary for the Board to decide...I thought it would save us and you time and effort if you could direct me to the issues you want us to work on, and we will get those items addressed in a second installment."); *see also*, Exhibits 1-3 to Petitioners' Procedural Irregularities Motion, *supra*, wherein the OWRB and Hearing Examiner made numerous voluntary disclosures regarding the Hearing Examiner's communications with OWRB attorneys and staff regarding Petitioners' Post-Hearing Brief).

Waiver of a claim of work product privilege "occurs when a party makes a partial disclosure of work-product while seeking to maintain work-product related to the same subject, otherwise known as 'subject matter' waiver". *Lindley, supra*, 267 F.R.D. at 394; *see also Central Soya Co., Inc. v. Geo. A. Hormel & Co.*, 581 F.Supp. 51, 53 (W.D. Okla. 1983), "when the client voluntarily waives the privilege as to some documents that the client considers not damaging and asserts the privilege as to the other documents that the client considers damaging,

the rule compelling production of all documents becomes applicable. The reason behind the rule is one of basic fairness...Similarly, if a party-client introduces part of his correspondence with his attorney, the production of all of the correspondence could be demanded". Here, because the OWRB voluntarily disclosed part of Mr. Jerry Barnett's communications with the Hearing Examiner regarding the issues raised in Petitioners' Post-Hearing Brief and the evidence relating thereto, it has waived any claim of privilege relating to the Memo. As such, the Memo should be produced without redaction.

IV. THE MEMO IS NOT WORK PRODUCT BECAUSE IT VIOLATES THE SEPARATION OF FUNCTIONS

To the extent any agency lawyer can render assistance to a Hearing Examiner, it must *not* be one who actively participated in the hearing on behalf of the agency. "Members of an agency's staff become adversarial as soon as they participate personally in developing or presenting evidence or argument before agency decision makers on behalf of or against a party in a particular case...Thus, staff members' adversarial involvement at any stage of an investigation or adjudication should preclude them from thereafter consulting with the adjudicators, at least as to the issue or issues in which they were previously involved". *Restricted Communications at the United States Nuclear Commission*, 59 Admin. L. Rev. 315, 382-383 (Spring 2007) (discussing the Federal APA).

In its response to Petitioners' Procedural Irregularities Motion, the OWRB acknowledged that:

At the (MAY) hearing, OWRB staff presented evidence in *support* of the tentative determination...

(OWRB Response Brief (May 14, 2014) (emphasis added)). It was certainly clear at the hearing that the OWRB's position was totally supportive of the MAY. After the Petitioners presented

their case in opposition to the MAY, the OWRB felt it necessary to call rebuttal witnesses to attempt to negate the Petitioners' case.

Mr. Jerry Barnett was the OWRB attorney at the MAY hearing who presented the OWRB's evidence in support of the MAY and in opposition of the Petitioners' position. It defies any proper notion of separating agency functions to have the same attorney who tried and supported the OWRB's case at the MAY hearing and opposed Petitioners' case to then be helping the Hearing Examiner "evaluate" the Petitioners' arguments as set forth in their Post-Hearing Brief. The old adage about the wolf guarding the hen house comes to mind.

V. THE WORK PRODUCT PRIVILEGE CANNOT BE USED TO HIDE INFORMATION CRITICAL TO THE FACT FINDING PROCESS

Even if the Memo were privileged work product, which it is not for the various reasons discussed above, the Oklahoma Supreme Court has long recognized that the work product privilege cannot be asserted to "hide information critical to the fact finding process". *Ellison v. Gray*, 1985 OK 35, 702 P.2d 360, 366, "An attorney's thoughts, impressions, views...generated by a lawyer in anticipation of litigation must be protected, but these protections should not become a legal closet in which a party can hide information critical to the fact finding process".

Again, the question before the Court is whether the Memo contains new arguments or evidence submitted to the Hearing Examiner off the record. If it does, a claim of attorney work product cannot shield such information from review.

VI. THE MEMO IS NOT WORK PRODUCT BECAUSE IT WAS PREPARED IN THE ORDINARY COURSE

In the writ proceedings before the Oklahoma Supreme Court, the OWRB repeatedly argued that it *routinely* has communications in MAY proceedings between its staff lawyers and the Hearing Examiner to assist in evaluating the evidence:

In numerous MAY proceedings dating back to the 1980s as well as the instant case...the OWRB staff provides administrative, technical and legal support to the Hearing Examiner. This support can and does include communication and providing assistance to the Hearing Examiner and the OWRB in (a) evaluating the evidence and legal arguments raised by the parties, (b) preparing a proposed order, and (c) issuing a final order determining the MAY.

OWRB Response to Application to Assume Original Jurisdiction and Petition for Writs filed on January 9, 2013, in Oklahoma Supreme Court No. 111,381 at p. 3 (“OWRB Initial Writ Response” hereafter). The OWRB attempted to characterize this staff assistance as “neutral assistance in evaluating evidence” (OWRB Second Response Brief to Assume Original Jurisdiction and Petition for Writs filed on February 13, 2013 in Oklahoma Supreme Court No. 111, 381 at p. 4 (“OWRB Second Writ Response” hereafter)), even though here the alleged “neutral” assistance was provided by the attorney who presented the OWRB’s case in support of the MAY.

Advice provided by an attorney to a client in the ordinary course of business is not privileged attorney work product. *Hall v. Goodwin*, 1989 OK 88, 775 P.2d 291, 292-296. The OWRB’s representations to the Oklahoma Supreme Court make it clear that the communications in question were routine and ordinary course of business, and it is now estopped from claiming such communications were in anticipation of a future appeal, as it now claims. As such, the communications are not privileged.

VII. THE MEMO MUST BE PRODUCED PURSUANT TO 75 O.S. §310(4)

In the Supreme Court writ proceedings, the OWRB also claimed:

MAY proceedings involve highly technical issues, precisely the kinds of cases in which the APA expressly authorizes an agency to utilize its experience, technical competence, and specialized knowledge...in the evaluation of the evidence. 75 O.S. §310(4).

(OWRB Second Writ Response at p. 6). The OWRB argued that this is what the Memo did, *i.e.* provide “technical support” and “specialized knowledge” to the Hearing Examiner.

However, §310(4) goes on to provide that, where the Hearing Examiner takes notice of “technical or scientific facts within the agency’s specialized knowledge”, the “*parties shall be notified...of the material noticed, including any staff memoranda or data, and they shall be afforded an opportunity to contest the materials so noticed*”. Pursuant to §310(4), the Memo is not privileged, rather, according to the OWRB, it provides technical information within the agency’s specialized knowledge of which the Petitioners were entitled to notice and opportunity to contest in the OWRB proceeding below.

CONCLUSION

The redacted portions of the Memo do not constitute privileged attorney work product prepared in anticipation of litigation as the OWRB belatedly attempts to assert. An OWRB attorney presented evidence at the MAY hearing in support of the proposed MAY and then received the post-hearing opportunity to “help” the Hearing Examiner better understand why the evidence he presented at the hearing better supported the proposed MAY than Petitioners’ evidence. The OWRB is willing to let the Petitioners see the innocuous portions of the Memo, but it does not want Petitioners to see the pejorative portions.

Under any standard of basic fairness, the Petitioners are entitled to see how the Memo sought to influence the Hearing Examiner against their position. At an absolute minimum, the Memo should be produced in its unredacted form, so the Court and the Parties can evaluate whether the material contained therein constitutes evidence or arguments not shown in the record. This information is necessary to address Petitioners’ Procedural Irregularities Motion.

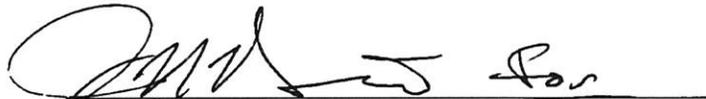
Respectfully submitted,



L. MARK WALKER, OBA #10508
SCOTT A. BUTCHER, OBA #22513
CROWE & DUNLEVY
A Professional Corporation

20 N. Broadway Ave., Suite 1800
Oklahoma City, Oklahoma 73102
(405) 235-7700
(405) 239-6651 (Facsimile)
mark.walker@crowedunlevy.com
scott.butcher@crowedunlevy.com

**Attorneys for Petitioners Oklahoma Farm
Bureau Legal Foundation, Pontotoc County
Farm Bureau, Oklahoma Independent
Petroleum Association, Environmental
Federation of Oklahoma, Oklahoma
Cattlemen's Association, and Oklahoma
Aggregates Association**



MICHAEL C. WOFFORD, OBA# 9810
DOERNER, SAUNDERS, DANIEL &
ANDERSON, LLP
105 N. Hudson Ave., Suite 500
Oklahoma City, Oklahoma 73102-4805
(405) 319-3504
(405) 319-3534 (Facsimile)
mwofford@dsla.com

**Attorneys For Petitioners Oklahoma
Aggregates Association and TXI**



JAMES R. BARNETT, OBA# 547
DOERNER, SAUNDERS, DANIEL &
ANDERSON, LLP
105 N. Hudson Ave., Suite 500
Oklahoma City, Oklahoma 73102-4805
(405) 319-3507
(405) 319-3537 (Facsimile)
jbarnett@dsla.com

**Attorneys For Petitioner Arbuckle-Simpson
Aquifer Protection Federation of Oklahoma,
Inc.**

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing was mailed, postage prepaid, this 25th day of July, 2014, to the addresses on Exhibit A.

 _____

Bill Holley
City of Sulphur
600 W. Broadway
Sulphur, Oklahoma 73086

City of Sulphur, A.S.A.P.

Tommy Kramer
215 N. 4th
Durant, Oklahoma 74701

City of Durant

George Mathews
426 Westchester
Ada, Oklahoma 74820

U.S. Silica, Oklahoma Aggregates Association

James Dunegan, City Manager
City of Durant
P.O. Box 578
Durant, Oklahoma 74702

City of Durant

Dave Roberson
P.O. Box 235
Sulphur, Oklahoma 73086

Murray County Rural Water District No. 1

Cody Holcomb
Ada Public Works Authority
231 S. Townsend
Ada, Oklahoma 74820

City of Ada, Ada Public Works Authority

Jona Tucker
Nature Conservancy of Oklahoma
31700 CR 3593
Stonewall, Oklahoma 74871

Nature Conservancy of Oklahoma

Thomas J. Enis
100 N. Broadway, Suite 1700
Oklahoma City, Oklahoma 73102

Estate of Ida Sutton Williams

Kevin Blackwood
P.O. Box 2352
Ada, Oklahoma 74820

CPASA

Shannon Shirley
2370 N. Daube Ranch Road
Mill Creek, Oklahoma 74856

Edward T. Tillery
210 W. Grant Ave.
Pauls Valley, Oklahoma 73075

Arbuckle Master Conservancy District

Richard Day
3284 State Highway 1 W
Roff, Oklahoma 74865

Gary Kinder, City Engineer
City of Ada
231 S. Townsend
Ada, Oklahoma 74820

City of Ada

Jerry L. Tomlinson, Mayor
City of Durant
P.O. Box 578
Durant, Oklahoma 74702

City of Durant

Lewis Parkhill, Mayor
City of Tishomingo
409 S. Mickle
Tishomingo, Oklahoma 73460

City of Tishomingo

Kelly Hurt
P.O. Box 299
Allen, Oklahoma 74825

Arbuckle-Simpson Landowners Group

Gary J. Montin
P.O. Box 202
Connerville, Oklahoma 74836

Joseph Morrow
23475 CR 3500
Roff, Oklahoma 74865

Fred Chapman
Chapman Properties
P.O. Box 1754
Ardmore, Oklahoma 73401

Chapman Properties

Chuck Roberts
21745 CR 3510
Fitzhugh, Oklahoma 74843

Marla Peck
Oklahoma Farm Bureau
2501 N. Stiles
Oklahoma City, Oklahoma 73105

Oklahoma Farm Bureau

Jim Rodriguez
Oklahoma Aggregates Association
3500 N. Lincoln
Oklahoma City, Oklahoma 73072

Oklahoma Aggregates Association

D. Craig Shew
Box 1373
Ada, Oklahoma 74821

City of Ada

Guy Sewell
1100 E. 14th St.
Ada, Oklahoma 74820

Institute of Environmental Science, Education & Research

C.J. Maxwell, Jr.
4500 Highway 7 West
Tishomingo, Oklahoma 73460

Jonathan Gourley
901 N.W. 37th St.
Oklahoma City, Oklahoma 73118

Bill Brunk
P.O. Box 280
Fittstown, Oklahoma 74842

Bruce Noble
National Park Service
Chickasaw National Recreation Area
1008 W. 2nd Street
Sulphur, Oklahoma 73086

National Park Service, Chickasaw National Recreation Area

Dick Scalf
P.O. Box 851
Ada, Oklahoma 74820

Ronnie Wartchow
26440 CR 3520
Roff, Oklahoma 74865

EXHIBIT A

Carolyn Sparks
P.O. Box 502
Sulphur, Oklahoma 73086

Charles Morrow
24044 Highway 1 W
Roff, Oklahoma 74865

Floy Parkhill
409 S. Mickle St.
Tishomingo, Oklahoma 73460

Velta Wingard
Wingard Water Corporation
10371 CR 1620
Fitzhugh, Oklahoma 74843

Paul Warren
P.O. Box 60
Mill Creek, Oklahoma 74856

Julie Aultman
P.O. Box 1209
Ardmore, Oklahoma 73402

Wingard Water Corporation

Jerry Lamb
12160 CR 1690
Roff, Oklahoma 74865

James T. Johnson
J.B. Johnson
1133 Fletcher Road
Sulphur, Oklahoma 73086

Charles Roos
7955 CR 1670
Roff, Oklahoma 74865

Carl Adcook
1035 Republic NW
Ardmore, Oklahoma 73401

Joyce Allgood
717 4th S.E.
Ardmore, Oklahoma 73401

Dean Arnold
4405 S. Prairie Road
Tishomingo, Oklahoma 73460

Deborah Arnold
4405 S. Prairie Road
Tishomingo, Oklahoma 73460

Mark Atkins
7481 Mesquite Ridge
Sanger, Texas 76266

Patricia Baker
147 Mark Rd.
Lone Grove, Oklahoma 73443

Dayna Baker
601 L. St. N.E.
Ardmore, Oklahoma 73401

Monica Bell
507 Fleming Drive
Mt. Pleasant, TX 75455

Johnny P. Bryant
2201 Oakglen Dr.
Ardmore, Oklahoma 73401

James Butler
918 3rd Ave. NE
Ardmore, Oklahoma 73401

Kenneth J. Byisma
407 Ash
Ardmore, Oklahoma 73401

Tracy Campbell
2021 4th N.W. #83
Ardmore, Oklahoma 73401

Michael Castellow
201 Country Club Rd.
Ardmore, Oklahoma 73401

Norma Chaney
1160 W. Webb Rd.
Tishomingo, Oklahoma 73460

Jill Clark
1908 7th N.W.
Ardmore, Oklahoma 73401

Jon Collins
460 Willowridge
Ardmore, Oklahoma 73401

Kenneth Copeland
57 Wisteria
Lone Grove, Oklahoma 73443

Amanda Copeland
57 Wisteria
Lone Grove, Oklahoma 73443

Betty Crabtree
23011 Indian Meridian Rd.
Pauls Valley, Oklahoma 73075

Joyce Crosby
800 Rosewood
Ardmore, Oklahoma 73401

Josh Davidson
692 Spring Hope Rd.
Ardmore, Oklahoma 73401

Howard and Jean Drew
2232 Clover Leaf Pl.
Ardmore, Oklahoma 73401

Kathy Eye
236 S. Pichens Rd.
Madill, Oklahoma 73446

Judy G. Fisher
P.O. Box 234
Fittstown, Oklahoma 74842

Tammie Durbin
337 Lakeside Rd.
Ardmore, Oklahoma 73401

Dan Elkins
1301 Division
Sulphur, Oklahoma 73086

Arlinda Elkins
1301 Division
Sulphur, Oklahoma 73086

James Gallgher
3302 Rancho Lane
Ardmore, Oklahoma 73401

Benji
602 1/2 W. Tishomingo
Sulphur, Oklahoma 73086

Estee Brunk
1015 Chambers Drive
Colorado Springs, CO 80904

Robert Brunk
1015 Chambers Drive
Colorado Springs, CO 80904

Macy Wisran
P.O. Box 500
Ardmore, Oklahoma 73401

Larry Wood
1412 Sunny Lane
Ardmore, Oklahoma 73401

Jeanie Upson
924 Sioux
Ardmore, Oklahoma 73401

Anna Vines
86 Laurel
Lone Grove, Oklahoma 73443

John M. Thompson III
819 Bixby
Ardmore, Oklahoma 73401

Roselyn Tiner
P.O. Box 178
3005 US Highway 70
Wilson, Oklahoma 73463

Luanne Snodgrass
91 Overland Rt.
Ardmore, Oklahoma 73401

Donnel Somers
34237 E. CR 1650
Wynnewood, Oklahoma 73098

Claudia F. Spalding
2649 Silo Road
Durant, Oklahoma 74701

David R. Spalding
P.O. Box 902
Tuttle, Oklahoma 73089

Ellen Spraggins
118 P.N.E.
Ardmore, Oklahoma 73401

James H. Stevens
627 W. 21
Ada, Oklahoma 74820

Barbara J. Stevens
627 W. 21
Ada, Oklahoma 74820

Jerry Summers
701 S. Turner
Ada, Oklahoma 74820

Mary Silverman
1200 Holly
Ardmore, Oklahoma 73401

E.J. Shipman
3073 E. Highway 22
Tishomingo, Oklahoma 73460

Retha Rousey
1470 Enterprise
Ardmore, Oklahoma 73401

Carin Salazar
416 P St. N.E.
Ardmore, Oklahoma 73401

C.D. Robertson, Jr.
8900 OK Highway 7E
Wapanucka, Oklahoma 73461

Christiane Robinson
1378 8th N.W.
Ardmore, Oklahoma 73401

James Rowland
8834 Egypt Road
Milburn, Oklahoma 73450

Phyllis Perry
1960 Woodridge Dr.
Newalla, Oklahoma 74857

Ed Perryman
404 Eastwood Circle
Ardmore, Oklahoma 73401

Richard Powell
1415 Holt
Ardmore, Oklahoma 73401

Rosemary Poythress
515 8th N.W.
Ardmore, Oklahoma 73401

Mark T. Presley
8 10 S.E.
Ardmore, Oklahoma 73401

Yvonne Pruitt
500 S. Highland
Ada, Oklahoma 74820

Lois J. Rasseo
320 B SW
Ardmore, Oklahoma 73401

Norma L. Paschall
P.O. Box 1133
Ardmore, Oklahoma 73401

Catherine Pendergrast
4727 Cass Lane
Connerville, Oklahoma 74836

Lucille J. Norman
1400 W. Ott Lane
Pontotoc, Oklahoma 74820

Rhonda Newton
205 Country Club Rd.
Ardmore, Oklahoma 73401

Doris Murray
606 N. Kemp
Tishomingo, Oklahoma 73460

Virgil M. Mowbray
1220 Beverly
Ardmore, Oklahoma 73401

Beverly McMillan
5487 Myall Rd.
Ardmore, Oklahoma 73401

Walter E. Mullendore
8003 Joan T. White Rd.
Ft. Worth, TX 76120

Roy David Mullens
41255 E. Co. Rd 1510
Pauls Valley, Oklahoma 73075

Richard K. Muller
6642 N. Dogwood Road
Ardmore, Oklahoma 73401

F. Lovell McMillin
814 Wood N. Creek Rd.
Ardmore, Oklahoma 73401

Zeno McMillin
7995 South Lone Cedar Road
Mannsville, Oklahoma 73447

Rosemary McBee
23695 Wolfcrest Way
Wister, Oklahoma 74966

Debra McCurry
1 Overland Rt.
Ardmore, Oklahoma 73401

Ebony McDonald
1914 Knox Road, Apt. 807
Ardmore, Oklahoma 73401

Michael Long
8905 Hwy 7 E
Wapanucka, Oklahoma 73441

Mike Harris
2004 7th N.W.
Ardmore, Oklahoma 73401

Mark Lumry
10707 Evans Road
Marietta, Oklahoma 73448

Norma J. Mantzke
28 T & C Circle
Ardmore, Oklahoma 73401

Tom Locke
906 Oaktree Lane
Ardmore, Oklahoma 73401

Elizabeth Kennedy
2188 Highway 77 South
Davis, Oklahoma 73030

Martha Kimbrough
607 W. Kemp
Tishomingo, Oklahoma 73460

John Kimbrough
607 W. Kemp
Tishomingo, Oklahoma 73460

Ellen T. Innis
1501 Persimmon Lane
Ardmore, Oklahoma 73401

Mark Hughes
337 Lakeside Road
Ardmore, Oklahoma 73401

Brenda Jones
1623 W. Broadway Place
Ardmore, Oklahoma 73401

Sharon Keith
5256 Myall Road
Ardmore, Oklahoma 73401

Talon Hyatt
2719 N. Shearer Road
Mill Creek, Oklahoma 74856

Paul Hall
11815 Wistinsond Road
Mill Creek, Oklahoma 74856

Vicki Harbert
2502 E. Harbert Road
Tishomingo, Oklahoma 73460

Heather McGee
9801 Silver Lake Drive
Oklahoma City, Oklahoma 73162

Pat Gray
7100 E. Egypt Road
Milburn, Oklahoma 73450

Rhoda Grayham
1020 8th N.E.
Ardmore, Oklahoma 73401

Gabe Greene
5601 Bullet Prairie
Tishomingo, Oklahoma 73460

Gary Greene
5601 Bullet Prairie
Tishomingo, Oklahoma 73460

Justin Grimes
306 G Street SE
Ardmore, Oklahoma 73401

Darrell Gipson
612 Sunset Road
Ada, Oklahoma 74820

Jason R. Girard
713 Ash N.W.
Ardmore, Oklahoma 73401

Gary Good
409 10th N.W.
Ardmore, Oklahoma 73401

Alan Woodcock
Department of the Interior
7906 E. 33rd Street
Tulsa, Oklahoma 74145
U.S. Fish and Wildlife Service, National Park Service

David Ocamb
4900 Richmond Square, Suite 203
Oklahoma City, Oklahoma 73118

Kyle E. Murray
Oklahoma Geological Survey
University of Oklahoma
100 E. Boyd Street, Suite N131
Norman, Oklahoma 73019

Peter Fahmy
Office of the Solicitor
Branch of National Parks
12795 W. Alameda Parkway, Suite 155A
Lakewood, CO 80228

Sierra Club

Oklahoma Geological Survey

National Park Service

Mike Wofford
Doerner Saunders Daniel & Anderson LLP
105 N. Hudson Avenue, Suite 500
Oklahoma City, Oklahoma 73102

James R. Barnett
Doerner Saunders Daniel & Anderson LLP
105 N. Hudson Avenue, Suite 500
Oklahoma City, Oklahoma 73102

Kerry Graves
5501 Highway 7 West
Tishomingo, Oklahoma 73460

Oklahoma Aggregates Association, TXI

**Arbuckle-Simpson Aquifer Protection,
Environmental Federation of Oklahoma, Inc.**

**U.S. Fish & Wildlife Service, Tishomingo
National Fish Hatchery**

Peter Burck
P.O. Box 1306
Albuquerque, NM 87103

Bill Flanigan
1341 W. Mockingbird
Dallas, TX 75247

Jason Aamodt
Aamodt Law Firm
1723 E. 15th Street, Suite 100
Tulsa, Oklahoma 74104

U.S. Fish & Wildlife Service

CPASA

Angela Williams
11937 N CR 3250
Paoli, Oklahoma 73074

Donald J. Chaffin
P.O. Box 1766
Ardmore, Oklahoma 73402

Amy Ford
889 Knight Drive
Durant, Oklahoma 74701

Chapman Family & Related Entities

Shon Augero
1533 Estelle St.
Durant, Oklahoma 74701

Woody D. Alexander
P.O. Box 116
Marietta, Oklahoma 73448

Sandra Alexander
5353 Brock Road
Ardmore, Oklahoma 73401

Anna and Wayne Baker
133 Orchard Hill
Ardmore, Oklahoma 73401

Terry Barnes
1920 Overlook Ridge Dr.
Keller, TX 76248

Michelle Bass
114 7th Ave. NW
Ardmore, Oklahoma 73401

Terry Beals
4001 S. Golf Course Rd.
Tishomingo, Oklahoma 73460

Terry Bell
122 Vinyard Rd.
Ardmore, Oklahoma 73401

Kara Berst
11138 CR 1518
Ada, Oklahoma 74820

Dorothy Bertino
18440 CR 3864
Ada, Oklahoma 74820

Stacy Blackwood
P.O. Box 2352
Ada, Oklahoma 74820

Nathan Bright
602 2nd Ave NW
Ardmore, Oklahoma 73401

Donald Brittin
PO Box 586
Davis, Oklahoma 73401

Kathryn Brunk
P.O. Box 260
Fittstown, Oklahoma 74842

Gary Burdine
600 NE 14th St.
Oklahoma City, Oklahoma 73012

Karen Butler
1116 Potter St. SE
Ardmore, Oklahoma 73401

Linda Byrd
17857 CR 1499 CT
Ada, Oklahoma 74820

Stephanie and Tim Carson
1201 Bernard
Ada, Oklahoma 74820

Cecil Carter
One Murray Campus
Tishomingo, Oklahoma 73460

Patricia Castellow
201 Country Club Rd
Ardmore, Oklahoma 73401

Fred Chapman
P.O. Box 1754
Ardmore, Oklahoma 73402

Connie Chrobot
1711 Broadway Place
Ardmore, Oklahoma 73401

Florence Coble
615 B Street NW
Ardmore, Oklahoma 73401

Ronnie Conner
806 N. Washington #5
Ardmore, Oklahoma 73401

Ava Converse
2719 N. Shearer Rd
Mill Creek, Oklahoma 74856

Ronald Cooper
256 Muse
Lone Grove, Oklahoma 73443

Melissa Davis
28 Dexter Rd
Ardmore, Oklahoma 73401

LaQuita Dayton
210 Oak Lawn Rd
Sulphur, Oklahoma 73086

Steve Deen
3390 Rock Creek Dr.
Sulphur, Oklahoma 73086

Terry Deen
1940 McIntire Drive
Sulphur, Oklahoma 73086

Mark Deen
3785 Rocky Point Dr.
Sulphur, Oklahoma 73086

Denver Donaho
938 P Street SW
Ardmore, Oklahoma 73401

Nancy Dromgold
1490 Savage Rd
Hartshorne, Oklahoma 74547

Jennifer Dunbar
805 Northwestern Blvd.
Ardmore, Oklahoma 73401

Roy Ewing
114 7th Ave NW
Ardmore, Oklahoma 73401

Kasy Fincher
PO Box 1722
Lone Grove, Oklahoma 73443

David Gainey
2255 Castle Rock Dr.
Sulphur, Oklahoma 73086

Jennifer and James Gallagher
3302 Rancho Ln.
Ardmore, Oklahoma 73401

Craig Garone
6558 E. Cedar Rd.
Milburn, Oklahoma 73450

Stacy Gibney
19990 CR 1543
Ada, Oklahoma 74820

M. Charlene Goodson
PO Box 248
Wapanucka, Oklahoma 73461

Luther Harbert
2502 E. Harbert Rd
Tishomingo, Oklahoma 73460

Melissa Heid
409 10th NW
Ardmore, Oklahoma 73401

Billy Howell
29480 CR 3620
Stonewall, Oklahoma 74871

James Hunter
3108 Rolling Stone Rd.
Oklahoma City, Oklahoma 73120

James Johnson
14815 CR 3585
Ada, Oklahoma 74820

Deanna Johnson
15989 Lacey Hull Rd
Madill, Oklahoma 73446

Kimberly Johnson
1204 Hailey Street SW
Ardmore, Oklahoma 73401

George Johnson
4200 E Blue Boy Ln
Milburn, Oklahoma 73450

Gary Joiner
14718 N. Country Rd 3400
Stratford, Oklahoma 74872

Royce Jones
306 N. 3 Rd.
Davis, Oklahoma 73030

Dawnita Kennedy
14431 US HWY 70 W
Ardmore, Oklahoma 73401

Wayne King
1015 Mike St.
Ada, Oklahoma 74820

Jon Krittenbrick
409 Riverside Dr.
Moore, Oklahoma 73160

Agnes Lane
18315 CR 1580
Ada, Oklahoma 74820

Betty Leggiero
10600 Kunkel
Norman, Oklahoma 73026

Tisha Lester
2959 Bull Run Road
Wilson, Oklahoma 73463

Janet Mathis
6 Aspen Lane
Davis, Oklahoma 73030

Chris McCurry
1 Overland Route
Ardmore, Oklahoma 73401

Tammy Merrell
3061 Copper Memorial Drive
Sulphur, Oklahoma 73086

Kenneth R. Meyers
1333 Red Cedar Road
Ardmore, Oklahoma 73401

Thalia Miller
19575 CR 3560
Ada, Oklahoma 74820

Sarah Miracle
409 S. 14th Place
Ada, Oklahoma 74820

Jane Mowbray
1220 Beverly
Ardmore, Oklahoma 73401

Edra L. Mullendore
8003 Joan T. White Road
Fort Worth, Texas 76120

Jane Murphy
16365 CR 1562
Ada, Oklahoma 74820

Shawna Murphy
1028 E 9 #A
Ada, Oklahoma 74820

Richard Murray
606 N. Kemp
Tishomingo, Oklahoma 73460

Pat Neasbitt
504 Oakland Ct.
Ardmore, Oklahoma 73401

Randy Neasbitt
261 Old Hwy 70
Ardmore, Oklahoma 73401

Sarah Newton
P.O. Box 845
Ardmore, Oklahoma 73402

Mark Newton
205 Country Club Road
Ardmore, Oklahoma 73401

Sherri Owens
P.O. Box 136
Kenefic, Oklahoma 74748

John C. Pope
11700 S. Lakeview Lane
Tishomingo, Oklahoma 73460

Donna L. Pope
11700 S. Lakeview Lane
Tishomingo, Oklahoma 73460

Josh Presley
1316 Morning Star
Ada, Oklahoma 74820

Audrey Pruitt
615 2nd Ave NW
Ardmore, Oklahoma 73401

Harold D. Pruitt
615 2nd Ave NW
Ardmore, Oklahoma 73401

Winifred Rasseo
320 B SW
Ardmore, Oklahoma 73401

Adalene Rhodes
1005 E. Davis
Davis, Oklahoma 73030

James P. Rhodes
1770 Sooner Rock Road
Davis, Oklahoma 73030

Jett Robbins
2370 N. Daube Ranch Road
Mill Creek, Oklahoma 74856

Reginald Robbins
2370 N. Daube Ranch Road
Mill Creek, Oklahoma 74856

Brenda Rolan
P.O. Box 177
Paoli, Oklahoma 73074

Robin Ross
7644 N. Meridian Rd.
Ardmore, Oklahoma 73401

Kerri Rousey
1234 Enterprise Road
Ardmore, Oklahoma 73401

Traci Roysse
1407 Rosedale
Ardmore, Oklahoma 73401

Whitney Ruelle
3073 OK Highway 22 E
Tishomingo, Oklahoma 73460

Carl Schneider
712 N. Maxwell
Ardmore, Oklahoma 73401

Abbie Schneider
712 N. Maxwell
Ardmore, Oklahoma 73401

Barry Schrader
700 E. Wynnewood
Sulphur, OK 73086

Fred Schraeder
6402 E. 56th
Stillwater, Oklahoma 74074

Ann Schraeder
508 Oakland Ct.
Ardmore, Oklahoma 73401

Melissa Shawn
215 W. 14th
Ada, Oklahoma 74820

S. L. Sherrell
13210 CR 1550
Ada, Oklahoma 74820

Brent Shields
906 N. McKinley
Shawnee, Oklahoma 74801

John David Smith
P.O. Box 1011
Lone Grove, Oklahoma 73443

Priscilla Stevens
409 Riverside Drive
Moore, Oklahoma 73160

Janis Stewart
203 S. Byrd Street
Tishomingo, Oklahoma 73460

Dawn R. Summers
P.O. Box 872
Davis, Oklahoma 73030

Michael Summers
111 Lakewood
Davis, Oklahoma 73030

Thorn Travis
110 R Street SW
Ardmore, Oklahoma 73401

Jeffery Vick
2545 Stadium Drive
Fort Worth, TX 76109

Cody Wainscott
P.O. Box 42
Allen, Oklahoma 74825

Cheryl Whitman
808 D Street NW
Ardmore, Oklahoma 73401

LaDonna Wilbanks
P.O. Box 82
Atwood, Oklahoma 74827

Amber Williams
7715 Roundrock Road
Dallas, TX 75248

Angela Williams
11937 N. CR 3250
Paoli, Oklahoma 73074

Johnny C. Wilson
4725 Brock Road
Ardmore, Oklahoma 73401

Amy Wisran
P.O. Box 500
Ardmore, Oklahoma 73401

Joel Wixon
P.O. Box 500
Ardmore, Oklahoma 73401

Charlie Wright
1102 W. Lindsay
Sulphur, Oklahoma 73086

Oklahoma Water Resources Board
c/o Jerry Barnett, Counsel
3800 N. Classen Blvd.
Oklahoma City, Oklahoma 73118

Bob Donaho
P.O. Box 962
Davis, Oklahoma 73030

Donna Hunt

Sara Kendall
Sulphur, Oklahoma

Sue Kendall

Diane Shaver

Nancy Binderim
Dickson, Oklahoma

Wayne Kellogg
1509 S. Broadway Blvd
Ada, Oklahoma 74820

Jim Baker
Box 52- 2808
Harris Ranch Rd
Connerville, Oklahoma 74836

Leonia Barger
2606 E. Palmer Rd.
Sulphur, Oklahoma 73086

Diane Barrett
1401 Sunny Lane
Ardmore, Oklahoma 73401

Retha Beals
4001 South Golf Course Rd
Tishomingo, Oklahoma 73460

Peggy Bell
16240 CR 1584
Ada, Oklahoma 74820

Leonard D. Briley
902 E. Gardena
Ada, Oklahoma 74820

Michaeli Brunk
P.O. Box 280
Fittstown, Oklahoma 74842

Bill Brunk
P.O. Box 280
Fittstown, Oklahoma 74842

John P. Bruno
4800 W. Slippery Falls Rd.
Tishomingo, Oklahoma 73460

Lou Carlton
34145 E. CR 1650
Wynnewood, Oklahoma 73098

Darryl Carter
3048 Country Club Rd
Sulphur, Oklahoma 73086

John H. Chrobot
1711 Broadway Place
Ardmore, Oklahoma 73401

Scott Clark
P.O. Box 16
Mill Creek, Oklahoma 74856

Virginia Cooper
506 Church
Lone Grove, Oklahoma 73443

Sandra Czajkowski
149 Pinewood Trails Dr.
Ardmore, Oklahoma 73401

Claude V. Czajkowski
149 Pinewood Trails Dr.
Ardmore, Oklahoma 73401

Sara Donaho-Jones
1414 3rd Ave SW
Ardmore, Oklahoma 73401

Joe S. Duncan
PO Box 45
Connerville, Oklahoma 74836

Jana L. Dutton
586 Hwy 110
Davis, Oklahoma 73030

David Earsom
1126 W. Broadway
Sulphur, Oklahoma 73086

Eddie Easterling
HCP 64 Box 241
Pontotoc, Oklahoma 74820

Gloria Ellis
1608 Knox Rd
Ardmore, Oklahoma 73401

Janice Ellis
1608 Knox Rd
Ardmore, Oklahoma 73401

Thomas M. Forster
5407 Hwy 1 S.
Mill Creek, Oklahoma 74857

Dana Forster
5407 Hwy 1 S.
Mill Creek, Oklahoma 74856

Cathy Gardner
101 Country Hill Rd.
Ardmore, Oklahoma 73401

Jerry A. Gray
7100 E. Egypt Rd
Milburn, Oklahoma 73450

Pat Gray
7100 E. Egypt Rd
Milburn, Oklahoma 73450

James F. Herndon
302 Larsh Lane
Ada, Oklahoma 74820

Susan Ingram
214 W. 16th
Ada, Oklahoma 74820

Jamie Inman
8301 S. Rockcreek Loop
Tishomingo, Oklahoma 73460

Dana Kelley
214 W. 16th
Ada, Oklahoma 74820

Austin LeMay
1709 FM 27
Wortham, Texas 76693

Ray Lokey
P.O. Box 520
Tishomingo, Oklahoma 73460

John Manning
1208 S. Stockton St.
Ada, Oklahoma 74820

Mike Martin
1419 Oxford Rd.
Davis, Oklahoma 73030

Mary J. Massey
307 W. Kentucky
Tishomingo, Oklahoma 73460

Cindy Matheny
P.O. Box 250
Tishomingo, Oklahoma 73460

C I Maxwell Jr.
4500 Hwy 7 W
Tishomingo, Oklahoma 73460

S.S. McGill
5399 Pete Nelson Rd.
Davis, Oklahoma 73030

Tim Metzger
134 Scivally
Springer, Oklahoma 73458

Esther Miller
9071 S. Willard Rd
Milburn, Oklahoma 73450

Marvin M. Munger
20267 NE 63
Harrah, Oklahoma 73045

Larry Murphy
16365 CR 1562
Ada, Oklahoma 74820

Mary Jane Nelson
P.O. Box 236
Tishomingo, Oklahoma 73460

Donald H. Nichols
603 E. 21st St.
Tishomingo, Oklahoma 73460

Gary Paddack
500 S. E. Country Rd
Ada, Oklahoma 74820

Floy Parkhill
409 S. Mickle St.
Tishomingo, Oklahoma 73460

Curtis Perry
1960 Woodridge Dr.
Newalla, Oklahoma 74857

Stanley Rice
1324 W. Elm
Durant, Oklahoma 74701

Paula Rush
1621 Chickasaw Blvd #590
Ardmore, Oklahoma 73401

Patti Sanders
14917 CR 3599
Ada, Oklahoma 74820

Donald Schraeder
508 Oakland Ct
Ardmore, Oklahoma 73401

John Sikes
12055 W. Jewel Sikes Rd
Mill Creek, Oklahoma 74856

Wayne Smith
PO Box 53
Bromida, Oklahoma 74543

Josh Talkingtion
602 E NW
Ardmore, Oklahoma 73401

Y. Steven Thompson
47 Ranch Acres
Ardmore, Oklahoma 73401

Helen Thompson
315 F. SW
Ardmore, Oklahoma 73401

Rogelio Trevino
932 W. 10th St
Sulphur, Oklahoma 73086

Wayne Walker
P.O. Box 115
Tishomingo, Oklahoma 73460

Gloria Webb
1250 Webb
Tishomingo, Oklahoma 73460

Danny Wells
800 W. Smith
Stratford, Oklahoma 74872

Steve Wheeler
4262 Devils Den Rd
Tishomingo, Oklahoma 73460

Dovena White
4896 Fairview Rd.
Davis, Oklahoma 73030

Glenna Wright
923 Crooked Oak
Durant, Oklahoma 74701

Paul D. Young
12681 County Rd. 1700
Roff, Oklahoma 74865

Charles W. Shipley
6336 S. Harvard Ave
Tulsa, Oklahoma 74136

Derek L. Collins
PO Box 280
Tishomingo, Oklahoma 73460

Betty Sue Boyd
6100 W. Woodbrook Rd.
Warr Acres, Oklahoma 73132

Darrell Morris
586964 A North
224 Mack Alford Correctional Center
PO Box 220
Stringtown, Oklahoma 74569

Evidence to answer inquiries by Professor Meazell:

9/14/2012

1. Amount of water in storage: 9,408,461 AF vs. "about 11,000,000" AF

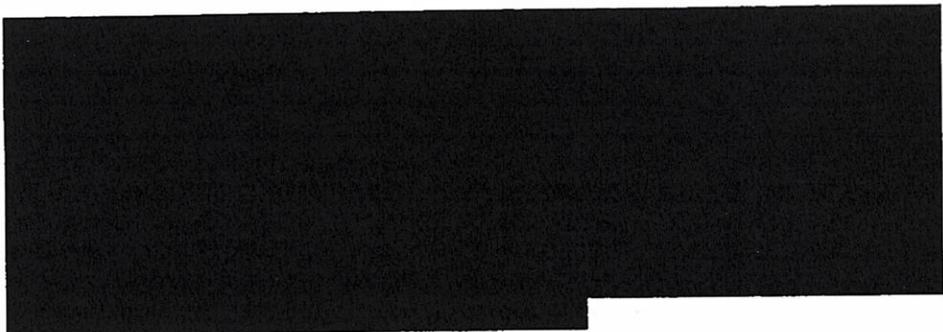
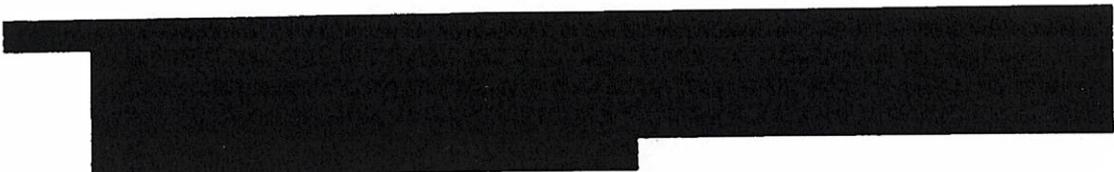
The latter figure is in OWRB Exhibit 5 (the March 13, 2012 Tentative Order approved and signed by the Board) at page 3, Tentative Finding paragraph no. 6. It is based in part on an average saturated thickness of 3,400 feet (id.).

The former figure is in OWRB Exhibit 4 (the PowerPoint presentation made by Julie Cunningham at the February 13, 2012 Board meeting). It is based in part on an average saturated thickness of 3,000 feet (id.).



2. "Why Scott Christenson used the model he did rather than the model used by Dr. Poeter"

OWRB Exhibit 10, Slides 30 and 31;
Testimony of Scott Christenson, Hearing Recording Part 6, 1:00 through 4:30 and following; and
OWRB Exhibit 1:
Abstract, page 1 first paragraph and page 2 third paragraph and following; and
Pages 80-89



[REDACTED]

3. Why the eastern portion of the aquifer was primarily studied

OWRB Exhibit 1 (the USGS Study Report) page 5, second column, second full paragraph:

“The hydrogeologic study and groundwater-flow model were focused on the eastern Arbuckle-Simpson aquifer because (1) the data needed to build the model are sparse in the western and central Arbuckle-Simpson aquifer, (2) the eastern Arbuckle-Simpson aquifer is the largest part of the aquifer by area and volume, (3) most of the current (2011) groundwater withdrawals from the aquifer are from the eastern Arbuckle-Simpson aquifer, and (4) the largest (by flow) streams and springs sourced from the aquifer are on the eastern Arbuckle-Simpson aquifer. Although the study emphasized the eastern Arbuckle-Simpson aquifer, understanding of the eastern part of the aquifer requires studying the entire aquifer, especially with respect to the geology.”

[REDACTED]

[REDACTED]

[REDACTED]

