From: <u>Village of Heisler</u>

To: camrose@assembly.ab.ca; "Battle River Watershed Alliance"; wnordin@flagstaff.ab.ca;

Damien.Kurek@parl.qc.ca; "EPA drought"; epa.minister@gov.ab.ca; "AEP Minister"; premier@gov.ab.ca

Cc: <u>Laura Friend</u>; <u>waterresources@arletta.ca</u>

Subject: Request for support against water license application #DCAS0017422 Water License - Groundwater:

Kroetsch_NW-15-42-16W4_Well ID"s 105363, 296831 & 202993

Date: October 22, 2024 2:57:47 PM

Attachments: Village of Heisler concern letter to Application #DAPP0101386.pdf

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Report

Good afternoon,

The Village of Heisler is requesting support against water license application #DCAS0017422 Water License - Groundwater: Kroetsch_NW-15-42-16W4_Well ID's 105363, 296831 & 202993 for a planned Confined Feeding Operation in the close proximity to the Village of Heisler.

As of the NRCB the Village of Heisler is not considered directed affected party to the proposed CFO, but Heisler Council and Residents are very concerned about our water in the future, should the water license application that Mitchel Kroetsch has filed of total of 62,421 m3 of groundwater annually be approved. Additional concerns are outlined in the attached letter of concern mailed out to Environment and Protected Areas' Approval Unit.

Thank you,

Heidi Rohe Chief Administrative Officer Village of Heisler 128 Main St, Box 60 Heisler Alberta TOB 2A0

Phone: 780-889-3774 Fax: 780-889-2280

Email: administration@villageofheisler.ca

Website: www.villageofheisler.ca



Heisler, Alberta T08 2A0 P.O. Box 60

Phone: 780-889-3774 Fex: 780-889-2280

Email: administration@villageofheislecca

October 22, 2024

Environment and Protected Areas Approvals Unit, 5th Floor, South Petroleum Plaza 9915 108 Street EDMONTON, AB T5K 2G8

From:

Name: Village of Heisler

ATS Reverence: SW-2-43-16-4

Distance from proposed Feedlot: 3.6 mi

Phone #: (780) 889 3774 Email: administration@villageofheisler.ca

Mailing Address: PO Box 60, Heisler, AB T0B2A0

Re: Application #DAPP0101386

The Village of Heisler is opposed to granting Mitchel Kroetsch the necessary permits/permission for Water Licence - Groundwater: Kroetsch_NW-15-42-16W4_Well ID's 105363, 296831 & 2029931 to establish a confined Feedlot Operation (RA23022) at: NW 15-42-16 W4M

These are the village's concerns:

As of the NRCB the Village of Heisler is not a directed affected party to the proposed CFO, but we are very concerned about our water in the future, should the water license application that Mitchel Kroetsch has filed of total of 62,421 m3 of groundwater annually be approved. This is five times more than the Village of Heisler's annual water usage. As of the attached Heisler Annual Water Comparison Chart the village used **60,306.3 m3 in 5 year (12,061.2 average/year)**.

We are all on the same aquifer and Municipalities are constantly reminded by water experts and politicians like Rebecca Schulz, Minister of Environment and Protected Areas that we are heading toward a scary time of draught in Alberta and to start planning how to use less water in the future. The amount of 62,421 m3 of water could cause massive water supply shortage for the village, the small farmers around us and all environmental areas on the Battle River Basin.

The Battle River Basin, a key watershed in east-central Alberta, covers approximately 30,000 square kilometres, most of which lies inside the province's borders. Extremely rich and diverse in plant and animal life, the basin's water supply is derived entirely from rain, snow melt and groundwater, without benefit of the mountain/foothill snowpacks or glacial melt typical of other river basins in Alberta.

As of the AB Government - Battle River water management plan - overview

2.5 Rationale for developing the Plan

The Battle River is an important watershed in east-central Alberta, covering an area of 25,000 square kilometers in the province. The river's water supply is derived entirely from local surface runoff (rain and snow melt) and groundwater flows. It is therefore without the benefit of prolific mountain/foothill snow packs and glacial melt. The Battle River watershed falls entirely within the Parkland Natural Ecoregion, the richest ecoregion in Alberta for biodiversity. The Battle River provides the ecoregion with a rich variation in ecosystems associated with its aquatic environment, associated living organisms and the ecological complexes of which they are part. Increasing pressure on the Battle River's water supply is presenting a challenge for residents of the watershed and for Alberta Environment and Sustainable Resource Development, the provincial department responsible for the management and allocation of water in Alberta. As demand for water meets or exceeds the river's natural supply, social, ecological and economic limitations and issues become apparent. A key tool to address this resource management challenge is a Water Management Plan.

Approved Water Management Plan for the Battle River Basin (Alberta) First Nations Consultation Report - December 2013

The biggest environmental concern is long-term contamination of our water from the CFO runoff running into our water source and spreading high volume of manure close by, including antibiotic waste.

The NRCB has temporarily halted Mr. Kroetsch's development permit because he hit already the water table in two areas while he was going to dig out his catch basins. Currently, the NRCB is reviewing the situation, and was supposed to reapply with a new plan for the catchment basin where he missed his deadline to re-apply. (attachment emails from September 17/24) Flagstaff County Property owner Heidi and Thomas Rohe responded with an email of concern (attachment email September 18/24) to the NRCB legal council and never received a response.

It is no news that the water table is too high in this area, already in 1954, the close by St. Mary's "Wanda "cemetery was shut down by the Bureau of Vital Statistics due to the high-water level. (Attachment cemetarywatertable).

What about the 1-5% dead cattle? Will they be left to rot, burned, or buried when even humans can not be buried in this area anymore?

In addition, attachment basementwatertable shows the water table that was encountered when Dallas Oberg, directed affected property owner, SW of proposed CFO was digging a basement.

The attached documents, Mr. Kroetsch has received permission to spread manure that have water runoff and/or standing water/dugouts that could be contaminated. The feedlot location itself as shown in maps clearly has water runoff areas that ultimately find their way into the Battle River. One of the properties for the planned manure spreading is located SW-3-43-16-W4 is not even 1 mile away from the Village of Heisler border.

You will also find attached an email from the Battle River Watershed Alliance regarding BRWA WATERSHED MANAGEMENT PLAN RECOMMENDATIONS:

Non-point Source Pollution Management

The BRWA Non-point Source Pollution Management Implementation Guidelines offers recommendations for crop and manure beneficial management practices, where applicable. This advice was developed with broad input from watershed residents, stakeholders and decision-makers. Regarding CFOs proposed within the Battle River and Sounding Creek watersheds, the following is recommended:

Recommendation 2.4.8: Efforts should be taken to limit the development of new Confined Feeding Operations within the effective drainage area of the Battle River and Sounding Creek watersheds. Rationale: The effective drainage area is that portion of the watershed that might be expected to contribute runoff to the main stem during a flood with a return period of two years. As these areas regularly contribute water to the main stem, the potential for nutrient transport from these areas is greater than in non contributing areas.

Source: Non-point Source Pollution Management Implementation Guidelines, PDF

With the water table being high in this area, there is also the concern of how the contaminants will find their way into the water well systems.

The Village of Heisler water well system is extremely endangered of contamination and the risk of running dry, located way to close to the planned CFO is endangered. Heisler's majority of residents are seniors and a lot of them already suffer from health issues. Currently, the Village of Heisler is in the growing process (2023 Census incorrectly); in the last few years more and more younger families with children moved into the community and will be impacted by health issues from water contamination, not to mention increase of flies, rodents, predators, air pollution and increase of crime resulting from a CFO with 5,000 heads of cattle. Yes, we are totally aware that the last point of comment is not directly related to the water license application, but the department of Alberta Environment and Protected Areas should also be the right place to provide these important concerns.

Once again, to protect the Village of Heisler, the environment, our children's future, the future of our neighbours we appeal to not approve the water licenses applications for the planned CFO.

Sincerely,

Heidi Rohe, CAO Village of Heisler CC: Honorable Rebecca Schulz

Minister of Environment and Protected Areas Honorable Damien Kurek, MP – Camrose Office Honorable Jackie Lovely, MLA – Camrose Constituency Flagstaff County Development and Planning Committee

Battle River Watershed Alliance

Battle River Water Management Plan (Province of Alberta)

Enclosures:

St. Mary's, Wanda Cemetery

Although St. Mary's Church closed in 1952 and the building moved to Forestburg in 1957, we respect the cemetery and site. It is a cherished part of our history.

In 1954 Reverend Father J. Rolheiser received a letter from the Bureau of Vital Statistics advising effective immediately there was to be no further burials in St. Mary's "Wanda" cemetery. Extensive soil testing was done and it was found the water table was too high along with the type of soil making it a restricted cemetery.

The thirty-eight bodies interred at the Wanda Cemetery are:

Dominic Schares Jacob Schares Christina Schares John Schares

Annie Fischer Christian Klein Louise Poepping Blanche Kroetsch

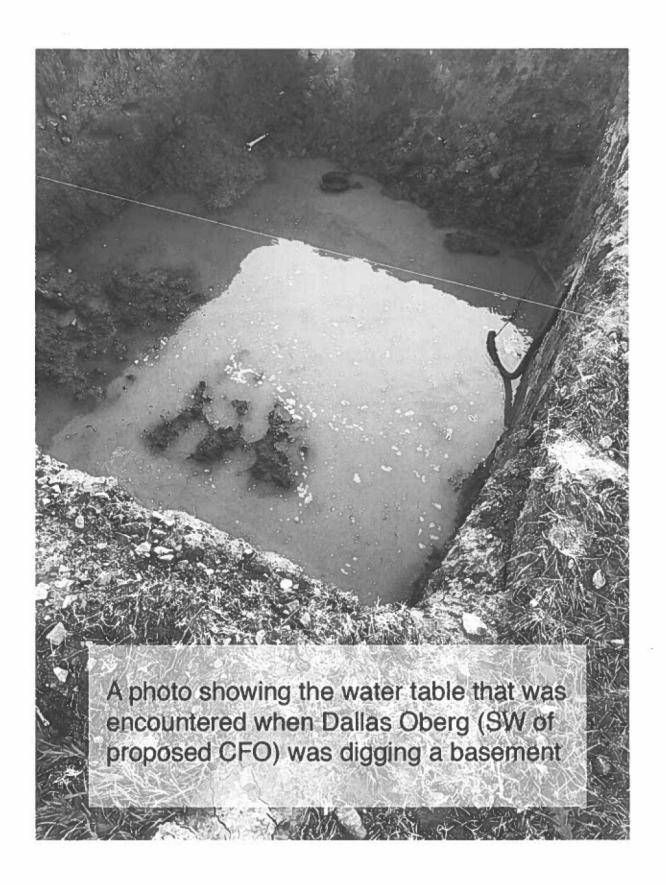
Mike Schares Irvin Dietrich George Kroetsch Mary Kroetsch John Kroetsch Joseph Laporte Theresia Kuntz John Messner Frank Rich Rosanna Dietrich Mary Steil Barnaby Steil Rosina Laporte Nicholas Dietrich

Nellie Plant Donna Messner Alice Plant Albert Ault Lawrence Kroetsch Loren Kroetsch Robert Plant William Godfrey Bernadette Kroetsch Edmund Kroetsch Marion Strauss Eldon Kroetsch Reuben Messner

There are three unmarked graves in the cemetery as well.

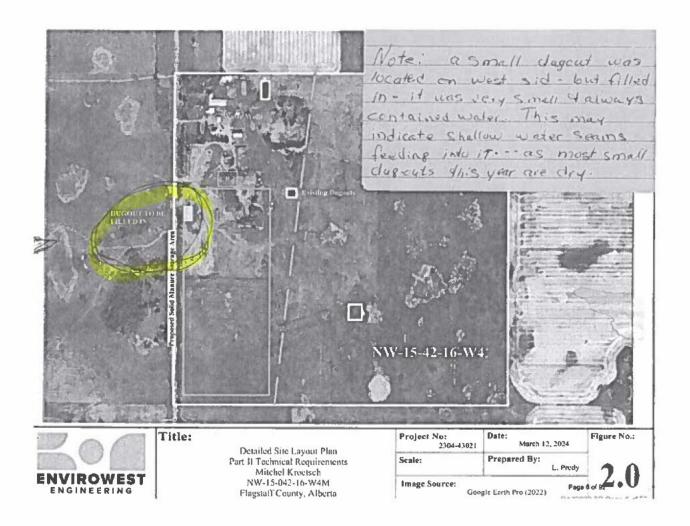
Wagon Trails in the Sod First Edition has a detailed account of the Wanda district.



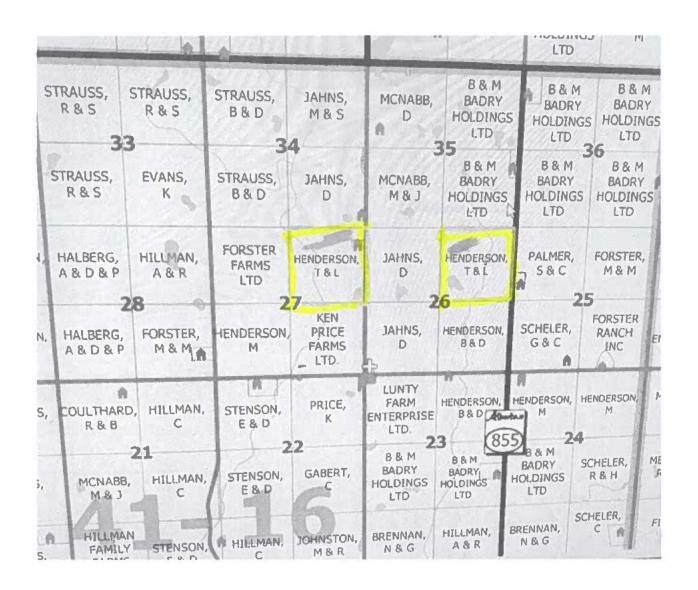


Fwd: Ground Water Contamination From: Time To: Makey Makey in Date: Friday. October 18, 2024 at 08 55 p.m. MDT Sent from my iPhone Begin forwarded message: From: Gatherine Peirce <executivedirector@battleriverwatershed ca> Date: October 18, 2024 at 14 57:54 MDT Subject: Ground Water Contamination HI Thomas, Thank you for stopping by the Battle River Watershed Alliance Office this week. I appreciate the update of the CFO. Your concerns about the high water table are important to communicate to the NRCB and for Water Well License Considerations. I reviewed the Government's document on catch basin construction (a link is included below). As you indicated, your plan to highlight this in a statement of concern through the Digital Regulatory Assurance System is a good idea. A water well ficence should be contingent on proof that the groundwater will not be contaminated on the site where a water well will be located. Protect Groundwater Quality: Minimize the Risks https://open/alberta.ca/dataset/ah1646bf-5cal-495i-8526-e62i7e1ac927/resource/b2e6b848-8f8a-48cd-8842-e7275072a188 dua rioad/576 5.pdf Catch Basin Design and Management othes/governalities cardiatary fine tise is \$155 of the broad and all sections about 15 and 9 feat 4241 blad 29 feat/36767 dogrifyaktival-ranch hasin designs treatively, an out seem of Some additional information: BRWA WATERSHED MANAGEMENT PLAN RECOMMENDATIONS Nen-point Source Pollution Management The BRWA Non-point Source Pollution Management Implementation Guidelines offers recommendations for crop and manure beneficial management practices, where applicable. This advice was developed with broad input from watershed residents, stakeholders and decision-makers. Regarding CFOs proposed within the Battle River and Sounding Creek watersheds, the following is recommended: Recommendation 2.4.8; Efforts should be taken to limit the development of new Confined Feeding Operations within the effective drainage area of the Battle River and Sounding Creek watersheds. Rationale: The effective drainage area is that portion of the watershed that might be expected to contribute runoff to the main stem during a flood with a return period of two years. As these areas regularly contribute water to the main stem, the potential for nutrient transport from these areas is greater than in non contributing areas. Source Non-point Source Pollution Management Implementation Guidelines, POF Below is the other information we were looking at when you were in the office regarding the Flagstaff MDP. While it is important to minimize negative effects on the environment and support stewardship. I am not sure this is applicable in this case OBJECTIVE MINIMIZE NEGATIVE IMPACTS OF AGRICULTURAL OPERATIONS ON THE ENVIRONMENT & ADJACENT LAND USES BY ENCOURAGING GOOD LAND STEWARDSHIP PRACTICES Clause 13 CFOs will be discouraged from locating in environmentally sensitive areas where slope instability and or groundwater contamination may be of concern THE REPORT DE MODERNI POR MOP CUPRENT

Best regards, Catherine



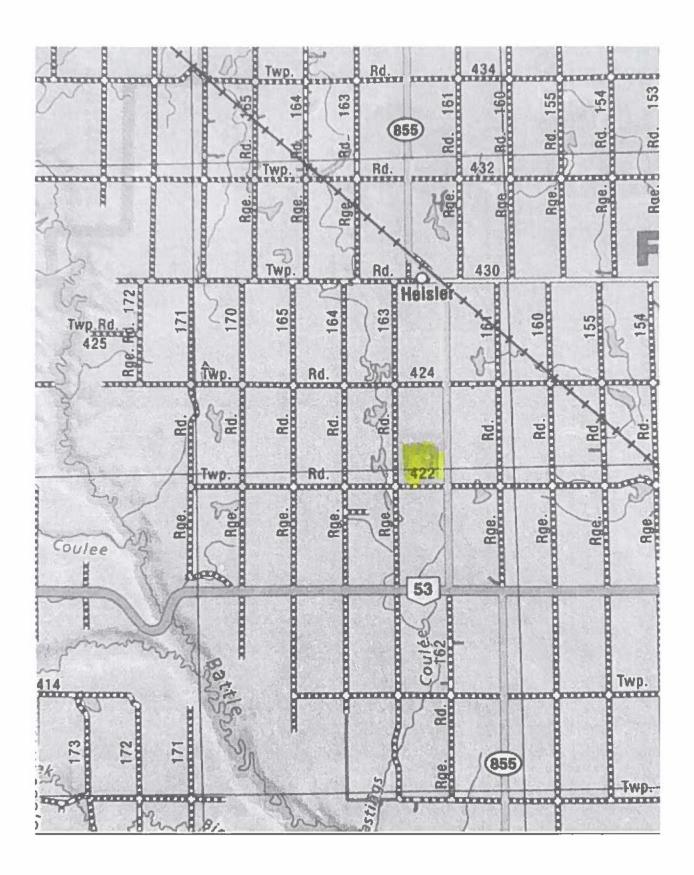
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Name of Landowners	Land Location	Acres	Soil Zone	
Barbara and Colin Kroetsch	SW-3-43-16-W4	117	Black	
Barbara and Colin Krietson	\$E-31-43-16-W4	110	Black	
Barbara and Colin kroetson	SW-31-43-16-W4	148	Black	
Barbara and Colin Kroetsch	NE-24-43-17-W4	130	Black	
Betty and Debbie Henderson	E%-29-41-16-W4	264	Black	
Betty and Deoble Henderson	SW-29-41-16-W4	150	Black	
Betty and Debbie Henderson	SE-30-41-16-W4	150	Black	
Lorraine Littenderson	NE-26-41-16-W4	155	Black	
Lorraine J Henderson	NE-27-41-16-W4	143	Black	
Lorraine J Henderson	SW-6-42-15-W4	147	Black	

AO Note: The applicant has provided 1,514 ac of land with black soil







January 2000

Agdes 576-5

Protect Groundwater Quality: Minimize the Risks

Groundwater is an important natural resource in Afberta. Many farmers and small towns rely on wells to provide drinking water for both domestic and its estock use. Groundwater, however, is vulnerable to contamination from activities around wells and sometimes activities on the land.

Groundwater is water that occupies the pure spaces in soil and rocks. It originates as precipitation that moves down through the soil and can be stored in aquifers.

Aquifers are geologic deposits capable of producing water in quantities sufficient for use by

humans, livestock or industry. Unconfined aquifers or water table aquifers are close to the ground surface while confined aquifers are overlain by geologic deposits of low permeability, such as clay or shale.

Confined aquifers are porous layers of rock (i.e. sandstone) trapped between layers of less porous rock. Most rural wells in Alberta are supplied by deep confined aquifers. Uncontined aquifers are more sensitive to contamination from activities on the land surface.

Confined aquifers can be contaminated by activities around a well.

It is less costly to protect groundwater than to clean it up.

and an aquifer can result from spills beside wells, improperly sealed well cosings or abundoned wells. Hooded well pits or back-siphoning from pesticide mixing tanks.

Indirect contamination can come from leaking sewage systems, fertilizer or manure spreading and pesticide spraying. Since nurate-nitrogen is very mobile in soil, leaking septic systems or spreading manure or fertilizers at rates that exceed crop uptake of nitrogen can result in groundwater contamination over time.

Similarly, pesticides that are relatively persistent and mobile as well as pesticide application on highly permeable soils can also contaminate grounds ater. Point source pollution like pesticide or fertilizer spills around a well is the greatest risk for groundwater contamination.

Protect water resources

Groundwater is a vital resource on the farm. Prevention of contamination is the key to protecting the quality of groundwater.

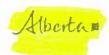
Present direct contamination of wells and aquiters:

Ensure wells are properly scaled and cased. Poorly
constructed casings allow surface water to seep along
the outside of the casing into groundwater.
 Contaminated surface water or shallow groundwater
can collect in well pits. Eliminate well pits in older
wells.

Groundwater contamination

Groundwater quality is influenced by natural conditions and human activities, and pollution can occur through direct or indirect contamination.

A well can be a direct conduit from the land surface to an aquifer. Thus, activities around a well can directly contaminate groundwater. Direct contamination of a well



- Locate wells up-slope and away from sources of contaminants, Locate wells away and up-slope from septic systems, manure storage areas and feedlots. Maximizing the distance between the well and contaminant sources minimizes the risk of contamination. Divert any runoff away from the well.
- Fill sprayers from nurse tanks away from wells or other sources of water. Mix pesticides in the sprayer or nurse tank away from the well. This method reduces the risk of back-siphoning pesticides into the well and contaminating groundwater.
- Property plug abandoned and unused wells.
 Abandoned wells are a serious risk to groundwater quality, Improperty plugged wells can act as a direct conduit for contaminants to reach groundwater. Use bentonite products to properly plug or seal unused or abandoned wells.

Present indirect contamination of wells and aquifers:

- Apply manure and fertilizers to meet crop nutrient needs. Over-application of manure and fertilizers can result in excess nitrate leaching to groundwater. Apply manure at recommended rates according to soil and manure nutrient content as well as crop demand. Ensure adequate land is available for spreading at appropriate rates.
- Maintain septic systems. Septic systems can pollute wells when placed too close to the well, when not properly maintained or when not properly installed. Make sure the septic tank is cleaned out regularly.

Prepared by

Alberta Agriculture and Rural Development

More information

Alberta Ag-Info Centre Call toll free; 310-FARM (3276)

Website: www.agriculture.alberta.ca

From: Thomas and Heidi Rohe

Subject: Fwd: Kroetsch RFR RA23022 - Field Services information

Date: Oct 20, 2024 at 11:20:22 AM

To: Thomas and Heidi Rohe

----- Forwarded message -----

From: Fiona Vance < Fiona Vance@nrcb.ca>

Date: Tue, Sep 17, 2024 at 1:34 PM

Subject: Kroetsch RFR RA23022 - Field Services information

To: Laura Friend < Laura Friend@nrcb.ca>

Cc: elow@envirowestengineering.ca <elow@envirowestengineering.ca>, rhoyland@flagstaff.ab.ca <rhoyland@flagstaff.ab.ca>, Bill Kennedy <Bill.Kennedv@nrcb.ca>, Lynn Stone <l.vnn.Stone@nrcb.ca>, Francisco

Echegaray < Francisco Echegaray@nrcb.ca>

Good morning,

I am legal counsel to NRCB Field Services in this matter, including the Approval Officer.

We take no position on whether a review should be scheduled based on the Requests for Review ("RFRs").

To assist the Board, I have shared with Laura Friend (Manager, Board Reviews at the NRCB) the original responses to application RA23022 that were submitted to the Approval Officer in May, by individuals who have filed RFRs. I have not attached those responses to this e-mail, due to volume. The responses are available upon request to either Ms. Friend or to myself.

In addition, one correction and one update have come to our attention that we feel the Board and the parties should be aware of in the context of the RFR process.

Correction

An inadvertent error in the decision documents for RA23022 appears in two places:

1. Page 24 of Technical Document RA23022 lists the two proposed catch basins and their calculated capacity (4017 m³ and 2529 m³ respectively). This information is correct. However, in identifying runoff volume from contributing areas, the Approval Officer inadvertently only listed the contributing runoff area from Catch Basin 1 (3809 m³). With the contributing areas from both catch basins, the total contributing runoff area for the feedlot should require a capacity of 6109 m³. The corrected information is:

Total required capacity for the feedlot: 6109 m³

Total proposed catch basin capacity (CB1 + CB2): 6546 m³

2. Flowing from this error, page 16 of Decision Summary RA23022 states that the catch basins would have 170% of their required capacity. The Decision Summary should instead state that the catch basins provide 107% of the required storage capacity.

Update

The Approval Officer has advised as follows:

On Tuesday, September 10, 2024 I received a text message from Mitchel Kroetsch. He stated that he was trenching in water lines for his feedlot, and observed that water was flowing in, presumably from the water table.

He then dug two test holes in the area of where the south catch basin (CB1) will be constructed. One hole at 10 feet below grade was dry; however the other hole at approximately 13 feet below grade (3.96 m) had water in it. The test holes were filled in.

Mitchel notified me as per condition 5 in RA23022. I verbally directed him to not construct the catch basins while we decide the next steps.

Approval RA23022 permits the construction of the two catch basins using a synthetic liner. Both catch basins are to be 3.5 m below grade. It appears that this site may be in conflict with AOPA's Standards and Administration Regulation 9(3)(a) as the bottom of the liner must not be less than 1 m above the water table at the time of construction.

Typically in scenarios like this, we have the operator submit an amendment application. This means that the operator will consult with their engineer, and modify their catch basin dimensions to propose a shallower catch basin, in order to meet the water table requirements. Often this also means that applicants may need to expand the length and width of the catch basin, in order to have sufficient capacity. Depending on the site, additional adjustments may need to be made to the location of pens to accommodate the change in catch basin dimensions.

This message is blind-copied to Mitchel Kroetsch, Arthur Congdon, Heidi Rohe, Thomas Rohe, Lorraine Congdon, Norman Congdon, Dallas Oberg, Lynn Poole, Gary and Carol Scheler, Wanda Bednarz-Hihn, David Hihn, Caitlin and Kevin Van Slyke, Nancy Hewson, John Congdon, Robert Burke, Ruth Burke (via Robert Burke), Bonnie Webber and Roxanne Westgate (for Chester Hastings), Rick Hewson, and Leann Congdon.

Regards,

Fiona N. Vance (she/elle)

Chief Legal Officer - Operations, NRCB

Fiona Vance@nrcb.ca

(780) 999-3197

Resporse to enail NRCB logal council from sep17/24

From: Thomas and Heidi Rohe countryrohe@gmail.com

Subject: Re: Kroetsch RFR RA23022 - Field Services information

Sep 18, 2024 at 12:39:18 PM

To: Fiona Vance Fiona.Vance@nrcb.ca

Cc: Laura Friend Laura. Friend@nreb.ca.

elow@envirowestengineering.ca, rhoyland@flagstaff.ab.ca,

Bill Kennedy Bill Kennedy@nrcb.ca, Lynn Stone

Lynn.Stone@nrcb.ca, Francisco Echegaray

Francisco. Echegaray@nrcb.ca, epa.drought@gov.ab.ca,

Damien.Kurek@parl.gc.ca, camrose@assembly.ab.ca,

greg.nelson@gov.ab.ca, otis@battleriverwatershed.ca, Sarah

Skinner sarah@battleriverwatershed.ca.

AGRIC.Minister@gov.ab.ca, epa.minister@gov.ab.ca,

degumom3@yahoo.ca, Dallas Oberg Auto Ltd.

d_grabo@hotmail.com, normcongdon@gmail.com,

wandahihn@gmail.com, lycongdon@gmail.com

Good afternoon Fiona Vance,

We have received and read your email below and we are very concerned about your last update regarding the CFO catch basins and run-offs.

First of all, your email states and I cite; I verbally directed him to not construct the catch basins while we decide the next steps. Approval RA23022 permits the construction of the two catch basins using a synthetic liner. Both catch basins are to be 3.5 m below grade. It appears that this site may be in conflict with AOPA's Standards and Administration Regulation 9(3)(a) as the bottom of the liner must not be less than 1 m above the water table at the time of construction...

For myself and my husband questions and more concerns arise:

Where is the designated area for run-off and how will it affect the resident's emidiate surrounding areas and environment?

Will the capacity for catch basins be changing, thus taking up more area?

Will a change in the size of new catch basins affect the whole scope of the engineered dimensions?

This matter is way too important to just 'fix an error 'in the application process, it should result in dismissal of the existing RA23022 application approval decision and a new application should be requested by NRCB for Mitchel Kroetsch's planned CFO.

We also would like to request information updates regarding NRCB current policies on how the NRCB addresses situations like this.

Thank you,

HEISLER ANNUAL WATER COMPARISON CHART

YEAR	2019	2020	2021	2022	2023		TOTAL PER 5 YEARS	AVERAGE PER 5 YEARS
January	819.6	833.0	859.0	895.0	855.98	m³	4262.5	852.5
February	729.5	818.0	846.0	803.0	764.06	m³	3950.5	790.1
March	800.5	998.0	994.0	927.0	950.75	m³	4670.2	934.0
April	984.6	968.0	860.0	883.0	931.86	m³	4627.4	925.4
May	987.6	1044.0	963.0	1044.0	1199.77	m³	5238.3	1047.6
June	920.4	1230.0	1229.0	1315.0	1163.80	m³	5858.2	1171.6
July	1329.2	962.0	1385.0	1324.0	1150.20	m³	6150.4	1230.0
August	1325.0	1384.0	1553.0	1214.0	1065.11	m³	6451.1	1290.2
September	1230.0	1149.0	1007.0	1065.0	918.96	m³	5369.9	1073.9
October	840.0	908.0	1040.0	985.0	841.53	m³	4614.5	922.9
November	783.0	866.0	1100.0	915.9	1017.83	m ³	4682.7	936.5
December	896.0	919.0	882.0	880.5	842.95	m ³	4420.4	884.0
TOTAL	11,555.4	12,078.9	12,717.9	12,251.4	11,702.7	m³	60,306.3	12,061.2
AVERAGE	962.9	1006.5	1059.8	1020.9	975.2	m ³	5025.3	1005.6
MIN	729.5	818.0	846.0	803.0	764.0	m³	3960.0	792.1
MAX	1329.2	1384.0	1553.0	1324.0	1199.7	m³	6789.9	1357.9
MIN MONTH	February	February	February	February	February	Min Mon Year	February	2019
MAX MONTH	July	August	August	July	May	Max Mon Year	August	2021

This chart is based on a 5 year comparison starting Jan 2019 and ending in Dec 2023