



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, TULSA DISTRICT
2488 EAST 81ST STREET
TULSA, OKLAHOMA 74137-4209

SWT-RO

February 26, 2025

MEMORANDUM FOR RECORD

SUBJECT: US Army Corps of Engineers (Corps) Pre-2015 Regulatory Regime
Approved Jurisdictional Determination in Light of *Sackett v. EPA*, 143 S. Ct. 1322
(2023),¹ SWT-2019-00227 MFR 1 of 1²

BACKGROUND. An Approved Jurisdictional Determination (AJD) is a Corps document stating the presence or absence of waters of the United States on a parcel or a written statement and map identifying the limits of waters of the United States on a parcel. AJDs are clearly designated appealable actions and will include a basis of JD with the document.³ AJDs are case-specific and are typically made in response to a request. AJDs are valid for a period of five years unless new information warrants revision of the determination before the expiration date or a District Engineer has identified, after public notice and comment, that specific geographic areas with rapidly changing environmental conditions merit re-verification on a more frequent basis.⁴ For the purposes of this AJD, we have relied on section 10 of the Rivers and Harbors Act of 1899 (RHA),⁵ the Clean Water Act (CWA) implementing regulations published by the Department of the Army in 1986 and amended in 1993 (references 2.a. and 2.b. respectively), the 2008 *Rapanos-Carabell* guidance (reference 2.c.), and other applicable guidance, relevant case law and longstanding practice, (collectively the pre-2015 regulatory regime), and the *Sackett* decision (reference 2.d.) in evaluating jurisdiction.

This Memorandum for Record (MFR) constitutes the basis of jurisdiction for a Corps AJD as defined in 33 CFR §331.2. The features addressed in this AJD were evaluated consistent with the definition of “waters of the United States” found in the pre-2015 regulatory regime and consistent with the Supreme Court’s decision in *Sackett*. This AJD did not rely on the 2023 “Revised Definition of ‘Waters of the United States,’” as

¹ While the Supreme Court’s decision in *Sackett* had no effect on some categories of waters covered under the CWA, and no effect on any waters covered under RHA, all categories are included in this Memorandum for Record for efficiency.

² When documenting aquatic resources within the review area that are jurisdictional under the Clean Water Act (CWA), use an additional MFR and group the aquatic resources on each MFR based on the TNW, interstate water, or territorial seas that they are connected to. Be sure to provide an identifier to indicate when there are multiple MFRs associated with a single AJD request (i.e., number them 1, 2, 3, etc.).

³ 33 CFR 331.2.

⁴ Regulatory Guidance Letter 05-02.

⁵ USACE has authority under both Section 9 and Section 10 of the Rivers and Harbors Act of 1899 but for convenience, in this MFR, jurisdiction under RHA will be referred to as Section 10.

SWT-RO

SUBJECT: Pre-2015 Regulatory Regime Approved Jurisdictional Determination in Light of *Sackett v. EPA*, 143 S. Ct. 1322 (2023), SWT-2019-00227

amended on 8 September 2023 (Amended 2023 Rule) because, as of the date of this decision, the Amended 2023 Rule is not applicable Oklahoma due to litigation.

1. SUMMARY OF CONCLUSIONS.

- a. Provide a list of each individual feature within the review area and the jurisdictional status of each one (i.e., identify whether each feature is/is not a water of the United States and/or a navigable water of the United States).
 - i. Non-Relatively Permanent Stream 1 (ES-1), non-jurisdictional
 - ii. Non-Relatively Permanent Stream 2 (ES-2), non-jurisdictional
 - iii. Non-Relatively Permanent Stream 3 (ES-3), non-jurisdictional
 - iv. Non-Relatively Permanent Stream 4 (ES-4), non-jurisdictional
 - v. Non-Relatively Permanent Stream 5 (ES-5), non-jurisdictional
 - vi. Relatively Permanent Stream 6 (S-6), jurisdictional, Section 404
 - vii. Relatively Permanent Stream 7 (S-7), jurisdictional, Section 404
 - viii. Relatively Permanent Stream 8 (S-8), jurisdictional, Section 404
 - ix. Relatively Permanent Stream 9 (S-9), jurisdictional, Section 404
 - x. Non-Relatively Permanent Stream 10 (ES-10), non-jurisdictional
 - xi. Relatively Permanent Stream 11 (S-11), jurisdictional, Section 404
 - xii. Wetland 1 (W-1), non-jurisdictional
 - xiii. Wetland 2 (W-2), non-jurisdictional
 - xiv. Wetland 3 (W-3), non-jurisdictional
 - xv. Wetland 4 (W-4), non-jurisdictional
 - xvi. Wetland 5 (W-5), non-jurisdictional
 - xvii. Wetland 6 (W-6), non-jurisdictional

SWT-RO

SUBJECT: Pre-2015 Regulatory Regime Approved Jurisdictional Determination in Light of *Sackett v. EPA*, 143 S. Ct. 1322 (2023), SWT-2019-00227

- xviii. Wetland 7 (W-7), non-jurisdictional
- xix. Wetland 8 (W-8), non-jurisdictional
- xx. Wetland 9 (W-9), non-jurisdictional
- xxi. Wetland 10 (W-10), non-jurisdictional
- xxii. Wetland 11 (W-11), non-jurisdictional
- xxiii. Wetland 12 (W-12), non-jurisdictional
- xxiv. Wetland 13 (W-13), non-jurisdictional
- xxv. Wetland 14 (W-14), jurisdictional, Section 404
- xxvi. Wetland 15 (W-15), non-jurisdictional
- xxvii. Pond 1 (P-1), non-jurisdictional
- xxviii. Pond 2 (P-2), non-jurisdictional
- xxix. Pond 3 (P-3), non-jurisdictional
- xxx. Ditch 1 (D-1), non-jurisdictional
- xxxi. Ditch 2 (D-2), non-jurisdictional

2. REFERENCES.

- a. Final Rule for Regulatory Programs of the Corps of Engineers, 51 FR 41206 (November 13, 1986).
- b. Clean Water Act Regulatory Programs, 58 FR 45008 (August 25, 1993).
- c. U.S. EPA & U.S. Army Corps of Engineers, Clean Water Act Jurisdiction Following the U.S. Supreme Court's Decision in *Rapanos v. United States & Carabell v. United States* (December 2, 2008)
- d. *Sackett v. EPA*, 598 U.S. ___, 143 S. Ct. 1322 (2023)

SWT-RO

SUBJECT: Pre-2015 Regulatory Regime Approved Jurisdictional Determination in Light of *Sackett v. EPA*, 143 S. Ct. 1322 (2023), SWT-2019-00227

- e. Navigable Waters Subject to Section 10 of the Rivers and Harbors Act within Tulsa District, <https://www.swt.usace.army.mil/Missions/Regulatory/Section-10-Waters/> (accessed November 1, 2023).
3. REVIEW AREA. The AJD requested by Ducks Unlimited is for approximately 731.2 acres of tracts of land and approximately 93.9 acres of road rights-of-way (ROW) that is located at latitude 36.300032, longitude -98.073477 near the City of Drummond in Garfield County, Oklahoma.
4. NEAREST TRADITIONAL NAVIGABLE WATER (TNW), INTERSTATE WATER, OR THE TERRITORIAL SEAS TO WHICH THE AQUATIC RESOURCE IS CONNECTED. The Cimarron River, an Interstate Water, which contributes flow to the Arkansas River, a Section 10 TNW.⁶
5. FLOWPATH FROM THE SUBJECT AQUATIC RESOURCES TO A TNW, INTERSTATE WATER, OR THE TERRITORIAL SEAS. The subject aquatic resources flow through Dry Salt Creek, Turkey Creek, the Cimarron River (Interstate Water), and then the Arkansas River, a Section 10 TNW.
6. SECTION 10 JURISDICTIONAL WATERS⁷: Describe aquatic resources or other features within the review area determined to be jurisdictional in accordance with Section 10 of the Rivers and Harbors Act of 1899. Include the size of each aquatic resource or other feature within the review area and how it was determined to be jurisdictional in accordance with Section 10.⁸ N/A.
7. SECTION 404 JURISDICTIONAL WATERS: Describe the aquatic resources within the review area that were found to meet the definition of waters of the United States in accordance with the pre-2015 regulatory regime and consistent with the Supreme Court's decision in *Sackett*. List each aquatic resource separately, by name,

⁶ This MFR should not be used to complete a new stand-alone TNW determination. A stand-alone TNW determination for a water that is not subject to Section 9 or 10 of the Rivers and Harbors Act of 1899 (RHA) is completed independently of a request for an AJD. A stand-alone TNW determination is conducted for a specific segment of river or stream or other type of waterbody, such as a lake, where upstream or downstream limits or lake borders are established.

⁷ 33 CFR 329.9(a) A waterbody which was navigable in its natural or improved state, or which was susceptible of reasonable improvement (as discussed in § 329.8(b) of this part) retains its character as "navigable in law" even though it is not presently used for commerce, or is presently incapable of such use because of changed conditions or the presence of obstructions.

⁸ This MFR is not to be used to make a report of findings to support a determination that the water is a navigable water of the United States. The district must follow the procedures outlined in 33 CFR part 329.14 to make a determination that water is a navigable water of the United States subject to Section 10 of the RHA.

SWT-RO

SUBJECT: Pre-2015 Regulatory Regime Approved Jurisdictional Determination in Light of *Sackett v. EPA*, 143 S. Ct. 1322 (2023), SWT-2019-00227

consistent with the naming convention used in section 1, above. Include a rationale for each aquatic resource, supporting that the aquatic resource meets the relevant category of “waters of the United States” in the pre-2015 regulatory regime. The rationale should also include a written description of, or reference to a map in the administrative record that shows, the lateral limits of jurisdiction for each aquatic resource, including how that limit was determined, and incorporate relevant references used. Include the size of each aquatic resource in acres or linear feet and attach and reference related figures as needed.

- a. TNWs (a)(1): N/A.
- b. Interstate Waters (a)(2): N/A.
- c. Other Waters (a)(3): N/A.
- d. Impoundments (a)(4): N/A.
- e. Tributaries (a)(5):
 - i. Stream 6 (5,267 linear feet) is a relatively permanent tributary that contributes relatively permanent flow to the downstream TNW. Stream 6 (Dry Salt Creek) is mapped on USGS Topographic, NHD, and NWI Maps as an intermittent stream channel. During an RO site-visit and within the applicant submitted wetland and waters delineation, Stream 6 was noted to exhibit a bed and bank and Ordinary Highwater Mark that is consistent with that of a stream channel that exhibits relatively permanent flow.
 - ii. Stream 7 (114 linear feet) is a downstream segment of Stream 6 (Dry Salt Creek) that was delineated within the ROW of South Logan Road. Thus, stream 7 is a relatively permanent tributary that contributes relatively permanent flow to the downstream TNW. Stream 7 is mapped on USGS Topographic, NHD, and NWI Maps as an intermittent stream channel. During an RO site-visit that examined an upstream segment of Stream 7 and upon review of the applicant submitted wetland and waters delineation, Stream 7 was determined to exhibit a bed and bank and Ordinary Highwater Mark that is consistent with that of a stream channel that exhibits relatively permanent flow.
 - iii. Stream 8 (104 linear feet) is a relatively permanent tributary that contributes relatively permanent flow to the downstream TNW. Stream 8 (unnamed tributary of Dry Salt Creek) is mapped on USGS Topographic, NHD, and NWI Maps as being an intermittent stream channel that contributes flow to Dry Salt

SWT-RO

SUBJECT: Pre-2015 Regulatory Regime Approved Jurisdictional Determination in Light of *Sackett v. EPA*, 143 S. Ct. 1322 (2023), SWT-2019-00227

- Creek. The applicant provided wetland and waters delineation determined the average OHWM of Stream 8 to be approximately 22 feet. Due to the discernable bed and bank and relatively wide OHWM of stream 8 in culmination with multiple aerial images (Google Earth 1995-2019) depicting flowing water, it was determined that stream 8 is a relatively permanent tributary.
- iv. Stream 9 (106 linear feet) is a downstream segment of Stream 6 and 7 (Dry Salt Creek) that was delineated within the ROW of West Skeleton Road. Thus, stream 9 is a relatively permanent tributary that contributes relatively permanent flow to the downstream TNW. Stream 9 is mapped on USGS Topographic, NHD, and NWI Maps as an intermittent stream channel. During an RO site-visit that examined an upstream segment of Stream 9 and upon review of the applicant submitted wetland and waters delineation, Stream 9 was determined to exhibit a bed and bank and Ordinary Highwater Mark that is consistent with that of a stream channel that exhibits relatively permanent flow.
 - v. Stream 11 (110 linear feet) is a downstream segment of Stream 6, 7, and 9 (Dry Salt Creek) that was delineated within the ROW of West Longhorn Trail. Thus, stream 11 is a relatively permanent tributary that contributes relatively permanent flow to the downstream TNW. Stream 11 is mapped on USGS Topographic, NHD, and NWI Maps as an intermittent stream channel. During an RO site-visit that examined an upstream segment of Stream 11 and upon review of the applicant submitted wetland and waters delineation, Stream 11 was determined to exhibit a bed and bank and Ordinary Highwater Mark that is consistent with that of a stream channel that exhibits relatively permanent flow.
 - f. The territorial seas (a)(6): N/A.
 - g. Adjacent wetlands (a)(7): Wetland 14 (14.42 acres) is a wetland that was determined to be adjacent to Dry Salt Creek (Stream 6). Upon review of Wetland 14 immediately south and east of the delineated wetland and review area boundary, it was determined that a ditch had been excavated in the past in an effort to drain portions of Wetland 14 for agricultural activities. This ditch that was excavated within Wetland 14 to drain Wetland 14 has maintained its wetland characteristics and is now an extension of Wetland 14 whose OHWM now drains/abuts directly into the OHWM of Stream 6. Thus, Wetland 14 has a continuous surface connection to Stream 6, making Wetland 14 a jurisdictional adjacent wetland.

SWT-RO

SUBJECT: Pre-2015 Regulatory Regime Approved Jurisdictional Determination in Light of *Sackett v. EPA*, 143 S. Ct. 1322 (2023), SWT-2019-00227

8. NON-JURISDICTIONAL AQUATIC RESOURCES AND FEATURES

- a. Describe aquatic resources and other features within the review area identified as “generally non-jurisdictional” in the preamble to the 1986 regulations (referred to as “preamble waters”).⁹ Include size of the aquatic resource or feature within the review area and describe how it was determined to be non-jurisdictional under the CWA as a preamble water. N/A.
- b. Describe aquatic resources and features within the review area identified as “generally not jurisdictional” in the *Rapanos* guidance. Include size of the aquatic resource or feature within the review area and describe how it was determined to be non-jurisdictional under the CWA based on the criteria listed in the guidance.
 - i. Ditch 1 (1,388 linear feet) is a man-made roadside ditch that was constructed within the uplands that does not exhibit a bed and bank, OHWM, or relatively permanent flow.
 - ii. Ditch 2 (2,584 linear feet) is a man-made roadside ditch that was constructed within the uplands that does not exhibit a bed and bank, OHWM, or relatively permanent flow.
- c. Describe aquatic resources and features identified within the review area as waste treatment systems, including treatment ponds or lagoons designed to meet the requirements of CWA. Include the size of the waste treatment system within the review area and describe how it was determined to be a waste treatment system. NA.
- d. Describe aquatic resources and features within the review area determined to be prior converted cropland in accordance with the 1993 regulations (reference 2.b.). Include the size of the aquatic resource or feature within the review area and describe how it was determined to be prior converted cropland. N/A.
- e. Describe aquatic resources (i.e. lakes and ponds) within the review area, which do not have a nexus to interstate or foreign commerce, and prior to the January 2001 Supreme Court decision in “*SWANCC*,” would have been jurisdictional based solely on the “Migratory Bird Rule.” Include the size of the aquatic resource or feature, and how it was determined to be an “isolated water” in accordance with *SWANCC*. N/A.

⁹ 51 FR 41217, November 13, 1986.

SWT-RO

SUBJECT: Pre-2015 Regulatory Regime Approved Jurisdictional Determination in Light of *Sackett v. EPA*, 143 S. Ct. 1322 (2023), SWT-2019-00227

- f. Describe aquatic resources and features within the review area that were determined to be non-jurisdictional because they do not meet one or more categories of waters of the United States under the pre-2015 regulatory regime consistent with the Supreme Court's decision in *Sackett* (e.g., tributaries that are non-relatively permanent waters; non-tidal wetlands that do not have a continuous surface connection to a jurisdictional water).

The following streams were determined to be non-relatively permanent tributaries with a flow regime that is best described as ephemeral in that flow is only present in direct response to precipitation events. These intrastate streams lack characteristics of Relatively Permanent Waters as they are characterized by low volume, infrequent, and short duration flow. During multiple site visits, these stream channels were observed to contain no flowing or pooled water. Additionally, bed and banks and OHWM were difficult to discern throughout many of these streams as they had been absent of flow for such extended periods that many portions of these streams had become heavily vegetated throughout:

- i. Non-jurisdictional Non-Relatively Permanent Stream 1 (1,577 linear feet)
- ii. Non-jurisdictional Non-Relatively Permanent Stream 2 (2,232 linear feet)
- iii. Non-jurisdictional Non-Relatively Permanent Stream 3 (964 linear feet)
- iv. Non-jurisdictional Non-Relatively Permanent Stream 4 (139 linear feet)
- v. Non-jurisdictional Non-Relatively Permanent Stream 5 (187 linear feet)
- vi. Non-jurisdictional Non-Relatively Permanent Stream 10 (6,021 linear feet)

The following features are intrastate ponds that are situated on intrastate streams that lack characteristics of Relatively Permanent Waters, rather they are characterized by low volume, infrequent, or short duration flow:

- vii. Non-jurisdictional Pond 1 (0.43 acre)
- viii. Non-jurisdictional Pond 2 (0.93 acre)
- ix. Non-jurisdictional Pond 3 (2.29 acres)

The following features are non-adjacent wetlands that do not exhibit a continuous surface connection to waters of the U.S. in their own right, that is, the following wetlands can be demarcated from waters of the U.S.

SWT-RO

SUBJECT: Pre-2015 Regulatory Regime Approved Jurisdictional Determination in Light of *Sackett v. EPA*, 143 S. Ct. 1322 (2023), SWT-2019-00227

- x. Non-adjacent non-jurisdictional Wetland 1 (0.52 acre): W-1 does not exhibit a continuous surface connection to any other demarcated feature as it is a depressional wetland that is isolated from all other aquatic features.
- xi. Non-adjacent non-jurisdictional Wetland 2 (0.09 acre): W-2 does not exhibit a continuous surface connection to a waters of the U.S. in its own right. That is, W-2 is adjacent to a non-jurisdictional ephemeral non-relatively permanent stream channel (ES-5) that flows outside the review area where bed and bank features appear to diminish. This demarcated non-jurisdictional feature then traverses approximately 2,660 linear feet (0.50 mile) before a confluence with a demarcated waters of the U.S. in its own right, S-6.
- xii. Non-adjacent non-jurisdictional Wetland 3 (0.01 acre): W-3 does not exhibit a continuous surface connection to a waters of the U.S. in its own right. That is, W-3 is adjacent to an excavated drainage ditch that is outside the review area. This demarcated drainage ditch then traverses approximately 582 linear feet before its confluence with a non-jurisdictional ephemeral non-relatively permanent stream channel (ES-5) that flows outside the review area where bed and bank features appear to diminish. This demarcated non-jurisdictional feature then traverses approximately 2,278 linear feet (0.43 mile) before a confluence with a demarcated waters of the U.S. in its own right, S-6.
- xiii. Non-adjacent non-jurisdictional Wetland 4 (0.09 acre): W-4 does not exhibit a continuous surface connection to any other demarcated feature as it is a depressional wetland that is isolated from all other aquatic features.
- xiv. Non-adjacent non-jurisdictional Wetland 5 (0.04 acre): W-5 does not exhibit a continuous surface connection to any other demarcated feature as it is a depressional wetland that is isolated from all other aquatic features.
- xv. Non-adjacent non-jurisdictional Wetland 6 (14.08 acres): W-6 does not exhibit a continuous surface connection to any other demarcated feature as it is a depressional wetland that is isolated from all other aquatic features.
- xvi. Non-adjacent non-jurisdictional Wetland 7 (0.08 acre): W-7 does not exhibit a continuous surface connection to any other demarcated feature as it is a depressional wetland that is isolated from all other aquatic features.

SWT-RO

SUBJECT: Pre-2015 Regulatory Regime Approved Jurisdictional Determination in Light of *Sackett v. EPA*, 143 S. Ct. 1322 (2023), SWT-2019-00227

- xvii. Non-adjacent non-jurisdictional Wetland 8 (0.19 acre): W-8 does not exhibit a continuous surface connection to any other demarcated feature as it is a depressional wetland that is isolated from all other aquatic features.
- xviii. Non-adjacent non-jurisdictional Wetland 9 (0.13 acre): W-9 does not exhibit a continuous surface connection to any other demarcated feature as it is a depressional wetland that is isolated from all other aquatic features.
- xix. Non-adjacent non-jurisdictional Wetland 10 (0.44 acre): W-10 does not exhibit a continuous surface connection to any other demarcated feature as it is a depressional wetland that is isolated from all other aquatic features.
- xx. Non-adjacent non-jurisdictional Wetland 11 (0.35 acre): W-11 does not exhibit a continuous surface connection to any other demarcated feature as it is a depressional wetland that is isolated from all other aquatic features.
- xxi. Non-adjacent non-jurisdictional Wetland 12 (0.72 acre): W-12 does not exhibit a continuous surface connection to a waters of the U.S. in its own right. That is, W-12 is adjacent to the demarcated non-jurisdictional impoundment (P-3) that is an impoundment of the demarcated non-jurisdictional ephemeral non-relatively permanent stream channel ES-10. ES-10 then traverses approximately 6,021 linear feet (1.14 miles) through the demarcated non-jurisdictional impoundment (P-2) before terminating into a demarcated non-jurisdictional roadside ditch (D-1). D-1 then traverses approximately 7,550 linear feet (1.43 miles) eastward before a confluence with a demarcated waters of the U.S. in its own right, S-8.
- xxii. Non-adjacent non-jurisdictional Wetland 13 (28.06 acres): W-13 does not exhibit a continuous surface connection to a waters of the U.S. in its own right. That is, W-13 is adjacent to the demarcated non-jurisdictional ephemeral non-relatively permanent stream channel ES-10. ES-10 then traverses approximately 4,040 linear feet (0.77 mile) through the demarcated non-jurisdictional impoundment (P-2) before terminating into a demarcated non-jurisdictional roadside ditch (D-1). D-1 then traverses approximately 7,550 linear feet (1.43 miles) eastward before a confluence with a demarcated waters of the U.S. in its own right, S-8.
- xxiii. Non-adjacent non-jurisdictional Wetland 15 (1.46 acres): W-15 does not exhibit a continuous surface connection to a waters of the U.S. in its own right. That is, W-15 is adjacent to the demarcated non-jurisdictional ephemeral non-relatively permanent stream channel ES-2. ES-2 then

SWT-RO

SUBJECT: Pre-2015 Regulatory Regime Approved Jurisdictional Determination in Light of *Sackett v. EPA*, 143 S. Ct. 1322 (2023), SWT-2019-00227

traverses approximately 391 linear feet before a confluence with a demarcated waters of the U.S. in its own right, S-6.

9. DATA SOURCES. List sources of data/information used in making determination. Include titles and dates of sources used and ensure that information referenced is available in the administrative record.

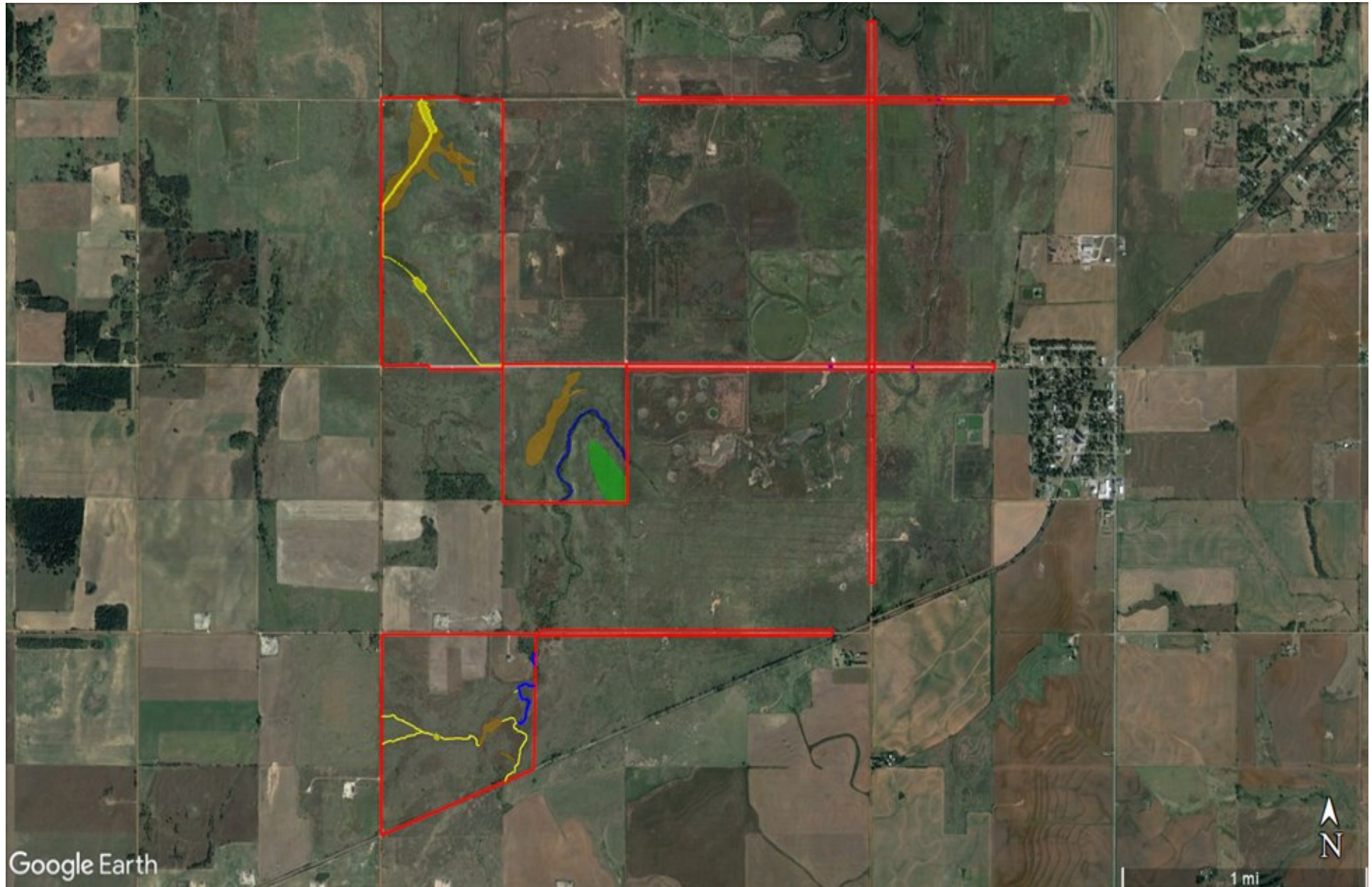
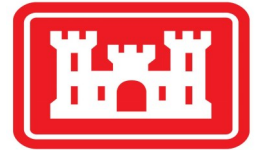
- a. Site Visit, October 24, 2023, and March 7, 2023.
- b. WETLAND AND STREAM DELINEATION REPORT DUCKS UNLIMITED-DRUMMOND FLATS WMA DRUMMOND, GARFIELD COUNTY, OKLAHOMA December 8, 2022.
- c. WETLAND AND STREAM DELINEATION REPORT DUCKS UNLIMITED-DRUMMOND FLATS WMA DRUMMOND, GARFIELD COUNTY, OKLAHOMA December 8, 2022, ADDENDUM, July 6, 2023.
- d. USGS Topographic and NHD Maps November 1, 2023.
- e. USFWS NWI Map November 1, 2023.
- f. Google Earth Aerial Imagery 1995-2019.

10. OTHER SUPPORTING INFORMATION.

11. NOTE: The structure and format of this MFR were developed in coordination with the EPA and Department of the Army. The MFR's structure and format may be subject to future modification or may be rescinded as needed to implement additional guidance from the agencies; however, the approved jurisdictional determination described herein is a final agency action.

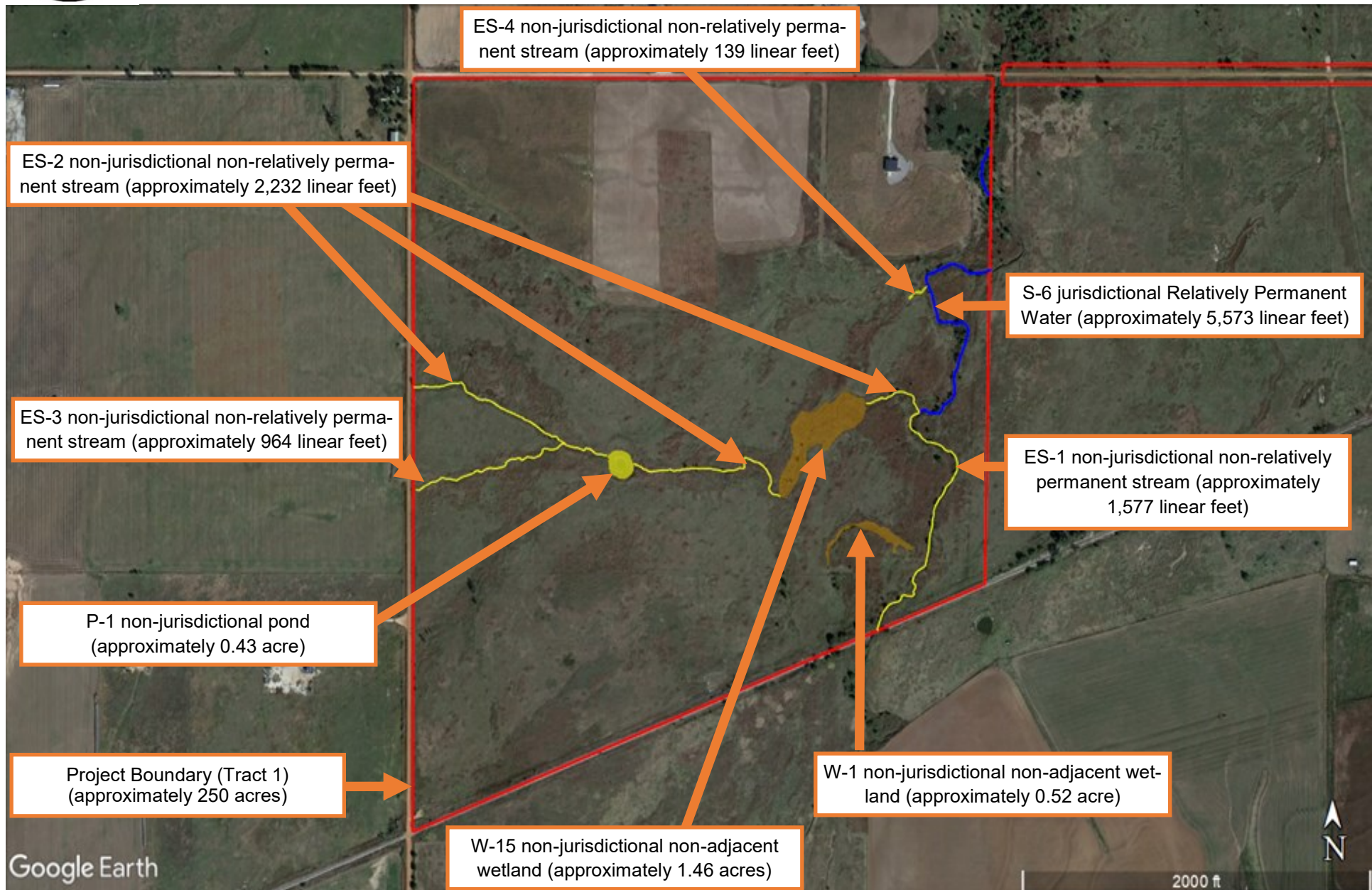
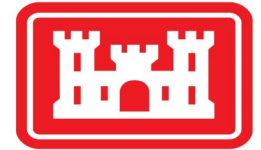


SWT-2019-00227
Approved Jurisdictional Determination
Ducks Unlimited Drummond Flats WMA
Overview Map



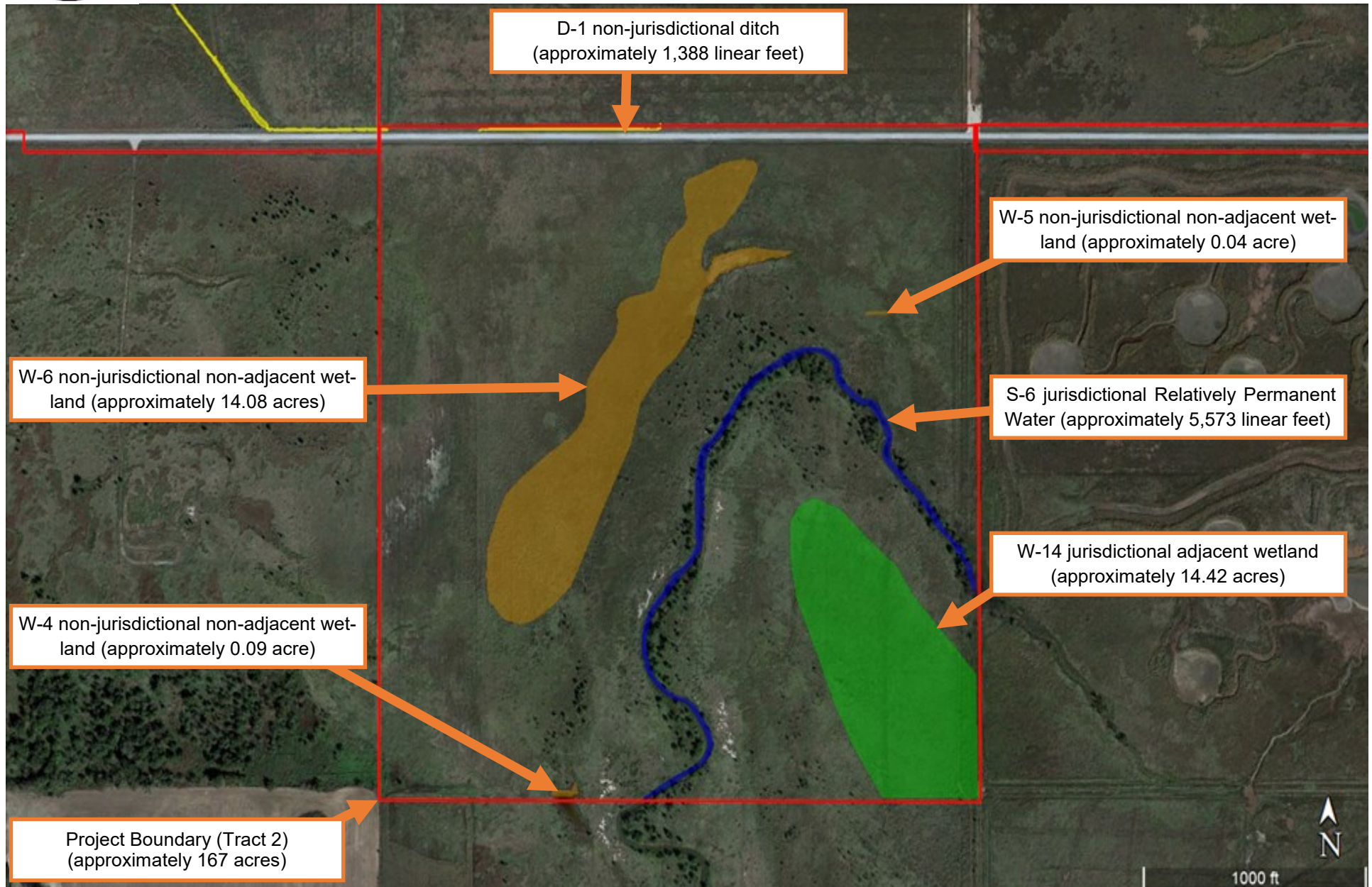
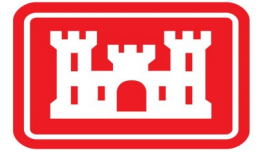


SWT-2019-00227
Approved Jurisdictional Determination
Ducks Unlimited Drummond Flats WMA
(Map 1 of 6)



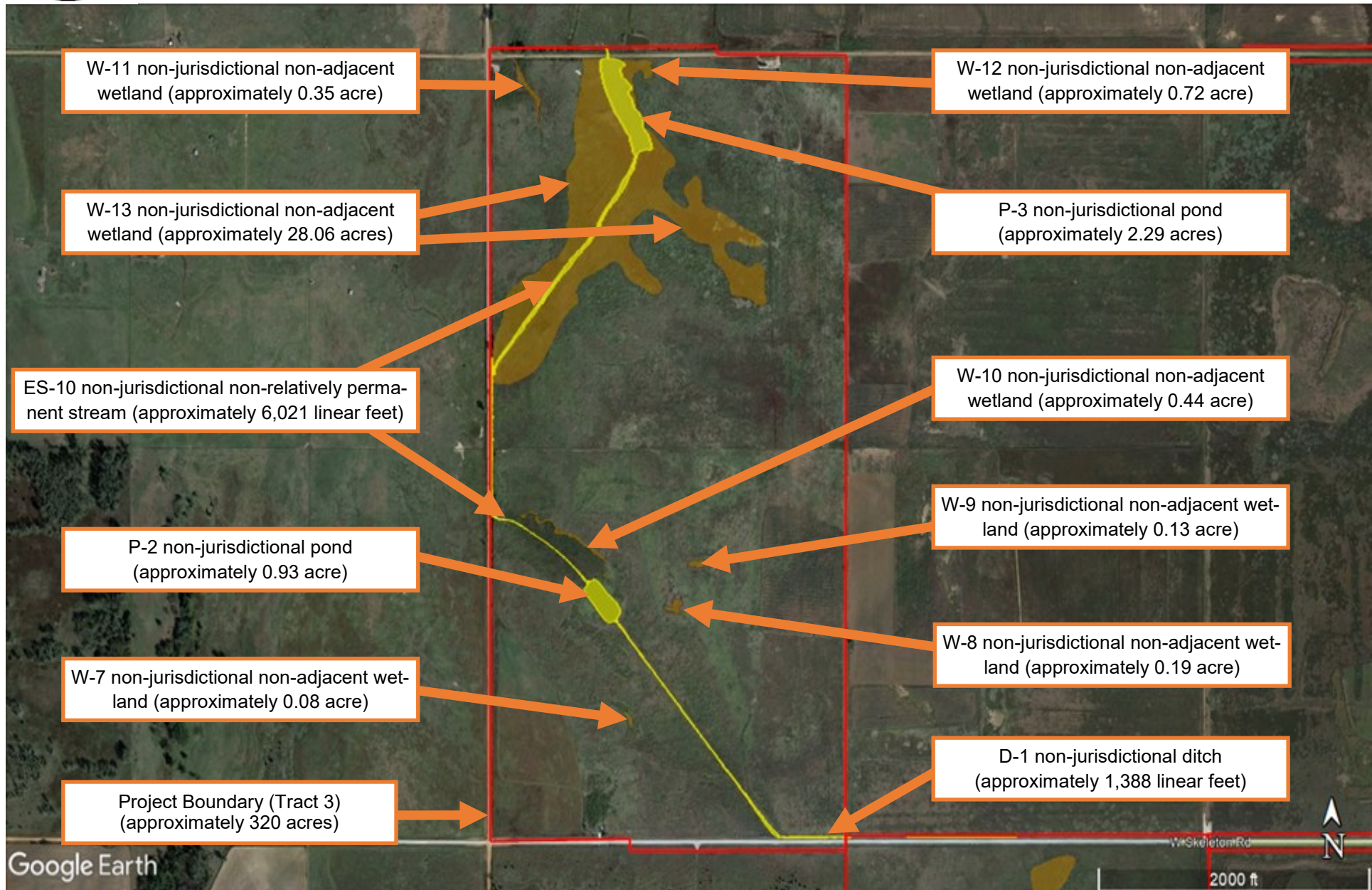
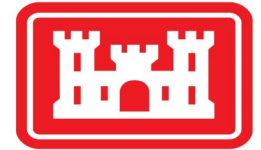


SWT-2019-00227
Approved Jurisdictional Determination
Ducks Unlimited Drummond Flats WMA
(Map 2 of 6)



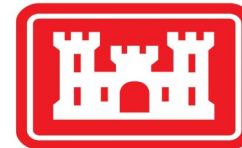


SWT-2019-00227
Approved Jurisdictional Determination
Ducks Unlimited Drummond Flats WMA
(Map 3 of 6)



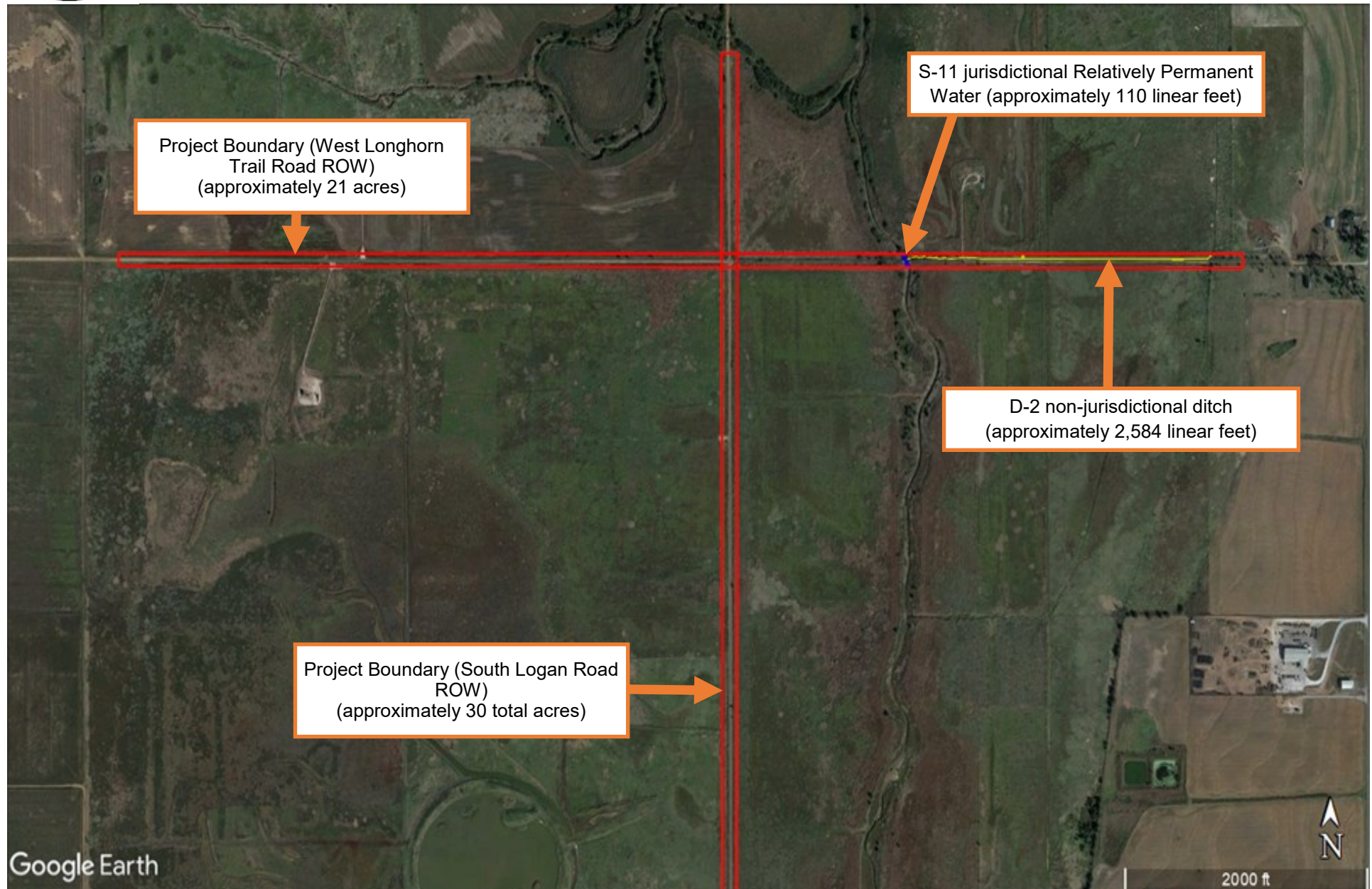
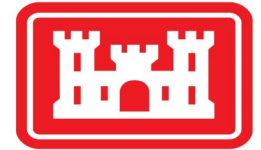


SWT-2019-00227
Approved Jurisdictional Determination
Ducks Unlimited Drummond Flats WMA
(Map 4 of 6)





SWT-2019-00227
Approved Jurisdictional Determination
Ducks Unlimited Drummond Flats WMA
(Map 5 of 6)





SWT-2019-00227
Approved Jurisdictional Determination
Ducks Unlimited Drummond Flats WMA
(Map 6 of 6)

