CROW BUTTE RESOURCES, INC.

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December 9, 2002

Mr. Michael Linder, Director
Nebraska Department of Environmental Quality
P.O. Box 98922
Lincoln, NE 68509-8922

Docket to 04008943

Subject: Class III UIC Permit Neo122611
CM5-11 Monitor Well Excursion 90 Day Report

Dear Mr. Linder:

By way of background, on September 10, 2002, during routine biweekly water sampling of Crow Butte Resources, Inc. (CBR) perimeter monitor well CM5-11, the multiple parameter upper control limit (UCL) was exceeded for chloride, sodium, sulfate, conductivity and alkalinity. As required by Footnote C.1 of Part II of UIC Permit NE0122611, a second sample was collected within 24 hours and analyzed for the five excursion indicator parameters. The results of the second sample exceeded the multiple UCL for chloride, sodium, sulfate, conductivity, and alkalinity.

CBR notified Mr. Dave Miesbach by telephone on September 12, 2002 of the confirmation of the excursion and submitted a letter to NDEQ Director Mr. Michael Linder on September 13, 2002. As required by footnote C.1, laboratory results for the sample analysis for CM5-11 are attached. In addition, graphs are attached for the five excursion indicator parameters and water levels that cover the period from May 1, 2002 through December 3, 2002.

As detailed in the September 13, 2002 memo, attempts at drawing back the plume through the lower portion of the sand were unsuccessful. Therefore, CBR recompleted well P-1167 in an effort to generate a hydrologic sink in the upper portion of the sand. Well P-1167 was placed back on-line on September 3, 2002 at approximately 45 gpm and the concentration of monitored parameters at well CM5-11 began to decrease slowly. However, by late October, the concentration of all monitored parameters at CM5-11 began to increase again even though there had been no change in the pumping rate in the area. Water level readings taken on November 21 made it apparent that the hydrologic sink was pulling the plume across CM5-11 from the east to the west (see Figure 1). Therefore, beginning on November 22, 2002, an effort was made to change the flow of water to a more southerly direction with the purpose of drawing the plume back into the wellfield at a ninety-degree angle instead of across CM5-11. Production from well 1181 was initiated on November 22, 2002 at 24 gpm. Western production wells 1179, 1253, and 1203 were shut off at approximately the same time. Although this reduced the total bleed from 79 gpm to 72 gpm, the angle of pull was adjusted from westerly to southerly.

The change in pull direction resulted in an immediate and significant reduction in the concentration of all monitored parameters at well CM5-11. Although CM5-11 remains on excursion, the most recent sample, taken on December 3, 2002 confirms that recovery of the excursion continues at a rapid pace.

NMSS01

UIC Permit NE0122611 Part II(B)(1) states in part, *"If corrective actions have not been effective within 90 days of the excursion confirmation, the injection of fluid shall be terminated in the affected area. Resumption of injection shall require a written approval by the Director."* The areas of injection closest to well CM5-11 are 940 feet to the west in Wellhouse 20 (well 1255) and 1,070 feet to the south in Wellhouse 14 (well 766). Injection at this distance from CM5-11 will have virtually no impact on the excursion or on attempts to recover the excursion; especially since the injection flow rate is balanced against the production flow rate. Therefore, CBR requests with this letter, written approval from the Director to continue injection.

If you have any questions regarding this submittal please feel free to contact Mike Griffin or me at (308) 665-2215.

Sincerely,
Crow Butte Resources, Inc.

John W. Cash
Senior Environmental/Safety Coordinator

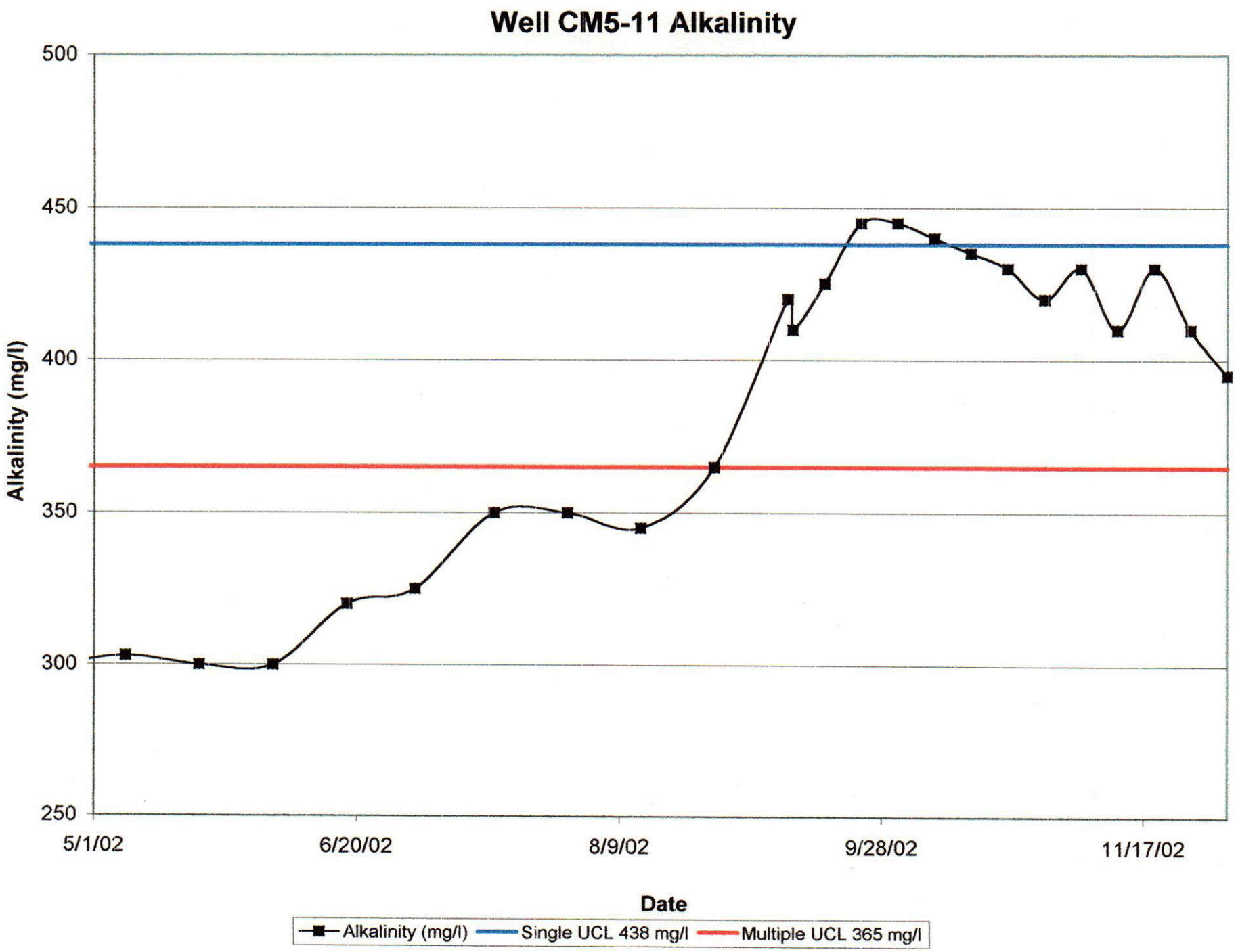
Enclosures: As Stated

cc: Mr. Dave Carlson
NDEQ Chadron Office

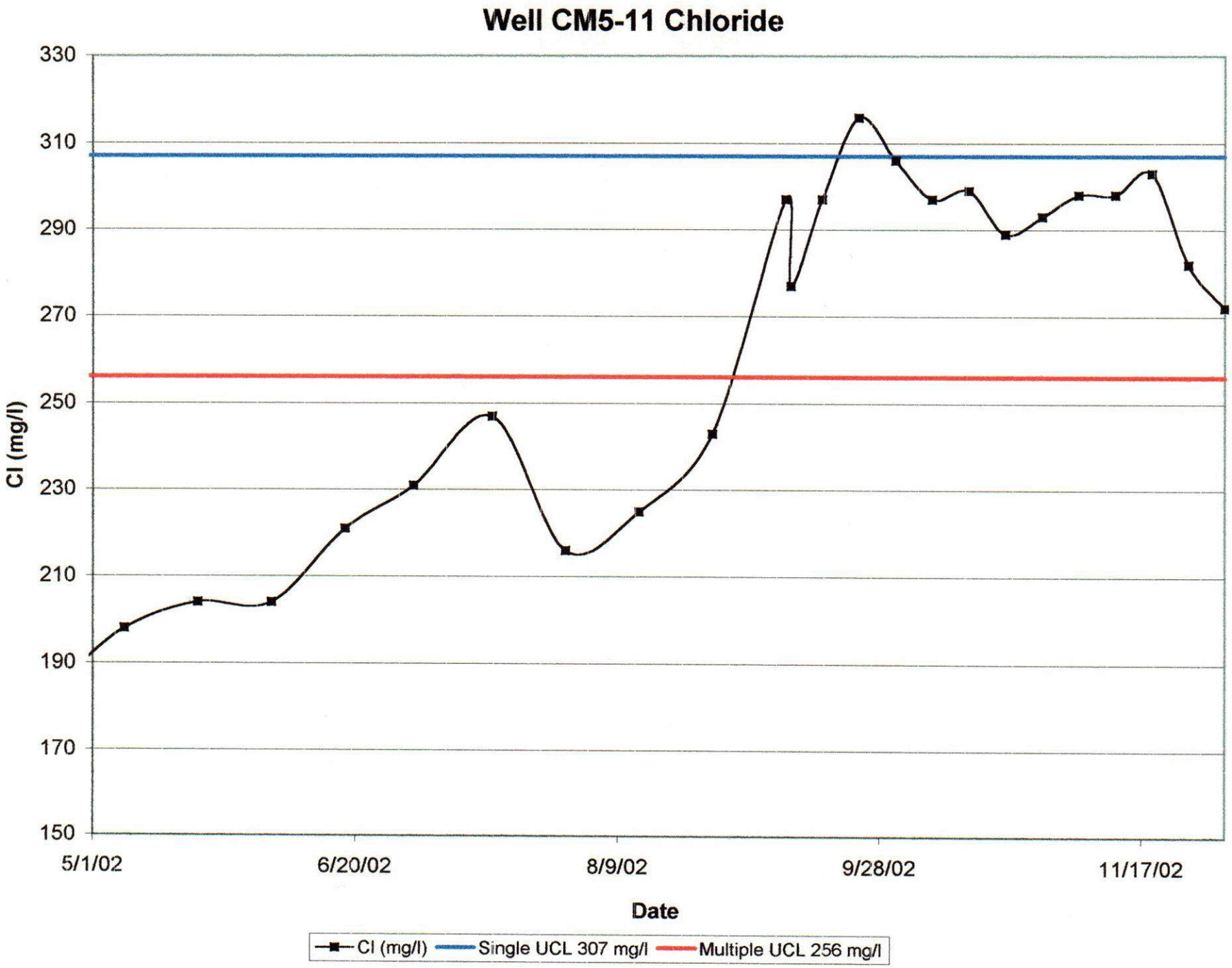
Mr. Steve Collings
CBR, Denver, Colorado

Mr. Daniel Gillen
Branch Chief, Fuel Cycle Licensing Branch
Division of Fuel Cycle Safety and Safeguards
c/o Document Control Desk
U. S. Nuclear Regulatory Commission
Washington D.C. 20555

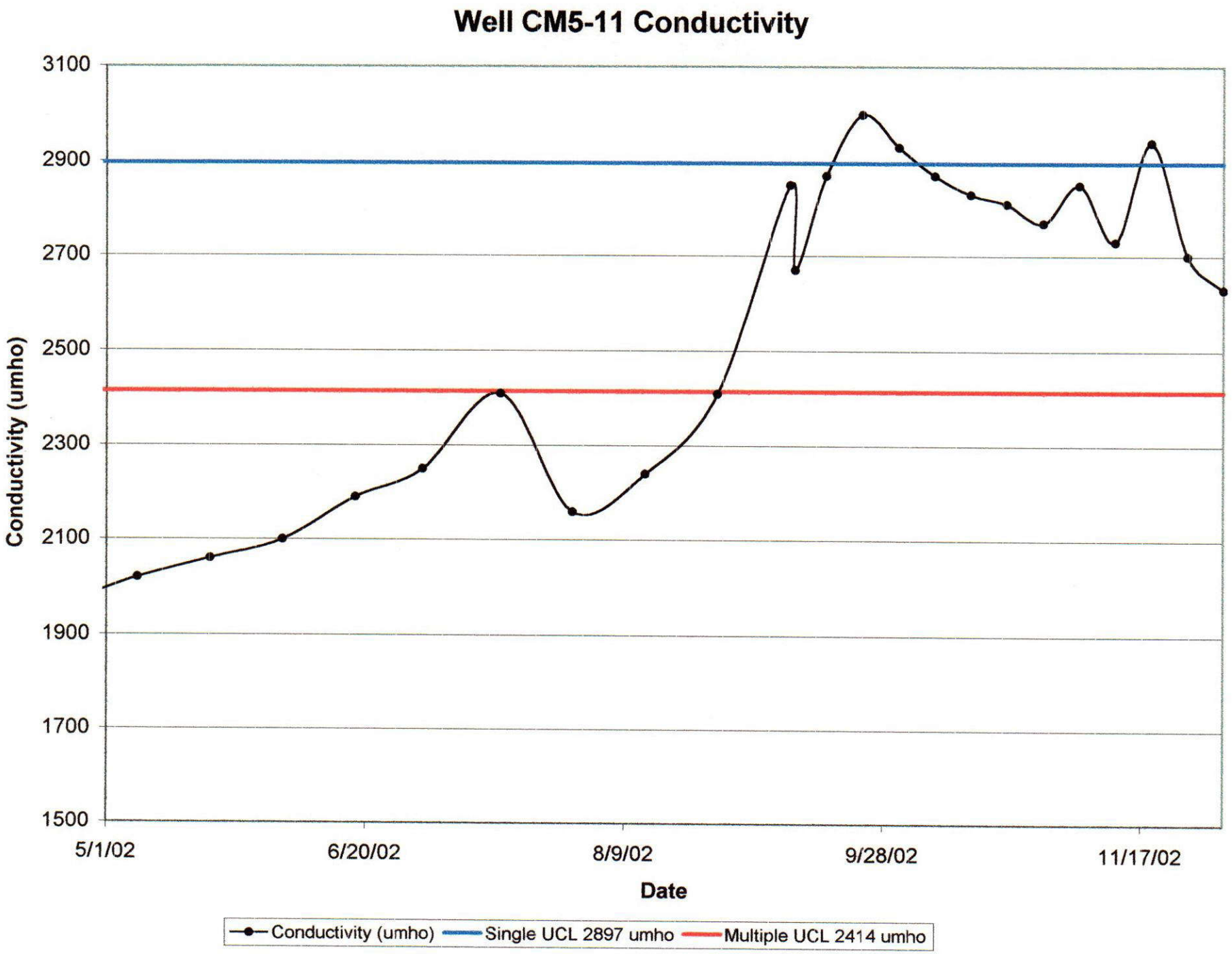
U.S. Nuclear Regulatory Commission
Mr. John Lusher – ADDRESSEE ONLY
Fuel Cycle Licensing Branch
Mail Stop T-8A33
Washington D.C. 20555


Well CM5-11 Alkalinity
500
450
400
350
300
250
Alkalinity (mg/l)
5/1/02
6/20/02
8/9/02
9/28/02
11/17/02
Date
Alkalinity (mg/l)
Single UCL 438 mg/l
Multiple UCL 365 mg/l

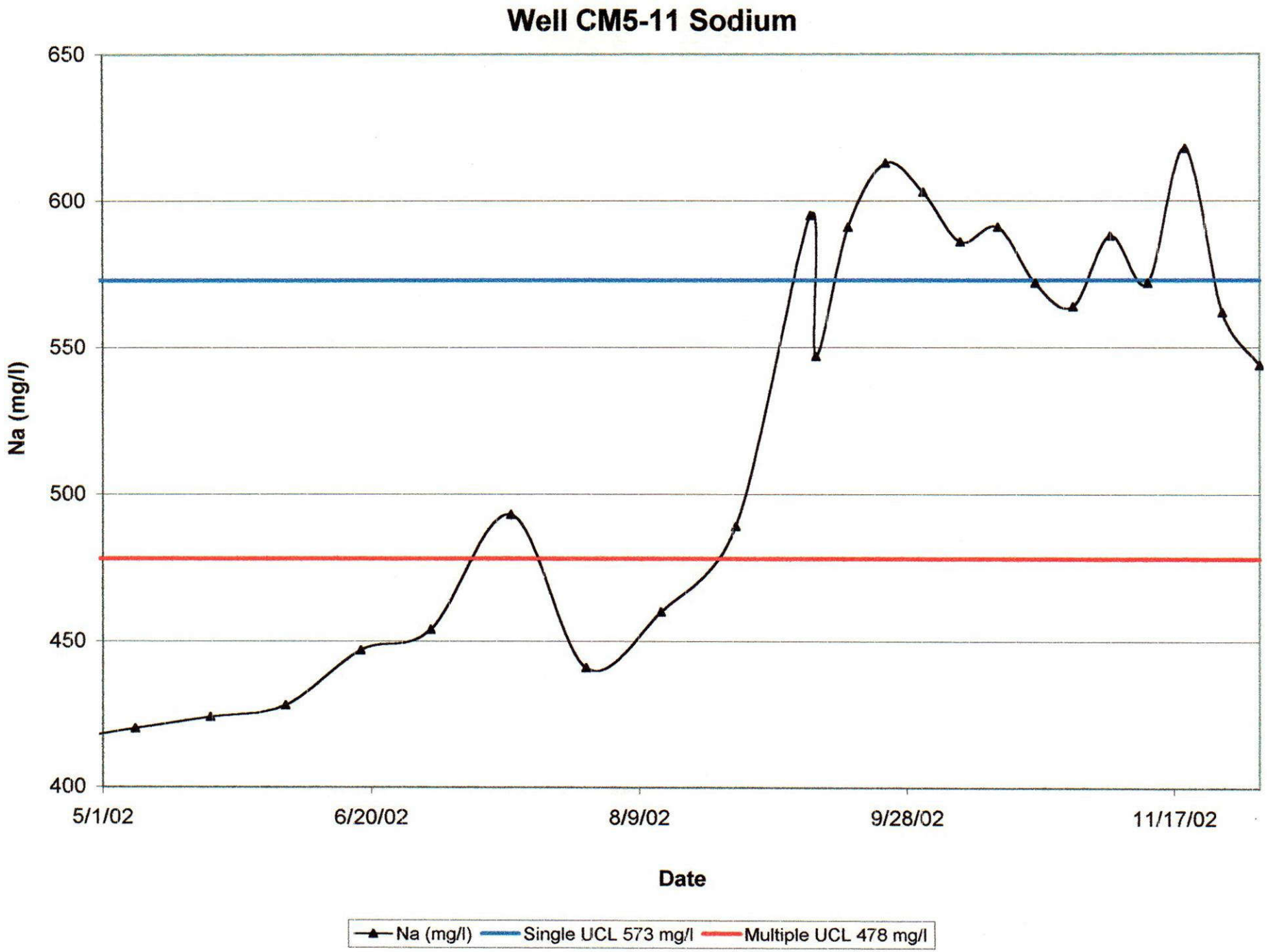
C01


Well CM5-11 Chloride
330
310
290
270
250
230
210
190
170
150
Cl (mg/l)
5/1/02
6/20/02
8/9/02
9/28/02
11/17/02
Date
Cl (mg/l)
Single UCL 307 mg/l
Multiple UCL 256 mg/l

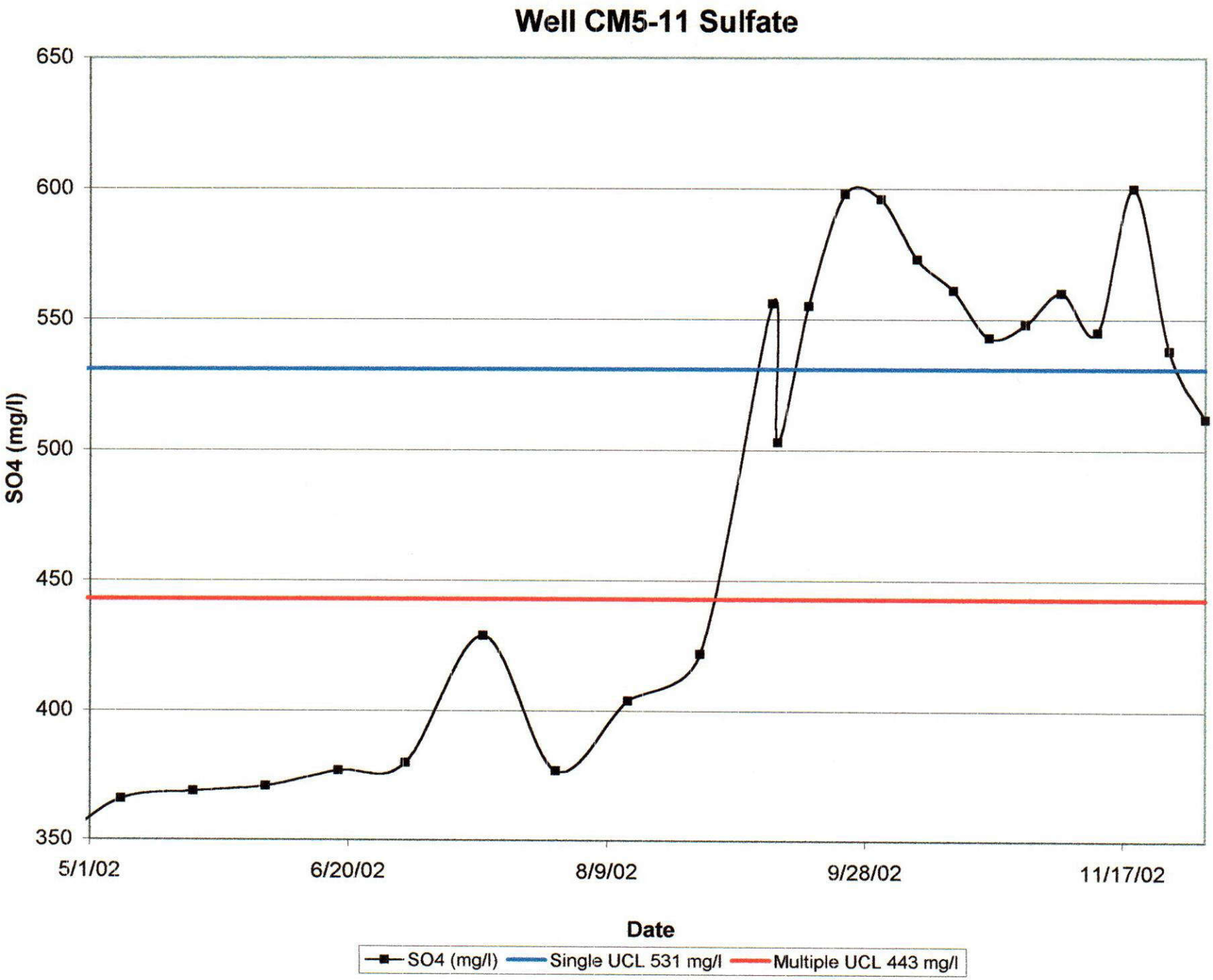
C02


Well CM5-11 Conductivity
3100
2900
2700
2500
2300
2100
1900
1700
1500
Conductivity (umho)
5/1/02
6/20/02
8/9/02
9/28/02
11/17/02
Date
Conductivity (umho)
Single UCL 2897 umho
Multiple UCL 2414 umho

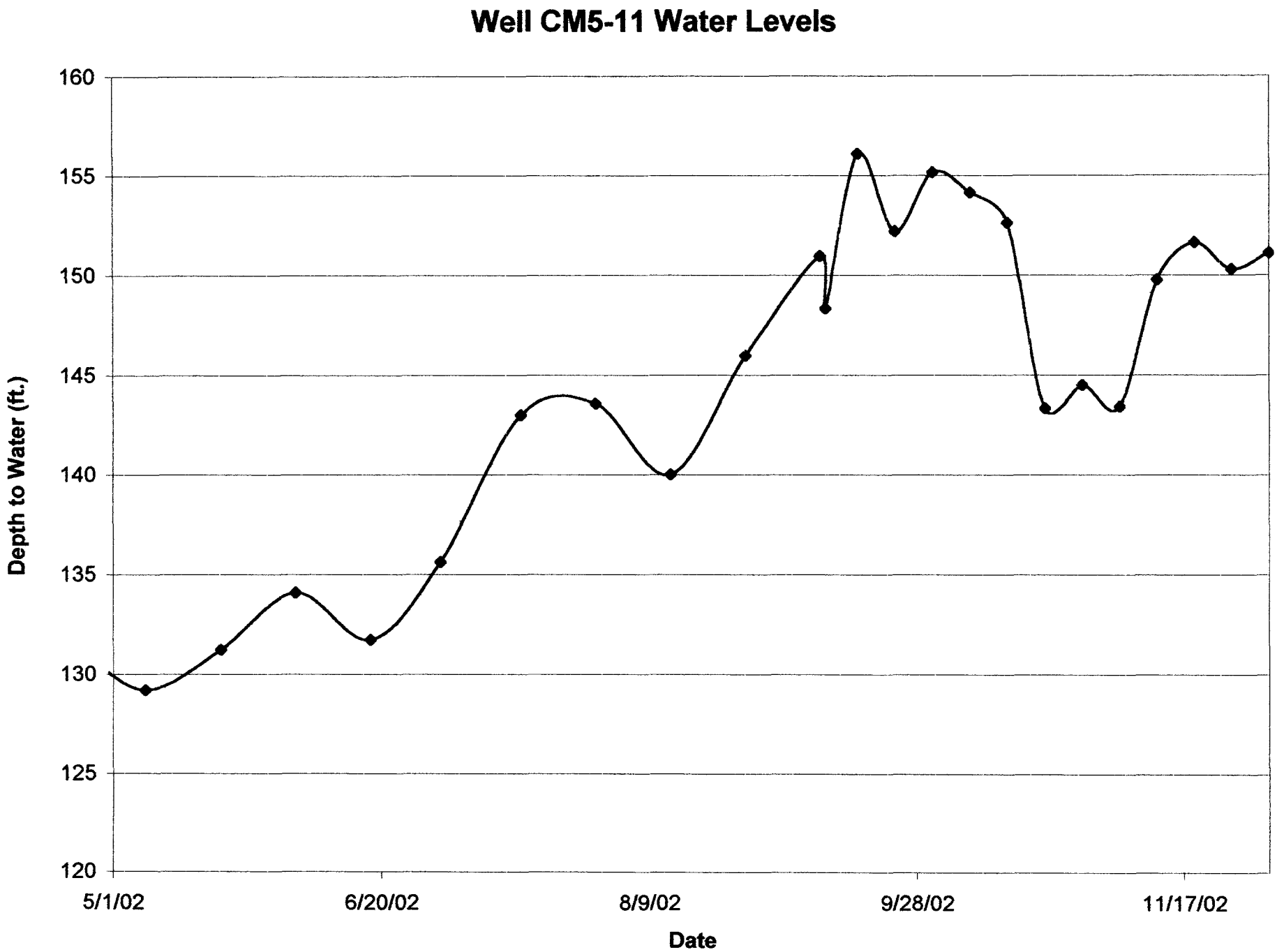
C03


Well CM5-11 Sodium
650
600
550
500
450
400
Na (mg/l)
5/1/02
6/20/02
8/9/02
9/28/02
11/17/02
Date
Na (mg/l)
Single UCL 573 mg/l
Multiple UCL 478 mg/l

C04


Well CM5-11 Sulfate
650
600
550
500
450
400
350
SO4 (mg/l)
5/1/02
6/20/02
8/9/02
9/28/02
11/17/02
Date
SO4 (mg/l)
Single UCL 531 mg/l
Multiple UCL 443 mg/l

C05


Well CM5-11 Water Levels
160
155
150
145
140
135
130
125
120
Depth to Water (ft.)
5/1/02
6/20/02
8/9/02
9/28/02
11/17/02
Date

Crow Butte Project
Monitor Well Laboratory Report

Page Number 2/2 Sample Date: 09-17-2002 Analyst: LG/TF
Analysis Date: 09-18-2002

Well Number	Sodium (mg/L)	Sulfate (mg/L)	Chloride (mg/L)	Conductivity (UMHOS)	Alkalinity (mg/L)
CM4-3	417	342	208	2050	330
Multiple	496	402	316	2676	372
Single	595	482	379	3211	446
CM4-4	376	319	177	1840	310
Multiple	491	390	258	2502	361
Single	589	468	310	3002	433
CM4-5	374	322	181	1850	300
Multiple	493	395	280	2642	344
Single	592	474	336	3171	413
CM4-6	377	327	179	1850	305
Multiple	445	402	220	2344	337
Single	534	482	264	2812	405
CM4-7	377	328	181	1860	305
Multiple	514	394	341	2777	348
Single	616	472	409	3332	418
CM7-2	380	322	177	1860	300
Multiple	492	408	296	2448	354
Single	590	490	356	2938	425
CM7-3	380	315	181	1860	300
Multiple	524	409	317	2544	372
Single	629	491	380	3053	446
CM7-4	374	318	181	1850	305
Multiple	463	379	241	2257	359
Single	556	455	289	2709	431
CM7-5	389	327	181	1900	310
Multiple	484	391	277	2368	366
Single	580	469	333	2841	439
CM7-6	384	324	180	1880	310
Multiple	484	397	263	2356	362
Single	580	477	315	2827	435
CM5-11	591*	555*	297*	2870*	425
Multiple	478	443	256	2414	365
Single	573	531	307	2897	438

* - Denotes 5% change from previous sample.

Crow Butte Project
Monitor Well Laboratory Report

Sample Date: 09-24-2002
Analysis Date: 09-25-2002
Analyst: LG/TF

Well Number	Sodium (mg/L)	Sulfate (mg/L)	Chloride (mg/L)	Conductivity (UMHOS)	Alkalinity (mg/L)
CM5-6	393	332	181	1880	300
Multiple	475	433	244	2370	382
Single	570	520	292	2844	458
CM5-7	389	329	181	1900	305
Multiple	482	451	240	2392	361
Single	579	541	288	2870	433
CM5-8	400	349	179	1920	303
Multiple	475	449	241	2396	373
Single	570	539	289	2876	448
CM5-9	400	344	181	1920	305
Multiple	475	446	241	2387	361
Single	570	536	289	2864	433
CM5-10	395	349	181	1910	295
Multiple	480	460	277	2453	336
Single	576	552	333	2943	403
CM5-11	613	598*	316*	3000	445
Multiple	478	443	256	2414	365
Single	573	531	307	2897	438
CM5-12	399	342	179	1930	300
Multiple	494	452	269	2485	380
Single	593	543	323	2982	456
CM6-1	382	346	177	1890	290
Multiple	510	460	278	2640	360
Single	612	552	334	3168	432
CM6-2	397	358	183	1930	295
Multiple	485	461	233	2352	364
Single	582	553	279	2822	436
CM6-3	397	356	183	1940	300
Multiple	488	454	224	2340	367
Single	586	544	269	2808	441

* - Denotes 5% change from previous sample.

Crow Butte Project
Monitor Well Laboratory Report

Page Number 2/2 Sample Date: 10-01-2002 Analyst: LG/TF
Analysis Date: 10-02-2002

Well Number	Sodium (mg/L)	Sulfate (mg/L)	Chloride (mg/L)	Conductivity (UMHOS)	Alkalinity (mg/L)
CM4-3	416	356	208	2060	330
Multiple	496	402	316	2676	372
Single	595	482	379	3211	446
CM4-4	379	327	179	1840	305
Multiple	491	390	258	2502	361
Single	589	468	310	3002	433
CM4-5	375	334	182	1850	300
Multiple	493	395	280	2642	344
Single	592	474	336	3171	413
CM4-6	378	328	177	1850	305
Multiple	445	402	220	2344	337
Single	534	482	264	2812	405
CM4-7	384	331	181	1860	300
Multiple	514	394	341	2777	348
Single	616	472	409	3332	418
CM7-2	380	322	181	1860	300
Multiple	492	408	296	2448	354
Single	590	490	356	2938	425
CM7-3	381	320	181	1860	300
Multiple	524	409	317	2544	372
Single	629	491	380	3053	446
CM7-4	380	323	183	1850	305
Multiple	463	379	241	2257	359
Single	556	455	289	2709	431
CM7-5	388	328	183	1910	305
Multiple	484	391	277	2368	366
Single	580	469	333	2841	439
CM7-6	394	331	181	1880	310
Multiple	484	397	263	2356	362
Single	580	477	315	2827	435
CM5-11	603	596	306	2930	445
Multiple	478	443	256	2414	365
Single	573	531	307	2897	438

* - Denotes 5% change from previous sample.

Crow Butte Project
Monitor Well Laboratory Report

Sample Date: 10-08-2002
Analysis Date: 10-09-2002
Analyst: LG/TF

Well Number	Sodium (mg/L)	Sulfate (mg/L)	Chloride (mg/L)	Conductivity (UMHOS)	Alkalinity (mg/L)
CM5-6	394	329	179	1870	300
Multiple	475	433	244	2370	382
Single	570	520	292	2844	458
CM5-7	393	330	181	1890	305
Multiple	482	451	240	2392	361
Single	579	541	288	2870	433
CM5-8	398	338	179	1920	300
Multiple	475	449	241	2396	373
Single	570	539	289	2876	448
CM5-9	398	339	181	1920	305
Multiple	475	446	241	2387	361
Single	570	536	289	2864	433
CM5-10	390	353	183	1900	295
Multiple	480	460	277	2453	336
Single	576	552	333	2943	403
CM5-11	586	573	297	2870	440
Multiple	478	443	256	2414	365
Single	573	531	307	2897	438
CM5-12	401	341	179	1920	300
Multiple	494	452	269	2485	380
Single	593	543	323	2982	456
CM6-1	383	351	177	1880	290
Multiple	510	460	278	2640	360
Single	612	552	334	3168	432
CM6-2	396	356	185	1930	295
Multiple	485	461	233	2352	364
Single	582	553	279	2822	436
CM6-3	399	355	183	1940	300
Multiple	488	454	224	2340	367
Single	586	544	269	2808	441

* - Denotes 5% change from previous sample.

Crow Butte Project
Monitor Well Laboratory Report

Page Number 2/2 Sample Date: 10-15-2002 Analyst: LG/TF
Analysis Date: 10-16-2002

Well Number	Sodium (mg/L)	Sulfate (mg/L)	Chloride (mg/L)	Conductivity (UMHOS)	Alkalinity (mg/L)
CM4-3	435	356	212	2070	330
Multiple	496	402	316	2676	372
Single	595	482	379	3211	446
CM4-4	385	330	183	1850	310
Multiple	491	390	258	2502	361
Single	589	468	310	3002	433
CM4-5	379	331	181	1850	300
Multiple	493	395	280	2642	344
Single	592	474	336	3171	413
CM4-6	381	332	181	1860	305
Multiple	445	402	220	2344	337
Single	534	482	264	2812	405
CM4-7	379	338	179	1850	300
Multiple	514	394	341	2777	348
Single	616	472	409	3332	418
CM7-2	382	321	181	1860	300
Multiple	492	408	296	2448	354
Single	590	490	356	2938	425
CM7-3	382	324	181	1860	300
Multiple	524	409	317	2544	372
Single	629	491	380	3053	446
CM7-4	380	321	183	1840	305
Multiple	463	379	241	2257	359
Single	556	455	289	2709	431
CM7-5	395	327	181	1920	305
Multiple	484	391	277	2368	366
Single	580	469	333	2841	439
CM7-6	390	325	181	1880	310
Multiple	484	397	263	2356	362
Single	580	477	315	2827	435
CM5-11	591	561	299	2830	435
Multiple	478	443	256	2414	365
Single	573	531	307	2897	438
SM7-3	91*	37*	3.9*	460*	175*
Multiple	119	52	29	583	214
Single	143	63	35	700	256

* - Denotes 5% change from previous sample.

Crow Butte Project
Monitor Well Laboratory Report

Page Number 2/2 Sample Date: 10-22-2002 Analyst: LG/TF
Analysis Date: 10-23-2002

Well Number	Sodium (mg/L)	Sulfate (mg/L)	Chloride (mg/L)	Conductivity (UMHOS)	Alkalinity (mg/L)
CM5-6	401	338	181	1880	300
Multiple	475	433	244	2370	382
Single	570	520	292	2844	458
CM5-7	395	333	181	1890	305
Multiple	482	451	240	2392	361
Single	579	541	288	2870	433
CM5-8	402	339	181	1920	300
Multiple	475	449	241	2396	373
Single	570	539	289	2876	448
CM5-9	401	343	181	1910	305
Multiple	475	446	241	2387	361
Single	570	536	289	2864	433
CM5-10	394	355	181	1910	295
Multiple	480	460	277	2453	336
Single	576	552	333	2943	403
CM5-11	572	543	289	2810	430
Multiple	478	443	256	2414	365
Single	573	531	307	2897	438
CM5-12	399	341	181	1920	300
Multiple	494	452	269	2485	380
Single	593	543	323	2982	456
CM6-1	382	358	177	1890	290
Multiple	510	460	278	2640	360
Single	612	552	334	3168	432
CM6-2	397	355	182	1950	295
Multiple	485	461	233	2352	364
Single	582	553	279	2822	436
CM6-3	403	359	183	1960	300
Multiple	488	454	224	2340	367
Single	586	544	269	2808	441

* - Denotes 5% change from previous sample.

Crow Butte Project
Monitor Well Laboratory Report

Sample Date: 10-29-2002
Analysis Date: 10-30-2002
Analyst: LG-TF

Well Number	Sodium (mg/L)	Sulfate (mg/L)	Chloride (mg/L)	Conductivity (UMHOS)	Alkalinity (mg/L)
CM4-3	435	366	214	2060	330
Multiple	496	402	316	2676	372
Single	595	482	379	3211	446
CM4-4	386	330	181	1840	310
Multiple	491	390	258	2502	361
Single	589	468	310	3002	433
CM4-5	383	331	181	1850	300
Multiple	493	395	280	2642	344
Single	592	474	336	3171	413
CM4-6	385	331	181	1850	305
Multiple	445	402	220	2344	337
Single	534	482	264	2812	405
CM4-7	387	333	178	1860	300
Multiple	514	394	341	2777	348
Single	616	472	409	3332	418
CM7-2	389	327	181	1860	300
Multiple	492	408	296	2448	354
Single	590	490	356	2938	425
CM7-3	384	324	181	1860	300
Multiple	524	409	317	2544	372
Single	629	491	380	3053	446
CM7-4	381	319	183	1850	307
Multiple	463	379	241	2257	359
Single	556	455	289	2709	431
CM7-5	393	325	181	1920	305
Multiple	484	391	277	2368	366
Single	580	469	333	2841	439
CM7-6	391	324	181	1880	310
Multiple	484	397	263	2356	362
Single	580	477	315	2827	435
CM5-11	564	548	293	2770	420
Multiple	478	443	256	2414	365
Single	573	531	307	2897	438
SM7-3					
Multiple	119	52	29	583	214
Single	143	63	35	700	256

* - Denotes 5% change from previous sample.

Crow Butte Project
Monitor Well Laboratory Report

Page Number 2/2 Sample Date: 11-05-2002 Analyst: LG/TF
Analysis Date: 11-06-2002

Well Number	Sodium (mg/L)	Sulfate (mg/L)	Chloride (mg/L)	Conductivity (UMHOS)	Alkalinity (mg/L)
CM5-6	397	332	179	1870	305
Multiple	475	433	244	2370	382
Single	570	520	292	2844	458
CM5-7	395	338	181	1890	305
Multiple	482	451	240	2392	361
Single	579	541	288	2870	433
CM5-8	400	355	181	1920	300
Multiple	475	449	241	2396	373
Single	570	539	289	2876	448
CM5-9	399	346	181	1910	305
Multiple	475	446	241	2387	361
Single	570	536	289	2864	433
CM5-10	397	352	181	1900	295
Multiple	480	460	277	2453	336
Single	576	552	333	2943	403
CM5-11	588	560	298	2850	430
Multiple	478	443	256	2414	365
Single	573	531	307	2897	438
CM5-12	400	353	181	1920	300
Multiple	494	452	269	2485	380
Single	593	543	323	2982	456
CM6-1	383	361	175	1870	290
Multiple	510	460	278	2640	360
Single	612	552	334	3168	432
CM6-2	396	365	183	1940	295
Multiple	485	461	233	2352	364
Single	582	553	279	2822	436
CM6-3	404	364	181	1950	300
Multiple	488	454	224	2340	367
Single	586	544	269	2808	441

* - Denotes 5% change from previous sample.

Crow Butte Project
Monitor Well Laboratory Report

Sample Date: 11-12-2002
Analysis Date: 11-13-2002
Analyst: LG/TF

Well Number	Sodium (mg/L)	Sulfate (mg/L)	Chloride (mg/L)	Conductivity (UMHOS)	Alkalinity (mg/L)
CM4-3	433	370	216	2110	330
Multiple	496	402	316	2676	372
Single	595	482	379	3211	446
CM4-4	386	327	181	1850	300
Multiple	491	390	258	2502	361
Single	589	468	310	3002	433
CM4-5	381	330	181	1850	300
Multiple	493	395	280	2642	344
Single	592	474	336	3171	413
CM4-6	381	336	181	1860	300
Multiple	445	402	220	2344	337
Single	534	482	264	2812	405
CM4-7	385	332	182	1860	300
Multiple	514	394	341	2777	348
Single	616	472	409	3332	418
CM7-2	389	329	183	1870	300
Multiple	492	408	296	2448	354
Single	590	490	356	2938	425
CM7-3	385	327	181	1860	300
Multiple	524	409	317	2544	372
Single	629	491	380	3053	446
CM7-4	382	321	183	1860	305
Multiple	463	379	241	2257	359
Single	556	455	289	2709	431
CM7-5	393	332	183	1890	305
Multiple	484	391	277	2368	366
Single	580	469	333	2841	439
CM7-6	390	325	181	1880	305
Multiple	484	397	263	2356	362
Single	580	477	315	2827	435
CM5-11	572	545	298	2730	410
Multiple	478	443	256	2414	365
Single	573	531	307	2897	438

* - Denotes 5% change from previous sample.

Crow Butte Project
Monitor Well Laboratory Report

Page Number 2/2 Sample Date: 11-19-2002 Analyst: LG/TF
Analysis Date: 11-20-2002

Well Number	Sodium (mg/L)	Sulfate (mg/L)	Chloride (mg/L)	Conductivity (UMHOS)	Alkalinity (mg/L)
CM5-6	398	329	179	1890	305
Multiple	475	433	244	2370	382
Single	570	520	292	2844	458
CM5-7	398	335	181	1890	305
Multiple	482	451	240	2392	361
Single	579	541	288	2870	433
CM5-8	402	347	181	1920	300
Multiple	475	449	241	2396	373
Single	570	539	289	2876	448
CM5-9	399	343	179	1910	303
Multiple	475	446	241	2387	361
Single	570	536	289	2864	433
CM5-10	395	358	181	1910	295
Multiple	480	460	277	2453	336
Single	576	552	333	2943	403
CM5-11	618*	600*	303	2940*	430
Multiple	478	443	256	2414	365
Single	573	531	307	2897	438
CM5-12	404	362	181	1920	300
Multiple	494	452	269	2485	380
Single	593	543	323	2982	456
CM6-1	390	360	180	1890	290
Multiple	510	460	278	2640	360
Single	612	552	334	3168	432
CM6-2	404	358	179	1930	295
Multiple	485	461	233	2352	364
Single	582	553	279	2822	436
CM6-3	410	364	181	1940	303
Multiple	488	454	224	2340	367
Single	586	544	269	2808	441

* - Denotes 5% change from previous sample.

Crow Butte Project
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Page Number 2/2 Sample Date: 11-26-2002 Analyst: LG/TF
Analysis Date: 11-27-2002

Well Number	Sodium (mg/L)	Sulfate (mg/L)	Chloride (mg/L)	Conductivity (UMHOS)	Alkalinity (mg/L)
CM7-9	396	350	181	1910	305
Multiple	490	406	252	2344	350
Single	588	487	302	2812	420
CM7-10	394	363	187	1940	295
Multiple	497	425	247	2398	378
Single	596	510	297	2877	454
CM7-11	391	362	179	1930	290
Multiple	475	444	234	2347	360
Single	570	533	281	2817	432
CM7-12	399	353	185	1950	305
Multiple	472	434	241	2328	352
Single	566	521	289	2794	422
CM7-13	400	362	183	1960	295
Multiple	491	451	239	2368	364
Single	589	541	287	2841	436
CM7-14	402	373	181	1950	290
Multiple	468	466	228	2310	352
Single	562	559	274	2772	422
CM7-15	409	367	188	1970	300
Multiple	490	443	236	2352	360
Single	588	531	284	2822	432
CM7-16	440	374	200	2110	330
Multiple	500	428	234	2359	367
Single	600	514	281	2831	441
PR-8	391*	319*	144*	1850*	360
Multiple	504	440	235	2388	403
Single	605	528	282	2866	484
PR-15	259*	195*	76*	1240*	290*
Multiple	492	428	223	2327	370
Single	590	514	268	2792	444
IJ-13	437	406	169	2100	380
Multiple	492	442	232	2417	346
Single	590	530	278	2900	415
SM7-23	108	69	6.6	550	180
Multiple	134	54	50	708	232
Single	161	65	59	850	278
CM5-11	562*	538*	282*	2700*	410
Multiple	478	443	256	2414	365
Single	573	531	307	2897	438

* - Denotes 5% change from previous sample.

Crow Butte Project
Monitor Well Laboratory Report

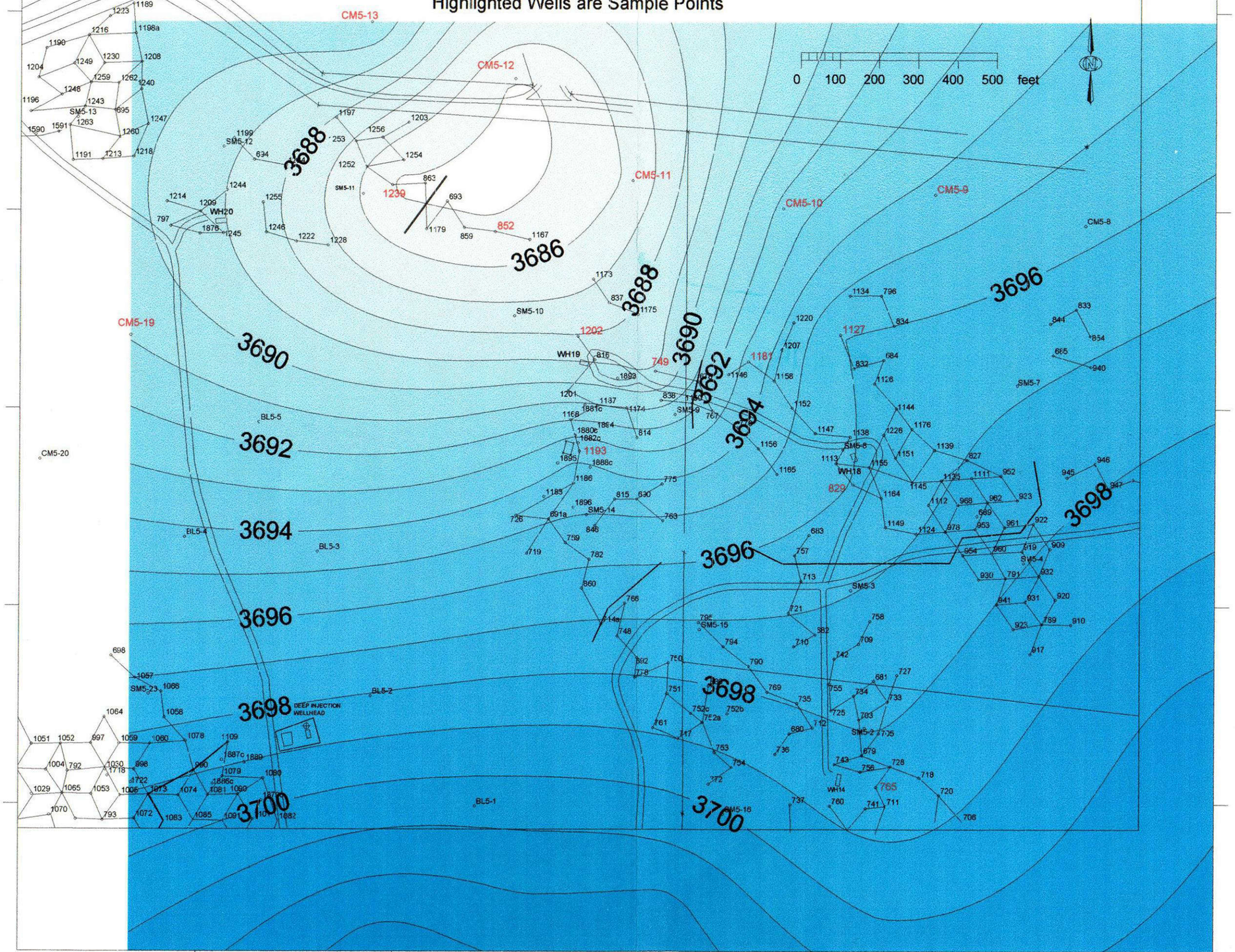
Page Number 2/2 Sample Date: 12-03-2002 Analyst: LG/TF
Analysis Date: 12-04-2002

Well Number	Sodium (mg/L)	Sulfate (mg/L)	Chloride (mg/L)	Conductivity (UMHOS)	Alkalinity (mg/L)
CM5-6	398	325	181	1890	305
Multiple	475	433	244	2370	382
Single	570	520	292	2844	458
CM5-7	398	334	181	1900	300
Multiple	482	451	240	2392	361
Single	579	541	288	2870	433
CM5-8	406	352	181	1920	300
Multiple	475	449	241	2396	373
Single	570	539	289	2876	448
CM5-9	399	343	181	1910	300
Multiple	475	446	241	2387	361
Single	570	536	289	2864	433
CM5-10	399	354	181	1900	295
Multiple	480	460	277	2453	336
Single	576	552	333	2943	403
CM5-11	544	512	272	2630	395
Multiple	478	443	256	2414	365
Single	573	531	307	2897	438
CM5-12	404	354	179	1930	295
Multiple	494	452	269	2485	380
Single	593	543	323	2982	456
CM6-1	388	363	179	1890	290
Multiple	510	460	278	2640	360
Single	612	552	334	3168	432
CM6-2	403	360	180	1940	295
Multiple	485	461	233	2352	364
Single	582	553	279	2822	436
CM6-3	411	366	181	1950	300
Multiple	488	454	224	2340	367
Single	586	544	269	2808	441

* - Denotes 5% change from previous sample.

FIGURE 1

Waterlevel Measurements Taken on November 21, 2002
Highlighted Wells are Sample Points



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