Approved: Kull Approved:

MEMO

To: Kristopher Byrd, Well Construction and Compliance Section Manager

From: Travis Kelly, Well Construction Compliance Coordinator

Subject: Review of Water Right Application G-19047

Date: February 9, 2022

The attached application was forwarded to the Well Construction and Compliance Section by the Groundwater Section. Halley Schibel and Travis Brown reviewed the application. Please see Halley and Travis' Groundwater Review.

Applicant's Well #1 (Proposed Well): Applicant's Well #1 is a proposed well, therefore it cannot be reviewed for construction. Construction of this proposed well shall be completed in a manner that protects ground water resources as required under Oregon Administrative Rules 690-200 through 690-240. During construction of this well, specific attention should be paid to ensure sealing requirements are met and that the well does not commingle aquifers.

The construction of applicant's proposed Well #1 may not satisfy hydraulic connection issues.

Groundwater Application Review Summary Form

Application # G- <u>19047</u>
GW Reviewer Halley Schibel/Travis Brown Date Review Completed: 12/14/2021
Summary of GW Availability and Injury Review:
Groundwater for the proposed use is either over appropriated, will not likely be available in the amounts requested without injury to prior water rights, OR will not likely be available within the capacity of the groundwater resource per Section B of the attached review form.
Summary of Potential for Substantial Interference Review:
\square There is the potential for substantial interference per Section C of the attached review form.
Summary of Well Construction Assessment:
☐ The well does not appear to meet current well construction standards per Section D of the attached review form. Route through Well Construction and Compliance Section.
This is only a summary. Documentation is attached and should be read thoroughly to understand the basis for determinations and for conditions that may be necessary for a permit (if one is issued).

WATER RESOURCES DEPARTMENT

MEM	О			_12/14/2021_								
то:		Applica	tion G-	19047								
FROM	1 :	GW: <u>H</u>	alley Scl Reviewer		avis Brov	<u>wn</u> _						
SUBJ	ECT: S	cenic Wa	aterway	Interf	erence l	Evaluat	ion					
	YES NO		source o		-	is hydr	aulically	y connec	cted to a	state S	Scenic	
	 □ YES □ NO Use the Scenic Waterway Condition (Condition 7J) 											
	interfer	RS 390.8 rence with rence is d	n surfac	e water	that con					_		
	interfer Depart propos	RS 390.83 rence with tment is sed use hin the fr	h surfac unable will me	e water to find easurab	that cor that the ly redu	ntributes ere is a p ace the	to a sce prepone surface	enic wat derance water	erway; t	therefo	re, the at the	
Calcula per crite	te the per eria in 39	ON OF II centage of 0.835, do r s unable to	consump 10t fill in	tive use b the table	y month c but check	the "und	ıble" optic					
Water	way by	is permit the follow flow is re	wing an			•					use by v	which
Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec]

PUBLIC INTEREST REVIEW FOR GROUNDWATER APPLICATIONS

TO: FROM:			Rights Sec			Hallan (S -1-:11/T		12/14/	2021		
FKUM	:	Groun	idwaler Sec	110II			Schibel/Tray wer's Name	vis Brown				
SUBJE	CT:	Appli	cation G-	19047_	S	Supersede	s review of	f				
										Date of Rev	iew(s)	
OAR 69 welfare, to determ	90-310-13 safety and mine whet	0 (1) <i>T d healt</i> ther the	h as describe presumption	ent shall pro ed in ORS 5 n is establis	esume that 337.525. De hed. OAR	<i>a proposed</i> epartment s 690-310-1	d groundwa staff review 40 allows th	groundwater ne proposed u	nsure the prese applications u use be modified ties in place at	nder OAR or condit	690-310 ioned to r	-140 meet
A. <u>GEN</u>	NERAL	<u>INFO</u>	RMATION		plicant's Na unty:			Vestern US 1	Inc. c/o Rob F	reeman		
A1.	Applican	ıt(s) see	ek(s) <u>0.07</u>	cfs from	_1	well(s) in the	Willamette				Basin,
	N	Iolalla-	Pudding			subba	sin					
A2.	Proposed	l use _	Comi	nercial		Seaso	nality: <u>Ye</u>	ear round				
A3.	Well and	l aquife	er data (attac	h and nun	ber logs fo	or existing	wells; mar	k proposed	wells as such ı	ınder logi	d):	
Well	Logic	d	Applicant's Well #	Propose	ed Aquifer*	Propo Rate(Location (T/R-S QQ-0		on, metes a N, 1200' E		
1	PROP000		1	Al	luvium	0.0		6S/2W-17-SES		S, 1900'W fi		
* Alluviu	ım, CRB, I	Bedrock										
Well	Well Elev ft msl	First Wate ft bla	ft bls	SWL Date	Well Depth (ft)	Seal Interval (ft)	Casing Intervals (ft)	Liner Intervals (ft)	Perforations Or Screens (ft)	Well Yield (gpm)	Draw Down (ft)	Test Type
Use data	from appli	80**	or proposed w	ells	300	0-150	0-300	-	TBD	-	-	-
A4.	Commendirectly a 4171, aprirrigate 4	nts: ** adjacen proxim 5.1 acı	Based on neut to fields be lately 450 fee es. The close	arby well Marby well Marby well Marby well Marby well well well more well well well well well well well we	d under cer thwest, wh tion well is	rtificates 24 ich is a 10 MARI 410	4695, 29154 5 ft deep we 60, which is	l, and 50614. ell drawing w State Observ	f Brooks, less to The closest we rater from alluvization Well 616 proposed well.	ell identifi vium and i	ed is MA s being us	RI sed to
A5.	managen (Not all l Commen	nent of pasin ru nts: <u>Th</u> basin r	ules contain : e proposed F ules do not a	r hydraulica such provis POA are gre pply.	ally connec ions.) eater than ½	ted to surfa	ace water [are, or 🗵	are not, activer source. Per C	ated by thi	s applica 502-0240	tion.
А6. 🗆	Name of	admin	istrative area	::					r limited by an			

B. GROUNDWATER AVAILABILITY CONSIDERATIONS, OAR 690-310-130, 400-010, 410-0070

B1.	Bas	ed upon available data, I have determined that groundwater* for the proposed use:
	a.	\Box is over appropriated, \Box is not over appropriated, or \boxtimes cannot be determined to be over appropriated during any period of the proposed use. * This finding is limited to the groundwater portion of the over-appropriation determination as prescribed in OAR 690-310-130;
	b.	\square will not or \square will likely be available in the amounts requested without injury to prior water rights. * This finding is limited to the groundwater portion of the injury determination as prescribed in OAR 690-310-130;
	c.	\square will not or \square will likely to be available within the capacity of the groundwater resource; or
	d.	 i. □ The permit should contain conditioned as indicated in item 2 below. iii. □ The permit should contain special condition(s) as indicated in item 3 below;
B2.	a.	☐ Condition to allow groundwater production from no deeper than ft. below land surface;
	b.	☐ Condition to allow groundwater production from no shallower than ft. below land surface;
	c.	✓ Condition to allow groundwater production only from the groundwater reservoir between approximately ft. and ft. below land surface; ft. and ft. below
	d.	 □ Well reconstruction is necessary to accomplish one or more of the above conditions. The problems that are likely to occur with this use and without reconstructing are cited below. Without reconstruction, I recommend withholding issuance of the permit until evidence of well reconstruction is filed with the Department and approved by the Groundwater Section. Describe injury —as related to water availability—that is likely to occur without well reconstruction (interference w/
		senior water rights, not within the capacity of the resource, etc):
В3.		undwater availability remarks: Groundwater for the proposed use cannot be determined to be over-appropriated due to fficient available data regarding rates of recharge and the current quantity of groundwater withdrawals from the aquifer em.
	Aqu depo estir imm requ the o	proposed POA is located in the Central Willamette Valley and will produce from sand and gravel (the Willamette ifer described by Gannett and Caldwell, 1998), which overlies fine-grained distal alluvial fan and low gradient stream osits locally separated by thin layers of sand and fine gravel (Willamette Confining Unit). The Willamette Aquifer is nated to be ~100-120 ft thick and is covered by ~60-80 ft of silt (the Willamette Silt Unit). The majority of wells in the rediate vicinity draw water from the Willamette Aquifer between ~80-180 ft depth (see attached well statistics). The rested rate (0.07 cfs) is well within the range of reported yields for water wells in this area and is unlikely to interfere with closest neighboring well, MARI 4171, which is ~450 ft to the northwest. The observation wells include state observation wells MARI 4160 and MARI 4217 with static water level measurements ecord since the late 1950's/early 1960's, with MARI 5217 being dropped from the network in the late 1980's. Other by wells include wells on permits with static water level reporting conditions, which have measurements on record since
		ate 1990's. Neither the permit condition wells nor the longer-term state observation well data show excessive, area-wide ines. Static water levels appear to be slightly deeper in the deeper wells that go into the Willamette Confining Unit.

In order to protect the groundwater resource and neighboring users, the conditions specified in B1(d)Ii) and B2(c), above, are recommended for any permit issued pursuant to this application.

C. GROUNDWATER/SURFACE WATER CONSIDERATIONS, OAR 690-09-040

C1. **690-09-040** (1): Evaluation of aquifer confinement:

We	Aquifer or Proposed Aquifer	Confined	Unconfined
1	Alluvium	\boxtimes	

Basis for aquifer confinement evaluation: Water levels in area wells are generally above the relevant water-bearing zones, which are overlain by a ~60-80 ft-thick sequence of fine-grained sediments (Willamette Silt as described by Gannett and Caldwell, 1998). Based on the available evidence, the aquifer is confined.

C2. **690-09-040** (2) (3): Evaluation of distance to, and hydraulic connection with, surface water sources. All wells located a horizontal distance less than ½ mile from a surface water source that produce water from an unconfined aquifer shall be assumed to be hydraulically connected to the surface water source. Include in this table any streams located beyond one mile that are evaluated for PSI.

Well	SW #	Surface Water Name	GW Elev ft msl	SW Elev ft msl	Distance (ft)		Hydraulically Connected? YES NO ASSUMED Subst Ass		Potentia Subst. In Assum YES	terfer.
1	1	Patterson Creek	~155- 165	~153- 160	~10,820	×				\boxtimes

Basis for aquifer hydraulic connection evaluation: The nearest perennial stream is greater than one mile from the proposed POA. Nearby wells (in particular, MARI 4160) with long records of measurement records indicate that the seasonal high water table is likely approximately 155-165 ft above mean sea level at the location of the applicant's proposed development. The water levels in nearby wells are generally above or coincident with nearby perennial stream reaches indicated groundwater discharges to local streams. Published water table maps in the area corroborate this elevation and indicate that groundwater flows towards, and discharges into local streams (Gannett and Caldwell, 1998 and Conlon et al., 2005).

Water Availability Basin the well(s) are located within: Watershed ID #151 PUDDING R > MOLALLA R - AB MILL CR
Water Availability Basin the stream(s) are located within: Watershed ID #182 WILLAMETTE R > COLUMBIA R - AB
MOLALLA R

C3a. **690-09-040** (4): Evaluation of stream impacts for <u>each well</u> that has been determined or assumed to be **hydraulically connected and less than 1 mile** from a surface water (SW) source. Limit evaluation to instream rights and minimum stream flows that are pertinent to that SW source, not lower SW sources to which the stream under evaluation is tributary. Compare the requested rate against the 1% of 80% *natural* flow for the pertinent Water Availability Basin (WAB). If Q is not distributed by well, use full rate for each well. Any checked ⊠ box indicates the well is assumed to have the potential to cause PSI.

Well	SW #	Well < 1/4 mile?	Qw > 5 cfs?	Instream Water Right ID	Instream Water Right Q (cfs)	Qw > 1% ISWR?	80% Natural Flow (cfs)	Qw > 1% of 80% Natural Flow?	Interference @ 30 days (%)	Potential for Subst. Interfer. Assumed?

C3b. **690-09-040 (4):** Evaluation of stream impacts by total appropriation for all wells determined or assumed to be **hydraulically connected and less than 1 mile** from a surface water source. **Complete only if Q is distributed among wells.** Otherwise same evaluation and limitations apply as in C3a above.

٠,	araanon	una i	iiiiitations t	ipprj as n	n esa acore	•					
		SW #		Qw > 5 cfs?	Instream Water Right ID	Instream Water Right Q (cfs)	Qw > 1% ISWR?	80% Natural Flow (cfs)	Qw > 1% of 80% Natural Flow?	Interference @ 30 days (%)	Potential for Subst. Interfer. Assumed?

Comments:			

C4a. **690-09-040 (5):** Estimated impacts on **hydraulically connected surface water sources greater than one mile** as a percentage of the proposed pumping rate. Limit evaluation to the effects that will occur up to one year after pumping begins. This table encompasses the considerations required by 09-040 (5)(a), (b), (c) and (d), which are not included on this form. Use additional sheets if calculated flows from more than one WAB are required.

							•						
Non-Di	istributed	Wells											
Well	SW#	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1	1	<1 %	<1 %	<1 %	<1 %	<1 %	<1 %	<1 %	<1 %	<1 %	<1 %	<1 %	<1 %
Well Q	as CFS	0.07	0.07	0.07	0.07	0.07	0.07	0.07	0.07	0.07	0.07	0.07	0.07
Interfere	ence CFS	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01
D1 + 11													
Distrib Well	uted Well SW#	ls Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
		%	%	%	%	%	%	%	%	%	%	%	9/
Well Q	as CFS												
Interfer	ence CFS												
		%	%	%	%	%	%	%	%	%	%	%	9/
Well Q	as CFS												
Interfer	ence CFS												
(A) T		0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01
	tal Interf.	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
$(\mathbf{B}) = 80$	% Nat. Q	21400	23200	22400	19900	16600	8740	4980	3830	3890	4850	10200	19300
(C) = 1	% Nat. Q	214	232	224	199	166	87.4	49.8	38.3	38.9	48.5	102	193
(D) = ((A) > (C)	√	√	√	√	√	√	√	√	√	√	√	√
, ,	/ B) x 100	%	%	%	%	%	%	%	%	%	%	%	%
		1	l					l					

(A) = total interference as CFS; (B) = WAB calculated natural flow at 80% exceed. as CFS; (C) = 1% of calculated natural flow at 80% exceed. as CFS; (D) = highlight the checkmark for each month where (A) is greater than (C); (E) = total interference divided by 80% flow as percentage.

Basis for impact evaluation: The low pumping rate and great distance between the proposed well and Patterson Creek combined with existing knowledge of the hydrogeologic regime in this area indicate that it is unlikely for the well to cause substantial interference. Potential for substantial interference was checked against the quantitative Hunt (2003) model using hydraulic parameters derived from regional data and studies (Pumping test reports; Conlon et al., 2005; Domenico and Schwartz, 1990; Freeze and Cherry, 1979; Iverson, 2002; Lohman, 1972; Price, 1967; Todd, 1980; and Woodward, 1998). Results indicate that interference with SW 1 is not anticipated to exceed 25 percent of the rate of withdrawal within the first year of continuous pumping.

C4b. 690-09-040 (5) (b) The potential to impair or detrimentally affect the public interest is to be determined by the Water Rights Section.

Application G-19047 Date: 12/14/2021 Page C5. If properly conditioned, the surface water source(s) can be adequately protected from interference, and/or groundwater use under this permit can be regulated if it is found to substantially interfere with surface water: i. The permit should contain condition #(s) ii. The permit should contain special condition(s) as indicated in "Remarks" below; C6. SW / GW Remarks and Conditions: **References Used:** Application G-19047 and application map received 12/4/2020. Pumping test reports (MARI 58, 3852, 4067, 4071, 4160, 4218, 4373, 4880, 54503, 57212, and 58798) and water levels (MARI 3878, 4110, 4160, 4217, 18766, 50927, 52494, and 60275) for selected nearby wells. Conlon, T.D., Wozniak, K.C., Woodcock, D., Herrera, N.B., Fisher, B.J., Morgan, D.S., Lee, K.K., and Hinkle, S.R., 2005, Groundwater hydrology of the Willamette Basin, Oregon, Scientific Investigations Report 2005-5168: U. S. Geological Survey, Reston, VA. Domenico, P.A. and F.W. Schwartz, 1990. Physical and Chemical Hydrogeology, John Wiley & Sons, New York, 824 p. Freeze, R.A. and Cherry, J.A., 1979, Groundwater, Prentice Hall, Englewood Cliffs, New Jersey, 604 p. Gannett, M.W. and Caldwell, R., 1998, Geologic framework of the Willamette Lowland aquifer system, Oregon and Washington, Professional Paper 1424-A, 32 p. U. S. Geological Survey, Reston, VA. Hunt, B., 2003, Unsteady stream depletion when pumping from semiconfined aquifer: Journal of Hydrologic Engineering, Janu Iverson, J., 2002, Investigation of the hydraulic, physical, and chemical buffering capacity of Missoula flood deposits for water quality and supply in the Willamette Valley of Oregon: Unpublished M.S. thesis, Oregon State University, 147 p. Iverson, J., 2002, Investigation of the hydraulic, physical, and chemical buffering capacity of Missoula flood deposits for water quality and supply in the Willamette Valley of Oregon: Unpublished M.S. thesis, Oregon State University, 147 p. Lohman, S.W., 1972. Ground-water hydraulics, U.S. Geological Survey Prof. Paper 708, 70p. [pdf] Price, D., 1967, Geology and water resources in the French Prairie area, northern Willamette Valley, Oregon: U. S. Geological Survey Water Supply Paper 1833, 98 p., accessed June 25, 2019, at https://pubs.er.usgs.gov/publication/wsp1833. Todd, D.K., 1980. Groundwater Hydrology, 2nd ed., John Wiley & Sons, New York, 535p. United States Geological Survey, 2014, National Hydrography Dataset (NHD), 1:24,000, U. S. Department of the Interior, Reston, VA. United States Geological Survey, 2017, Gervais quadrangle, Oregon [map], 1:24,000, 7.5 minute topographic series, U.S. Department of the Interior, Reston, VA.

Watershed Sciences, 2009, LIDAR remote sensing data collection, Department of Geology and Mineral Industries, Willamette

Woodward, D.G., Gannett, M.W., and Vaccaro, J.J., 1998, Hydrogeologic framework of the Willamette Lowland aquifer system,

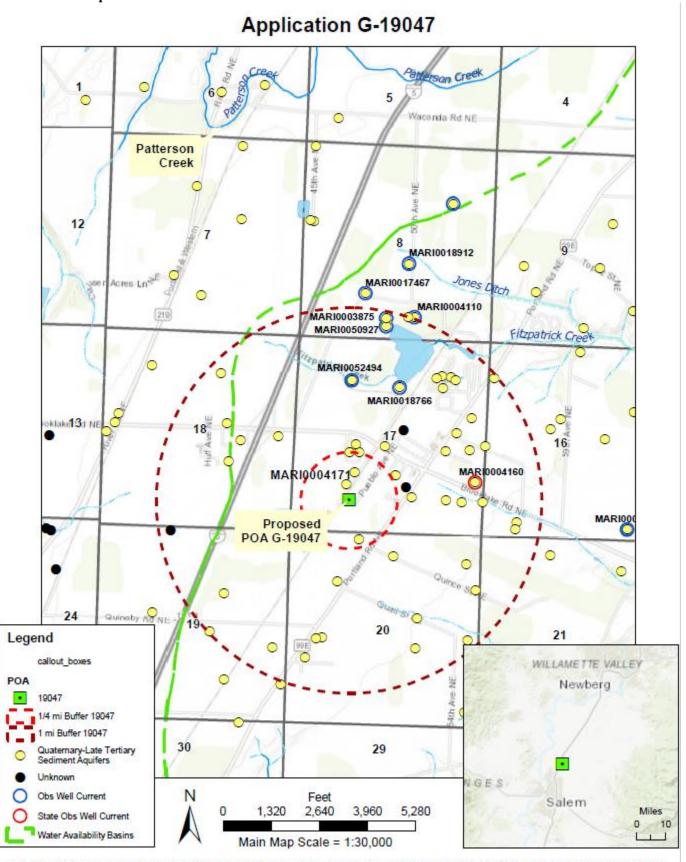
Valley Phase I, Oregon: Portland, OR, December 21.

Oregon and Washington: U.S. Geological Survey Professional Paper 1424-B, 82 p.

D. WELL CONSTRUCTION, OAR 690-200

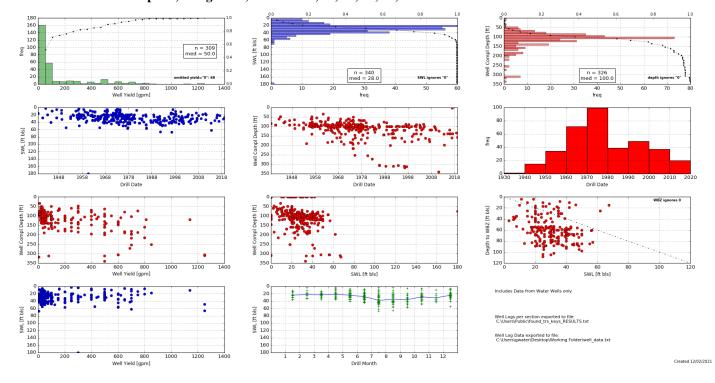
D1.	Well #: Logid:N/A (proposed)
D2.	THE WELL does not appear to meet current well construction standards based upon:
	a. \square review of the well log;
	b.
	c. report of CWRE
	d. other: (specify)
D3.	THE WELL construction deficiency or other comment is described as follows:
D4.	Route to the Well Construction and Compliance Section for a review of existing well construction.

Well Location Map

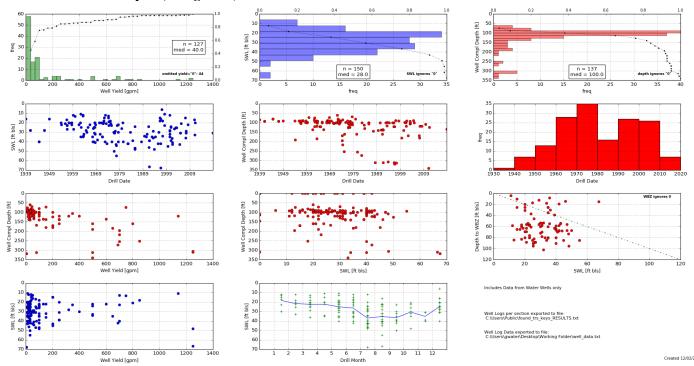


Service Layer Credits: Sources: Esri, HERE, Garmin, Intermap, Increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community

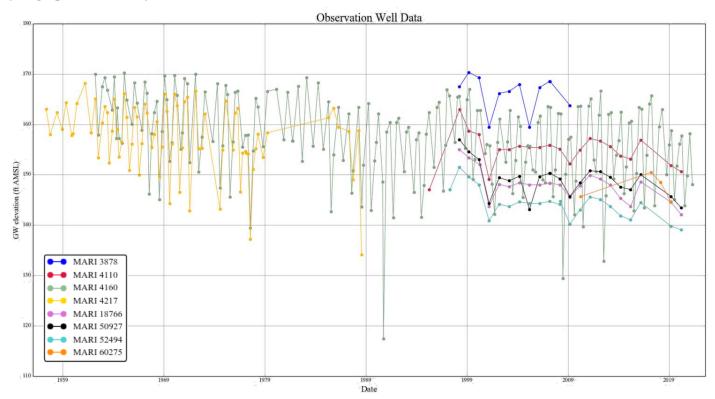
Well Statistics - Township 6 S, Range 2 W, Sections 16, 17, 18, 19, 20, and 21



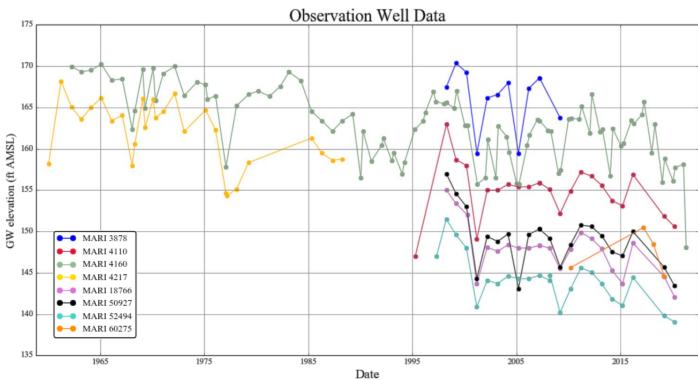
Well Statistics - Township 6 S, Range 2 W, Sections 17 and 20



Hydrographs - All Nearby Observation Wells, All Measurements



Hydrographs - All Nearby Observation Wells, January-April Measurements Only



Application G-19047 Date: 12/14/2021

Hunt (2003) Model Parameters and Output

 Application type:
 G

 Application number:
 19047

 Well number:
 1

 Stream Number:
 1

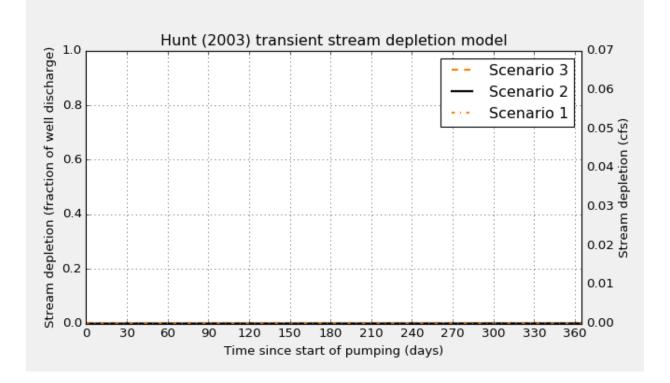
 Pumping rate (cfs):
 0.07

 Pumping duration (days):
 365

 Pumping start month number (3=March)
 1

Parameter	Symbol	Scenario 1	Scenario 2	Scenario 3	Units
Distance from well to stream	a	10820	10820	10820	ft
Aquifer transmissivity	Т	970	3908	6100	ft2/day
Aquifer storativity	S	0.003	0.008	0.002	-
Aquitard vertical hydraulic conductivity	Kva	0.01	0.05	0.0001	ft/day
Aquitard saturated thickness	ba	60	60	60	ft
Aquitard thickness below stream	babs	63	63	63	ft
Aquitard specific yield	Sya	0.2	0.2	0.2	-
Stream width	WS	5	50	100	ft

Stream depletion for Scenario 2: 120 150 180 210 Days 10 30 60 90 240 270 300 330 360 Depletion (%) 0 0 0 0 0 0 0 0 0 0 0 0 0 Depletion (cfs) 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00



Page

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Water Availability Tables

Date: 12/3/2021

Water Availability Analysis

Detailed Reports

PUDDING R > MOLALLA R - AB MILL CR WILLAMETTE BASIN

Water Availability as of 12/3/2021

Watershed ID #: 151 (Map)

Water Rights

Water Availability Calculation Consumptive Uses and Storages Instream Flow Requirements Reservations

Water Availability Calculation

Monthly Streamflow in Cubic Feet per Second Annual Volume at 50% Exceedance in Acre-Feet

Month	Natural Stream Flow	Consumptive Uses and Storages	Expected Stream Flow	Reserved Stream Flow	Instream Flow Requirement	Net Water Available
JAN	1,040.00	125.00	915.00	0.00	36.00	879.00
FEB	1,180.00	115.00	1,070.00	0.00	36.00	1,030.00
MAR	1,010.00	76.60	933.00	0.00	36.00	897.00
APR	787.00	52.40	735.00	0.00	36.00	699.00
MAY	425.00	50.60	374.00	0.00	36.00	338.00
JUN	224.00	72.50	152.00	0.00	36.00	116.00
JUL	109.00	114.00	-4.89	0.00	36.00	-40.90
AUG	71.00	93.40	-22.40	0.00	36.00	-58.40
SEP	67.30	53.00	14.30	0.00	36.00	-21.70
OCT	91.60	11.50	80.10	0.00	36.00	44.10
NOV	363.00	48.60	314.00	0.00	36.00	278.00
DEC	957.00	119.00	838.00	0.00	36.00	802.00
ANN	706,000.00	56,100.00	650,000.00	0.00	26,100.00	626,000.00

Version: 07/28/2020

Watershed Characteristics

Exceedance Level: 80% •

Time: 2:54 PM

Water Availability Analysis

Detailed Reports

WILLAMETTE R > COLUMBIA R - AB MOLALLA R WILLAMETTE BASIN

Water Availability as of 12/14/2021

Watershed ID #: 182 (<u>Map)</u> Date: 12/14/2021 Exceedance Level: 80% v
Time: 10:17 AM

Water Availability Calculation Consumptive Uses and Storages Instream Flow Requirements Reservations

Water Rights Watershed Characteristics

Water Availability Calculation

Monthly Streamflow in Cubic Feet per Second Annual Volume at 50% Exceedance in Acre-Feet

Manah	Natural Stream Flow	C	Functional States of Florida	December of Change Class	Instrument Description	Net Water Available
Month		Consumptive Uses and Storages	Expected Stream Flow	Reserved Stream Flow	Instream Flow Requirement	
JAN	21,400.00	2,300.00	19,100.00	0.00	1,500.00	17,600.00
FEB	23,200.00	7,480.00	15,700.00	0.00	1,500.00	14,200.00
MAR	22,400.00	7,250.00	15,100.00	0.00	1,500.00	13,600.00
APR	19,900.00	6,910.00	13,000.00	0.00	1,500.00	11,500.00
MAY	16,600.00	4,250.00	12,400.00	0.00	1,500.00	10,900.00
JUN	8,740.00	1,980.00	6,760.00	0.00	1,500.00	5,260.00
JUL	4,980.00	1,810.00	3,170.00	0.00	1,500.00	1,670.00
AUG	3,830.00	1,650.00	2,180.00	0.00	1,500.00	682.00
SEP	3,890.00	1,390.00	2,500.00	0.00	1,500.00	998.00
OCT	4,850.00	749.00	4,100.00	0.00	1,500.00	2,600.00
NOV	10,200.00	885.00	9,310.00	0.00	1,500.00	7,810.00
DEC	19,300.00	969.00	18,300.00	0.00	1,500.00	16,800.00
ANN	15 200 000 00	2 250 000 00	13 000 000 00	0.00	1 090 000 00	11 900 000 00