ZONING ADVISORY PANEL PUBLIC COMMENT

Received Between July 9, 2021 (noon) and July 23, 2021 (noon)

As part of the County's strong commitment to an open and transparent public process, comments received from any Citizen which reference the Zoning Advisory Panel (ZAP) are usually made available to the general public through uploading the comments to the County's website prior to the next ZAP meeting. Similarly, if the commenter requests, the information may also be forwarded to the ZAP Members directly.

* Please Note: Inclusion of Public Comments herein, does not imply any support nor opposition of the comments by the County.

Any Web Links included in the Public Comment have not been vetted by the County and readers should proceed with caution when accessing Web links*

From:

DW Paulson County Planning Mail To: threebars7@yahoo.com Cc:

Subject: Attention ZAP

Monday, July 19, 2021 2:30:32 PM Date:

ZAP July 19, 2021.docx Attachments:

See Attached

To: Community Development and Planning Department

Attention ZAP
From: Dale W Paulson
2610 Three Bars Road
East Helena Montana

I very much appreciate being able to view the proceedings of ZAP via the website provided. I monitor the Lewis and Clark County Zoning website and watch the meetings when they become available. I hope that this option will continue to be available when the meetings change to Face to Face in August. I have found the transparency provided to be excellent and enlightening. I live in the Spokane Creek area and am most interested in sustainability of the existing development and am concerned about the negative effects of the proliferation of wells in the area. If I am correct I believe water availability falls in the Technical and Environmental Areas so I am keenly interested in the brainstorming related to water. Please provide me a link to the Jam board so I can follow ZAP's brainstorming.

Thank you.

Dale W Paulson

July 19, 2021

From: Thomas, Andrew
To: County Planning Mail

Subject:Public Comment ZAP Meeting July 14th 2021Date:Thursday, July 22, 2021 12:05:08 PMAttachments:mbmg544-helenavalleyhydrogeology.pdf

July 14th ZAP panel comment. A. Thomas, 7.22.2021.docx

Hello,

Please see attached public comment for the July 14th ZAP meeting. Also attached is a hydrologist report for the Helena Valley. Please note recommendations on page 25.

Thank you,

Andrew Thomas

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Andrew R. Thomas

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Cell: 509-592-0720 ARThomas@Carroll.edu

Comment, Zoning Advisory Panel Meeting Jul 14th Comment, Andrew Thomas, 7.18.2021

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In response to the July 14th ZAP meeting, the following comments are intended to inform the "technical" and "environmental" discussion. Specifically, I will present some thoughts on how to consider evidence and how to use that evidence in a way to bring about a reasonable and meaningful solution to a problem.

Evidence:

The first issue that everyone must confront is what types of facts or evidence should be utilized as a basis for decision making. Arguably, everyone wants to use the "best evidence" to make a decision. However, that is often a difficult task when we consider complex situations such as land-use decisions. Scientific evidence is generally useful but may be limited in certain situations because we do not know how generalizable it is from one situation or another. People's opinions sometimes have value because they relate to what people think about a certain topic, or value, regardless of the facts of the situation. Often, we have to make a decision that reconciles people's opinions about a topic relative to the facts that we know about a topic. For example, it may be "efficient" to force people to live in very high densities, but most people would prefer not to.

Uncertainty and Tradeoffs:

Another major consideration that is important in land-use issues is the matter of uncertainty. Although in the abstract we might know something about water availability in a certain area we do not know for certain how it relates to a specific parcel and whether that general understanding can reasonably apply to decision relating to that parcel. Along these lines, we also need to consider trade-offs for which there is no clear-cut answer. For example, people generally do not like paying taxes and people like having good public services. There is no moral judgment to favor one or the other, however if we are formulating public policy about a certain area and how much development we will permit we have to reconcile this trade-off in a way that is reasonable. As one of the ZAP panel members noted, if we had unlimited resources it would be quite easy to fix all the problems in the county. However, we have limited resources and must prioritize and reconcile competing interests to come up with a solution that most people can live with.

Best Evidence:

To do this requires using the best evidence available. One definition that I would ask the ZAP panel to consider is that the best evidence is: *The evidence which has the most explanatory power or probative value, most broadly explains the situation, can reconcile competing interests, and balances both finite needs and equitable interests, and has the least bias.* That obviously sounds like a lot, but let me break it down in a way that people can understand.

- Explanatory power and probative value are statements of facts. Good evidence explains things in a predictive way (scientific standard) it also explains why certain things are more probative (legal evidence standard) or probable than other things.
- Evidence which reconciles competing interests or trade-offs is evidence that acknowledges that sometimes there is no one right way of resolving a situation.
- Evidence that that balances finite needs and equitable interests is evidence that acknowledges that regardless of the facts of a certain situation people have certain interests or rights in a matter. "Equity" is a legal term which refers to concepts of doing what is fair regardless of what specific rules or facts might suggest.
- Bias. The first step in addressing bias is to acknowledge that everyone has some bias or predisposition to think in a certain way. In debates over land-use some individuals may want to see certain development patterns, force people to live in certain ways, prioritize certain things such as open space over affordable housing etc. Other people may prioritize property rights over the interests of the community and have very different biases. In either instance it is necessary for everyone to consider what their bias is and how it might color their thinking on a certain issue.

Example: Someone who opposes government intervention might not realize that they are ultimately creating a mess for private property owners whose wells run dry or whose roads cannot be maintained. Someone who for example believes that affordable housing is something that only occurs in dense urban areas may ignore the fact that more spread out and less dense housing can be just as affordable and more desirable to certain people.

Bias and Narrative: Another feature of bias is the tendency for people to adhere to "stories" or "narratives." A narrative is a set of ideas people adhere to regardless of whether the facts suggest otherwise. Often people are not aware how narratives influence how they think. In many cases, even with experts, people selectively use facts use facts to rationalize their narratives. For example some environmentalists have a narrative that "people are bad and we must protect the environment from people." Such an individual is unlikely find ways of reconciling environmental concerns with other social or economic considerations. Another example of narratives is that "government can't do anything right" such a person is unlikely to ever consider government action to be preferable.

Regardless of the type of narrative, it is important that people think about what their "narrative" is when it comes to certain issues. Once they have identified their narrative is important for them to think of counter narratives. For example at a recent ZAP panel meeting a ZAP member mentioned that he did not like people living in a trailer and setting up an encampment next to the river near Route 12. This person showed some distain for the trailer being set up on the property and asked whether regulation could prohibit such things. Although I will not speculate as to exactly what narrative this person adhered to, it does highlight the need to think critically and out of the box about issues. Specifically, it may have been more useful not to jump to conclusions that stem from one's preconceived notions, but to ask more nuanced questions. In this instance rather than show distain for people living in a trailer and ask how to regulate them out of existence it might have been more useful to ask questions like:

- Why are there people living in a trailer with shipping containers as sheds?
- Was the regulation that prevented them from building a house there reasonable?
- Were they not able to find housing elsewhere?
- Is "normal housing" too expensive so they live in a camper etc.

Ultimately the moral of this is that simply going in and viewing a situation in a way that you want to never leads to questions about the totality of circumstances giving rise to the situation. To put it another way, only asking questions you want to ask rather than asking the questions that you need to ask only results in a self-validating conclusion.

Ultimately the key is not to eliminate bias, but to acknowledge it and realize that there are a variety of different equally valid perspectives on a matter that must be considered to make an equitable or fair decision. In the instance of land-use policy, these can include things such as property rights or the ability of people to live as they see fit. They might also involve considering the alternative that you might not personally agree with such as the idea that government regulation is necessary or unnecessary in certain instances, or considering things out side of your

primary area of focus, such as economic and social impact when thinking about environmental problems.

Sources of Evidence: To make good decisions about land use we have to consider all the above in the evidence we use. By no means is this an easy task and there is ultimately no right way to do it however the better the evidence and the more carefully it is considered the better the solution will be in the more people will be amenable to it. Below is a list of sources of evidence that would be useful to consider in a land-use related context:

- Generalized scientific studies
- Public opinion data
- Expert understanding about technical feasibility relating to things such as infrastructure costs and water
- Existing laws whether they be county level or state level
- Observations about past patterns both in terms of what has worked and what has
- An understanding of individual interests that might conflict or align in the policy debates relating to this topic.
- Carefully considering alternative both in terms of specific actions but also perspectives.

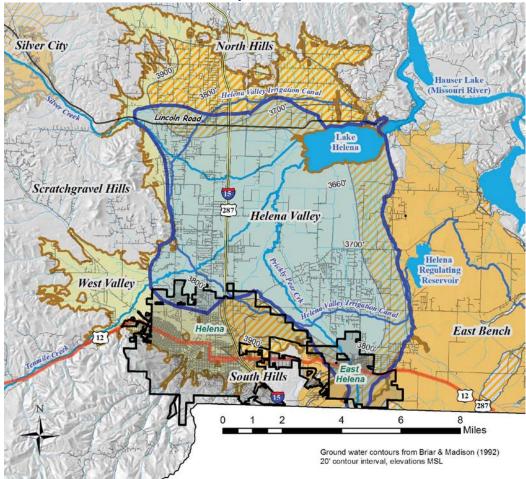
Developing a Methodology to Consider and Apply Evidence:

I would ask the ZAP panel to consider is the methodology or approach that it uses in structuring evidence into a meaningful analysis from which policy can be derived. At the July 14th meeting I heard a lot of people talking about various topics in a relatively unstructured way. Although this is a good exercise to develop a broad understanding of the issues that the ZAP panel confronts, in terms of developing a coherent policy it is necessary to create more structure in terms of prioritizing certain types of evidence over others. It is also necessary to create a structure that aggregates different types of information in a way that different types of information can be merged and balanced to inform one decision.

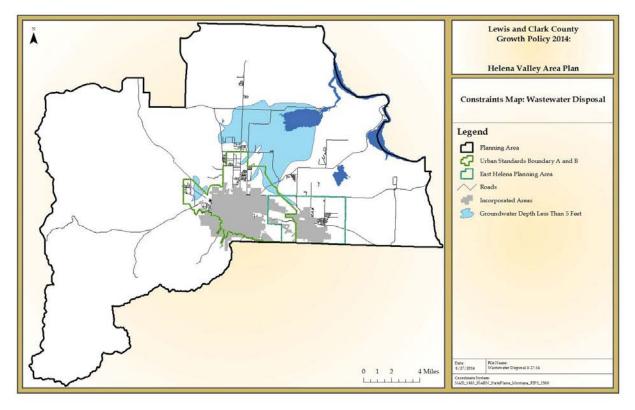
Prioritizing Evidence

With regards to prioritizing evidence or considerations when we look at the growth policy there are certain priorities that are more prominent in some areas than others. For example, in the tertiary aquifer areas in the valley rim water availability is arguably the most important and critical issue. However, if we are to look at the Scratch Gravel Hills or Rimini water availability is likely not a prominent issue. However, infrastructure and wildfire protection are likely very prominent issues in those areas. Thus, it would be a waste of time for all areas in the Helena Valley planning area to consider all issues from the growth policy equally. What I would suggest the ZAP panel do is draw a map of sub areas within the planning area and prioritize the five issues for those sub areas. To do this I would suggest that the ZAP panel refer to the growth policy since many of the overlay maps that identify key issues are already presented there.

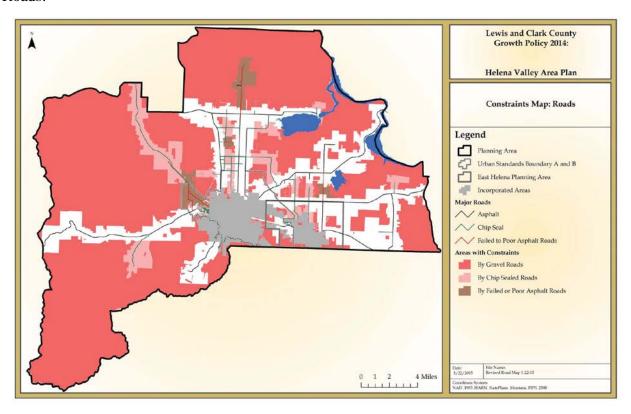
Areas of concern from the Growth Policy:



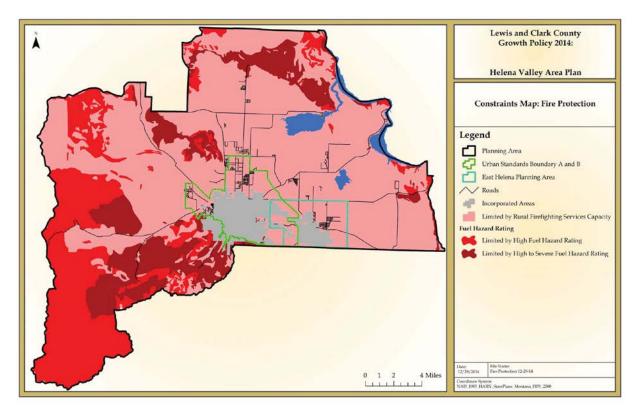
Waste Water:



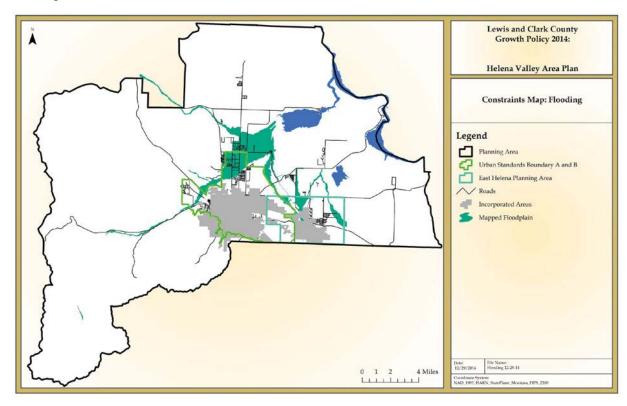
Roads:



Fire hazards:



Flooding:



Considering Alternatives

Once the issues outlined in the growth policy have been prioritized, is next necessary to either prioritize those issues or reconcile them with other interests such as property rights or the needs of the community. This is somewhat of a technical exercise that must occur in a very limited geographic fashion if not at the parcel level. Ideally, any well-developed policy relating towards managing growth in the Helena Valley area would create a method whereby the five issues outlined in the growth policy could be analyzed and applied towards each individual parcel or proposed subdivision.

Once a prioritization occurs the next task is to create a protocol that reconciles the interests of the community with those of the property owner in a way that reduces conflict and creates the most favorable outcome for all parties involved. Reasonably, what this would look like is to create a general set of standards for development in each sub area of the Helena Valley planning area. For example, in the tertiary aquifer areas research as well as experience might suggest that a good default minimum lot size might be two acres. That could be adopted as the standard lot size for that area. However, the ZAP could look at evidence relating to water availability and create a protocol whereby a landowner might demonstrate that only one acre would be adequate for a certain area. In other areas, a land owner might refute the default assumption about lot size by providing better evidence that they can mitigate certain issues for example in areas that are prone to fire hazards a landowner might demonstrate that there subdivision would not unduly burden emergency services or pose an undue risk by utilizing defensive space and appropriate building techniques.

In areas for example where infrastructure might be an issue a landowner might agree to finance some limited amount of road improvements. Along these lines existing residence in that area might be given the option of collectively agreeing to finance infrastructure improvements through moderate tax increases in exchange for the right to develop at a higher level of density above what the default lot size is. In all of these instances the ZAP can create reasonable, default lot sizes or requirements that then a property owner can appeal through using evidence to modify in a way that meets their needs. This creates a transparent and flexible system in which lot sizes and other technical requirements of development are not in flexible and arbitrary but can change and evolve depending upon the preferences and needs of people living in a certain sub area of the Helena

Environmental Issues

This section is intended as general commentary on how to consider and address environmental issues. Although there are a variety of ways to discuss environmental issues, one approach that I have found to be particularly useful is to consider first the structure of what defines an environmental issue and then to consider how to integrate that understanding of the issue into a decision-making process that considers other factors. Since environmental issues can be particularly diverse in terms of what defines them and how they manifest themselves, it not particularly useful to simply put forth a list of environmental issues and claim that is somehow comprehensive. Arguably, anything can be considered an environmental issue if it is considered

in the appropriate context. For the purposes of the ZAP panel's task there are obviously certain prominent issues relating to water availability, wildlands management, open-space, and wastewater management amongst other issues. What ultimately is more important is understanding the process of evaluating an environmental issue and then making a decision based upon that evaluation.

Defining Environmental Issues

To start out with it's probably a good idea to consider the different types of environmental issues that exist and how they fit into a greater understanding of sustainability but also policy and regulation. In general, we can create a typology of environmental issues ranging from very specific things such as for example pollution caused by single-point pollution sources. These things can include things like oil spills or toxic dumping. At the other end of the spectrum there are general environmental issues such as non-point pollution, sustainable forestry, or agriculture practices resource consumption, issues relating to climate or some other very broad set of variables that is difficult to pinpoint a specific cause and sometimes a specific impact.

The next issue is assuming that we can define an environmental issue is how to appropriately deal with the issue. With certain issues this may be relatively specific and surgical in nature. For example, once it was determined that lead in gasoline was toxic a policy decision was made to remove lead additives and replace them with other less toxic compounds. Arguably, there was very little trade off in making this decision as it directly reduced harm to people and the environment. However, in other instances we are confronted with the challenge of dealing with the trade-off.

For example, air pollution caused by burning wood in the wintertime. Although no one would debate that air pollution is a problem there is obviously a trade-off when we consider the economic value to some people that burning wood hats. Therefore, we are confronted with a situation where we have to optimize a trade-off. On one hand we want to reduce pollution. On another hand, we want to allow people to continue to burn wood because it may be their only source of economically viable heat. In other instances, we are confronted with very broad very general concepts such as a healthy ecosystem or a sustainable environment.

These concepts are very broad and can conclude and can include any type of policy action and are often subject to a great deal of subjectivity but also a great deal of ambiguity as to how to appropriately deal with. For example, when we think of the term "healthy forests" some individuals might say that limiting timber harvesting in forests and allowing nature to take its course is indicative of creating a healthy forest. Whereas, other individuals see the problems caused by lack of management and allowing fuel stock to build up and create extreme forest fires as a result. Although there is no one right approach to take each decision results in trade-offs. With regards to how evaluating environmental issues relate to other considerations it is preferable to consider the UN's Brundtland commission's statement on sustainability.

"Sustainable development is development that meets the needs of the present without

compromising the ability of future generations to meet their own needs." ¹ This is particularly important when we think about policymaking and environmental issues because invariably environmental issues are connected to economic and social structures. Again, consider the example of burning wood during the wintertime. Ultimately, the environmental issue is colored by its economic and social impact and likely the policy decision to deal with woodburning a certain way is more influenced by the social and economic impacts them by simply the environmental effect.

Environmental Methodology:

As environmental issues relate to the discussion above about general methodology it is useful to consider how to apply that methodology to environmental issues. A few things that I've seen quite consistently with regards to environmental issues that create problems is that people often have very strong ideological narratives about the environment and what should be done about it. This often results in simplistic narrative based thinking that does not result in very useful policy decisions. For example, one master narrative that is quite common is that "people are bad and the environment is on the verge of catastrophic collapse if we don't take drastic action." These narratives strangely parallel old science fiction movies such as *Soylent Green* or *Logan's Run*. Although they make for good entertainment, they really are not useful for policymakers because one most people would prefer that humanity continues and to it's very unlikely that any one thing where you are doing is in fact creating the risk of catastrophic problems in the environment. In the place of rigid narrative-based thinking what likely is more useful is to acknowledge that there are environmental problems and to create a protocol for one of evaluating the impact of the environmental problem and then evaluating how appropriately to deal with the problem while mitigating any negative social war economic effects that might have.

Example rigid verses flexible approach:

For example, wastewater can be a substantial environmental problem. A person of a particularly rigid disposition might say that all wastewater is bad regardless of how much it is treated because there are always some pollutants left in the treated wastewater. From the perspective of managing growth this is not a particularly useful stance to take because it effectively means no development will ever occur. A more realistic approach might be to knowledge that wastewater can be a pollutant however also acknowledge that at a minimal level treated water is not an issue for most areas. Also, a more realistic approach might acknowledge that technology and mitigation procedures can help limit the risks associated with wastewater in a given area. This might vary in certain areas depending upon population size and growth trends, but it could result for example in the development of a wastewater treatment facility better septic systems or better septic system monitoring. All of which resolve the environmental problem while considering the economic and social impact of the mitigation.

Another consideration with regards to environmental issues is the idea of integrating environmental awareness into policy. For example, most people would acknowledge that having open space and habitat are important things for almost any environment. Although absolutists

¹ https://en.wikipedia.org/wiki/Brundtland Commission, <u>"1991- The United Nations World Commission on Environment and Development"</u>. Archived from the original on 2013-11-03.

would say that no land ever should be developed outside of cities, a more pragmatic approach might be to require new subdivisions even in suburban or urban transition areas to have a certain amount of open space. Although this obviously has an economic cost it also has a great deal of environmental utility as well as other utility by reducing density and the need for urban level services. Although such a solution is not exactly an "ideologically/narrative pure" solution in the view of certain environmentalists, it does achieve an important environmental goal while still allowing development to occur.

An applied environmental methodology:

From this I would propose that a protocol for evaluating environmental issues might resemble the following:

- Assessing what defines the environmental issue in terms of how specific it is versus how general it is.
- Assessing the potential externalities, that is social and economic, concepts that are related to that environmental issue
- Assessing the potential regulatory options available for mitigating the environmental problem while not causing undue social or economic consequences
- Assessing the policy options available that allow for flexibility and diversity of response depending upon what either residence or the specific environment necessitates.

Example: Applied Environmental Methodology:

For the sake of example consider the issue of water availability. What defines water availability in the Helena Valley planning area is extremely diverse. Certain areas clearly do not have a water availability problem while others given the development patterns and aquifer have a severe water availability problem. In the areas were water availability is a problem it may be the case that development could theoretically be prohibited in those areas. However obviously this would create a social and economic consequence that is quite negative. In the place of a prohibition though it may be desirable to consider requiring mitigation measures such as dry scaping and water conservation be put in place in certain areas. In other areas it may be desirable to consider eventually installing public utilities in that area. Through taking this course of action the environmental solution becomes one that is both adequate and responsive to the social and economic needs of the community. As with all policy actions there is always going to be some level of compromise and some level of cost however by taking this approach to policy development it allows for the development of responsive and efficient policy.

Conclusion: Environmental Issues

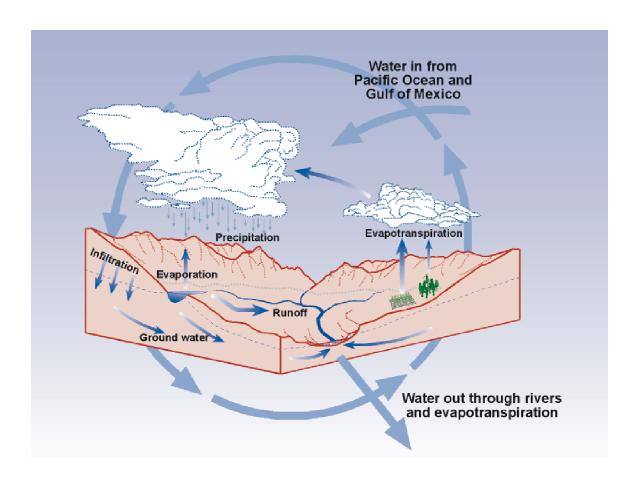
Ultimately environmental issues highlight a critical feature of all land-use issues. Despite the simplistic conception that environmental issues are remote or disjointed problems that we must address in a black-and-white way, ultimately environmental issues are complex and interconnected to a broader system that necessarily considers social and economic issues. As with all of the problems that land-use confronts to successfully address environmental issues again it is necessary that you consider the social and economic consequences of each decision. Although a certain environmental regulation might seem like a clear-cut and good option if you

do not consider the other consequences of that regulation in the decision it will ultimately create a number of very negative unintended consequences. From this it may ultimately be more desirable to compromise and have a slightly higher level of environmental impact that that is offset by a better social or economic outcome then to take a unilateral one size fits all approach to dealing with environmental issues.

HYDROGEOLOGY OF THE NORTH HILLS, HELENA, MONTANA

MONTANA BUREAU OF MINES AND GEOLOGY

Open-File Report 544



Prepared in cooperation with the

LEWIS AND CLARK COUNTY
WATER QUALITY PROTECTION DISTRICT



HYDROGEOLOGY OF THE NORTH HILLS, HELENA, MONTANA

MONTANA BUREAU OF MINES AND GEOLOGY

Open-File Report 544

Prepared in cooperation with the LEWIS AND CLARK COUNTY WATER QUALITY PROTECTION DISTRICT

> Butte, Montana August, 2006

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Introduction

The North Hills of the Helena Valley is located in north-central Montana and about 8 miles north of Helena, Montana (figure 1). The study area is 52 square miles and is comprised of mostly flat, gentle southerly sloping pediment surfaces and alluvial plain surrounded on the west, north, and east by slightly rugged mountainous terrain.

The North Hills is the fastest growing area in Lewis and Clark County, and one of the fastest growing areas in the state. From 1990 to 2000, the Helena Valley Northwest Census Designated Places (CDP), which includes that portion of the North Hills bounded by Lincoln Road on the south and Interstate 15 on the east (about a 27-square mile area), showed that the population increased from 1,215 to 2,082, an increase of 71 percent (Department of Commerce, 2006). Since 2000, the population has undoubtedly increased as many more new homes have been built and are continuing to be built. Some of the new homes are being built on 5 to 20 acre tracts, but many are being constructed on less than 1 acre lots such as the development in 11N4W24, 11N3W6, and the recently started development in 11N3W17 (see appendix 1 for a description of the location system). Because city services do not extend to the North Hills, the residents depend on water pumped from private or public wells for their domestic water source. In addition, the residents dispose of their waste water through septic systems.

Beginning in the late 1990's, and continuing to the present day, more than 30 wells in the North Hills area have gone dry or the water in the well has dropped to a level that can't be pumped (Kathy Moore, Lewis and Clark County Water Quality Protection District Manager, per. commun., 2004). Meanwhile, long-term well hydrographs in some areas of the North Hills have shown steadily decreasing water-level trends (figure 2). What caused the decreasing trends in water levels? Was the decrease due to the increase demand placed on the aquifer from the increase in population, or was the decrease due to climatic factors that led to less recharge?

In July 2001, some citizens in the North Hills became concerned about the decline in water levels in wells and petitioned the Montana Department of Natural Resources and Conservation (DNRC) to create a Controlled Groundwater Area. The citizens filing the petition recognized the need to collect hydrogeologic information so that informed decisions could be made concerning future development in the North Hills.

In 2002, the DNRC established a temporary Controlled Groundwater Area. The purpose of the temporary Controlled Groundwater Area was to closely track new wells being installed in the area, install flow meters so that usage could be measured, collect water samples from these new wells for nitrate analysis, and monitor water levels in these wells. In essence, the DNRC, through the temporary Controlled Groundwater Area, started a systematic data-collection effort as the first step to assess the declining water-level trends.

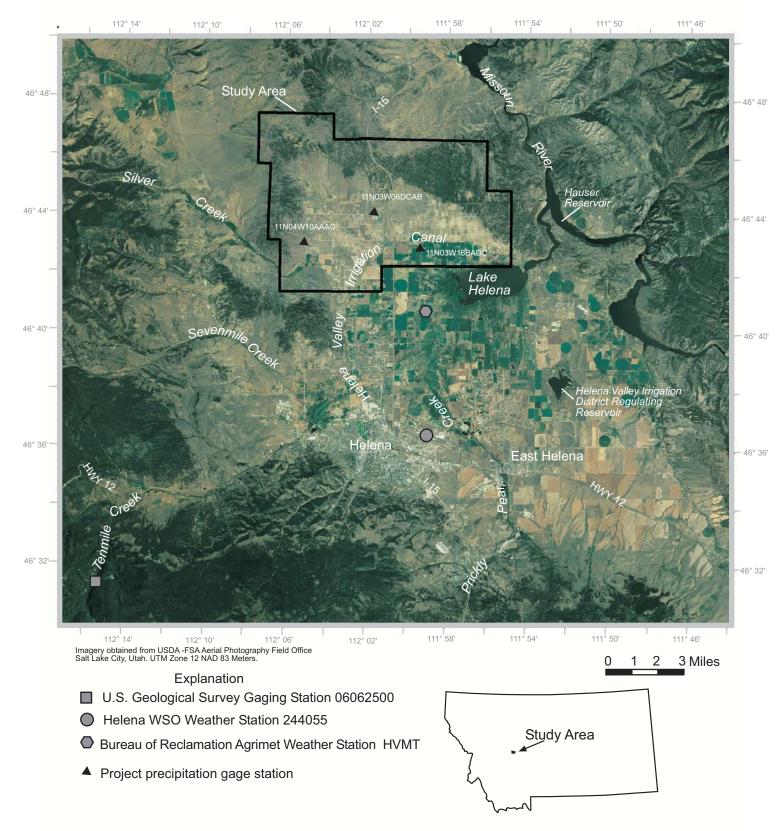
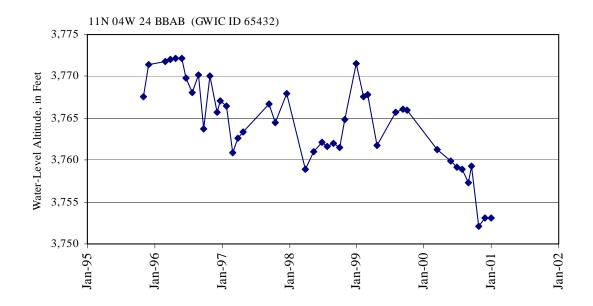


Figure 1--The North Hills study area encompasses an area of about 52 square miles in the north end of the Helena Valley, about 8 miles north of Helena, Montana. Silver Creek is located along the southwest part of the study area. More than 15,000 acres of land are irrigated in the Helena Valley, mostly for the production of hay. Of the total acreage irrigated, about 1,100 acres are located in the study area. Water is delivered to this acreage via a 6-mile section of the Helena Valley Irrigation Canal.



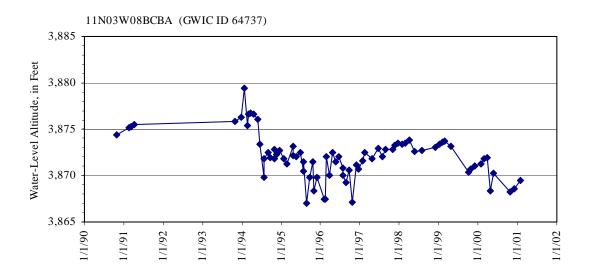


Figure 2—In 2000 and 2001 water levels in wells were dropping, and in some cases the water level dropped to the point where water could not be extracted from the well (a dry well). Citizens of the North Hills became concerned that because of all of the development and population growth that occurred between 1990 and 2000 that the aquifer was being over drafted. The two hydrographs above are used to show examples of water levels in 1999 and 2000.

PURPOSE AND SCOPE

In 2004, through a cooperative effort with the Lewis and Clark County Water Quality Protection District, the Montana Bureau of Mines and Geology (MBMG), in collaboration with the DNRC, started a data collection and interpretation effort to assess why water levels have dropped and wells have gone dry. The goal of this project was to assess the change in water levels in wells. This goal was achieved through the following specific objectives:

- 1. Establish a monitoring well network and monitor water levels in wells;
- 2. Define the potentiometric surface and the direction of ground-water flow;
- 3. Determine the geologic framework and aquifer geometry, and how this relates to transmitting water to wells;
- 4. Determine the sources of ground-water recharge/discharge and quantify these sources;
- 5. Assess how water levels in wells respond to recharge and discharge sources; and
- 6. Assess the distribution of nitrate in the ground-water system.

Water level was measured in 193 wells (appendix 2). Most of these wells were domestic-supply wells, but included some dedicated monitoring wells and unused domestic wells. Fourteen of these wells have been monitored since 2001 of which 10 have water-level record that go back to at least 1995. Eleven wells were equipped with continuous water-level recorders consisting of either transducers or Stevens Type-F chart recorders. All wells were surveyed for latitude, longitude, and altitude using survey-grade GPS. The well completion reports and water-level records for these monitoring wells are stored in the MBMG's Ground Water Information Center (GWIC) database accessible at http://mbmggwic.mtech.edu/. Water-level altitudes in wells measured between September 2005 and March 2006 were used to construct a potentiometric map.

The geologic framework and aquifer geometry were determined by interpreting some of the more than 2,000 well completions reports on file in GWIC. Field investigations to observe rock outcrops and to describe drill cuttings during well installations added to our knowledge of the area. Previously published geologic mapping was an important source for determining the geologic framework and aquifer geometry.

The sources of ground-water recharge and discharge were easily determined through observation and familiarity with the area. Average ground-water discharge from wells was estimated using average measured usage for about 140 residences. Recharge from irrigation, including leakage from the Helena Valley Irrigation canal and laterals was quantified using published leakage rates for the canal, laterals, and irrigated fields. Leakage to the ground-water flow system from Silver

Creek was estimated using indirect methods for quantifying stream flow. Underflow through the system was calculated using Darcy's law and transmissivity from a long-term aquifer test, measured gradients and aquifer widths.

Well hydrographs were used to determine where and how the water levels in North Hills' aquifers respond to the various sources of recharge and discharge. The long-term stream flow record for Tenmile Creek was used as a surrogate for assessing temporal leakage to the groundwater flow system from Silver Creek.

PREVIOUS INVESTIGATIONS

The geology of the northern part of the Boulder Batholith and of the Helena mining district was described by Knopf (1913, 1963). Mineral deposits of the Helena mining area were reported on by Pardee and Schrader (1933). The faulting and seismicity of the Helena area were described by Freidline and others (1976), Reynolds (1979), Schmidt (1977, 1986), Stickney (1978, 1987), and Stickney and Bartholomew (1987). Lorenz and Swenson (1951) were the first to report on the water resources of the Helena Valley. Wilke and Coffin (1973) described the ground-water quality of the valley. Wilke and Johnson (1978) investigated the depth to water table and area inundated by the June 1975 flood. Moreland and Leonard (1980) evaluated the shallow part of the aquifer system beneath the valley. Briar and Madison (1992) developed a ground-water budget and numerical ground-water flow model for the valley-fill aquifer system. Thamke (2000) assessed the hydrology of the bedrock aquifer surrounding the Helena valley-fill aquifer; her study provided data on water-level trends in wells and ground-water quality.

ACKNOWLEDGMENTS

The author wishes to thank several people for their assistance in conducting this investigation. Kathy Moore, Lewis and Clark County Water Quality Protection District Manager, for her time and assistance in collecting water levels from wells and her knowledge of the North Hills. Russell Levens, Department of Natural Resources and Conservation (DNRC), assisted in collecting water levels in wells and surveying all of the wells. Kathy Arndt from the DNRC Helena regional office also should be acknowledged for her efforts measuring water levels in wells and compiling water quality and flow reports from well owners. H&L Drilling and Treasure State Drilling allowed observations during the drilling of several wells; Treasure State was also kind enough to pull a couple of pumps to recover snagged well probes. Finally, the many land owners should be acknowledged for allowing access to their wells for monitoring purposes.

GEOGRAPHY

The North Hills is an area in the north part of the Helena Valley. The Helena Valley is an intermontane basin in the north-central part of the Northern Rocky Mountains physiographic province. The Continental Divide, which separates the Columbia River drainage from the Missouri River drainage is about 10 miles to the west of the North Hills. The Missouri River is about 1.5 miles to the east of the study area.

PHYSIOGRAPHY

Pediment surfaces and alluvial plains form a gentle, southerly sloping surface that comprise most of the North Hills. It is the gentle nature of the topography and the south-facing exposure that make this an attractive area to live. The pediment surfaces and alluvial plains are surrounded on the west, north, and east by slightly rugged mountainous terrain. The lowest altitude of the study area is Lake Helena, at 3,650 feet near the southeast corner of the study area. The highest altitude is about 5,150 feet in the northwest part of the study area.

CLIMATE

The North Hills has a semiarid climate similar to areas in Montana east of the Continental Divide. Average annual precipitation at the Helena Weather Service Office (WSO) weather station, about 8 miles to the south of the study area, is 11.90 inches based on 112 years of record; at the Helena Valley, Montana (HVMT) Agrimet station, located about 1.7 miles to the south, the average annual precipitation is 9.2 inches based on 10 years of record. Nine out of ten years, the Agrimet Station total precipitation was less than that at the Helena WSO weather station; total precipitation in 2005 for 3 project rain gaging stations operated in the study area (figure 1) were less than the Helena WSO weather station by about 25 percent (figure 3). Based on the Agrimet HVMT station and the project rain gaging stations, total annual precipitation in the North Hills is probably less than that recorded at the Helena WSO weather station and it may be as much as 25 percent less, but accurate determination can only be made with more data from the North Hills precipitation gages. Based on 114 years of record, the coldest month is January with an average temperature of 20.5°F, and based on 113 years of record, the warmest month is July, with an average temperature of 68.1°F.

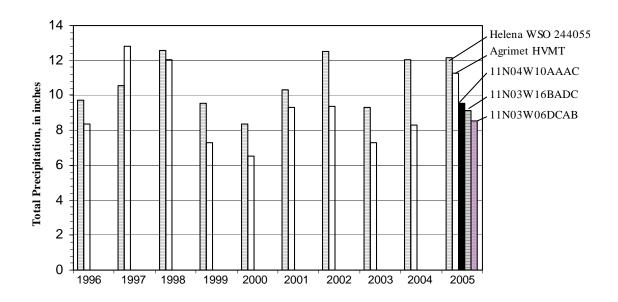


Figure 3—Annual precipitation at the Helena WSO Station, the Bureau of Reclamation Station HVMT, and at three project stations in the North Hills.

STREAM FLOW

Silver Creek enters the southwest corner of the study area, and usually flows for about 2 miles before its water completely infiltrates into the ground. During high flow, the water probably flows farther down stream before soaking into the ground. Within the study area, water is diverted from Silver Creek for irrigation of about 40 acres. Unfortunately, a "ditch rider" is not assigned to Silver Creek, so diversion records do not exist.

A gaging station does not exist on Silver Creek; long-term mean monthly flow was estimated using techniques of Parrett and others (1989) developed for ungaged basins in the upper Missouri River basin (table 1). Although stream flow in Silver Creek is relatively small, it is an important source of ground-water recharge for the southwest part of the study area.

Table 1Calculated monthly mean and annual mean streamflow for Silver Creek												
Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
Streamflow, in cubic feet per second												
0.73	0.74	1.05	2.92	8.47	9.17	4.03	1.96	1.46	1.33	1.03	0.89	2.82
				Streamflow, in acre feet								
45	41	66	175	525	550	250	121	88	83	64	55	2,060

The calculated flow in Silver Creek gives a rough estimate of the average flow in Silver Creek, but does not provide a way to estimate the annual mean for the past few years. The long-term streamflow record for Tenmile Creek may be used as an indication of how the streamflow in Silver Creek fluctuates if it is assumed that the streamflow in Tenmile Creek is proportional to the streamflow in Silver Creek and that the two respond to changes in climate similarly.

Annual mean streamflow in Tenmile Creek at USGS gage 06062500 recorded since 1970 is presented in figure 4. In 2000, the annual mean streamflow in Tenmile Creek was 1.74 cubic feet per second (cfs), or 10 percent of the mean annual flow of 16.8 cfs. If streamflow in Silver Creek is proportional to streamflow in Tenmile Creek, in 2000 Silver Creek streamflow would have been 10 percent of the annual mean streamflow. An irrigator that uses Silver Creek water reported that in 2000 he produced 10 percent of the normal amount of hay produced from his land because not enough water was available from Silver Creek (William Gehring, per. commun., 2006).

Also plotted on the graph is the 24-month Standard Precipitation Index (SPI) for the Helena WSO weather station calculated quarterly since 1970. To quote Hayes (2006), "The SPI calculation for any location is based on the long-term precipitation record for a desired period. This long-term record is fitted to a probability distribution, which is then transformed into a normal distribution so that the mean SPI for the location and desired period is zero. (Edwards and McKee, 1997). Positive SPI values indicate greater than median precipitation, and negative values indicate less than median precipitation."

The SPI is useful for determining how streamflow responds to long-term precipitation anomalies.

For Tenmile Creek, the 24-month SPI correlates quite well with annual mean streamflow (figure 5). This indicates that annual mean streamflow responds to 24 month precipitation anomalies. The 12-, 18-, 30-, 36-, and 48-months SPI correlated more poorly with annual mean streamflow than the 24 month SPI and are not presented.

HYDROGEOLOGY

Ground-water flow in the North Hills is strongly controlled by the orientation and water-bearing properties of the geologic material through which they flow. The depth and yield of wells can best be understood from the context of the material in which they are completed.

GENERAL GEOLOGY

Detailed descriptions of the geology of the Helena area have been made by Knopf (1913), Pardee (1925), Lorenz and Swenson (1951), Knopf (1963), Schmidt (1977, 1986), Stickney (1978, 1987), Reynolds (1979), Stickney and Bartholomew (1987), Briar and Madison (1992), and Thamke (2000). The reader is referred to these sources for detailed discussions about the geology of the Helena area.

The North Hills consists of pediment surfaces and alluvial plains that form a gentle southerly sloping surface surrounded on the west, north, and east by folded and faulted pre-Tertiary bedrock (figure 6). The pre-Tertiary bedrock consists mostly of lower middle Proterozoic Belt Supergroup rocks.

The Belt Supergroup rocks include the Greyson, Spokane, Helena, and Empire formations. The Greyson Formation consists of siltite and argillite with quartzite in the uppermost part of the formation. The Spokane consist of argillite and siltite with limestone and dolostone in the uppermost and lower parts. The Empire Formation consists of thinly and evenly laminated light and dark-green dolomitic argillite or argillite and siltite. The Helena Formation is predominantly dolomite, dolomitic siltite, and dolomitic argillite. These units are generally very fractured at the outcrop; locally the fracturing is so intense that the bedding attitude cannot be discerned. In the southwest corner of the study area the lower middle Proterozoic rocks have been intruded by late Proterozoic gabbro sills and dikes and by upper Cretaceous quartz monzonite.

In the northeast part of the study area, Paleozoic rocks are exposed northeast of the Eldorado Thrust Fault. The Paleozoic Rocks include the Madison Limestone; the Big Snowy Group which consist of mudstone, siltstone, and limestone; and the Phosphoria, Quadrant, and Amsden formations which consist of sandstone, limestone, siltstone, and dolostone beds.

Poorly to moderately consolidated Tertiary (undivided) sediments crop out at several locations in the southeast part of the study area (figure 6). In other parts of the study area, the Tertiary valley fill is concealed by a few feet to several hundred feet of Quaternary alluvium. In the area of the

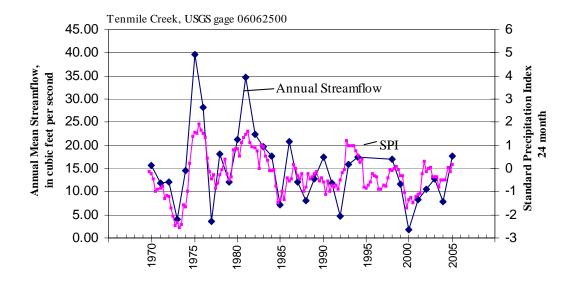


Figure 4—Annual mean streamflow for Tenmile Creek since 1970 and the 24 month Standard Precipitation Index for the Helena WSO weather station calculated quarterly. Tenmile Creek responds to 24 month precipitation anomalies which reflects the ground water component on streamflow. Annual mean streamflow in Silver Creek probably responds to the SPI in a similar fashion. Annual mean streamflow for 1995-1997 not reported.

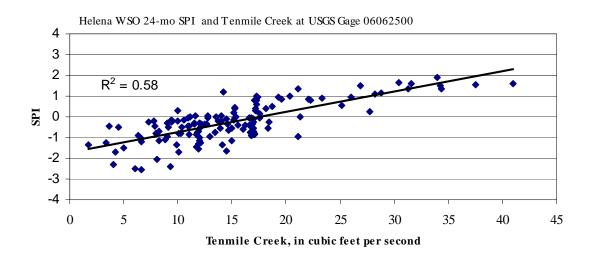


Figure 5—The 24-month Standard Precipitation Index correlates the best with annual mean flow in Tenmile Creek compared with the 12, 18, 30, and 36 month SPI. Linear interpolation between annual mean streamflow was used to generate data points for the correlation.

bedrock outliers in the west part of the study area the Quaternary alluvium is thin and Tertiary strata are absent. Near Lake Helena, the Tertiary sediments may be up to 6,000 feet thick based on gravity analyses (Davis and others, 1963). The Tertiary valley fill consists mostly of interbedded silt and clay with lenses of sand and gravel ranging from a few inches to a few feet.

Observation of well drilling resulted in a better understanding of the subsurface geology. At location 11N03W10BBBB (GWIC ID 223525), a well drilled there penetrated about 500 feet of Tertiary material before encountering bedrock. The cuttings from that hole consisted mostly of silt and clay with minor sand; because the hole was sloughing, steel casing was driven, and the 20 to 40 feet of open hole ahead of the casing yielded less than 1 gallon/minute (gpm). At location 11N03W06BDCC (GWIC ID 222567) about 280 feet of Tertiary valley fill was drilled through before drilling into bedrock. Cutting from this interval also consisted of silt and clay with very little sand. South of these wells, the Tertiary section probably gets thicker.

Quaternary alluvium covers most of the study area where bedrock is not exposed. The alluvium is thinnest near the bedrock outcrops and thickens to the south. At site 11N03W17CBDB (GWIC ID 204558), 300 feet of alluvium was encountered. Tertiary sediments were not encountered, so this is a minimum thickness for the Quaternary. The Quaternary alluvium consists of sandy pebble-to-cobble gravel with sand lenses and minor silt lenses. The sand and gravel clasts reflect the mostly red siltites and argillites from which they were weathered. Drillers commonly describe this material as "shale gravel".

The Helena Valley fault trends northwest through the northern part of the study area. There is no evidence that there has been any recent movement along this fault. The inferred Scratch Gravel Hills Fault (Stickney, 1987) was recently trenched. The results of the trenching show that a suspected fault scarp at the surface was not a fault (Mike Stickney, geologist, MBMG, per. commun., 2006).

AQUIFER GEOMETRY AND HYDRAULIC CHARACTERISTICS

Based on the geologic map of the North Hills study area (figure 6 and Stickney, 1987), well completion reports, and field observations of well installations, three aquifers were delineated within the North Hills (plate 1). These three consist of the pre-Tertiary bedrock aquifer, Tertiary aquifer, and the Quaternary aquifer. Although separated into three aquifers for consideration in this discussion, nothing prevents ground-water flow from one aquifer to the other, and therefore a ground-water flow continuum exists across rock units within the ground-water flow system.

Water is derived from the pre-Tertiary bedrock aquifer through the secondary porosity developed by the joints and fractures in the bedrock. Wells drilled into the bedrock depend on encountering enough saturated fractures that will yield an adequate volume of water for domestic use. In some cases, adequately fractured rock is not encountered; the well is drilled deeper and deeper hoping that eventually a good fracture will be encountered. As a result, some wells drilled into the bedrock aquifer are several hundred feet deep; and in some cases there are two deep wells near each other because yields in the first one were too low to be of use. Within the North Hills study

Figure 6--Generalized geologic map of the North Hills, Helena, Montana. Most houses are built on valley fill which consists of the Quaternary alluvium and Tertiary sediment. Near Lake Helena, the valley fill may be up to 45,000 life of the Roman Research of the Property of the Roman Research of the Property of the Roman Research of the Roman Research

area, wells completed in the bedrock have been reported up to 1,000 feet deep, but the average bedrock well is about 200 feet deep. Well yields up to 100 gpm have been reported, with an average yield of about 20 gpm.

The Tertiary aquifer was delineated using the geologic map, well cuttings, and well completion reports. The depth to which casing was hammered into the ground by well drillers served as the best guide for delineating the northern extent of the Tertiary aquifer. Prior to this study, it was thought that much of the area delineated as Tertiary aquifer in plate 1 was only underlain by bedrock aquifer (Briar and Madison, 1992; Thamke, 2000). Too many wells in this area have casing driven more than 200 feet below land surface for the material in this area to be bedrock; drillers typically do not hammer steel casing into bedrock because a bedrock hole will stay open and does not require steel casing to prevent it was sloughing. There also are many wells that produce adequate water from less than 200 feet in this area, so the material meets the definition of an aquifer. In the Tertiary aquifer, drillers generally target a sand or gravel lens of sufficient thickness and aerial extent that will yield 5 gpm or greater. There is no way to predict at what depth a lens of this sort will be encountered. In the absence of a sand or gravel lens, the Tertiary silt and clay will yield less than 1 gpm to about 20 to 40 feet of open bore hole during drilling. It is possible that in the absence of a sand or gravel lens that 100 to 200 feet of the Tertiary could be screened and a sand pack installed to increase the yield of a well to an adequate rate of about 5 gpm.

Along the north edge of the Tertiary aquifer, wells are sometimes drilled through the Tertiary and into the pre-Tertiary bedrock aquifer. At site 11N03W06DCAB (GWIC ID 213255), the well penetrated about 150 feet of Tertiary valley fill and was completed in bedrock to a total depth of 210 feet below land surface.

Well depths in the Tertiary aquifer have been reported up to 800 feet, but the average is about 190 feet. The maximum well yield reported for the Tertiary aquifer is 500 gpm, with an average of 20 gpm.

At site 11N03W07DCA (GWIC ID 193704), a well completed in the Tertiary aquifer was pumped in 2002 for 24 hours at a rate of 65 gpm. The reported transmissivity determined for this aquifer test was about 760 feet²/day determined using the pumping-well drawdown/recovery data and about 1,100 feet²/day using drawdown/recovery data from a nearby observation well. In 2004, the same well was pumped again at a rate of 98 gpm for 72 hours; The reported transmissivity, determined using the drawdown/recovery data for the pumping well and two observations wells, was 1,650 feet²/day.

The Quaternary aquifer was delineated using the geologic map (Stickney, 1987), observation of well cuttings, and well completion reports. The Quaternary aquifer is distinguished from the Tertiary aquifer most readily by yields and well depths. Yields are greater and depths are shallower for wells completed in the Quaternary aquifer. Drillers often describe the cuttings from wells in this area as "shale gravel", which reflects the locally derived red and green siltite and argillite clasts. Well yields are high because of the permeable nature of the gravel composing the aquifer. Average well depth is shallower than the Tertiary aquifer because the highly permeable

nature of the aquifer does not require penetration deep into the aquifer to yield an adequate flow of water for domestic needs.

The Quaternary aquifer directly overlies the Tertiary aquifer in most areas of the study area. The depth of the contact below land surface is unknown because wells have not been drilled deep enough to define this contact. In the southwest part of the study area, the Tertiary aquifer may be absent and the Quaternary aquifer may overlie the pre-Tertiary bedrock aquifer.

Well depths have been reported up to 600 feet, but the average is 120 feet. Yields have been measured up to about 900 gpm, with a reported average yield of 35 gpm.

At site 11N03W17CADA (GWIC ID 199989), a 244 feet deep well completed in the Quaternary aquifer was pumped at 894 gpm for 72 hours. Remarkably the water level in the well was only drawn down about 15 feet after 72 hours of pumping. The reported transmissivity determined for this aquifer test was about 18,800 feet²/day determined using the pumping-well drawdown/recovery data and about 15,100 feet²/day using drawdown/recovery data from a nearby observation well.

POTENTIOMETRIC SURFACE AND DIRECTION OF GROUND-WATER FLOW

Water levels were measured periodically between 2003 and 2006 in most of the 193 well monitoring network (appendix 2). Some of the wells were only measured once, while some were equipped with continuous water-level monitoring that measured the water level thousands of times. Some of the wells have water-level records that date back before 2003. The water level information is stored in the MBMG's Ground Water Information Center (GWIC) database accessible at http://mbmggwic.mtech.edu/. The measuring point for all monitoring wells was surveyed for latitude, longitude and altitude using survey-grade GPS.

The potentiometric surface in the Quaternary, Tertiary, and pre-Tertiary bedrock aquifer was determined using water levels measured during September 2005 through March 2006 (plate 2). Seven wells were not used in contouring the potentiometric surface, but are plotted on the plate. Water-level altitude in these seven wells are influenced by vertical hydraulic gradients when compared to nearby wells of different depths. Horizontal ground-water flow is perpendicular to the potentiometric contours and down gradient. Ground-water flow in the North Hills aquifers is generally from the north to the south.

The shape and slope of the potentiometric surface corresponds to the topography and material through which the ground water flows. The potentiometric contours are generally parallel to the valley-fill/bedrock contact. The contours tend to wrap around the bedrock that protrudes out into the valley in 11N03W04 and 11N03W05. The hydraulic gradient in the bedrock and Tertiary aquifers is similar and ranges between 0.018 to 0.036, but does not appear to be any steeper or flatter in any one aquifer. The similarity in gradients suggest that the two aquifers may share similar hydraulic characteristic. Hydraulic gradients in the Quaternary aquifer are less steep compared to the gradient in the two other aquifers and range between 0.0025 to 0.008. These flatter gradients reflect the higher transmissivity in the Quaternary aquifer compared to the pre-

Tertiary bedrock and Tertiary aquifers.

GROUND-WATER RECHARGE AND DISCHARGE

One of the questions that prompted this study was whether or not the quantity of water discharged from wells exceeded recharge in the North Hills and caused water levels to decline. To answer this question, a ground-water budget was constructed for the North Hills study area. What the budget attempts to accomplish is to describe and quantify the sources of recharge to and discharge from the North Hills aquifers.

Ground-water recharge to and discharge from the North Hills aquifers is described by the following equation:

$$(SC_{in}) + (IC_{in}) + (IFP_{in}) + (AR_{in}) = (DR_{out}) + (UF_{out}) + (WL_{out})$$

where:

SC_in = Recharge from infiltration of Silver Creek streamflow,

IC_in = Recharge from the Helena Valley Irrigation Canal and laterals,

IFP_in = Recharge from infiltration of excess irrigation water and precipitation applied to irrigated fields,

AR_in = Infiltration of aerial recharge,

DR_out = Discharge to drains,

UF_out = Discharge through underflow through the southern boundary of the study area, and

WL_out = Discharge through withdrawal from wells.

Recharge to the North Hills aquifers is through infiltration of Silver Creek streamflow, irrigation water, and precipitation. Recharge from Silver Creek was estimated using the calculated streamflow presented in table 1. Assuming all of Silver Creek infiltrates into the ground and that about 60 acre-feet per year is diverted from the stream for irrigation, mean annual recharge from this source is about 2,000 acre-feet.

Leakage from Helena Valley Irrigation Canal and laterals were estimated using leakages rates defined by Briar and Madison (1992). Their measurements show that the main canal loses about 0.63 cubic feet per second per mile and that the smaller laterals lose at 1/3 of this rate. In the study area there are about 6.2 miles of main canal and 5.3 miles of laterals. Assuming that the canal and laterals have water in them for 150 days per year, about 1,220 acre feet of water infiltrates into the ground-water flow system from this source.

About 1,190 acres of land are irrigated within the North Hills study area from water diverted from the Helena Valley Irrigation Canal. Briar and Madison (1992) estimated the amount of excess irrigation water applied to the irrigated area within the Helena Valley which includes the area irrigated in the North Hills. Their analysis accounted for the total volume of water applied plus any precipitation falling on the irrigated area and the water consumed by evapotranspiration. Their analysis shows that on average, about 1.5 acre feet of water per acre of irrigated land is not

consumed in the root zone and recharges the ground water system. Annual average recharge in irrigated areas of the North Hills is about 1,825 acre feet.

A large area of the North Hills study area does not receive any recharge from irrigation sources or Silver Creek leakage. The only ground-water recharge that this area receives is from infiltration of rain and snow melt (plate 3). Directly measuring this component would be difficult. To estimate aerial recharge to the aquifer, it was assumed that ground-water flow past the 3,850 foot contour on the potentiometric map was derived only from rain and snow melt that had infiltrated through the unsaturated zone to recharge the ground-water system. A gradient of 0.026, a flow width of about 38,500 feet, and a transmissivity of 1,100 feet²/day were used with Darcy's Law to estimate the flow past the 3,850 foot contour. Based on this calculation, average annual flow past the 3,850 foot contour is about 9,200 acre feet. This ground-water flux through the 3,850 contour is in good agreement with the flux out of the North Hills area calculated by Briar and Madison (1992).

Ground water discharges from the North Hills' aquifers to drains, wells, and as underflow through the south boundary of the study area. Agricultural drains along the south boundary of the study area collect shallow ground water and channel it to Lake Helena. Measurements by DNRC indicate that the average annual discharge is about 725 acre-feet.

Ground water flows out of the study area along the southern boundary. There is no way to directly measure this discharge, so Darcy's Law was used to calculate the discharge. Using a gradient of 0.0033, a flow width of 26,250 feet and a transmissivity of 18,000 feet²/day resulted in an estimated of the average annual underflow out of the area of about 12,970 acre feet.

Withdrawal of ground water by wells was estimated using metered usage from two subdivisions that totaled about 140 residences. Average usage for each residence was calculated to be 464 gallons/day. Based on usage during the winter, 162 gallons/day/residence is returned to the ground water system via septic systems. The remainder or 302 gallons/day/residence is consumed through irrigation. There are about 1,623 residences in the North Hills based on a count from recent aerial photographs. Annual consumption of ground water withdrawn from wells is estimated to be about 550 acre feet.

The estimated components of yearly recharge to and discharge from the North Hills Aquifer are summarized in the ground water budget presented in table 2. One purpose of the water budget was to determine how much water was being consumed by wells and what percentage of the budget this represents. Net yearly consumption from withdrawal of ground water by wells in the North Hills study area is about 550 acre feet and accounts for about 4% of the total budget.

Table 2Average annual ground water budget for the North Hills area.												
		Recharge)				Discl	narge				
	A	Acre-Feet					Acre	e-Feet				
AR_in	SC_in	IC_in	IFP_in	Total		UF_out	WL_out	DR_out				
9,200	2,000	1,220	1,825	14,245		12,970	550	725				
		% of total					% of total					
65	14	9	13	100		91	4	5				

CHANGES IN WATER LEVELS

Water levels in wells respond to changes in sources of recharge and discharge. Typically, water levels in wells are lowest in spring, rise during spring runoff and the irrigation season, and fall throughout autumn and winter. The water levels rise during spring runoff and the irrigation season because during this period recharge exceeds discharge and water is put into storage. In the fall and winter discharge exceeds recharge, and water is removed from storage. So if from year to year more water recharges than discharges from an aquifer, hydraulic head in the aquifer will increase. The converse is true when discharge exceeds recharge.

Why did the water level in well 11N04W24BBAB (GWIC ID 65432) decline nearly 15 feet in 2000 and 2001? Figure 4 shows the annual mean discharge for Tenmile Creek. In 2000, the flow was 10 percent of normal. Assuming that Silver Creek streamflow was 10 percent of normal, recharge to the Quaternary aquifer in this part of the North Hills was probably only 10 percent of normal as well. Since the summer of 2001, water level in well 11N04W24BBAB has recovered to almost record high levels (figure 7).

Since 2003, when water levels in 11N04W24BBAB (GWIC ID 65432) recovered to normal levels, about 55 wells have been drilled in 11N04W24 (figure 8). In the future, if recharge from Silver Creek diminishes to near the rate that it was in 2000, water level in many of these wells could drop to a level that would negatively impact their performance. What happened with streamflow in 2000 was probably not an isolated incident. Between 1970 and 2000, the 24-month SPI has been near or below -1 on three different occasions, indicating that streamflow in Silver Creek may have been much below average on these occasions as well (figure 4).

Within the North Hills study area, some wells upgradient of the Helena Valley Irrigation Canal, and all wells downgradient show a seasonal response to ground-water recharge from leakage from the irrigation canal, laterals, and excess water applied to irrigated land (figure 9 and plate 3). In some areas, owing to a flat hydraulic gradient developed in the highly permeable Quaternary aquifer, the irrigation recharge affects water levels in wells more than a mile upgradient from the Helena Valley Irrigation Canal.

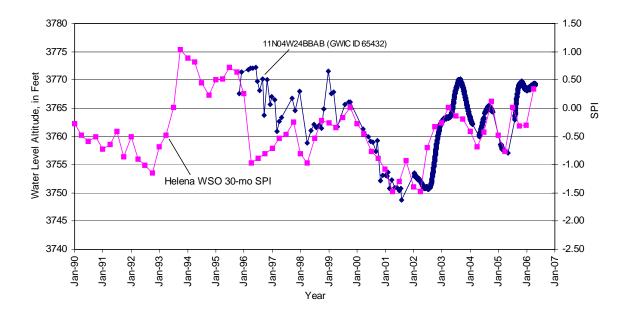


Figure 7–In 2000, streamflow in Silver Creek was probably 10 percent of normal (based on flow in Tenmile Creek) and ground-water recharge to the southwest part of the North Hills ground-water system was less than normal. As a result, the water level in well 11N04W24BBAB (GWIC ID 65432) continued to drop throughout 2000 and into 2001. The water level in the well seems to correspond to 30-month anomalies in climate.

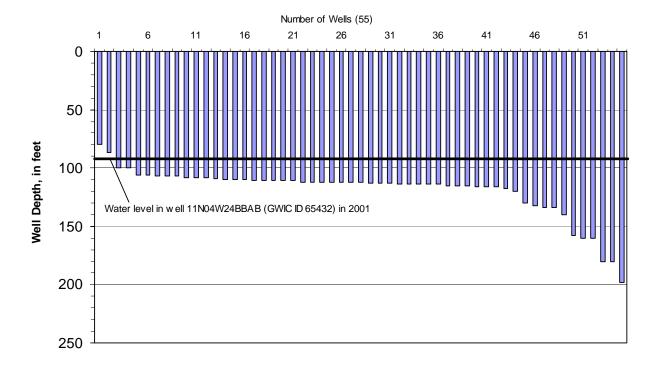


Figure 8– Since 2003, when water level in well 11N04W24BBAB (GWIC ID 65432) recovered, 55 wells have been drilled in 11N04W24. If depth to water is similar to 11N04W24BBAB (GWIC ID 65432) and water level responds similarly, many wells in the future could be impacted if Silver Creek streamflow responds to a dry climate like it did in 2000.

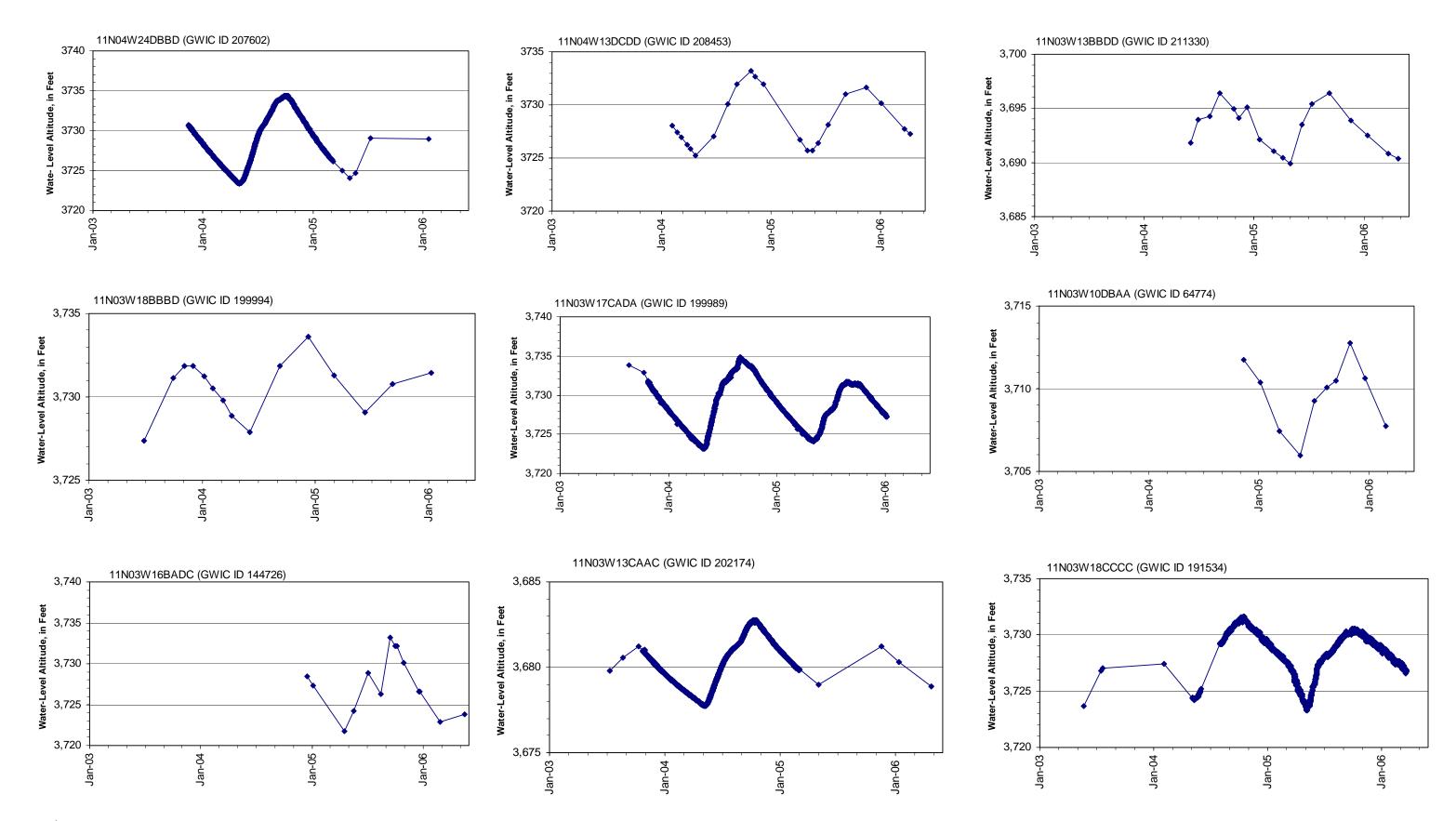


Figure 9– Hydrographs of North Hills wells influenced by recharge from leakage of water from the Helena Valley Irrigation Canal and laterals; and excess irrigation and precipitation on irrigated fields. In some areas, the influence is observed in wells more than a mile upgradient from the irrigation canal.

The ground-water flow system in most of the North Hills study area does not receive any recharge from losing streams or irrigation features (plate 3). The only recharge this area receives is from rain and snow melt. In May and June of 2005, the North Hills received close to 7 inches of rain. Although there was not any apparent immediate response in many hydrographs, a few showed relatively rapid response such as 11N04W02DBBB (GWIC ID 196245) which showed about a 4-feet rise in water level over about 6 months, and 11N04W11CCDB (GWIC ID 198749) which showed about a 7-feet rise over about a 2-month period.

An unusual response that many wells show, to varying magnitudes, is water levels that fall through the spring and summer and rise in the fall and winter (figure 10). It would be easy to explain this response as caused by a nearby pumping well or wells, but well 11N03W10BBAC (GWIC ID 205626) is an unused well in a relatively undeveloped area of the North Hills where there are no irrigation or community supply wells nearby that could cause the decline recorded by this hydrograph. It is not readily apparent what causes these fluctuations, but it could be due to the transient response of infiltrating rain and snow melt reaching the ground-water system. The hydrograph for well 11N03W06DCAD (GWIC ID 64702) shows a similar response but it is located in one of the most developed areas of the North Hills, and some of the decline may be caused by pumping in the summer, but it is not clear to what extent.

Two long-term hydrographs in North Hills have shown declining water level trends since about 2000. These hydrographs are in the area where the ground-water flow system receives recharge only from rain and snow melt. The water level in well 11N03W11BBBA (GWIC ID 148259) has declined about 5 feet since 2000 (figure 11). This well is in a relatively undeveloped area of the North Hills, and the decline is probably related more to climate than over development of the ground-water resource by withdrawal from wells. Water level in well 11N03W08BCBA (GWIC ID 64737) has declined about 8 feet since 2000 (figure 12). It is located near one of the most developed areas in the North Hills, and some of the decline may be related to the withdrawal of ground water, but probably is mostly related to the dry conditions that the North Hills has experienced since 2000. The 2006 peak in the hydrograph is at a similar level to the 2005 peak, and this corresponds with the trend of the 30-month SPI for about the last few quarters.

NITRATE IN GROUND WATER

Between 2000 and July, 2006, water samples were collected from 127 wells for determination of nitrate concentration; for some samples, chloride concentration also was determined. The samples were collected by either the Lewis and Clark County Water Quality Protection District, the MBMG, or private well owners.

Nitrate in ground water may be derived from human and animal waste, organic nitrogen from soil, fertilizer, atmospheric deposition, or a combination of these sources. Large concentrations of chloride (>40 mg/L) in water samples may indicate a human source for nitrate because humans consume and dispose of NaCl (Thamke, 2000). In the North Hills, Thamke (2000) used land use, chloride concentrations, and nitrogen isotopes to infer that the source of nitrate in one well was organic nitrogen from soil or a combination of sources, and in another well, human or

animal waste.

The U.S. Environmental Protection Agency (EPA) primary drinking water standard for nitrate established for public drinking-water supplies is 10 mg/L (U.S. EPA, 2002). Of the 127 wells sampled in the North Hills, the nitrate concentration in two wells exceeded the drinking water standard (figure 13). Well 11N04W24ADCA (GWIC ID 65369) had a nitrate concentration of 10.2 mg/L and a chloride concentration of 54.0 mg/L; based on the high chloride concentration in this well and the land use in the area, the nitrate may be derived from the disposal of human waste via the septic system at this site or a nearby site. At well 11N04W10BDBB (GWIC ID 214684) the nitrate concentration was 17.6 mg/L, and the chloride concentration was 20.0 mg/L; the source of the nitrate at this site may be organic nitrogen from soil or animal waste. Nitrate concentration at 11 sites was between 5 to less than 10 mg/L; at least three of these sites also had large (>40 mg/L) chloride concentrations suggesting nitrate derived from human waste; and at 4 sites, the chloride concentration was small (<40 mg/L) suggesting a source for the nitrate from animal waste, organic nitrogen from soil, fertilizer, or a combination of sources. At the remaining 114 sites, the nitrate concentration was less than 5 mg/L.

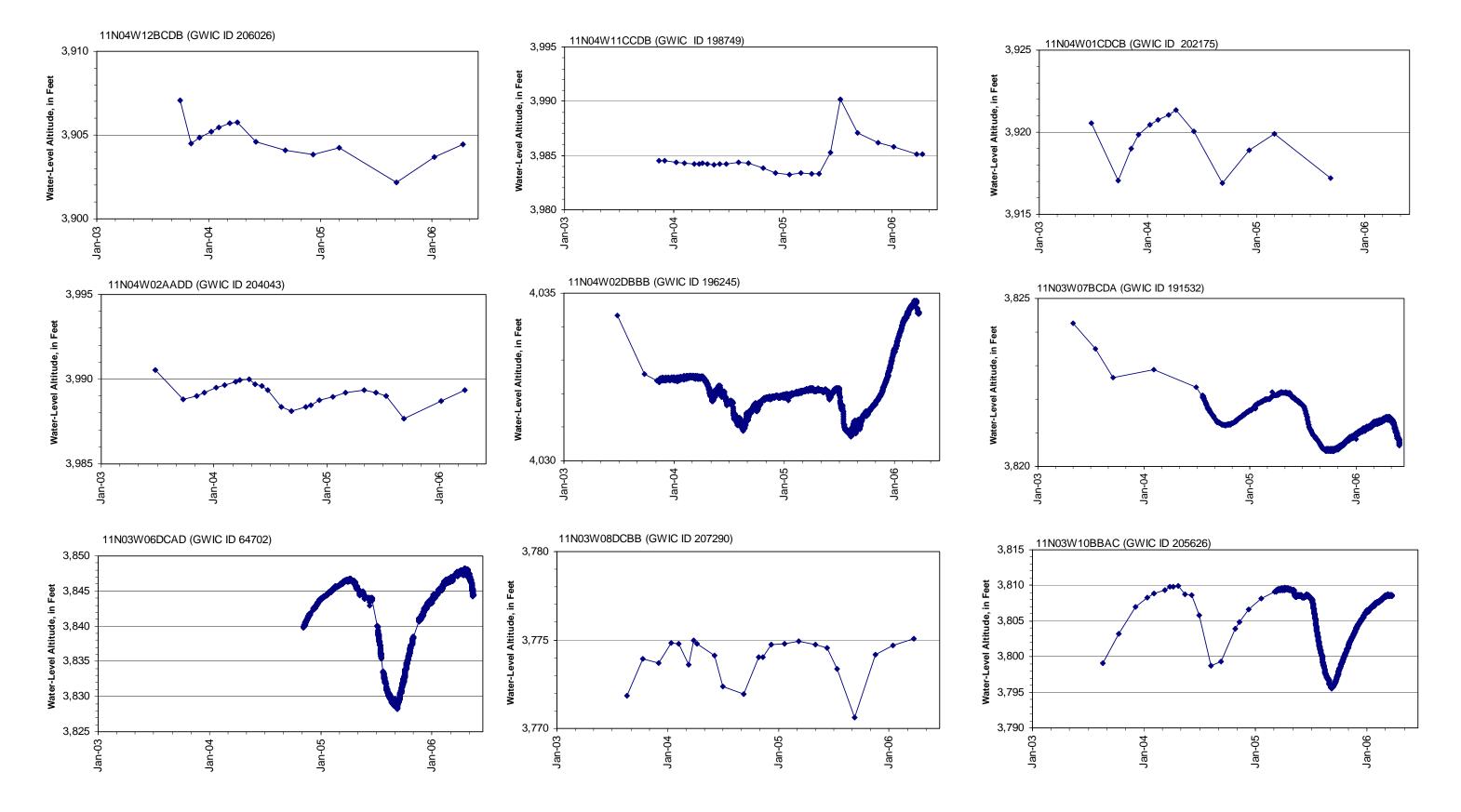


Figure 10—Well hydrographs for wells in the North Hills that are completed in the part of the ground-water system that is not influenced by the effects of irrigation. Recharge is by infiltration of rain and snowmelt. Some wells in the area responded within a few months to the almost 7 inches of rain that the North Hills received in May and June of 2005 as shown by 11N04W11CCDB and 11N04W02DBBB. Other wells respond oppositely to the wells effected by irrigation recharge. Their water levels fall throughout the spring and summer, and rise in the fall and winter. It would seem that these hydrographs reflect drawdown caused by a pumping well, but well 11N03W10BBAC is in a fairly undeveloped part of the North Hills, and there are no irrigation or community supply wells nearby.

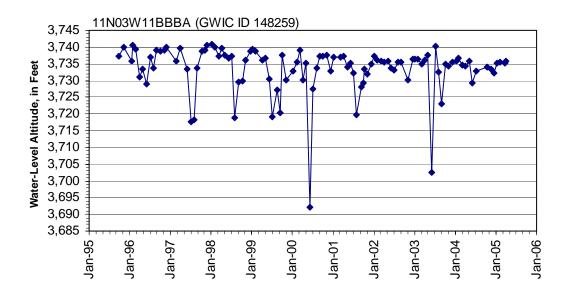


Figure 11–Water level in well 11N03W11BBBA (GWIC ID 148259) has declined about 5 feet since 2000. The well is located in a relatively undeveloped area of the North Hills. The decline probably reflects long-term climate trends.

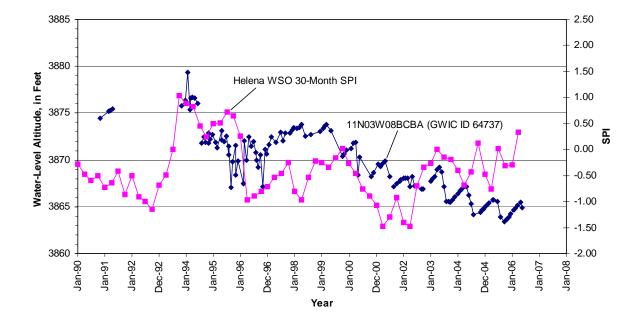


Figure 12—Water level in well 11N03W08BCBA (GWIC ID 64737) has declined about 8 feet since 2000. The 30-month SPI correlates with the hydrograph fairly well. The last two peaks of the well hydrograph are close to the same level. It may take several years of above normal precipitation (SPI near 1) for the water level in the groundwater flow system to rise to pre-2000 levels.

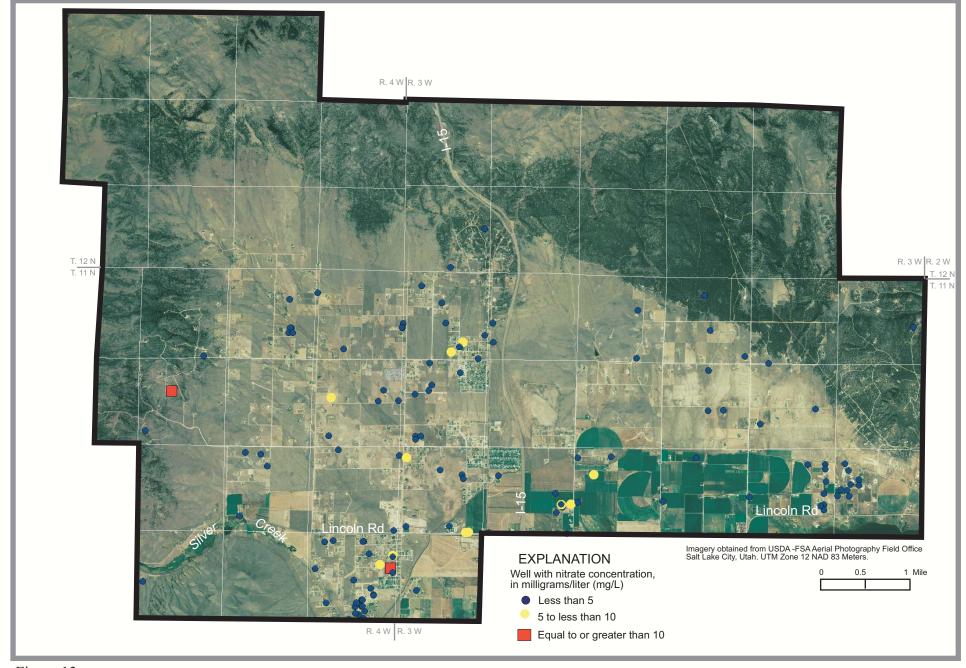


Figure 13--Nitrate concentrations in water samples from 114 wells were less than 5 mg/L; 5 mg/L to less than 10 mg/L in 11 wells; and 10 mg/L or greater in 2 wells. Samples were collected in 2000 through July, 2006.

SUMMARY AND CONCLUSIONS

The North Hills of the Helena Valley is located in north-central Montana and about 8 miles north of Helena, Montana. The study area is 52 square miles and contains more than 1,600 residences.

The North Hills is the fastest growing area in Lewis and Clark County, and one of the fastest growing areas in the state. From 1990 to 2000, the population of a portion of the North Hills went from 1,215 to 2,082, an increase of 867 people (71 percent).

Beginning in the late 1990's, and continuing to the present day, more than 30 wells in the North Hills area have gone dry or the water in the well has dropped to a level that cannot be pumped. This prompted a group of concerned citizens to petition the Montana Department of Natural Resources and Conservation to create a temporary Controlled Groundwater Area; the Controlled Groundwater Area was established in 2002, and data collection began in 2003 as the first step in assessing why water levels were falling.

Average annual precipitation at the Helena WSO weather station, about 8 miles to the south of the study area, is 11.90 inches. Precipitation data from a weather station located about 2 miles south of the North Hills and three project stations, indicate that average annual precipitation falling on the North Hills may be up to 25 percent less than the average annual precipitation at the Helena WSO weather station.

Silver Creek is the only perennial stream in the North Hills and flows through the southwest corner of the study area. Silver Creek emerges from a bedrock canyon, and most times loses all of its stream flow by infiltration into the valley-fill sediments. Calculated average annual streamflow for Silver Creek is 2.82 cfs or 2,060 acre feet/year.

The North Hills area is comprised of mostly flat, gentle southerly sloping pediment surfaces and alluvial plain surrounded on the west, north and east by slightly rugged mountainous terrain composed mostly of lower middle Proterozoic rocks of the Belt Supergroup. Poorly to moderately consolidated Tertiary sediments outcrop in the southeast part off the North Hills and consist of interbedded clay and silt with lenses of sand and gravel. The Tertiary sediments underlie and are concealed in most places by pediment surfaces and alluvial plain. Quaternary alluvium covers most of the study area where bedrock is not exposed. The alluvium is thinnest near the bedrock outcrops and thickens to the south, where it may be up to 600 feet thick.

Based on the geologic map of the North Hills study area, well-completion reports, and field observations of well installations, three aquifers were delineated within the North Hills. These three consist of the pre-Tertiary bedrock aquifer, Tertiary aquifer, and the Quaternary aquifer. Although separated into three aquifers, nothing prevents ground-water flow from one aquifer to the other, and therefore a ground-water flow continuum exists across rock units within the ground-water flow system. Well depths in the pre-Tertiary bedrock aquifer have been reported up to 1,000 feet, but the average bedrock well is about 200 feet deep. Wells yields have been reported up to 100 gallons per minute, with an average yield of about 20 gallons per minute. Well depths in the Tertiary aquifer have been reported up to 800 feet, but the average is about

190 feet; the maximum well yield reported for the Tertiary aquifer is 500 gallons per minute, with an average of 20 gallons per minute. In the Quaternary aquifer, well depths have been reported up to 600 feet, but the average is 120 feet; yields have been measured up to about 900 gallons per minute, with a reported average yield of 35 gallons per minute.

The potentiometric surface in the Quaternary, Tertiary, and pre-Tertiary bedrock aquifers was determined using water levels measured during September 2005 through March 2006. Groundwater flow in the North Hills' aquifers is generally from the north to the south, and all three aquifers appear to function as single hydrostratigraphic unit.

Recharge to the North Hills aquifers is through infiltration of Silver Creek streamflow, irrigation water, and precipitation. Ground water discharges from the North Hills' aquifers to drains, wells, and as underflow through the south boundary of the study area. Discharge of water through wells for mostly watering grass in the summer is 550 acre feet, which is about 4 percent of the total amount discharged from the aquifer. A large part of the North Hills ground-water system is recharged only from rain and snow melt.

In 2000, the streamflow in Silver Creek was about 10% of normal. The aquifer in the southwest part of the study area received less recharge because of this, and water level in wells fell during the summer of 2001. Since then streamflow has increased and the water levels in the wells have returned to normal.

In other parts of the North Hills where the ground-water system is recharged only by rain and snow melt, water levels in some wells have declined. Although the decline in some wells is near the most developed part of the North Hills, the decline has also been measured in wells where development is minimal. The decline, therefore, is probably related more to climatic anomalies and to a lesser extent over drafting by well withdrawals.

Of the 127 wells sampled in the North Hills, the nitrate concentration in two wells exceeded the U.S. EPA drinking water standard. Nitrate concentration at 11 sites was between 5 to less than 10 mg/L. At the remaining 114 sites, the nitrate concentration was less than 5 mg/L. The source for nitrate appears to be human and animal waste, organic nitrogen from soil, fertilizer, atmospheric deposition, or a combination of these sources.

RECOMMENDATIONS

The following recommendations for consideration are as follows:

- 1. New wells should be drilled at least 20 feet and preferably 50 feet deeper than surrounding wells to allow for fluctuations in the potentiometric surface due to fluctuations caused by drought and future development as illustrated in figure 8.
- 2. Lewis and Clark County or some other stakeholder group should consider leasing or buying Silver Creek water rights to ensure streamflow and ground-water recharge to the southwest part

of the North Hills ground-water system.

- 3. Develop high capacity community-supply wells in the Quaternary aquifer for use in areas underlain by Tertiary or pre-Tertiary bedrock aquifers.
- 4. Developers could contract with the U.S. Bureau of Reclamation to use water from the Helena Valley Irrigation Canal for lawn watering at current and future high-density development(s).
- 5. A stream gaging station should be established on Silver Creek near the southwest part of the North Hills study area to monitor streamflow. The streamflow data could be used to a assess recharge to the ground-water system and to alert citizens of potential declining water levels during anomalously (30 month) dry periods.
- 6. A subset of wells monitored for this study should continue to be monitored. Important locations to consider for long-term monitoring include the ground-water system under 11N04W24B which is effected by Silver Creek leakage. Other important areas include 11N03W06 and 11N03W07 where there has been a significant development and declining water levels.
- 7. Develop a numerical ground-water flow model to test and refine the aquifer geometry, aquifer properties, and ground-water budget.

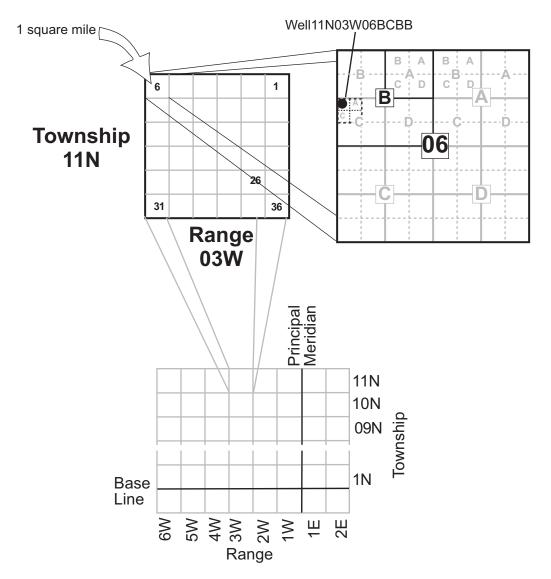
REFERENCES

- Briar, D.W. and Madison, J.P., 1992, Hydrogeology of the Helena valley-fill aquifer system, west-central Montana: U.S. Geological Survey Water-Resources Investigation, Report 92-4023.
- Davis, W.E., Kinoshita, W.T., and Smedes, H.W., 1963, Bouguer gravity, aeromagnetic, and generalized geologic map of the East Helena and Canyon Ferry Quadrangles and part of the Diamond City Quadrangle, Leis and Clark, Broadwater, and Jefferson Counties, Montana: U.S. Geological Survey Geophysical Investigation Map GP-444, scale 1:62,500.
- Department of Commerse, 2006, http://commerce.state.mt.us/censusresources.asp
- Freidline, R.A., Smith, R.B., and Blackwell, D.D., 1976, Seismicity and contemporary tectonics of the Helena, Montana area: Seismological Society of America Bulletin, v. 66, no. 1, p. 81-95.
- Knopf, A., 1913, Ore deposits of the Helena Mining region, Montana: U.S. Geological Survey Bulletin 527, 143 p.
- Hayes, M.J., undated, What is Drought?, National Drought Mitigation Center: http://drought.unl.edu/whatis/indices.htm#spi.
- Knopf, A., 1963, Geology of the northern part of the Boulder Batholith and adjacent area, Montana: U.S. Geological Survey Miscellaneous Geologic Investigations, Map I-381.
- Lorenz, H.W., and Swenson, F.A., 1951, Geology and ground-water resources of the Helena Valley, Montana, *with a section on* The chemical quality of water, by H.A. Swenson: U.S. Geological Survey Circular 83, 68 p.
- Moreland, J.A. and Leonard, J.B., 1980, Evaluation of shallow aquifers in the Helena Valley, Lewis and Clark County, Montana: U.S. Geological Survey Water-Resources Investigation, Open-File Report 80-1102.
- Pardee, J.T., 1925, Geology and ground-water resources of the Townsend Valley, Montana: U.S. Geological Water Supply Paper 539, 61 p.
- Pardee, J.T. and Schrader, F.C., 1933, Metalliferous deposits of the greater Helena mining region, Montana: U.S. Geological Survey Bulletin 842.
- Parrett, C., Johnson, D.R., and Hull, J.A., 1989, Estimates of monthly streamflow characteristics at selected sites in the upper Missouri River basin, Montana, base period water years 1937-86: U.S. Geological Survey Water-Resources Investigations Report 89-4082, 103 p.

- Reynolds, M.W., 1979, Character and extent of basin-range faulting, western Montana and east-central Idaho, in Newman, G.W., and Goode, H.G., eds., Basin and Range Symposium: Rocky Mountain Association of Geologists and Utah Geological Association, Denver, Co., p 185-193.
- Schmidt, R.G., 1977, Map of Helena and East Helena quadrangles, Montana, showing areal distribution of surficial deposits and bedrock and location of geologic faults: U.S. Geological Survey Open-File Report 77-129, 5 p.
- Schmidt, R.G., 1986, Geology, earthquake hazards, and land use in the Helena area, Montana–a review: U.S. Geological Survey Professional Paper 1316, 64 p.
- Stickney, M. C., 1978, Seismicity and faulting of central western Montana: Northwest Geology, v. 7, p. 1-9.
- Stickney, M.C., 1987, Quaternary geology and faulting in the Helena Valley, Montana: Montana Bureau of Mines and Geology Geologic Map Series 46, scale 1:50,000.
- Stickney, M.C., and Bartholomew, M.J., 1987, Seismicity and late Quaternary faulting of the northern Basin and Range Province, Montana and Idaho: Seismological Society of America Bulletin, v. 77, no. 5, p. 1602-1625.
- Thamke, J.N., 2000, Hydrology of the Helena area bedrock, west-central Montana, 1993-1998 *with a section on* Geologic setting and a generalized bedrock geologic map by M.W. Reynolds: U.S. Geological Survey Water-Resources Investigations Report 00-4212, 119 p.
- U.S. Environmental Protection Agency, 2002, List of Contaminants & their MCLs, EPA-F-03-016, 6 p.
- Wilke, K.R., and Coffin, D.L., 1973, Appraisal of the quality of ground water in the Helena Valley, Montana, U.S. Geological Survey Water-Resources Investigations 32-73,
- Wilke, K.R., and Johnson, M.V., 1978, Maps showing depth to water table, September 1976, and area inundated by the June 1975 flood, Helena Valley, Lewis and Clark County, Montana: U.S. Geological Survey Open-File Report 78-110, scale 1:62,500.

APPENDIX 1

LOCATION SYSTEM



The locations of wells and other sites are designated by location numbers, which are based on the rectangular system for the subdivision of public lands. Each number consists of as many as 14 characters and is assigned according to the location of the site within a given township, range, and section. The first three characters specify the township and its position north (N) of the Montana Base Line. The next three characters specify the range and its position west (W) of the Principal Meridian. The next two characters indicate the section. The next three or four characters indicate the position of the site within the section. The first letter denotes the quarter section (160-acre tract); the second, the quarter-quarter section (40-acre tract); the third, the quarter-quarter-quarter section (10-acre tract); and the fourth, the quarter-quarter-quarter-quarter section (2½-acre tract). The subdivisions of the sections are numbered A,B,C, and D in a counterclockwise direction beginning in the northeast quadrant. The last two characters form a sequence number that is assigned on the basis of order of inventory within that tract. For example the location number 11N03W06BCBB01 refers to the first well (01) inventoried in the NW½ NW½ SW¼ NW⅓ sec. 06, T. 11 N., R. 3 W.

Appendix 1--Location numbering system.

APPENDIX 2

MONITORING WELLS

Appendix 2--North Hills monitoring wells.

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	OWIO ID	Lander	Latterda	L	Land Surface Altitude,	Total Depth of Well, In Feet Below Land	Last Measurement	Last Static Water Level, in Feet Below Land	Static Water Level
_	GWIC ID	Location	Latitude	Longitude	in Feet	Surface	Date	Surface	Readings
		11N03W01DAAB	46.7401	-111.9170	4,121	255	5/16/06	148.65	12
		11N03W02CDCD	46.7338	-111.9523	3,914	254	2/27/06	212.99	40
		11N03W03DBBC	46.7392	-111.9667	3,980	178	5/16/06	69.45	11
		11N03W03DDDB	46.7349	-111.9582	3,945	390	5/16/06	169.6	12
		11N03W04ACDD	46.7420	-111.9838	4,024	48	3/24/06	34.57	15
		11N03W04DCAC	46.7385	-111.9835	3,940		5/16/06	36.15	11
		11N03W04DCDB	46.7358	-111.9854	3,941	324	9/8/05	47.48	6
		11N03W05CBBC	46.7395	-112.0200	3,997	170	4/12/06	86.45	8
		11N03W05CCBC	46.7367	-112.0198	3,965	70	5/17/06	67.09	143
		11N03W05CCBC	46.7363	-112.0191	3,965	110	5/17/06	68.12	12
		11N03W06AACD	46.7453	-112.0245	4,075	260	5/16/06	76.35	16
		11N03W06BBDB	46.7452	-112.0365	4,061	139	4/12/06	62.31	26
		11N03W06BBDB	46.7461	-112.0375	4,074	150	1/9/06	76.14	9
		11N03W06BCAB	46.7447	-112.0387	4,052	121	1/9/06	55.32	4
		11N03W06BCBA	46.7440	-112.0390	4,042	177	1/9/06	44.85	12
		11N03W06BCBB	46.7439	-112.0402	4,049	118	6/8/05	48.01	2
		11N03W06BDAD	46.7430	-112.0324	4,030	260	9/8/05	44.49	4
		11N03W06DAAA	46.7404	-112.0209	3,990	95	5/17/06	107.68	21
		11N03W06DBBB	46.7399	-112.0315	4,000	174	5/17/06	103.01	24
		11N03W06DBDD	46.7375	-112.0263	3,969	209	4/5/04	98.18	5
		11N03W06DCAB	46.7359	-112.0281	3,952	210	12/21/05	105.65	11
		11N03W06DCAB	46.7367	-112.0272	3,966	200	5/17/06	115.8	41
		11N03W06DCAD	46.7352	-112.0274	3,950	130	5/16/06	105.59	16,270
		11N03W06DCDB	46.7352	-112.0289	3,941	200	1/11/05	99.01	4
		11N03W06DCDC	46.7333	-112.0288	3,924	130	6/10/05	102.55	8
		11N03W06DDCD	46.7340	-112.0234	3,931	100	5/17/06	76.84	34
		11N03W07BBAA	46.7331	-112.0354	3,922	125	4/11/06	92.53	26
		11N03W07BCBD	46.7278	-112.0388	3,888	150	3/23/06	66.82	26
	191532	11N03W07BCDA	46.7285	-112.0355	3,884	100	6/12/06	63.31	13,494
		11N03W07CCCA	46.7202	-112.0386	3,849	240	2/28/05	81.31	4
	211328	11N03W07CCCA	46.7208	-112.0386	3,854	134	1/9/06	75.89	7
		11N03W07CCCD	46.7192	-112.0382	3,844		9/8/04	86.52	2
		11N03W07CCDA	46.7207	-112.0381	3,856	134	1/9/06	76.04	2
	206648	11N03W07CCDB	46.7199	-112.0371	3,847	320	1/9/06	120.6	26
		11N03W07CDCB	46.7208	-112.0372	3,851	281	9/7/05	156.81	5
	202171	11N03W07DCAC	46.7210	-112.0277	3,830	100	1/5/06	19.09	1,808
	64737	11N03W08BCBA	46.7294	-112.0169	3,925	208	5/17/06	60.07	161
	213904	11N03W08DCAB	46.7219	-112.0061	3,818	340	1/13/06	35.62	5
		11N03W08DCBB	46.7214	-112.0098	3,813	535	3/24/06	38.09	23
	216091	11N03W08DDAC	46.7216	-112.0014	3,816	120	1/13/06	38.72	2
	176011	11N03W09CABB	46.7237	-111.9942	3,832	240	5/16/06	45.73	12
		11N03W09CABB	46.7243	-111.9942	3,841	140	5/16/06	41.6	12
	219837	11N03W09CCAC	46.7217	-111.9966	3,818	128	3/24/06	46.55	4
	219841	11N03W09CDBD	46.7217	-111.9922	3,820	156	3/24/06	50.82	4
	176010	11N03W09DADA	46.7250	-111.9790	3,837	259	5/16/06	106	11

Appendix 2--North Hills monitoring wells (Continued).

		U \-						
014/0		1.20	Level 1	Land Surface Altitude,	Total Depth of Well, In Feet Below Land	Last Measurement	Last Static Water Level, in Feet Below Land	Static Water Level
GWIC IE		Latitude	Longitude	in Feet	Surface	Date	Surface	Readings
	3 11N03W09DADB	46.7248	-111.9797	3,827		5/16/06	91.5	11
	5 11N03W10ACDD	46.7271	-111.9633	3,857	420	9/9/05	114.53	1 500
	5 11N03W10BBAC	46.7326	-111.9745	3,918	420	3/24/06	109.28	1,539
-	4 11N03W10DBAA	46.7258	-111.9633	3,842	420	2/27/06	134.3	10
	9 11N03W10DBBB	46.7256	-111.9672	3,833	158	9/8/05	67.27	4
	9 11N03W11BBBA	46.7330	-111.9544	3,900	350	5/17/06	166.61	131
	2 11N03W13BBCA	46.7170	-111.9333	3,753	108	1/13/06	59.88	24
	11N03W13BBDC	46.7159	-111.9325	3,748	140	4/25/06	58.55	7
	11N03W13BBDD	46.7170	-111.9326	3,761	142	4/25/06	70.59	18
	11N03W13BCCD	46.7126	-111.9342	3,709	117	4/25/06	21.16	14
	4 11N03W13BCDB	46.7135	-111.9319	3,732	120	4/25/06	45.38	10
	3 11N03W13BCDD	46.7126	-111.9327	3,716	119	4/25/06	29.1	15
	3 11N03W13BDAA	46.7144	-111.9262	3,748	159	4/25/06	74.4	2
	3 11N03W13BDBC	46.7144	-111.9299	3,744	121	4/25/06	57.65	12
	3 11N03W13BDCA	46.7133	-111.9278	3,721	140	4/25/06	48.43	5
	1 11N03W13BDCB	46.7134	-111.9298	3,734	140	4/25/06	48.89	8
	4 11N03W13CAAC	46.7115	-111.9267	3,710	83	4/25/06	30.8	2,002
	5 11N03W13CAAD	46.7106	-111.9256	3,699	80	1/13/06	18.4	2
	1 11N03W13CBAA	46.7116	-111.9322	3,708	80	4/25/06	23.63	3
	3 11N03W13CBBB	46.7116	-111.9352	3,717	74	4/25/06	28.76	12
	1 11N03W14AACD	46.7160	-111.9397	3,752	120	4/25/06	60.09	6
207737	7 11N03W14AADB	46.7169	-111.9383	3,762	120	4/25/06	68.62	20
207738	3 11N03W14AADC	46.7161	-111.9382	3,741	120	4/25/06	47.71	13
220184	1 11N03W14ABCC	46.7170	-111.9455	3,767	120	4/25/06	66.21	3
	6 11N03W14ABDB	46.7168	-111.9425	3,764	120	4/25/06	67.02	12
	5 11N03W14ADAB	46.7152	-111.9382	3,750	120	4/25/06	56.98	12
	6 11N03W14ADAC	46.7140	-111.9379	3,756	120	4/25/06	64.45	10
	1 11N03W14CAAA	46.7112	-111.9473	3,712	92	1/13/06	13.78	4
219651	1 11N03W14DAAB	46.7118	-111.9381	3,721	100	4/25/06	34.62	3
	4 11N03W14DAAC	46.7099	-111.9382	3,704	89	4/25/06	14.79	7
216089	9 11N03W14DAAD	46.7107	-111.9375	3,711	100	4/25/06	21.19	5
	5 11N03W14DACA	46.7099	-111.9392	3,705	120	4/25/06	12.83	3
214702	2 11N03W14DACC	46.7091	-111.9399	3,693	98	4/25/06	6.23	5
221138	3 11N03W14DADD	46.7089	-111.9368	3,690	97	4/25/06	5.05	3
199988	3 11N03W15BAAC	46.7177	-111.9698	3,761	60	4/6/04	44.56	8
195637	7 11N03W15CBCC	46.7106	-111.9775	3,698	16	5/17/06	6.1	51
144726	5 11N03W16BADC	46.7177	-111.9906	3,784	240	5/18/06	60.25	14
892125	5 11N03W16BBBB	46.7175	-111.9988	3,781	125	5/16/06	51.4	65
191556	5 11N03W16DAAD	46.7103	-111.9778	3,700	50	11/17/04	4.48	13
199989	9 11N03W17CADA	46.7085	-112.0110	3,748	244	1/5/06	21.1	3,232
204557	7 11N03W17CBDB	46.7096	-112.0171	3,762	240	1/4/06	33.31	9
204558	3 11N03W17CBDB	46.7094	-112.0174	3,761	300	1/4/06	33.02	9
204554	4 11N03W17CBDB	46.7097	-112.0174	3,763	240	1/4/06	33.88	24
204564	4 11N03W17CCBC	46.7062	-112.0201	3,757	200	4/12/06	32.9	11
204563	3 11N03W17CCBC	46.7065	-112.0201	3,758	200	3/23/06	32.93	26

Appendix 2--North Hills monitoring wells (Continued).

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					Land Surface Altitude,	Total Depth of Well, In Feet Below Land	Last Measurement	Last Static Water Level, in Feet Below Land	Static Water Level
_	GWIC ID	Location	Latitude	Longitude	in Feet	Surface	Date	Surface	Readings
		11N03W18ACAA	46.7144	-112.0271	3,799	134	5/17/06	72.01	20
		11N03W18ACAD	46.7138	-112.0265	3,805	135	5/17/06	68.11	18
		11N03W18ADCA	46.7141	-112.0229	3,797	120	4/12/06	62.97	11
		11N03W18ADDC	46.7123	-112.0215	3,781	100	3/23/06	53.9	11
		11N03W18BACC	46.7161	-112.0366	3,829	220	1/9/06	97.87	15
		11N03W18BADD	46.7161	-112.0327	3,826	140	1/5/06	85.01	1,217
		11N03W18BBBC	46.7175	-112.0391	3,850	124	5/17/06	87.44	61
		11N03W18BBBC	46.7172	-112.0407	3,848	159	12/8/04	107.25	1
		11N03W18CCCC	46.7055	-112.0406	3,798	100	3/24/06	71.23	2,439
		11N03W19CBDA	46.6948	-112.0378	3,774	112	9/8/05	43.32	13
		11N03W20BBBB	46.7043	-112.0199	3,755	43	10/31/05	26.02	12
		11N03W21BBAA	46.7041	-111.9933	3,690	46.4	5/17/06	3.72	261
		11N04W01CCCA	46.7350	-112.0597	3,970	125	9/7/05	75.08	4
		11N04W01CDCB	46.7353	-112.0564	3,966	98	9/7/05	49	13
		11N04W01DADA	46.7391	-112.0418	3,988	350	1/9/06	146.94	4
		11N04W01DADA	46.7391	-112.0423	3,988	314	1/9/06	146.24	4
		11N04W01DADB	46.7391	-112.0436	3,990	330	1/9/06	146.08	2
		11N04W02AADD	46.7447	-112.0630	4,073	170	3/23/06	84.09	25
		11N04W02ACAD	46.7435	-112.0698	4,065	219	4/13/06	75.7	15
		11N04W02ADAA	46.7438	-112.0636	4,060	131	9/7/05	72.34	7
		11N04W02BADB	46.7458	-112.0755	4,109	280	4/12/06	53.87	27
	214703	11N04W02CDDD	46.7346	-112.0754	4,060	304	1/6/06	141.64	4
	209292	11N04W02DBAA	46.7387	-112.0696	4,041	197	1/6/06	60.55	10
	196245	11N04W02DBBB	46.7398	-112.0726	4,057	80	3/24/06	22.74	3,466
	213257	11N04W02DBDC	46.7379	-112.0699	4,038	169	1/6/06	80.88	5
	216078	11N04W02DBDD	46.7379	-112.0691	4,038	156	1/6/06	76.16	4
	209185	11N04W02DBDD	46.7387	-112.0693	4,039	100	1/6/06	58.73	8
	213511	11N04W02DCCC	46.7339	-112.0734	4,039	480	6/9/05	131.07	2
	221168	11N04W04DAAA	46.7405	-111.9785	4,015	114	9/9/05	43.83	1
	706051	11N04W09ADAD	46.7288	-112.1068	4,345	250	5/25/06	34.11	66
	215716	11N04W09DDBC	46.7207	-112.1115	4,353	450	1/6/06	146.66	3
	221166	11N04W10BCBA	46.7290	-112.1046	4,400	264	1/6/06	80.36	3
	214684	11N04W10BDBB	46.7281	-112.0983	4,304	220	4/13/06	71.7	12
	202176	11N04W10CCCA	46.7211	-112.1047	4,226	560	4/13/06	52.3	14
	138466	11N04W10CCCD	46.7190	-112.1042	4,183	250	3/23/06	30.76	41
	211340	11N04W11CADC	46.7229	-112.0772	4,017	340	3/23/06	10.82	8
	198749	11N04W11CCDB	46.7191	-112.0824	4,062	340	4/13/06	76.35	26
	169705	11N04W12ADBC	46.7284	-112.0466	3,909	220	1/9/06	80.47	13
	206026	11N04W12BCDB	46.7271	-112.0594	3,949	200	4/13/06	44.35	14
	206837	11N04W12CCBD	46.7206	-112.0598	3,910	400	3/23/06	150.04	17
	168597	11N04W12CDDC	46.7193	-112.0556	3,891	250	1/9/06	142.09	7
	65271	11N04W12CDDD	46.7191	-112.0536	3,890	176	5/17/06	137.21	166
	207600	11N04W13ADAC	46.7140	-112.0448	3,838	220	1/9/06	107.31	6
	216653	11N04W13ADCD	46.7123	-112.0446	3,835	400	1/9/06	97.75	2
	209187	11N04W13DCBB	46.7074	-112.0517	3,828	200	4/12/06	98.96	16

Appendix 2--North Hills monitoring wells (Continued).

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					Land Surface Altitude,	Total Depth of Well, In Feet Below Land	Last Measurement	Last Static Water Level, in Feet Below Land	Static Water Level
_	GWIC ID	Location	Latitude	Longitude	in Feet	Surface	Date	Surface	Readings
		1N04W13DCDD	46.7049	-112.0475	3,814	200	4/12/06	86.81	22
		1N04W13DDDC	46.7048	-112.0436	3,804	180	3/1/05	76.85	6
		1N04W14BABD	46.7174	-112.0764	3,957	502	4/13/06	10.65	25
		1N04W14BADD	46.7154	-112.0747	3,928	220	3/23/06	42.16	12
		1N04W14BBAD	46.7176	-112.0801	3,996	550	8/6/04	68.4	2
		1N04W18ADDB	46.7124	-112.0432	3,830	137	5/17/06	97.15	17
		1N04W22CBCB	46.6957	-112.1049	4,056	218	1/18/06	55.99	8
		1N04W24ABDD	46.7005	-112.0489	3,815	155	5/17/06	89.08	20
		1N04W24ABDD	46.7008	-112.0489	3,815	95	5/17/06	89.4	16
		1N04W24ADCC	46.6978	-112.0460	3,801	112	9/8/05	69.05	6
		1N04W24ADCC	46.6977	-112.0472	3,805	112	9/8/05	72.48	6
		1N04W24ADDC	46.6977	-112.0437	3,795	100	9/8/05	63.01	12
		1N04W24BBAB	46.7030	-112.0584	3,845	120	6/12/06	74.95	6,619
		1N04W24BCCA	46.6982	-112.0627	3,849	300	9/8/05	44.32	11
		1N04W24CBAA	46.6963	-112.0589	3,839	160	9/9/05	41.66	1
		1N04W24CBCA	46.6941	-112.0619	3,847	280	9/8/05	39.79	5
		1N04W24CDDA	46.6908	-112.0527	3,800	115	1/18/06	69.61	10
	217987 1	1N04W24DACB	46.6950	-112.0482	3,806	110	1/18/06	74.82	1
	213264 1	1N04W24DACC	46.6939	-112.0484	3,801	111	1/18/06	73.39	5
	213262 1	1N04W24DACC	46.6940	-112.0483	3,802	111	1/18/06	73.89	5
	213261 1	1N04W24DACC	46.6940	-112.0482	3,801	111	1/18/06	73.53	5
	213259 1	1N04W24DACC	46.6939	-112.0482	3,802	112	1/18/06	73.76	5
	222890 1	1N04W24DBAA	46.6966	-112.0482	3,809	116	1/18/06	77.67	1
	222891 1	1N04W24DBAA	46.6966	-112.0476	3,808	113	1/18/06	76.43	1
	223346 1	1N04W24DBBB	46.6967	-112.0513	3,816	113	1/18/06	85.79	1
	222672 1	1N04W24DBBC	46.6956	-112.0528	3,817	116	1/18/06	86.38	1
	222674 1	1N04W24DBBC	46.6956	-112.0522	3,816	114	1/18/06	85.43	1
	222673 1	1N04W24DBBD	46.6957	-112.0512	3,813	113	1/18/06	83.23	1
	207602 1	1N04W24DBBD	46.6950	-112.0501	3,809	110	1/18/06	80.48	1,925
	217071 1	1N04W24DBCA	46.6949	-112.0512	3,812	140	1/18/06	82.18	1
	217072 1	1N04W24DBCB	46.6949	-112.0520	3,819	100	1/18/06	83.82	1
	206641 1	1N04W24DBCC	46.6926	-112.0525	3,808	107	1/18/06	78.93	10
	220000 1	1N04W24DBCC	46.6938	-112.0519	3,810	111	1/18/06	81.84	2
	217073 1	1N04W24DBCC	46.6938	-112.0521	3,809	120	1/18/06	80.11	1
	217099 1	1N04W24DBCC	46.6938	-112.0520	3,809	160	1/18/06	79.64	2
	220001 1	1N04W24DBCC	46.6938	-112.0519	3,810	110	1/18/06	80.33	2
	217982 1	1N04W24DBDB	46.6938	-112.0500	3,805	114	1/18/06	76.5	2
	217989 1	1N04W24DBDB	46.6948	-112.0488	3,808	112	1/18/06	76.89	3
	220003 1	1N04W24DBDB	46.6950	-112.0500	3,809	115	1/18/06	80.47	2
	220002 1	1N04W24DBDC	46.6940	-112.0502	3,811	114	1/18/06	77.34	1
	213258 1	1N04W24DBDC	46.6938	-112.0502	3,806	116	1/18/06	77.1	5
	217983 1	1N04W24DCAA	46.6932	-112.0482	3,799	112	1/18/06	71.58	2
	217984 1	1N04W24DCAB	46.6932	-112.0492	3,800	115	1/18/06	73.39	2
	217988 1	1N04W24DCAB	46.6932	-112.0493	3,801	115	1/18/06	73.31	2
	204585 1	1N04W24DCBB	46.6931	-112.0512	3,806	107	1/18/06	77.1	12

Appendix 2--North Hills monitoring wells (Continued).

					Total			
					Depth		Last Static	
				Land	of Well,		Water Level,	Static
				Surface	In Feet	Last	in Feet Below	Water
				Altitude,	Below Land	Measurement	Land	Level
GWIC ID	Location	Latitude	Longitude	in Feet	Surface	Date	Surface	Readings
204590	11N04W24DCBB	46.6931	-112.0510	3,805	118	1/18/06	69.77	13
204583	11N04W24DCBB	46.6920	-112.0512	3,803	108	1/18/06	74.72	10
206643	11N04W24DCBC	46.6927	-112.0525	3,808	107	1/18/06	78.74	10
204588	11N04W24DCBC	46.6919	-112.0528	3,807	158	1/18/06	76.91	11
204589	11N04W24DCBD	46.6920	-112.0510	3,803	106	1/18/06	74.35	11
204587	11N04W24DCBD	46.6918	-112.0510	3,802	111	1/18/06	73.54	10
206644	11N04W24DCBD	46.6919	-112.0511	3,803	106	1/18/06	74.24	10
202179	11N04W24DCCA	46.6912	-112.0505	3,799	100	1/18/06	71.33	11
194433	11N04W24DCCB	46.6906	-112.0518	3,798	136	1/18/06	68.83	9
194432	11N04W24DCCC	46.6900	-112.0507	3,794	120	1/18/06	65.39	8
212618	12N03W31ADDC	46.7558	-112.0222	4,257	350	4/12/06	0.6	8
208488	12N03W31DBBD	46.7542	-112.0295	4,230	327	4/12/06	85.48	28
66332	12N03W31DDAC	46.7502	-112.0222	4.133	53	5/16/06	16.67	50

