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STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

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January 15, 1987

TO: Coal File

FROM: Holland Shepherd SH for Reclamation Specialist

Re: Maintenance of Water Pipeline in the Mohrland Mine Area, U. S. Fuel Company, ACT/007/011, Folder #7, Carbon County, Utah

On December 31, 1987, Lowell Braxton, Susan Linner, and myself visited the Mohrland area, to inspect the condition of the water main which supplies water to the Town of Hiawatha and the U. S. Fuel processing plant facility. The Mohrland site is located in Cedar Creek Canyon, situated along the southeast border of the Hiawatha Complex. We met with Mr. Paul Shank and Ms. Jean Semborski, of U. S. Fuel at the Mohrland site.

On two previous inspections, within the last 5 weeks, I have issued two violations (N86-9-12-1 and N86-9-13-1) concerning large leaks which had developed in this pipeline. In both cases a great deal of water had escaped from the water main, under pressure, causing damage to the road, hillside, stream embankment, and contributing additional sediment to Cedar Creek.

The main purpose of this visit was to develop an agreement with the operator concerning the maintenance of this pipeline in order to prevent further leaks or, if leaks do occur to deal with them as expeditiously as possible. Several points of agreement were made at this meeting between ourselves and operator personnel. They are as follows:

1. The Division understands that though the pipeline is quite old, it may still be functionable under certain circumstances. If the pipe were to be replaced, or sections of it replaced, the operator would incur a considerable financial burden. Before requesting that the operator replace any section of this pipeline we have agreed to allow the operator time to test a method of cathodic protection on the pipeline.

   According to Mr. Shank, inspection of cross sections of broken pipeline indicates that leaks have developed, not as a result of corrosion of the pipe, but as a result of electrolysis. Magnesium anodes have been installed along the pipeline in Cedar Creek Canyon. These anodes should act to reduce the process of electrolysis, thus preventing future leaks in the pipeline. Also, according to Mr. Shank, the effects of these anodes will not be verifiable for another 4-5 months.

2. The Division has agreed to wait to see if the cathodic protection works on the pipeline within the 4-5- month period specified by Mr. Shank as long as the operator agrees to do the following:

   A.) Inspect the pipeline in the Mohrland area at least twice weekly during critical seasons late fall and early spring, and once per week during less critical times of the year.

   B.) Log or make a record of all inspections and breaks in the pipe.

   C.) Anodes will be maintained along the pipeline at intervals sufficient to provide adequate protection to the pipeline along sections where leaks have been developing.

   D.) Repair all leaks as expeditiously as possible, and any damage that may have resulted from the leaks.

   E.) Prevent water erosion to the road and stream embankment, and sediment loading to the creek, by maintaining drainage controls along the roadway and utah Railway right-of-way in the Savage Brother's loadout area. Specific measures what would be taken in this area include: maintainence of existing water bars along the roadway; grading the road such that drainage will flow along the inside of the road until reaching a water bar; and insuring that any drainage, that occurs below the last water bar on the road, follows the inside of the road down into the ditch which channels drainage across the Savage Brother's property and then into Ben Johnson Creek, instead of across the loadout yard.

   It should be noted, that the operator has requested he not be required to maintain a ditch on the inside of this roadway, as the maintenance of such would increase the probability of damaging the pipeline.

The Division reserves the right to take appropriate action in the event of any gross negligence on the part of the operator, in maintaining the pipeline or, allowing drainage controls along the roadway to deteriorate to the point where large quantities of water cannot be adequately channeled.

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cc: J. Semborski, U. S. Fuel
K. May
S. Linner
B. Roberts
0399Q-17-18