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Portland, OR 97232



05 Mar 2005
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March 1, 2005

Harry T. Hall, P.E.
Regional Engineer
Federal Energy Regulatory Commission
101 SW Main, Suite 905
Portland, Oregon 97204

Subject: American Fork Hydroelectric Project, FERC No. 696
Plan and Schedule to Repair American Fork Flowline

Dear Mr. Hall:

In early January 2005, we completed our investigation of the December 11, 2004 flowline failure at our American Fork Project, and made an evaluation of potential repairs to the flowline. Because of the location of the break, we have concluded that a repair to the flowline will be costly and difficult to complete, and possibly dangerous to our employees. Since the flowline is mostly buried and its overall condition cannot be tested until it is refilled, we are also concerned that additional flowline breaks might exist which cannot now be detected.

For these reasons, and the fact that American Fork decommissioning activities will begin in August 2006, we have decided not to repair the American Fork flowline. We will also defer the restoration of the scarp area below the flowline break until decommissioning activities begin.

On February 23, 2005 we met with representatives of Uinta National Forest (USFS) and Timpanogos Cave National Monument (NPS) to inform them of our decision to not repair the flowline, and to place the project in a non-operational state. By telephone message on February 24, 2005, we also informed Utah Division of Wildlife Resources (DWR) of our decision. We discussed the items that need to be accomplished to secure the project, and agreed on a plan and schedule. We therefore present the following in place of the plan and schedule for repair of the American Fork flowline requested in your January 25, 2005 letter.



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We will:

1. Remove the gates from the dam to leave an unobstructed path for water flow;
2. Seal the flowline downstream of the tainter gate at the intake to prevent any water from flowing through the flowline;
3. Install barriers to prevent access to exposed sections of broken flowline;
4. Remove potential contaminants from the powerhouse and secure the building;
5. Before spring run-off, remove the slide debris that entered the river as a result of the flowline break to prevent possible erosion of the highway.
6. Have an operator check the security of the facilities once a week.

We anticipate completing items 1 through 4 within 90 days. Item 6 has already begun and will continue until decommissioning begins.

Regarding item 5, the DWR has recently expressed concerns about the actual need for removal of this debris. If removal is required, concerns then arise about the removal process and its potential effect on the brown trout spawning areas downstream of the slide area. We will discuss the necessity for removal with USFS, NPS and DWR; and a decision will be made whether or not to proceed. If a decision is made to remove the debris, we will determine the best method to use, and will begin the process immediately following our receipt of a stream alteration permit. If it is decided to leave the debris as-is, we will cancel item 5 from our plan.

Enclosed are the original and two copies of this letter. If you have any questions or need further information, please contact Paul Johnson at 801-220-4630.

Sincerely,

for 

R.A. Landolt
Managing Director, Hydro Resources

RAL:PJ

cc: Tracy Conti -- Utah Department of Transportation
John Gangemi -- American Whitewater
Pam Gardner -- Uinta National Forest
Kit Mullen -- Timpanogos Cave National Monument
Barbara Murphy -- Utah State Historic Preservation Office
Don Wiley -- Utah Division of Wildlife Resources
Director, Utah Water Project -- Trout Unlimited