

MEMORANDUM

RECEIVED

TO: Bill Schlotthauer, P.E., Technical Services  
FROM: Kerry Carpenter, Southwestern Regional Engineer  
DATE: 29 January 1999  
RE: DEQ/DWQ Letter to Beaver County Commission - 19 January 1999

FEB 03 1999

WEL WATER RIGHTS  
SALT LAKE

You sent me a copy of the referenced letter with a note to "read, comment and return".

I have read, now I will comment:

For a number of years (I don't know how many, but perhaps as many as 15), there has been a flooding problem on the Beaver River north of Minersville. The problem is primarily due to the encroachment of agricultural operations into the floodplain and channel. Whereas the county has primary responsibility for flood control, it appears that a decision was made to, rather than remove the encroachments, construct a diversion in the river and a canal to divert excess flows westward across the Milford Flat toward Hay Springs. Hay Springs is a low area that historically produced significant flows, but with groundwater drawdowns have since been mostly dry.

As you may have heard from the very reliable (hah!) media, there has recently been a spate of positive bacteriological test results in private wells in the Milford Flat. The initial reaction of many of the locals was to blame Circle Four Farms for groundwater contamination. A later theory suggested that the "artificial recharge" incurred by the county's flood control efforts was to blame. The county had been diverting water into a couple of gravel pits and a landfill site under the auspices of flood control, but there was some campaign bragging about recharging the aquifer as well.

Subsequent to water quality sampling done on December 1 & 2 and again on December 11 & 12, most of the wells were disinfected and new samples were taken on January 12. Although nearly all wells tested in the first two rounds came up positive for coliform, only four of the 25 tested positive after disinfection - and two of those four had not been disinfected. Do you see a pattern here? Yeah, me too. Subsequent to further testing, the DEQ Bureau of Microbiology issued an "Interim Report" (copy attached) in which they have made "preliminary" conclusions that:

- 1) The groundwater is not contaminated (that is, the wells are the problem);
- 2) The source of contamination (fecal strep) is NEITHER the river water or Circle Four Farms' lagoons.

The locals aren't buying it. A "committee" set up by DEQ to study the problem and try to find money to finance a solution has seen the report, but are intent on continuing to demand the use of taxpayer money to finance a comprehensive groundwater study. I was a member of the committee. I recently resigned.

Memorandum - DEQ/DWQ Letter

29 January 1999

Page 2

---

Back to the letter: The county is probably concerned about being made liable for contaminating the groundwater. It appears that they have made some sort of application or inquiry to DWQ for a permit to continue to put water in the gravel pit/landfill. Hence, Don Ostler's response.

It is my opinion that the only viable long-term response to the flooding problem is to remove the agricultural encroachments and let the river get back to nature. This is a very unpopular position to express to the farmers on the Flat. It is also my opinion that the "contamination" is due exclusively to improperly constructed, located or maintained wells (lots of surfactant "hits" in the latest round of sampling). Also a currently unpopular position. I gave up on being popular on the Milford Flat a long time ago.

If you or someone else in the Division wants to discuss this further, I would be glad to do so.

ENCL:

"Milford Flats - Water Quality Data Summary - Private Wells/Surface Water/CCF" - Table generated by Bill Damery, DEQ, January 27, 1999  
"Interim Report" - Bureau of Microbiology - Milford Flats Water Project - January 20, 1999 (Susan Mottice, PhD/Sue Robbins, MT(ASCP))



# Water Quality Data Summary Surface Water/CFF

Well/ Site Number	Well Name	Dec. 1 & 2, 98'			Dec. 11 & 12, 98'			January 12, 99'				
		TC	FC	FS	NC	Nitrate	TC	FC	FS	NC	TC	FC
36	Beaver River At Minersville									112	INDT*	18
37	Lowline Canal									90		4
38	Beaver River above landfill									10		2
39	Trans Canal above Beaver									40	<10	110
41	Beaver River @ Rollins									20	<10	700
42	Beaver River at Milford Flats									60	20	680
43	Beaver River North Walker									250	240	970
44	Beaver River @ U-130 Minersville									60	<10	320
45	Beaver River @ Milford											
46	Beaver River below Landfill									<10	10	170
51	Skyline Ranch Well #4											
52	Skyline Ranch Well											
53	Skyline Ranch Well #3											
	CFF 102 MU											
	CFF 102 MD2											
	CFF 203 MU											
	CFF 203 MD											
	CFF 103 MU											
	CFF 103MD2											
	CFF Lagoon 102P	1400000	8E+05	0								
	CFF Lagoon 102s	28000	12000	15000								
	CFF Lagoon 202P	930000	55000	**								
	CFF Lagoon 202s	<1000	<1000	13000								
	CFF Lagoon 302P	450000	43000	94000								

TC = Total Coliform (counts per 100 ml.)  
 FC = Fecal Coliform (counts per 100 ml.)  
 FS = Fecal Strep (counts per 100 ml.)  
 NC = Non Coliform Bacteria (counts per 100 ml.)  
 Nitrate data given in mg/l

\*INDT = Unable to quantitate  
 \*\* = Still to be determined by lab