

# Remedial Excavation Work Plan 35153

**Kelly Rae's**  
**25 Batavia Lane**  
**Kalispell, MT 59901**  
**Facility ID 15-06101, Release 1850, Work Plan 35153**

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**WCEC Project No. 2603-0236**

# WCEC

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Environmental



Emergency Response



Industrial Services

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## 1.0 Introduction

West Central Environmental Consultants (WCEC) has prepared this Work Plan (WP) for the Kelly Rae's facility (Facility ID 15-006101, Release 1850) located at 25 Batavia Lane in Kalispell, MT [Figure 1]. Additional corrective actions were requested by the Montana Department of Environmental Quality (DEQ) in correspondence dated February 18, 2026. The purpose of this Work Plan is to design and implement a remedial excavation coinciding with pending facility upgrades to remove petroleum impacted soil in the source area to the maximum extent practicable.

### 1.1 Site Location

The site is located in a rural area of Flathead County near the town of Batavia, approximately five miles west of Kalispell on Highway 2 [Figure 1]. The primary land use is agricultural with mixed residential and light commercial businesses. Adjacent downgradient properties include the Batavia Waterfowl Production Area (WPA) and the Smith Valley School. The approximate geographic coordinates are 48.174912, -114.422852. The Public Land Survey System (PLSS) description for the site is the SW/4, NE/4, Section 20, Township 28 North, Range 22 West.

The Kelley Rae's facility consists of a retail convenience store with a petroleum storage/distribution system that includes four aboveground storage tanks (ASTs) with underground piping, one underground storage tank (UST), and two pump islands [Figure 2]. Product storage capacity and type by tank for the current UST/AST system is as follows:

Tank 03 – Tag Number: 4505, Install Date: 02-01-1994; 6,000-gal, diesel, cathodically protected steel UST

Tank S6 – Tag Number: 5891, Install Date: 01-10-2019; 5,000-gal, dyed diesel, AST

Tank S7 – Tag Number: 5892, Install Date: 01-10-2019; 10,000-gal, diesel, AST

Tank S8 – Tag Number: 5893, Install Date: 01-10-2019; 15,000-gal, gasoline, AST

Tank S9 – Tag Number: 5894, Install Date: 01-10-2019; 5,000-gal, premium gasoline, AST

The convenience store is serviced by a transient non-community public water supply well (PWS ID# MT0003093) located north of the store [Figure 2]. The store also has an onsite septic system consisting of an 1,100-gallon septic tank connected to a mounded drain field in the northwest corner of the property. The store building was damaged by a fire in January 2025 and had to be torn down. A manufactured building has been installed to serve as a temporary store while construction plans are being developed for a new store building on the west side of the property. The petroleum fuel systems layout will also be reconfigured as part of the upcoming reconstruction, including removal and closure of the diesel UST (Tank 03).

## 1.2 Site Geology

The Kelly Rae's facility is situated in the Smith Valley which is principally drained by Ashley Creek. Regionally, groundwater flows from recharge areas in the surrounding mountains towards the center of the valley, discharging to Ashley Creek which generally flows northeast [LaFave, 2004]. At the Kelly Rae's facility, depth to shallow groundwater ranges from approximately 2 to 9 feet below ground surface (bgs) based on the data collected from previous groundwater monitoring events [WET, 2023]. The calculated local groundwater flow direction is to the southeast towards Ashley Creek. The nearest surface water body is an ephemeral oxbow channel of Ashley Creek located approximately 300 feet southeast of the facility [Figure 1]. The average groundwater hydraulic conductivity is 0.1 feet/day based on slug tests completed in 2017 [AWC, 2018].

The surficial geology of the Smith Valley predominately consists of Quaternary glacial and alluvial deposits. The more recent alluvial deposits (Qal) are underlain and interbedded with outwash (Qgo), till (Qgt), and ablation/ice contact sediments (Qgta/Qgi) associated with Pleistocene glaciation [Smith, 2004]. Lithological data obtained from historical soil remediation activities conducted at the facility indicates that the shallow subsurface primarily consists of fine-grained silts and clays to a depth of at least 8 feet bgs [AWC, 2013], [AWC, 2015], [WET, 2020]. This fine-grained material is underlain by a layer of sandy gravel with cobbles starting at a depth of approximately 8 to 12 feet bgs depending on location. The coarse-grained gravel interval is saturated with groundwater that appears to be under confined conditions based on observations of water infiltrating into the December 2018 remedial excavation [AWC, 2019].

## 1.3 Site Background

The current active release (Release 1850) was confirmed on January 12, 1994, during the closure and removal of two USTs that had been in place south of the store since 1981. The existing diesel UST (Tank 03) was installed on February 1, 1994, after the older USTs were removed [Figure 2]. Initial remedial investigations included the installation of four groundwater monitoring wells, labeled MW-N1 through MW-N4. Additional monitoring wells were installed in 2012 (MW-5 – MW-9), 2014 (MW10 – MW13), 2019 (MW-11R), and 2023 (MW-3NR). The cumulative dataset derived from the various remedial investigations indicated that two distinct source areas were evident, one located near two ASTs established west of the store in 1965, and another centered around the dispenser island east of the store.

The two ASTs installed in 1965 were decommissioned and removed in 2018, providing access to contaminated soil underlying the containment basin for remedial excavation. A total of 534 cubic yards of impacted soil was removed from the site during the December 2018 excavation [AWC, 2019]. Monitoring well MW-11 was destroyed by excavation activities and ultimately replaced by monitoring well MW-11R in 2019 [WET, 2020]. New dual-compartment ASTs (Tank S6 – Tank S9) were constructed northwest of the store to replace the tanks removed in 2018 [Figure 2].

A soil boring investigation was conducted in October 2023 in the vicinity of the dispenser island east of the store [WET, 2024]. A total of seven soil boreholes were advanced during the investigation (SB-1 – SB-7). A replacement well for destroyed monitoring well MW-N3 (labeled as MW-3NR) was also drilled in October 2023, in the same location as soil borehole SB-7.

A PetroFix injection pilot test was completed on November 7, 2025. The pilot test was focused on the source area with worst case soil and groundwater impacts documented near monitoring well MW-8. Post-injection groundwater monitoring events provided evidence that the pilot test was successful in reducing groundwater concentrations near MW-8. However, groundwater concentrations appeared to increase at MW-3NR post-injection, indicating that there may have been some localized flushing by the injectate fluid causing constituent mobilization away from the source area [WCEC, 2026].

## 2.0 Scope of Work

### 2.1 Required Scope of Work

The scope of work requested by the DEQ which will be completed by WCEC consists of:

- Excavate and dispose of petroleum contaminated soil.
  - Include in the work plan the estimated dimensions (lateral and vertical) and volume of the excavation, as well as screening criteria that will be used to determine the extent.
- Collect soil samples from the base and sidewalls of the excavation.
- Backfill the excavation with clean fill suitable for site restoration.
- Analyze soil samples for petroleum constituents as required by the Montana Risk-Based Corrective Action Guidance for Petroleum Releases [DEQ, 2024]. Additionally, analyze waste characterization samples for constituents required by the disposal facility.
- Validate all laboratory analytical data using DEQ's Data Validation Summary Form (DVSF) found online under the Guidance dropdown at the Petroleum Tank Cleanup Section (PTCS) webpage.
- Discuss ongoing WP tasks and results with DEQ's project manager; submit written agreed-upon WP modifications as required to complete the WP objectives.
- Prepare and submit one Cleanup Report detailing the results of the excavation. The Cleanup Report is expected to include all the discussion, tables, figures, and appendices outlined in the Montana Cleanup Guidance for Petroleum Releases.
- Use the standardized DEQ WP and Report formats found online under the Forms dropdown at the PTCS webpage.
- Submit WP and Reports electronically following the PTCS submittal requirements found under the Guidance dropdown at the PTCS webpage.

## 2.2 Remedial Excavation Overview

Since the convenience store building burned down in January 2025, construction plans have been developed to rebuild a new store on the west side of the property. As part of the redevelopment, the fuel systems layout is going to be upgraded, including consolidating the two existing pump island dispensers into one larger island in the center of the property. Removal of the dispenser island in front of the old store will provide the opportunity to access petroleum impacted soils documented during the October 2023 remedial investigation [WET, 2024].

WCEC has obtained preliminary approval from the Flathead County Solid Waste Department and the DEQ Solid Waste Section to dispose of up to 660 cubic yards of petroleum contaminated soil at the Class II landfill in Kalispell, MT. Excavation bids were solicited from Petrocon Systems, Mile High Excavating (no bid), Wesco, and LHC (non-responsive). Petrocon Systems was the low bidder and will be contracted to complete soil excavation, hauling, backfilling, and compaction activities associated with the remedial excavation.

## 2.3 Remedial Excavation, Backfilling, Compaction, & Confirmation Soil Sampling

WCEC will coordinate, direct, and supervise the excavation and removal of petroleum-impacted soils from the area outlined on Figure 3. Prior to initiating the excavation, WCEC will submit a public utility locate to mark all known subsurface utilities near the work area. A private utility locator (Deep D'tect Services) will also be contracted to identify any active private utilities that may intersect the proposed excavation boundary.

The remedial excavation will be initiated near monitoring well MW-8 where the highest petroleum concentrations in soil have been encountered. Monitoring well MW-8 will be properly abandoned under the supervision of a licensed monitoring well constructor as required by the Montana Board of Water Well Contractors (BWWC). Bentonite chips will be used to seal the well boring and the casing will be removed by the excavator operator. As the excavation progresses laterally, additional wells that may be abandoned during excavation activities include MW3-NR and MW-7, depending on field screening results of soils near the wells.

Soils will be field screened for petroleum hydrocarbon impacts using a photoionization detector (PID), visual, and olfactory observations. The onsite project manager will use a combination of these observations in progressing the excavation to remove soils that exhibit hydrocarbon impacts. The excavation will continue until field screening indicates PID measurements are less than 100 parts per million (ppm) or physical obstructions are encountered limiting the extent. Impacted soils will be loaded into trucks and exported from the site for disposal at the Flathead County Class II Landfill in Kalispell, MT. Clean overburden soils that

do not exhibit petroleum impacts will be segregated into a temporary stockpile for later use as backfill material.

The estimated horizontal extent of the excavation is approximately 80 feet long by 40 feet wide [Figure 3]. The vertical extent of the excavation is predicted to be 8 to 9 feet bgs, based on the depth reached during the previous remedial excavation completed in 2018 [AWC, 2019]. The total volume of the proposed excavation is estimated to be 960 cubic yards, with approximately 300 cubic yards of this total consisting of clean overburden and 660 cubic yards consisting of contaminated soil for removal to the landfill. The actual vertical depth achieved will be dependent on the seasonal groundwater level, and therefore the excavation will be timed for low groundwater conditions. Even during periods of low groundwater, there may be groundwater infiltration into the excavation pit from the underlying semiconfined formation, as occurred during the December 2018 remedial excavation. Approximately 1,800 gallons of petroleum impacted water was pumped from the 2018 remedial excavation pit to facilitate adequate compaction of the imported backfill [AWC, 2019]. Based on this information, a contingency plan for dewatering the excavation of up to 2,000 gallons of petroleum contaminated water has been established with Nash Enterprises of Missoula, MT as the disposal vendor.

Following completion of the remedial excavation, WCEC will collect an appropriate number of discrete soil samples from the sidewalls and pit bottom to delineate residual soil concentrations. Sample locations will be determined in the field by the onsite project manager and will be collected according to DEQ requirements [DEQ, 2024]. It is anticipated that 10 sidewall and 5 pit bottom samples will be collected based on the proposed excavation extent [Figure 3]. The actual number of confirmation samples may vary depending on the final horizontal and vertical extent of the excavation. Soil samples will be packed on ice and submitted to Energy Laboratories in Helena, Montana. Samples will be analyzed for VPH and EPH screen. EPH fractions analysis will be completed for any samples which exceed the EPH screening limit of 200 mg/kg.

WCEC personnel will map the extent of excavation and soil sampling locations using a Trimble Geo7X Centimeter Edition GPS unit with external antenna. The excavation will be backfilled and compacted to existing grade using imported pit-run materials and clean native overburden that has been stockpiled. The backfill will be placed in 12-inch lifts with the first two lifts consisting of drain rock to cover the excavation floor, which is likely to be saturated. A geotextile fabric will be installed on top of the drain rock followed by pit-run backfill to approximately 12-inches below grade. The pit-run will be compaction tested by Alpine Geotechnical to 95% standard proctor according to ASTM D6938. The top 12-inches of backfill will consist of crushed gravel road base suitable for asphalt paving.

### 3.0 Report Preparation

Following the remedial excavation, WCEC will prepare and submit a Cleanup Report detailing the excavation activities. The report will include all the discussion, tables, figures, and appendices outlined in DEQ Cleanup Guidance for Petroleum Releases. Laboratory analytical data will be validated using DEQ's Data Validation Summary Form (DVSF) with the DVSF appended to the associated analytical data package. The Cleanup Report will include a completed Release Closure Plan (RCP) based on the cumulative knowledge of the site and a brief analysis of remedial options and recommendations to address any remaining petroleum impacts to soil, evaluation of potential receptors at and surrounding the facility, and necessary actions to progress the release towards closure. The report will be submitted within 60 days of laboratory analytical results from post-excavation soil confirmation sampling. Well abandonment logs will be prepared by a licensed monitoring well constructor and submitted to the Montana Bureau of Mines and Geology (MBMG) Groundwater Information Center (GWIC) database.

#### 4.0 Time Line & Costs

The attached *Estimated Costs – Remedial Excavation* spreadsheet details anticipated project costs to complete the DEQ required scope of work. The excavation is tentatively planned to be completed during low groundwater conditions in August/September 2026, coinciding with anticipated redevelopment activities at the property. This timeframe also aligns with the requirements of the Flathead County landfill which only accepts petroleum contaminated soil from June 1 to September 30 each year. Final scheduling of the project will be completed pending work plan approval from the DEQ and review by the PTRCB.

## 5.0 References

**Applied Water Consulting, LLC.** (AWC, 2013). *Additional Remedial Investigation Report for the Petroleum Release at Former Long's Main Stop*. April 12, 2013.

**Applied Water Consulting, LLC.** (AWC, 2015). *Additional Remedial Investigation Report for the Former Long's Conoco*. January 27, 2015.

**Applied Water Consulting, LLC.** (AWC, 2018). *Groundwater Sampling and Hydraulic Conductivity Assessment Report (AR-07) for the Petroleum Release at the Former Long's Main Stop (Kelly Rae's)*. February 14, 2018.

**Applied Water Consulting, LLC.** (AWC, 2019). *Petroleum Contaminated Soil Remedial Excavation at Kelly Rae's (Formerly Long's Main Stop)*. March 25, 2019.

**LaFave, J.I.** (LaFave, 2004). *Potentiometric Surface Map of the Deep Aquifer, Kalispell Valley: Flathead County, Montana*. Montana Bureau of Mines and Geology: Groundwater Assessment Atlas 2, Part B, Map 2.

**Montana Department of Environmental Quality.** (DEQ, 2024). *Montana Risk-Based Corrective Action Guidance for Petroleum Releases*. February 2024.

**Smith, L.N.** (Smith, 2004). *Surficial Geologic Map of the Upper Flathead River Valley (Kalispell Valley) Area, Flathead County, Northwestern Montana*. Montana Bureau of Mines and Geology: Groundwater Assessment Atlas 2, Part B, Map 6.

**Water & Environmental Technologies.** (WET, 2020). *Soil Boring, Monitoring Well Installation, and Groundwater Monitoring Report for Kelly Rae's (Former Longs Conoco)*. November 11, 2020.

**Water & Environmental Technologies.** (WET, 2023). *Groundwater Monitoring Interim Data Submittal for the Petroleum Release at Kelly Rae's*. December 13, 2023.

**Water & Environmental Technologies.** (WET, 2024). *Remedial Investigation Report for Kelly Rae's*. March 1, 2024.

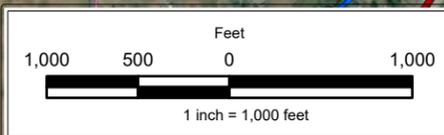
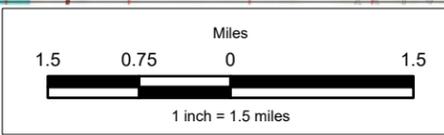
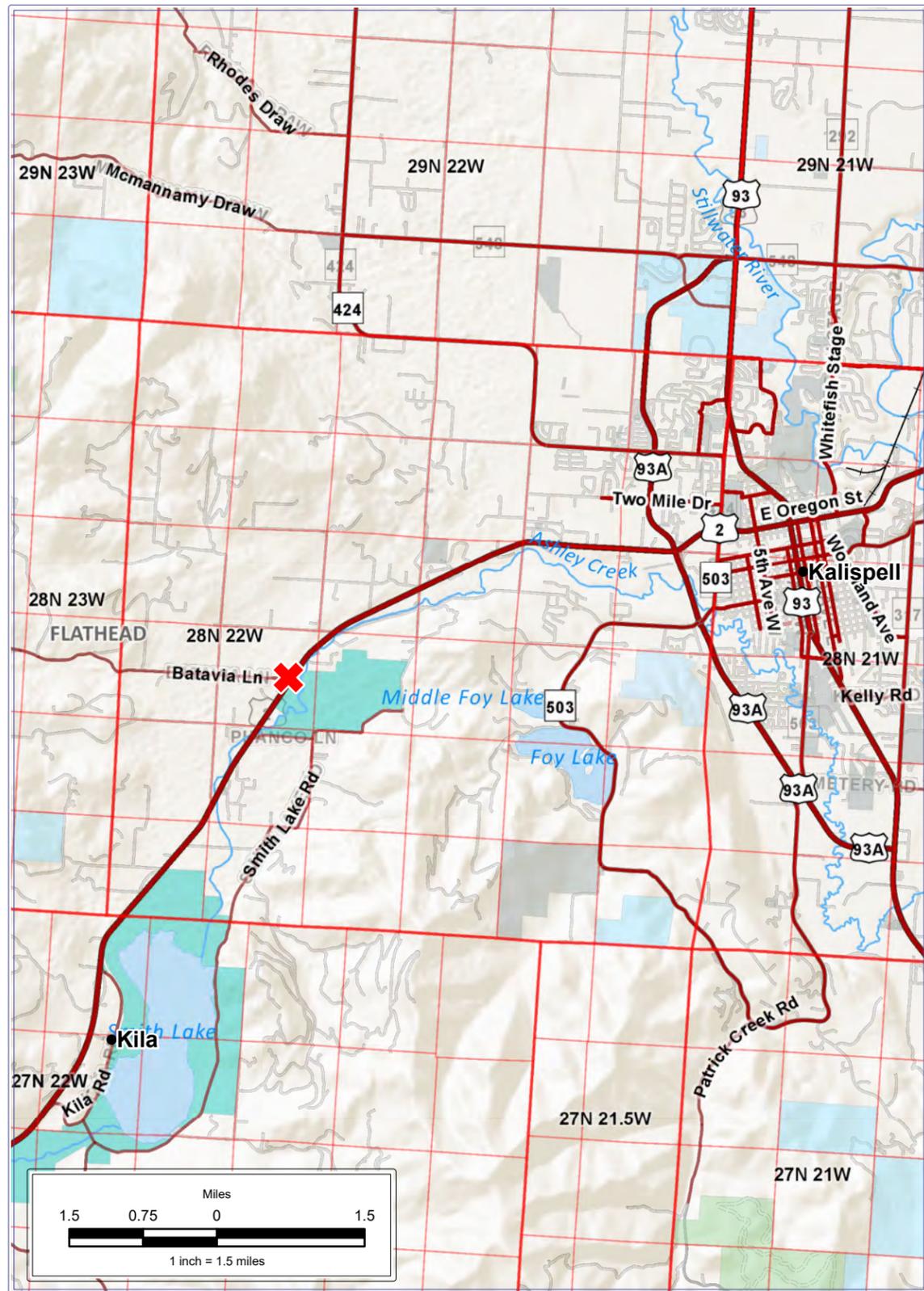
**West Central Environmental Consultants.** (WCEC, 2026). *PetroFix® Injection & Groundwater Monitoring Report*. January 20, 2026.

## **Maps**

Figure 1: Site Location

Figure 2: Site Details

Figure 3: Proposed Excavation



**X** Site Location



# Site Location

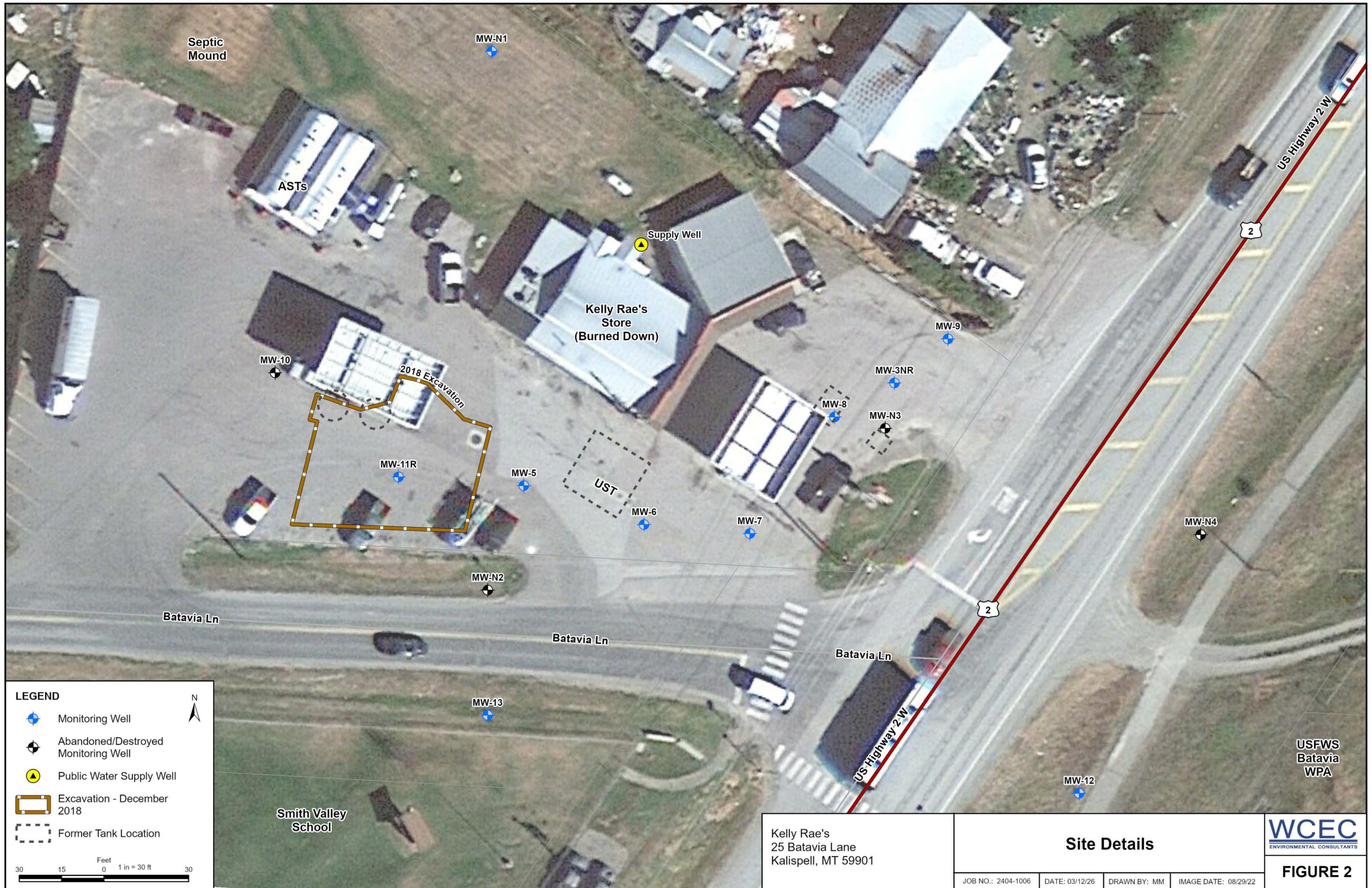
Kelly Rae's  
25 Batavia Lane  
Kalispell, MT

DRAWN BY: MM  
DATE: 05/14/24  
SCALE: 1:12,000



PROJECT NUMBER: 2404-1006      IMAGE SOURCE: ESRI BASEMAPS

**FIGURE 1**



Septic Mound

ASTs

MW-N1

Supply Well

Kelly Rae's Store  
(Burned Down)

MW-9

MW-10

2018 Excavation

MW-3NR

MW-8

MW-N3

MW-11R

UST

MW-5

MW-6

MW-7

MW-N4

Batavia Ln

Batavia Ln

Batavia Ln

MW-N2

MW-13

MW-12

Smith Valley School

US Highway 2 W

US Highway 2 W

USFWS  
Batavia  
WPA

**LEGEND**

- Monitoring Well
- Abandoned/Destroyed Monitoring Well
- Public Water Supply Well
- Excavation - December 2018
- Former Tank Location

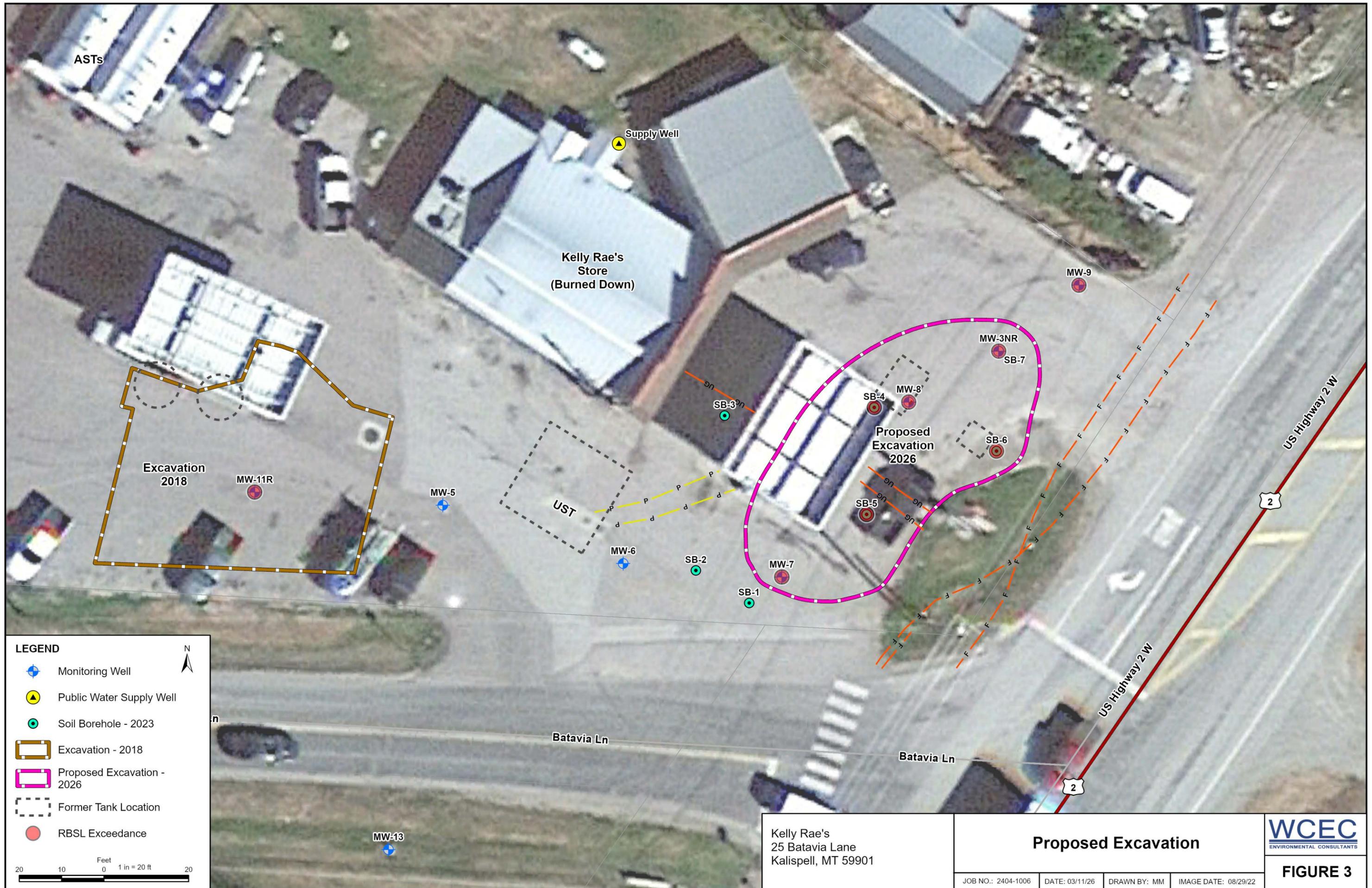
Feet  
0 1 in = 30 ft  
30 15 30

Kelly Rae's  
25 Batavia Lane  
Kalispell, MT 59901

Site Details			
JOB NO.: 2404-1006	DATE: 03/12/26	DRAWN BY: MM	IMAGE DATE: 08/29/22

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**FIGURE 2**



**LEGEND**

- Monitoring Well
- Public Water Supply Well
- Soil Borehole - 2023
- Excavation - 2018
- Proposed Excavation - 2026
- Former Tank Location
- RBSL Exceedance

Feet  
 20 10 0 1 in = 20 ft 20

Kelly Rae's  
 25 Batavia Lane  
 Kalispell, MT 59901

**Proposed Excavation**

JOB NO.: 2404-1006    DATE: 03/11/26    DRAWN BY: MM    IMAGE DATE: 08/29/22

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**FIGURE 3**

## Tables

- Table 1: Groundwater Elevation Data
- Table 2: Groundwater Analytical Results – VPH/EPH ( $\mu\text{g/L}$ )
- Table 3: Groundwater Analytical Results – 8270 SVOCs ( $\mu\text{g/L}$ )
- Table 4: Groundwater Analytical Results – IBIs
- Table 5: Soil Analytical Results – VPH/EPH ( $\text{mg/kg}$ )

**Table 1**  
**Groundwater Elevation Data**  
**Kelly Rae's, Facility ID 15-06101, Release 1850, Kalispell, MT**

Well ID	Date Measured	Top of Casing Elevation (ft amsl)	Depth to Water (ft bgs)	Groundwater Elevation (ft amsl)
<b>MW-N1</b>	10/15/12	3139.95	4.96	3134.99
	12/04/12	3139.95	3.34	3136.61
	02/06/13	3139.95	3.71	3136.24
	06/19/13	3139.95	4.22	3135.73
	03/24/14	3139.95	1.77	3138.18
	04/08/14	3139.95	1.83	3138.12
	10/08/14	3139.95	4.33	3135.62
	12/12/17	3139.95	4.03	3135.92
	01/24/20	3139.95	3.66	3136.29
	05/21/20	3139.95	2.33	3137.62
	09/19/23	3139.95	7.27	3132.68
	10/16/24	3139.95	7.26	3132.69
	05/19/25	3139.95	5.28	3134.67
11/10/25	3139.95	8.02	3131.93	
<b>MW-N3 (Destroyed 2020)</b>	10/15/12	3138.68	7.23	3131.45
	12/04/12	3138.68	4.10	3134.58
	06/19/13	3138.68	4.99	3133.69
	03/24/14	3138.68	2.98	3135.70
	04/08/14	3138.68	2.60	3136.08
	10/08/14	3138.68	7.33	3131.35
	01/03/18	3138.68	5.91	3132.77
<b>MW-3NR</b>	10/16/24	3138.75	8.55	3130.20
	05/19/25	3139.02	6.02	3133.00
	11/10/25	3139.02	8.28	3130.74

2404-1006

**Table 1**  
**Groundwater Elevation Data**  
**Kelly Rae's, Facility ID 15-06101, Release 1850, Kalispell, MT**

Well ID	Date Measured	Top of Casing Elevation (ft amsl)	Depth to Water (ft bgs)	Groundwater Elevation (ft amsl)
<b>MW-5</b>	10/15/12	3140.62	7.22	3133.40
	12/04/12	3140.62	4.80	3135.82
	02/06/13	3140.62	5.46	3135.16
	06/20/13	3140.62	5.16	3135.46
	03/24/14	3140.62	2.99	3137.63
	04/08/14	3140.62	2.95	3137.67
	10/08/14	3140.62	6.16	3134.46
	01/03/18	3140.62	7.65	3132.97
	01/24/20	3140.89	6.75	3134.14
	05/21/20	3140.89	4.90	3135.99
	09/19/23	3140.89	8.96	3131.93
	10/16/24	3140.89	9.25	3131.64
	05/19/25	3140.84	6.44	3134.40
	11/10/25	3140.84	9.07	3131.77
<b>MW-6</b>	10/15/12	3140.24	8.03	3132.21
	12/04/12	3140.24	5.67	3134.57
	02/06/13	3140.24	6.29	3133.95
	06/20/13	3140.24	6.05	3134.19
	03/24/14	3140.24	3.63	3136.61
	04/08/14	3140.24	3.84	3136.40
	10/08/14	3140.24	8.10	3132.14
	12/12/17	3140.24	7.65	3132.59
	01/24/20	3140.24	7.42	3132.82
	05/21/20	3140.24	5.45	3134.79
	09/19/23	3140.24	9.10	3131.14
	10/16/24	3140.24	9.69	3130.55
	05/19/25	3140.08	6.56	3133.52
	11/10/25	3140.08	9.00	3131.08

2404-1006

**Table 1**  
**Groundwater Elevation Data**  
**Kelly Rae's, Facility ID 15-06101, Release 1850, Kalispell, MT**

Well ID	Date Measured	Top of Casing Elevation (ft amsl)	Depth to Water (ft bgs)	Groundwater Elevation (ft amsl)
<b>MW-7</b>	10/15/12	3139.57	7.92	3131.65
	12/04/12	3139.57	4.55	3135.02
	02/06/13	3139.57	5.61	3133.96
	06/20/13	3139.57	5.42	3134.15
	03/24/14	3139.57	2.32	3137.25
	04/08/14	3139.57	3.32	3136.25
	10/08/14	3139.57	7.13	3132.44
	01/03/18	3139.57	6.17	3133.40
	01/24/20	3139.57	7.28	3132.29
	05/21/20	3139.57	5.50	3134.07
	09/19/23	3139.57	8.86	3130.71
	10/16/24	3139.57	9.45	3130.12
	05/19/25	3139.41	5.72	3133.69
	11/10/25	3139.41	7.35	3132.06
<b>MW-8</b>	10/15/12	3139.32	7.46	3131.86
	12/04/12	3139.32	4.85	3134.47
	02/06/13	3139.32	5.54	3133.78
	06/20/13	3139.32	5.42	3133.90
	03/24/14	3139.32	3.45	3135.87
	04/08/14	3139.32	3.78	3135.54
	10/08/14	3139.32	7.49	3131.83
	12/12/17	3139.32	6.42	3132.90
	01/24/20	3139.32	7.25	3132.07
	05/21/20	3139.32	5.73	3133.59
	09/19/23	3139.32	8.37	3130.95
	10/16/24	3139.32	8.76	3130.56
	05/19/25	3139.32	5.60	3133.72
	11/10/25	3139.32	8.39	3130.93

2404-1006

**Table 1**  
**Groundwater Elevation Data**  
**Kelly Rae's, Facility ID 15-06101, Release 1850, Kalispell, MT**

<b>Well ID</b>	<b>Date Measured</b>	<b>Top of Casing Elevation (ft amsl)</b>	<b>Depth to Water (ft bgs)</b>	<b>Groundwater Elevation (ft amsl)</b>
<b>MW-9</b>	10/15/12	3138.97	7.22	3131.75
	12/04/12	3138.97	4.14	3134.83
	02/06/13	3138.97	5.17	3133.80
	06/19/13	3138.97	5.27	3133.70
	03/24/14	3138.97	2.56	3136.41
	04/08/14	3138.97	2.87	3136.10
	10/08/14	3138.97	7.11	3131.86
	12/12/17	3138.97	6.92	3132.05
	01/24/20	3138.57	5.63	3132.94
	05/21/20	3138.57	3.80	3134.77
	09/19/23	3138.57	8.00	3130.57
	10/16/24	3138.57	Dry	Dry
	05/19/25	3138.81	3.53	3135.28
	11/10/25	3138.81	8.10	3130.71
<b>MW-10 (Destroyed 2019)</b>	03/24/14	3140.72	2.36	3138.36
	04/08/14	3140.72	2.28	3138.44
	10/08/14	3140.72	5.58	3135.14
	01/03/18	3140.72	5.25	3135.47
<b>MW-11 (Excavated 2018)</b>	03/24/14	3140.95	3.02	3137.93
	04/08/14	3140.95	3.00	3137.95
	10/08/14	3140.95	6.74	3134.21
	01/03/18	3140.95	6.20	3134.75
<b>MW-11R</b>	01/24/20	3140.94	6.77	3134.17
	05/21/20	3140.94	4.81	3136.13
	09/19/23	3140.94	8.63	3132.31
	10/16/24	3140.94	8.85	3132.09
	05/19/25	3140.94	6.29	3134.65
	11/10/25	3140.94	8.97	3131.97

2404-1006

**Table 1**  
**Groundwater Elevation Data**  
**Kelly Rae's, Facility ID 15-06101, Release 1850, Kalispell, MT**

Well ID	Date Measured	Top of Casing Elevation (ft amsl)	Depth to Water (ft bgs)	Groundwater Elevation (ft amsl)
MW-12	03/24/14	3138.48	6.63	3131.85
	04/08/14	3138.48	6.88	3131.60
	10/08/14	3138.48	10.36	3128.12
	01/03/18	3138.48	9.46	3129.02
	01/24/20	3138.48	9.84	3128.64
	05/21/20	3138.48	8.00	3130.48
	09/19/23	3138.48	11.21	3127.27
	10/16/24	3138.48	11.34	3127.14
	05/19/25	3138.48	9.10	3129.38
11/10/25	3138.48	11.69	3126.79	
MW-13	10/08/14	3139.39	9.13	3130.26
	01/03/18	3139.39	7.32	3132.07
	01/24/20	3139.39	7.43	3131.96
	05/21/20	3139.39	5.77	3133.62
	09/19/23	3139.39	10.35	3129.04
	10/16/24	3139.39	10.67	3128.72
	05/19/25	3139.39	7.38	3132.01
	11/10/25	3139.39	10.17	3129.22

2404-1006

**Table 2**  
**Groundwater Analytical Results - VPH/EPH (µg/L)**  
**Kelly Rae's, Facility ID 15-06101, Release 1850, Kalispell, MT**

Sample ID	Date Sampled	VPH Constituents										EPH Constituents				
		MTBE	Benzene	Toluene	Ethyl-benzene	Total Xylenes	Naphthalene	C <sub>9</sub> -C <sub>10</sub> Aromatics	C <sub>5</sub> -C <sub>8</sub> Aliphatics	C <sub>9</sub> -C <sub>12</sub> Aliphatics	TPH	C <sub>9</sub> -C <sub>18</sub> Aliphatics	C <sub>19</sub> -C <sub>36</sub> Aliphatics	C <sub>11</sub> -C <sub>22</sub> Aromatics	TEH	
MW-N1	Feb-95	--	ND	ND	ND	ND	--	--	--	--	--	--	--	--	--	
	Jun-95	--	ND	ND	ND	ND	--	--	--	--	--	--	--	--	--	
	Sep-95	--	ND	ND	ND	ND	--	--	--	--	--	--	--	--	--	
	Dec-95	--	ND	ND	ND	ND	--	--	--	--	--	--	--	--	--	
	Jul-96	ND	ND	ND	ND	ND	--	--	--	--	--	--	--	--	--	
	Jun-99	ND	ND	ND	ND	ND	--	--	--	--	--	--	--	--	--	
	Oct-99	ND	ND	ND	ND	ND	--	ND	ND	ND	ND	ND	--	--	--	
	Jul-00	ND	ND	ND	ND	ND	--	ND	ND	ND	ND	ND	--	--	--	
	12/04/12	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	--	--	--	ND
	06/19/13	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	--	--	--	ND
	03/24/14	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	--	--	--	ND
	10/08/14	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	--	--	--	ND
12/12/17	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	--	--	--	ND	
MW-N2 (Destroyed 1997)	Feb-95	ND	ND	ND	ND	--	--	--	--	--	--	--	--	--	--	
	Jun-95	--	ND	ND	ND	--	--	--	--	--	--	--	--	--	--	
	Sep-95	--	ND	ND	ND	--	--	--	--	--	--	--	--	--	--	
	Dec-95	--	ND	ND	ND	--	--	--	--	--	--	--	--	--	--	
	Jul-96	ND	ND	ND	ND	--	--	--	--	--	--	--	--	--	--	
	Jul-97	ND	ND	ND	ND	ND	--	--	--	--	--	--	--	--	--	
DEQ RBSLs		30	5	1,000	700	10,000	100	980	700	3,000		3,000	100,000	1,100		

**Bold** indicates that the constituent was detected above the laboratory method reporting limits (MRLs).

2404-1006

**Orange shading** indicates that the constituent exceeds the DEQ Tier 1 RBSLs.

(--) Sample was not analyzed for the constituent, data not available. (ND) Non-detect. (J) Estimated value, analyte was present but less than the MRLs.

**Table 2**  
**Groundwater Analytical Results - VPH/EPH (µg/L)**  
**Kelly Rae's, Facility ID 15-06101, Release 1850, Kalispell, MT**

Sample ID	Date Sampled	VPH Constituents										EPH Constituents			
		MTBE	Benzene	Toluene	Ethyl-benzene	Total Xylenes	Naphthalene	C <sub>9</sub> -C <sub>10</sub> Aromatics	C <sub>5</sub> -C <sub>8</sub> Aliphatics	C <sub>9</sub> -C <sub>12</sub> Aliphatics	TPH	C <sub>9</sub> -C <sub>18</sub> Aliphatics	C <sub>19</sub> -C <sub>36</sub> Aliphatics	C <sub>11</sub> -C <sub>22</sub> Aromatics	TEH
MW-N3 (Destroyed 2020)	Feb-95	--	175	40	279	239	--	--	--	--	--	--	--	--	--
	Jun-95	--	ND	ND	ND	ND	--	--	--	--	--	--	--	--	--
	Sep-95	--	61	29	171	220	--	--	--	--	--	--	--	--	--
	Dec-95	--	36	5.6	9.3	88	--	--	--	--	--	--	--	--	--
	Jul-96	ND	13	9.8	76	99	--	--	--	--	--	--	--	--	--
	Jan-97	ND	ND	3.9	63	104	--	--	--	--	--	--	--	--	--
	Jul-97	ND	28	13	141	165	--	--	--	--	--	--	--	--	--
	Jun-99	ND	586	155	1,020	1,550	--	--	--	--	--	--	--	--	--
	Oct-99	ND	108	8.2	64	27.6	--	367	892	212	1,560	--	--	--	--
	Jul-00	ND	17	3.6	43	25	--	217	818	126	1,030	--	--	--	--
	May-01	ND	ND	ND	54	63	17	622	2,880	906	3,330	--	--	--	--
	Nov-01	ND	40	10	210	114	25	816	1,970	372	3,350	--	--	--	--
	May-02	ND	ND	0.9	26	36	14	302	798	113	1,140	--	--	--	--
	Jan-06	ND	ND	0.66	6.4	18	6.4	149	442	86	598	--	--	--	--
	Jun-06	ND	ND	ND	10	11	2.8	96	326	98	439	--	--	--	--
	12/04/12	<31	<10	32	25	58	20	1,300	3,480	705	4,310	390	1,070	841	6,460
06/19/13	ND	8.3	49	50	139	25	1,100	2,870	754	3,900	449	4,100	1,080	11,000	
03/24/14	ND	10	26	56	89	28	853	2,960	521	3,550	ND	1,230	541	4,900	
10/08/14	ND	14	21	58	106	32	1,000	3,550	755	4,250	ND	916	817	7,790	
01/03/18	ND	ND	7.4	47	62	38	1,460	4,840	1,170	6,480	6,610	28,600	5,110	56,000	
MW-3NR	10/16/24	<1.3	0.54	0.37 J	<0.5	3.4	4.1	46	189	51	269	--	--	--	310
	05/19/25	<5	126	24	274	373	71	1,930	3,260	1,380	6,390	157 J	<300	177 J	1,860
	11/10/25	<5	230	52	722	721	169	1,870	6,210	2,170	11,100	34 J	<300	226 J	1,430
DEQ RBSLs		30	5	1,000	700	10,000	100	980	700	3,000		3,000	100,000	1,100	

**Bold** indicates that the constituent was detected above the laboratory method reporting limits (MRLs).

**Orange shading** indicates that the constituent exceeds the DEQ Tier 1 RBSLs.

(--) Sample was not analyzed for the constituent, data not available. (ND) Non-detect. (J) Estimated value, analyte was present but less than the MRLs.

**Table 2**  
**Groundwater Analytical Results - VPH/EPH (µg/L)**  
**Kelly Rae's, Facility ID 15-06101, Release 1850, Kalispell, MT**

Sample ID	Date Sampled	VPH Constituents										EPH Constituents				
		MTBE	Benzene	Toluene	Ethyl-benzene	Total Xylenes	Naphthalene	C <sub>9</sub> -C <sub>10</sub> Aromatics	C <sub>5</sub> -C <sub>8</sub> Aliphatics	C <sub>9</sub> -C <sub>12</sub> Aliphatics	TPH	C <sub>9</sub> -C <sub>18</sub> Aliphatics	C <sub>19</sub> -C <sub>36</sub> Aliphatics	C <sub>11</sub> -C <sub>22</sub> Aromatics	TEH	
MW-N4 (Destroyed 2006)	Dec-95	--	ND	ND	ND	ND	--	--	--	--	--	--	--	--	--	
	Jul-96	ND	ND	ND	ND	ND	--	--	--	--	--	--	--	--	--	
	Jan-97	ND	ND	ND	ND	ND	--	--	--	--	--	--	--	--	--	
	Jul-97	ND	ND	ND	ND	ND	--	--	--	--	--	--	--	--	--	
	Jun-99	ND	ND	ND	ND	ND	--	--	--	--	--	--	--	--	--	
	Oct-99	ND	ND	ND	ND	ND	--	ND	ND	ND	ND	ND	--	--	--	
	Jul-00	ND	ND	ND	ND	ND	--	ND	ND	ND	ND	ND	--	--	--	
	May-01	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	--	--	--	
	Nov-01	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	--	--	--	
	May-02	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	--	--	--	
MW-5	12/04/12	ND	<b>143</b>	<b>11</b>	<b>121</b>	<b>142</b>	<b>54</b>	<b>480</b>	<b>1,560</b>	<b>430</b>	<b>2,630</b>	ND	ND	ND	<b>1,140</b>	
	06/20/13	ND	<b>178</b>	<b>4.3</b>	<b>84</b>	<b>98</b>	<b>39</b>	<b>354</b>	<b>897</b>	<b>358</b>	<b>1,810</b>	--	--	--	<b>559</b>	
	03/24/14	ND	<b>206</b>	<b>10</b>	<b>86</b>	<b>80</b>	<b>37</b>	<b>432</b>	<b>1,160</b>	<b>298</b>	<b>2,040</b>	--	--	--	<b>895</b>	
	10/09/14	ND	<b>112</b>	<b>2</b>	<b>41</b>	<b>26</b>	<b>16</b>	<b>226</b>	<b>543</b>	<b>190</b>	<b>1,000</b>	--	--	--	<b>636</b>	
	01/03/18	ND	<b>66</b>	<b>0.45</b>	<b>16</b>	<b>0.91</b>	ND	<b>98</b>	<b>125</b>	<b>92</b>	<b>356</b>	--	--	--	<b>470</b>	
	01/24/20	<1	<b>9.5</b>	<b>0.54</b>	<b>4.5</b>	<b>2.7</b>	<1	<b>10</b>	<b>15</b>	<b>7</b>	<b>47</b>	<330	<b>921</b>	<330	<b>1,680</b>	
	05/22/20	<1	<b>5</b>	<0.5	<b>2</b>	<b>0.56</b>	<1	<b>14</b>	<b>19</b>	<b>17</b>	<b>53</b>	--	--	--	<b>855</b>	
	09/19/23	<1	<0.5	<0.5	<0.5	<0.5	<1	<20	<20	<20	<20	<20	--	--	--	<300
	10/16/24	<1	<b>0.56</b>	<0.5	<0.5	<0.5	<1	<20	<20	<20	<20	<20	--	--	--	<300
	05/19/25	<1	<b>2.4</b>	<b>0.52</b>	0.38 J	<0.5	<1	<20	<b>27</b>	18 J	<b>101</b>	<b>413</b>	<b>498</b>	<300	1,100	
11/10/25	<1	<0.5	<0.5	<0.5	<0.5	<1	<20	9.2 J	<20	<20	--	--	--	756		
DEQ RBSLs		<b>30</b>	<b>5</b>	<b>1,000</b>	<b>700</b>	<b>10,000</b>	<b>100</b>	<b>980</b>	<b>700</b>	<b>3,000</b>		<b>3,000</b>	<b>100,000</b>	<b>1,100</b>		

**Bold** indicates that the constituent was detected above the laboratory method reporting limits (MRLs).

**Orange shading** indicates that the constituent exceeds the DEQ Tier 1 RBSLs.

(--) Sample was not analyzed for the constituent, data not available. (ND) Non-detect. (J) Estimated value, analyte was present but less than the MRLs.

**Table 2**  
**Groundwater Analytical Results - VPH/EPH (µg/L)**  
**Kelly Rae's, Facility ID 15-06101, Release 1850, Kalispell, MT**

Sample ID	Date Sampled	VPH Constituents										EPH Constituents			
		MTBE	Benzene	Toluene	Ethyl-benzene	Total Xylenes	Naphthalene	C <sub>9</sub> -C <sub>10</sub> Aromatics	C <sub>5</sub> -C <sub>8</sub> Aliphatics	C <sub>9</sub> -C <sub>12</sub> Aliphatics	TPH	C <sub>9</sub> -C <sub>18</sub> Aliphatics	C <sub>19</sub> -C <sub>36</sub> Aliphatics	C <sub>11</sub> -C <sub>22</sub> Aromatics	TEH
MW-6	12/04/12	ND	1.7	ND	1.7	1.7	0.9	ND	39	22	58	--	--	--	ND
	06/20/13	ND	14	ND	ND	ND	0.8 J	20 J	46	15 J	77	--	--	--	ND
	03/24/14	ND	26	0.76	ND	2	1.8	36	69	24	134	--	--	--	717
	10/08/14	ND	ND	0.38	0.38 J	0.43 J	ND	ND	27	16	13	--	--	--	ND
	12/12/17	ND	11	0.48	2.3	6.5	ND	ND	20 J	24	58	--	--	--	ND
	01/24/20	<1	<0.5	0.28 J	0.68	1.3	<1	<20	<20	5.4 J	12	--	--	--	<320
	05/21/20	<1	<0.5	<0.5	<0.5	<0.5	<1	<20	<20	<20	21	--	--	--	<300
	09/19/23	<1	<0.5	<0.5	<0.5	<0.5	<1	<20	<20	<20	<20	--	--	--	565
	10/16/24	<1	<0.5	<0.5	<0.5	<0.5	<1	<20	27	20	46	--	--	--	<300
	05/19/25	<1	<0.5	<0.5	<0.5	<0.5	<1	<20	<20	<20	<20	--	--	--	<300
11/10/25	<1	<0.5	<0.5	<0.5	<0.5	<1	<20	<20	<20	<20	--	--	--	<300	
MW-7	12/04/12	ND	25	32	542	180	165	1,840	8,770	1,520	10,000	ND	ND	ND	2,720
	06/20/13	ND	19	25	534	168	171	1,830	5,590	1,630	7,730	ND	ND	ND	2,710
	03/24/14	ND	244	549	686	836	205	2,450	9,230	1,990	12,400	ND	ND	ND	4,440
	10/09/14	ND	13	19	51	96	32	924	3,550	720	4,150	ND	ND	ND	2,660
	01/03/18	ND	313	38	534	192	145	1,850	6,810	1,800	9,870	ND	ND	ND	4,800
	01/24/20	<3	229	30	387	135	142	1,730	5,610	1,200	9,300	786	<326	350	5,300
	05/21/20	<45	232	29	455	107	152	1,700	6,080	1,460	8,830	<312	<312	<312	3,310
	09/19/23	<30	52	13	238	70	86	1,100	4,400	2,360	6,780	<316	<316	<316	738
	10/16/24	<19	34	8.5	241	59	107	1,140	3,850	1,130	6,180	<310	<310	<310	1,230
	05/19/25	<26	33	7.5	196	35	66	1,000	4,310	856	5,590	<300	<300	<300	731
11/10/25	<5	70	12	388	115	93	1,410	4,140	1,230	7,140	63 J	<300	130 J	824	
DEQ RBSLs		30	5	1,000	700	10,000	100	980	700	3,000		3,000	100,000	1,100	

**Bold** indicates that the constituent was detected above the laboratory method reporting limits (MRLs).

**Orange shading** indicates that the constituent exceeds the DEQ Tier 1 RBSLs.

(-) Sample was not analyzed for the constituent, data not available. (ND) Non-detect. (J) Estimated value, analyte was present but less than the MRLs.

**Table 2**  
**Groundwater Analytical Results - VPH/EPH (µg/L)**  
**Kelly Rae's, Facility ID 15-06101, Release 1850, Kalispell, MT**

Sample ID	Date Sampled	VPH Constituents										EPH Constituents			
		MTBE	Benzene	Toluene	Ethylbenzene	Total Xylenes	Naphthalene	C <sub>9</sub> -C <sub>10</sub> Aromatics	C <sub>5</sub> -C <sub>8</sub> Aliphatics	C <sub>9</sub> -C <sub>12</sub> Aliphatics	TPH	C <sub>9</sub> -C <sub>18</sub> Aliphatics	C <sub>19</sub> -C <sub>36</sub> Aliphatics	C <sub>11</sub> -C <sub>22</sub> Aromatics	TEH
MW-8	12/04/12	ND	5.3	9.9	47	135	18	289	591	280	1,030	ND	ND	ND	2,480
	06/20/13	ND	22	49	280	635	101	1,450	2,740	1,620	5,060	ND	ND	ND	2,150
	03/24/14	ND	24	31	135	310	51	964	1,890	778	3,160	ND	ND	ND	1,190
	10/08/14	ND	0.86	1.4	11	9.2	3.6	13	5.2	102	425	--	--	--	346
	12/12/17	ND	21	55	357	998	120	1,680	2,550	1,700	6,330	363	1,020	ND	4,060
	01/24/20	<26	17	48	230	577	77	1,480	2,710	986	5,760	507	3,330	709	8,810
	05/21/20	<10	23	61	416	1,080	143	1,890	3,130	1,710	7,010	<319	<319	<319	3,670
	09/19/23	<10	69	35	220	341	70	662	1,050	1,930	2,940	<300	214 J	<300	890
	10/16/24	<5	52	35	268	530	112	965	1,630	1,270	4,050	218 J	383	<325	2,050
	05/19/25	<1	1.2	0.71	0.47 J	0.41 J	<1	<20	81	<20	89	598	2,570	235	3,970
11/10/25	<1	<0.5	<0.5	<0.5	<0.5	<1	<20	<20	<20	<20	--	--	--	980	
MW-9	12/04/12	ND	<26	ND	74	39	29	2,620	8,580	2,090	9,890	--	--	--	983
	06/19/13	ND	ND	<1	ND	ND	ND	83	178	92	261	--	--	--	514
	03/24/14	ND	2.5	0.69	1.6	1.2	ND	60	172	62	227	--	--	--	ND
	10/08/14	ND	ND	ND	ND	ND	ND	24	95	43	122	--	--	--	ND
	12/12/17	ND	ND	ND	ND	ND	ND	ND	26	28	47	ND	2,270	452	4,940
	01/24/20	<2	1.5	0.85	<0.5	<0.5	<1	64	166	42	261	<306	498	<306	2,330
	05/22/20	<1.5	<0.5	0.79	0.49	1	<1	56	107	51	183	--	--	--	643
	05/19/25	<1	<0.5	<0.5	<0.5	<0.5	<1	<20	<20	<20	<20	<303	2,030	475	2,660
11/10/25	<1	0.4 J	0.45 J	<0.5	<0.5	<1	<20	81	18 J	102	--	--	--	91	
DEQ RBSLs		30	5	1,000	700	10,000	100	980	700	3,000		3,000	100,000	1,100	

**Bold** indicates that the constituent was detected above the laboratory method reporting limits (MRLs).

**Orange shading** indicates that the constituent exceeds the DEQ Tier 1 RBSLs.

(--) Sample was not analyzed for the constituent, data not available. (ND) Non-detect. (J) Estimated value, analyte was present but less than the MRLs.

**Table 2**  
**Groundwater Analytical Results - VPH/EPH (µg/L)**  
**Kelly Rae's, Facility ID 15-06101, Release 1850, Kalispell, MT**

Sample ID	Date Sampled	VPH Constituents										EPH Constituents			
		MTBE	Benzene	Toluene	Ethyl-benzene	Total Xylenes	Naphthalene	C <sub>9</sub> -C <sub>10</sub> Aromatics	C <sub>5</sub> -C <sub>8</sub> Aliphatics	C <sub>9</sub> -C <sub>12</sub> Aliphatics	TPH	C <sub>9</sub> -C <sub>18</sub> Aliphatics	C <sub>19</sub> -C <sub>36</sub> Aliphatics	C <sub>11</sub> -C <sub>22</sub> Aromatics	TEH
MW-10 (Destroyed 2019)	03/24/14	ND	<b>0.91</b>	ND	ND	<b>0.38</b>	ND	ND	<b>32</b>	ND	<b>28</b>	--	--	--	ND
	10/08/14	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	--	--	--	ND
	01/03/18	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	--	--	--	ND
MW-11 (Excavated 2018)	03/24/14	ND	<b>2,860</b>	<b>3,430</b>	<b>658</b>	<b>3,530</b>	<b>198</b>	<b>4,130</b>	<b>11,800</b>	<b>3,750</b>	<b>23,200</b>	ND	ND	ND	<b>8,500</b>
	10/09/14	ND	<b>1,370</b>	<b>874</b>	<b>281</b>	<b>1,180</b>	<b>80</b>	<b>1,560</b>	<b>6,340</b>	<b>1,910</b>	<b>10,300</b>	ND	ND	ND	<b>3,710</b>
	01/03/18	ND	<b>2,110</b>	<b>1,370</b>	<b>521</b>	<b>2,020</b>	<b>116</b>	<b>2,040</b>	<b>6,210</b>	<b>3,020</b>	<b>14,400</b>	ND	ND	ND	<b>6,920</b>
MW-11R	01/24/20	<17	<b>239</b>	<b>81</b>	<b>85</b>	<b>263</b>	<b>32</b>	<b>998</b>	<b>550</b>	<b>505</b>	<b>2,580</b>	ND	ND	ND	<b>3,040</b>
	05/22/20	<15	<b>25</b>	<b>6.3</b>	<b>8.8</b>	<b>33</b>	<b>3.9</b>	<b>151</b>	<b>488</b>	<b>114</b>	<b>744</b>	--	--	--	<b>487</b>
	09/19/23	<10	<b>40</b>	<b>3.6</b>	<b>15</b>	<b>14</b>	<b>3.8</b>	<b>152</b>	<b>411</b>	<b>292</b>	<b>733</b>	<353	<353	<353	<353
	10/16/24	<3.7	<b>10</b>	<b>1.1</b>	<b>7.3</b>	<b>2.1</b>	<b>0.74</b>	<b>63</b>	<b>198</b>	<b>45</b>	<b>319</b>	--	--	--	<b>337</b>
	05/19/25	<5.1	<b>6.6</b>	<b>1.1</b>	<b>7.2</b>	<b>4.4</b>	<b>1.7</b>	<b>102</b>	<b>273</b>	<b>74</b>	<b>397</b>	--	--	--	<300
	11/10/25	<7	<b>13</b>	<b>2.1</b>	<b>8.5</b>	<b>3.6</b>	<b>&lt;1</b>	<b>89</b>	<b>448</b>	<b>81</b>	<b>635</b>	--	--	--	291 J
MW-12	03/24/14	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	--	--	--	ND
	10/08/14	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	--	--	--	ND
	01/03/18	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	--	--	--	ND
MW-13	10/09/14	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	--	--	--	ND
	01/03/18	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	--	--	--	ND
DEQ RBSLs		<b>30</b>	<b>5</b>	<b>1,000</b>	<b>700</b>	<b>10,000</b>	<b>100</b>	<b>980</b>	<b>700</b>	<b>3,000</b>		<b>3,000</b>	<b>100,000</b>	<b>1,100</b>	

Bold indicates that the constituent was detected above the laboratory method reporting limits (MRLs).

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Orange shading indicates that the constituent exceeds the DEQ Tier 1 RBSLs.

(--) Sample was not analyzed for the constituent, data not available. (ND) Non-detect. (J) Estimated value, analyte was present but less than the MRLs.

**Table 3**  
**Groundwater Analytical Results - 8270 SVOCs (µg/L)**  
**Kelly Rae's, Facility ID 15-06101, Release 1850, Kalispell, MT**

Sample ID	Date Sampled	Semi-Volatile Organic Compounds (SVOCs)																	
		1-Methylnaphthalene	2-Methylnaphthalene	Acenaphthene	Acenaphthylene	Anthracene	Benzo(a)anthracene	Benzo(a)pyrene	Benzo(b)fluoranthene	Benzo(g,h,i)perylene	Benzo(k)fluoranthene	Chrysene	Dibenzo(a,h)anthracene	Fluoranthene	Fluorene	Indeno(1,2,3-cd)pyrene	Naphthalene	Phenanthrene	Pyrene
MW-7	10/16/24	<b>14</b>	<b>20</b>	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	<b>68</b>	<b>0.22</b>	<0.21
MW-8	10/16/24	<b>5.5</b>	<b>6.8</b>	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<b>67</b>	<b>0.23</b>	<0.22
DEQ RBSLs		<b>11</b>	<b>36</b>	<b>70</b>	--	<b>2,100</b>	<b>0.5</b>	<b>0.05</b>	<b>0.5</b>	--	<b>5</b>	<b>50</b>	<b>0.05</b>	<b>20</b>	<b>50</b>	<b>0.5</b>	<b>100</b>	--	<b>20</b>

**Bold** indicates that the constituent was detected above the laboratory method reporting limits (MRLs).

2404-1006

**Orange shading** indicates that the constituent exceeds the DEQ Tier 1 RBSL.

(J) Estimated value, analyte was present but less than the MRLs.

(--) No value established.

**Table 4**  
**Groundwater Analytical Results - IBIs**  
**Kelly Rae's, Facility ID 15-06101, Release 1850, Kalispell, MT**

Sample ID	Date Sampled	Metabolic By-products			Terminal Electron Acceptors			ORP <sup>(a)</sup> (mV)
		Methane	Dissolved Iron	Dissolved Manganese	Nitrate + Nitrite	Sulfate	Dissolved Oxygen <sup>(a)</sup>	
MW-3NR	10/16/24	<b>0.0027</b>	<0.02	<b>0.745</b>	<b>1.88</b>	<b>35</b>	<b>1.27</b>	<b>-79.8</b>
	05/19/25	<b>0.15</b>	<b>3.24</b>	<b>0.541</b>	<b>1.22</b>	<b>20</b>	<b>1.75</b>	<b>-100</b>
	11/10/25	<b>0.28</b>	<b>6.16</b>	<b>0.5</b>	<b>0.25</b>	<b>7</b>	<b>1.59</b>	<b>-144.9</b>
MW-5	10/16/24	<b>0.31</b>	<b>1.49</b>	<b>0.438</b>	<b>2.33</b>	<b>35</b>	<b>1.26</b>	<b>78.9</b>
	05/19/25	<b>0.022</b>	<b>1.55</b>	<b>0.686</b>	<b>0.05</b>	<b>15</b>	<b>1.56</b>	<b>-69.7</b>
	11/10/25	<b>0.39</b>	<b>2.16</b>	<b>0.6</b>	<b>1.94</b>	<b>42</b>	<b>1.86</b>	<b>-58.3</b>
MW-6	10/16/24	<b>0.014</b>	<b>1.07</b>	<b>1.14</b>	<b>0.21</b>	<b>30</b>	<b>1.29</b>	<b>-77.5</b>
	05/19/25	<0.002	<0.02	<b>0.732</b>	<b>0.83</b>	<b>40</b>	<b>1.64</b>	<b>237.5</b>
	11/10/25	<0.002	<b>0.24</b>	<b>0.597</b>	<b>0.37</b>	<b>33</b>	<b>2.16</b>	<b>-66.6</b>
MW-7	10/16/24	<b>0.19</b>	<b>4.77</b>	<b>1.29</b>	<0.01	<1	<b>1.23</b>	<b>-105.1</b>
	05/19/25	<b>0.074</b>	<b>5.66</b>	<b>0.928</b>	<0.01	<b>32</b>	<b>1.47</b>	<b>-126.1</b>
	11/10/25	<b>0.15</b>	<b>6.12</b>	<b>1.26</b>	<0.01	<1	<b>1.46</b>	<b>-144.3</b>
MW-8	10/16/24	<b>1.2</b>	<b>5.99</b>	<b>0.443</b>	<b>0.5</b>	<b>14</b>	<b>1.24</b>	<b>-134.6</b>
	05/19/25	<b>0.1</b>	<b>3.64</b>	<b>0.404</b>	<b>0.03</b>	<b>27</b>	<b>1.58</b>	<b>-84.7</b>
	11/10/25	<b>0.25</b>	<0.02	<b>0.460</b>	<b>0.36</b>	<b>961</b>	<b>1.70</b>	<b>-142.2</b>
MW-9	05/19/25	<b>0.013</b>	<b>1.1</b>	<b>0.11</b>	<b>2.67</b>	<b>48</b>	--	--
	11/10/25	<b>0.36</b>	<b>3.42</b>	<b>0.558</b>	<b>0.41</b>	<b>20</b>	<b>1.52</b>	<b>-150.8</b>
MW-11R	10/16/24	<b>0.0091</b>	<b>1.24</b>	<b>0.835</b>	<b>0.02</b>	<b>33</b>	<b>1.44</b>	<b>-116.4</b>
	05/19/25	<0.002	<0.02	<b>0.113</b>	<b>0.42</b>	<b>27</b>	<b>1.90</b>	<b>143.1</b>
	11/10/25	<b>0.0062</b>	<b>1.07</b>	<b>0.767</b>	<b>0.03</b>	<b>12</b>	<b>1.88</b>	<b>-100.0</b>
<b>MCLs <sup>(b)</sup></b>			<b>0.3 <sup>(2)</sup></b>	<b>0.05 <sup>(2)</sup></b>	<b>10 <sup>(1)</sup></b>	<b>250 <sup>(2)</sup></b>		

**Bold** indicates that the constituent was detected above the method reporting limit (MRL).

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All values reported in mg/L, with the exception of ORP.

(a) Collected by field meter, not laboratory analysis. (--) Data not available.

(b) EPA National Drinking Water Regulations Maximum Contaminant Level.

(1) Primary MCL. (2) Secondary MCL.

**Table 5**  
**Soil Analytical Results - VPH/EPH (mg/kg)**  
**Kelly Rae's, Facility ID 15-06101, Release 1850, Kalispell, MT**

Sample ID	Date Sampled	Sample Depth (feet bgs)	VPH Constituents										EPH Constituents				PID (ppm)
			MTBE	Benzene	Toluene	Ethyl-benzene	Total Xylenes	Naphthalene	C <sub>9</sub> -C <sub>10</sub> Aromatics	C <sub>5</sub> -C <sub>8</sub> Aliphatics	C <sub>9</sub> -C <sub>12</sub> Aliphatics	TPH	C <sub>9</sub> -C <sub>18</sub> Aliphatics	C <sub>19</sub> -C <sub>36</sub> Aliphatics	C <sub>11</sub> -C <sub>22</sub> Aromatics	TEH	
MW-5	10/10/12	3.8-4.3	<0.13	<b>0.056</b>	ND	<b>0.38</b>	<b>0.12</b>	<b>4</b>	<b>116</b>	<b>5.8</b>	<b>186</b>	<b>382</b>	<b>215</b>	<b>47</b>	<b>132</b>	<b>467</b>	11.3
	10/10/12	7.8-8.3	<0.11	<0.056	ND	<b>0.13</b>	<b>0.052</b>	<b>0.39</b>	<b>20</b>	<b>2.7</b>	<b>34</b>	<b>80</b>	--	--	--	<b>77</b>	22.4
MW-6	10/11/12	6.6-7.1	<0.13	<0.063	ND	ND	ND	ND	ND	ND	ND	ND	--	--	--	ND	7.2
MW-7	10/11/12	6-6.5	<1.3	<b>0.72</b>	<b>1.1</b>	<b>6.6</b>	<b>3</b>	<b>2</b>	<b>126</b>	<b>395</b>	<b>318</b>	<b>626</b>	--	--	--	<b>15</b>	378
MW-8	10/10/12	7.1-7.6	<2.6	<b>1</b>	<b>2.4</b>	<b>13</b>	<b>27</b>	<b>4.9</b>	<b>240</b>	<b>604</b>	<b>554</b>	<b>1,060</b>	--	--	--	<b>44</b>	981
MW-9	10/11/12	6.2-6.7	<0.61	<b>0.76</b>	<b>1.1</b>	<b>4.9</b>	<b>0.94</b>	<b>0.31</b>	<b>138</b>	<b>456</b>	<b>397</b>	<b>735</b>	<b>111</b>	ND	ND	<b>241</b>	188
MW-10	03/19/14	5.5-6	<0.13	<0.064	ND	ND	ND	ND	ND	ND	ND	ND	--	--	--	ND	0.1
MW-11 (Excavated)	03/19/14	5.75-6.25	<1.2	<b>32</b>	<b>144</b>	<b>45</b>	<b>231</b>	<b>10</b>	<b>440</b>	<b>1,070</b>	<b>593</b>	<b>1,920</b>	<b>42</b>	ND	<b>21</b>	<b>209</b>	2,183
	03/19/14	12-12.5	<0.19	<0.11	<b>0.2</b>	<b>0.55</b>	<b>1.7</b>	<b>0.37</b>	<b>46</b>	<b>151</b>	<b>75</b>	<b>211</b>	--	--	--	<b>24</b>	1,500
MW-11R	07/19/19	3.25-3.75	<0.1	<0.052	<0.053	<0.054	<0.055	<0.1	<2.1	<2.1	<2.1	<2.1	--	--	--	<10	1.8
	07/19/19	9.5-9.8	<2	<0.28	<0.5	<0.28	<1.5	<1	<b>151</b>	<b>310</b>	<b>215</b>	<b>525</b>	--	--	--	<b>27</b>	1,729
MW-12	03/19/14	5.75-6.25	<0.13	<0.63	ND	ND	ND	ND	ND	ND	ND	ND	--	--	--	ND	0.3
MW-13	03/19/14	6-6.5	<0.13	<0.064	ND	ND	ND	ND	ND	ND	ND	--	--	--	--	ND	0.4
SB-1	10/24/23	7-9	<0.12	<0.061	<0.061	<b>0.11</b>	<0.061	<0.12	1.7 J	<b>9.1</b>	<b>8.8</b>	<b>17</b>	--	--	--	<20	1.7
SB-2	10/24/23	8-10	<0.12	<0.062	<0.062	<b>0.079</b>	<0.062	<0.12	<2.5	<b>4.9</b>	<b>7.1</b>	<b>10</b>	--	--	--	<20	1.2
SB-3	10/24/23	7-9	<0.12	<0.06	<0.06	<0.06	<0.06	<0.12	<2.4	<2.4	<2.4	<2.4	--	--	--	<20	3.1
SB-4	10/24/23	4-5	<0.12	<b>0.12</b>	<b>0.21</b>	<b>0.72</b>	0.46 J	<0.12	<b>6.2</b>	<b>39</b>	<b>20</b>	<b>63</b>	<12	<b>358</b>	<b>63</b>	<b>1,020</b>	17.5
	10/24/23	7-9	<0.14	<b>0.32</b>	<b>0.74</b>	<b>6.9</b>	2.1 J	<b>0.16</b>	<b>155</b>	<b>198</b>	<b>496</b>	<b>672</b>	<b>110</b>	<41	<40	<b>257</b>	16.8
SB-5	10/24/23	7-9	<0.13	<b>0.17</b>	<b>0.35</b>	<b>3.8</b>	<b>0.67</b>	0.073 J	<b>93</b>	<b>142</b>	<b>291</b>	<b>422</b>	--	--	--	<b>48</b>	1.3
SB-6	10/24/23	8-10	<0.12	<b>0.43</b>	<b>0.57</b>	<b>5.5</b>	1.3 J	<b>0.14</b>	<b>132</b>	<b>236</b>	<b>402</b>	<b>626</b>	--	--	--	<b>89</b>	116
SB-7	10/24/23	8-10	<0.12	<b>0.84</b>	<b>0.81</b>	<b>5.3</b>	<b>3</b>	<b>0.34</b>	<b>130</b>	<b>249</b>	<b>352</b>	<b>604</b>	--	--	--	<b>156</b>	7.7
RBSLs (DC Construction 0-10 ft)			<b>9,100</b>	<b>190</b>	<b>14,000</b>	<b>1,200</b>	<b>1,900</b>	<b>120</b>	<b>4,000</b>	<b>2,000</b>	<b>3,000</b>		<b>6,000</b>	<b>1,600,000</b>	<b>33,000</b>		
RBSLs (<10 ft to groundwater)			<b>0.078</b>	<b>0.07</b>	<b>21</b>	<b>26</b>	<b>320</b>	<b>12</b>	<b>130</b>	<b>220</b>	<b>11,000</b>		<b>53,000</b>		<b>370</b>		

**Bold** indicates that the constituent was detected above the laboratory method reporting limits (MRLs).

**Blue shading** indicates that the constituent exceeds the DEQ Tier 1 RBSL for leaching to groundwater.

J - Estimated value, analyte was present but less than the MRLs.

ND - Non-detect.

(--) Sample was not analyzed for the constituent, not applicable.

2404-1006

**Remedial Excavation Work Plan 35153**

Kelly Rae's  
Kalispell, MT

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## **Excavation Subcontractor Bids**

## Excavation Contractor Bid Worksheet

Kelly Rae's, 25 Batavia Lane, Kalispell, MT

Facility ID# 15-06101: Release# 1850, Work Plan# 35153

Contractor Company Name: Petrocon Systems INC. Contractor Representative Signature: 

TASK	Units	Unit Cost	Quantity	Total Cost
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### Cut, Remove, Dispose of Asphalt Pavement

This task includes all equipment and labor costs for cutting, removing, hauling, and disposing of asphalt pavement. The asphalt area to be removed is approximately 2,000 SF. Disposal fees will be paid by contractor.

SF	\$1.21	2,000	\$2,420.00
<b>Sub Total:</b>			<b>\$2,420.00</b>

### Soil Excavation, Segregation, Loading

This task includes all equipment and labor costs to excavate, segregate impacted and unimpacted soils, load impacted soils directly into trucks for hauling, and stockpile unimpacted soils for use as backfill. WCEC will direct the excavation and segregation activities. Price must be a firm fixed rate per bank cubic yard based on an anticipated total excavation volume of 960 CY with 300 CY of clean overburden to be stockpiled onsite and 660 CY loaded for hauling to the Flathead County landfill (based on truck counts).

CY	14.33	960	\$13,761.00
<b>Sub Total:</b>			<b>\$16,181.00</b>

### Soil Hauling - Petroleum Impacted Soils

This task includes all equipment and labor costs for hauling and delivering petroleum impacted soils to the Flathead County landfill located on Disposal Road approximately 14 miles one way from project site. Price must be a firm fixed rate per cubic yard with an anticipated volume of 660 CY (based on truck counts). Do not include landfill disposal fees as these will be paid by WCEC. Soil must be hauled to landfill prior to September 30.

CY	\$13.20	660	\$8,712.00
<b>Sub Total:</b>			<b>\$24,893.00</b>

### Backfilling and Compaction

This task includes all equipment, labor, and material costs related to sourcing, importing, placing, and compaction of backfill materials. Backfilling and compaction to within 4 inches of existing grade is to be completed using maximum lift thickness of 12 inches. The first lifts will be 1-inch drain rock placed in the bottom of the excavation (2 ft thick) and covered with a geotextile fabric. Clean 3-inch minus pit run will be placed on top of this gravel layer and compacted to 95% standard proctor according to ASTM D6938. WCEC will facilitate proctor testing. The final (top) lift will be 1.5-inch minus crushed gravel (1 ft thick) underlain by geotextile fabric. Price must be a firm fixed rate per cubic yard with an anticipated total volume of 960 CY with 300 CY of unimpacted overburden and 660 CY of imported clean backfill.

CY	34.44	960	\$34,565
<b>Sub Total:</b>			<b>\$59,458.00</b>

### Assumptions:

**Total Cost:** \$59,457.00

- 1) For bidding purposes, assume removal of the stated bank soil volumes and weight conversion factor of 1.4 tons per banked CY
- 2) Invoicing must be based on actual banked CY removed and replaced and categorized to match this bid worksheet
- 3) Surveying of the excavation and/or tonnage delivered to the landfill will be used for volume reconciliation
- 4) WCEC will supervise and direct contractor in segregation of impacted and unimpacted soils
- 5) WCEC will determine the final extent of the excavation
- 6) WCEC will conduct all necessary ambient air monitoring during excavation and backfilling activities
- 7) WCEC will develop and implement a site specific health & safety plan and conduct daily health & safety meetings which must be attended by all site personnel
- 8) WCEC will coordinate all site access and utility locates
- 9) Landfill tipping fees will be billed to WCEC's account



PO Box 342  
Kalispell, MT 59903  
(406) 334-3585

Date 3/12/2026  
Estimator Seth Wantaja

Quoted to  
**WECE Engineering**

Project Name & Location  
**Kelly Raes Environmental Excavation**

Item	Description	Quantity	Unit	Unit Price	Total Price
01	Cut, Remove, Dispose of Asphalt Pavement	2000	SF	\$1.06	\$2,125.00
02	Soil Excavation, Segregation, Loading	960	CY	\$10.73	\$10,300.00
03	Soil Hauling - Petroleum Impacted Soils	660	CY	\$14.20	\$9,375.00
04	Backfilling and Compaction	960	CY	\$40.57	\$38,950.00
<b>TOTAL</b>					<b>\$60,750.00</b>

## Myles Morris

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**From:** milehighdirt@gmail.com  
**Sent:** Friday, March 13, 2026 8:37 AM  
**To:** Myles Morris  
**Subject:** RE: Bid for Excavation at Kelly Rae's Kalispell

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Myles,

I looked it over several times. I don't think I am going to give a quote on it.

Bryan

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**From:** Myles Morris <mmorris@setenv.com>  
**Sent:** Friday, March 13, 2026 8:33 AM  
**To:** milehighdirt@gmail.com  
**Cc:** milehighpetro@gmail.com  
**Subject:** RE: Bid for Excavation at Kelly Rae's Kalispell

Hi Bryan, if you could please get back to me today on the Kelly Rae's project, I would appreciate it. I would like to submit my work plan to DEQ today if I could.

It finally snowed here!

Thanks,  
Myles

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**From:** Myles Morris  
**Sent:** Friday, February 27, 2026 2:18 PM  
**To:** [milehighdirt@gmail.com](mailto:milehighdirt@gmail.com)  
**Cc:** [milehighpetro@gmail.com](mailto:milehighpetro@gmail.com)  
**Subject:** Bid for Excavation at Kelly Rae's Kalispell

Hi Bryan, I left you a voicemail earlier this week, I've got another Petrofund project at a gas station in Kalispell called Kelly Rae's that we are planning to complete a remedial excavation at later this year. There was an excavation done here in 2018 that you guys were the low bid on, so I thought I would send you a bid request for this upcoming one. Petrocon will be doing the fuel systems work, we are going to excavate the contaminated soil after the demo of the dispensers has been completed. We will need to complete the project in August/September during low groundwater conditions. We have to deliver the soil to the landfill prior to September 30, so the project window is kind of tight.

If you could please fill out the attached bid sheet and send back to me in 2 weeks, by Friday, March 13, I would appreciate it! Please let me know if you have any questions.

**Remedial Excavation Work Plan 35153**

Kelly Rae's  
Kalispell, MT

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## **Estimated Costs – Remedial Excavation Work Plan 35153**