PIONEER TECHNICAL SERVICES

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December 29, 2025

Mr. Jonathan Love, P.G.
Environmental Project Officer
Petroleum Tank Cleanup Section
Montana Department of Environmental Quality
P.O. Box 200901
Helena MT 59620-0901

RE: **Remedial Investigation Work Plan for the Petroleum Release at the Former South 27th Express Center (Former Kwik Way #18), 1239 South 27th Street, Billings, Yellowstone County, Montana**
Facility ID #56-04955 (TID #29952), Release #2853, Work Plan #35102

Owner/ Responsible Party:	Dennis Whitmore C-Store Properties, Inc. PO Box 80391 Billings, MT 59108 dwhitmore@gmconostores.com	**Consultant/ Work Plan Preparer:**	Pioneer Technical Services, Inc. Charlie Peterson 2310 Broadwater Ave, Suite 1 Billings, MT 59102 cpeterson@pioneer-technical.com

Dear Mr. Love:

On behalf of C-Store Properties, Inc., Pioneer Technical Services, Inc. prepared the following Remedial Investigation Work Plan and cost estimate for the former South 27th Express Center (Kwik Way #18) facility in Billings, Montana. As requested in correspondence from the Montana Department of Environmental Quality dated October 10, 2025, our scope of work and associated proposed costs are outlined in the attached work plan. The original work plan was to be generated by November 28, 2025; however, due to various contractual requirements and delays, Pioneer requested the due date for work plan generation be extended to December 31, 2025. This request was granted by Department of Environmental Quality.

If you have any questions concerning this project or the proposed scope of work, please contact me at (406) 702-2430 or cpeterson@pioneer-technical.com.

Sincerely,

Pioneer Technical Services, Inc.

Charles L. Peterson, PG
Program Manager

Attachment 1: Figures
Attachment 2: Cost Estimate

cc: Mr. Taylor Bienvenue, GIT, Pioneer Technical Services, Inc
Mr. Dennis Whitmore, Responsible Party

EXECUTIVE SUMMARY

The purpose of this document is to provide a Remedial Investigation Work Plan (work plan) for the Former South 27th Street Express Center (former Kwik Way #18) facility, Facility ID #56-04955, as requested in electronic correspondence from Montana Department of Environmental Quality (DEQ) dated October 10, 2025. The purpose of the proposed work activities is to further determine the extent and magnitude of petroleum impacts to soil and groundwater at the Site and to address known data gaps identified in previous reports, evaluate the status of petroleum-contaminated media associated with the release via groundwater monitoring, and prepare a Release Closure Plan (RCP) to identify and propose additional work needed to resolve the release.

The most recent groundwater monitoring event at the Site occurred in May 2025 as part of a Phase II investigation (RTI, 2025). A review of laboratory data from the 2025 Phase II investigation indicates that petroleum concentrations exist in the groundwater above Montana's Risk-Based Screening Levels (RBSLs) (DEQ, 2024).

Based on discussions with DEQ and the Responsible Party, Pioneer defined the scope of this work plan. The scope of work includes advancing four soil borings downgradient of the source area, completing the soil borings as monitoring wells, and performing one groundwater monitoring event. Upon completion of the relevant tasks, Pioneer will prepare a remedial investigation report detailing advancement of the soil borings and construction of monitoring wells, associated soil sampling, and the initial groundwater monitoring event. A RCP will be generated and appended to the remedial investigation report. These activities are detailed in the following work plan.

1 FACILITY SUMMARY AND CURRENT CONDITIONS

Site Description

The former South 27th Express Center facility (former Kwik Way #18) is located at 1239 South 27th Street, Billings, Yellowstone County, Montana. The Site is in a mixed commercial and light industrial area. The Site is on a level lot with an elevation of approximately 3,118 feet above mean sea level. The Site is bordered by commercial property to the north, by a commercial building and parcel containing a return irrigation ditch to the east, a vacant lot to the south, and by South 27th Street to the west, across from which is a gasoline convenience store. This area of Billings is served by public utility city services (e.g., potable water and sanitary and storm sewer systems). There are no structures on the property as the former service station building and canopy have been removed. Eleven groundwater monitoring wells are located on the subject property. The location of the Site is shown on the Location and Vicinity Map (Figure 1) and Site Map (Figure 2) in Attachment 1.

Facility History and Release Background

Release #2853 was discovered while replacing piping at this facility in 1996. Contaminated soil, exhibiting a total petroleum hydrocarbons concentration of 5,700 milligrams per kilogram, was discovered near the northern dispensers (Figure 2). From 1998 through 2005, Terracon conducted subsurface investigations including installation of five monitoring wells and several rounds of groundwater sampling. In 2002 and 2003, monitoring MW-3 exhibited light non-aqueous phase liquid (LNAPL) accumulation. From 2002 to 2005, monitoring wells MW-1 and MW-2 occasionally exhibited benzene concentrations that exceeded the Montana's Tier 1 RBSL for groundwater by relatively narrow margins. Resource Technologies, Inc. (RTI) resumed groundwater monitoring in 2009. Well MW-3 contained free product, and MW-2 exhibited elevated concentrations of gasoline-range hydrocarbons including 410 micrograms per liter of benzene. Resource Technologies, Inc. installed a passive LNAPL skimmer in well MW-3 and conducted periodic LNAPL recovery (RTI, 2012). In 2013, RTI conducted a Site-wide laser-induced fluorescence (LIF) investigation to determine the lateral and vertical extent of the soil contamination. The LIF investigation results were documented in the Abbreviated LIF Investigation Report; Kwik Way 18 (RTI, 2013). Using LIF data, RTI oversaw the excavation of approximately 2,200 yards of contaminated soil at the Site in January and February 2016 (RTI, 2016). In December 2017, RTI installed six additional monitoring wells, MW-6 through MW-11. Groundwater monitoring conducted from 2018 through 2023 indicated that elevated contaminant concentrations persisted in monitoring wells MW-3, MW-10, and MW-11 (RTI, 2025).

Since completion of the 2016 excavation, elevated contaminant concentrations have persisted in wells MW-10 and MW-11, located in the central portion of the Site, and in well MW-3, located near the northeast corner of the former underground storage tank (UST) basin (Figure 2). The source of contamination in the central portion of the Site appears to be associated with a mass of contamination associated with an old dispenser that predates the 1990s configuration of the Site. The LIF boring, LIF 6, advanced in the former dispenser area

indicated responses of 20% to 40% between 8 and 11 feet below ground surface (bgs). The limit of this mass of contamination was roughly defined by LIF boreholes, LIF-5, LIF-7, LIF-22, and LIF-27. Persistent dissolved contamination in the vicinity of well MW-3 appears to be associated with an area of LNAPL accumulation that extends beyond the northern extent of the former UST area and excavation as indicated by data from LIF boreholes, LIF-10, LIF-13, and LIF 14. Impacts in this area appeared to reside at depths of 6 to 8 feet bgs (RTI, 2025).

Based upon the results of the November 2024 and May 2025 groundwater monitoring events, DEQ requested that an additional remedial investigation be completed to further determine the downgradient extent and magnitude of the dissolved-phase plume. This work plan was prepared to determine these objectives.

2 OBJECTIVES OF CORRECTIVE ACTION WORK PLAN

The primary objective of this work plan is to further define the current extent and magnitude of petroleum impacts to soil and groundwater and to recommend remediation work required to clean up and resolve the release.

3 PROPOSED SCOPE OF SERVICES

In summary, this work plan involves advancing four soil borings and completing the borings as groundwater monitoring wells to fill data gaps within the well network, conducting a groundwater monitoring event, preparing a remedial investigation report, and creating a RCP upon completion of all activities.

Specifically, this work plan proposes the following actions to achieve these goals:

- Install four soil borings and new monitoring wells to determine the extent and magnitude of petroleum contamination in soil and groundwater.
- Perform a groundwater monitoring event to determine current groundwater conditions.
- Validate all laboratory analytical data using DEQ's Data Validation Summary Form.
- Discuss work plan tasks and results with DEQ's project manager; any modifications required to complete the work plan objectives will be submitted and agreed upon.
- Prepare and submit a remedial investigation report detailing the results of the investigation and groundwater monitoring event.
- Prepare a RCP and discuss the results with DEQ's project manager.
- Work plan and reports will be submitted electronically following the Petroleum Tank Cleanup Section submittal requirements.

These investigation activities will be used to delineate the magnitude and extent of the release in order to resolve Release #2853. As requested by DEQ, Pioneer proposes the following scope of work:

- Task 1: Project Management and Planning.
- Task 2: Soil Boring and Groundwater Monitoring Well Installation.
- Task 3: Surveying.
- Task 4: Groundwater Monitoring.
- Task 5: Reporting.

The following sections describe each task for the proposed work along with Pioneer's cost estimate and proposed schedule.

3.1 Task 1 – Project Management and Planning

Task 1 Project Management and Planning work will include:

- Preparing a work plan and cost estimate.
- Coordinating utility locates.
- Project scheduling.
- Preparing a Health and Safety Plan.
- Coordinating with subcontractors, owners, and regulators.
- Site work preparation.

Pioneer will notify 811 for utility locates prior to drilling activities. Pioneer field personnel will document the locations of marked underground and aboveground utilities on the figures provided with the final report.

3.2 Task 2 – Soil Boring and Groundwater Monitoring Well Installation

The work plan includes advancing four soil borings and constructing all four soil borings into monitoring wells. Pioneer is proposing to advance all soil borings on the north and northeast portion of the subject property to determine the downgradient extent of the petroleum-impacted area. The Site Map (Figure 2 in Attachment 1) shows the location of the proposed soil borings.

The anticipated total depth of the soil borings is 15 feet bgs. The boring depth was determined based on the maximum depth of petroleum impacted soil ranging from 8 to 17 feet bgs. Pioneer does not anticipate petroleum impacted soil being greater than 15 feet bgs at the downgradient extent of the plume. Groundwater at the Site ranges from 4 to 7 feet bgs.

Pioneer will advance the soil borings using Pioneer's direct-push Geoprobe® drill rig and associated equipment to conduct the soil investigation. Using a direct-push drill rig will minimize Site disturbance and the amount of investigation derived waste (cuttings).

Final boring locations will be determined in the field after consulting Montana DEQ's project manager and will be based on accessibility, underground utilities, the presence of unforeseen impedances, or other factors.

For the groundwater monitoring well installation phase, the team will use the Geoprobe® drill rig to construct the monitoring wells. The monitoring wells will be constructed with 2-inch-diameter, schedule 40 polyvinyl chloride (PVC) pipe. All well screens and piping will be delivered to the Site factory wrapped. Each well will be constructed using a prepack well screen consisting of 0.010-inch, factory-slotted PVC screen covered with a 65-mesh stainless steel screen and filled with 20/40 mesh silica sand. The wells will be screened from 3 to 13 feet bgs. The remainder of the borehole will be completed with PVC riser pipe to grade. The annular space between the prepack well screen and the borehole will have 0.10- to 0.20-inch sand completion to 1 foot above the screen, and the remaining annular space between the well casing and the borehole will have a bentonite seal. The wells will be secured with flush mount bolt-down covers set in concrete. The newly constructed wells will be developed after construction. Each well will be considered developed once clear of sediment or after being pumped with a submersible pump or surface pump for 1 hour.

A Pioneer geologist will supervise drilling operations and be present to collect, screen, and log soil types. Soil samples will be collected at continuous intervals, and personnel will log the soil type and consistencies and document any visible signs of petroleum impacts. Standard headspace readings will be collected using a photoionization detector (PID) meter. A portion of each soil sample will be placed into an airtight container, labeled, and allowed sufficient time for the hydrocarbons, if present, to volatilize. After the equilibration period, each sample will be scanned with a PID meter by inserting the sampling probe into the headspace of the container. The PID readings from each soil sample collected from each borehole will be reviewed and recorded. The sample with the highest reading or with other signs indicating petroleum impacts will be selected for laboratory analysis. In addition to the sample with highest presumed petroleum impact, analytical samples will also be collected at the groundwater interface and at the bottom of the smear zone for each boring. A maximum of three soil samples from each boring and one duplicate sample will be submitted for laboratory analysis for a total of 13 submitted soil samples. The selected samples will be placed into a laboratory-supplied container, labeled, stored on ice, and submitted to Energy Laboratories, Inc. (Energy) in Billings, Montana, for volatile petroleum hydrocarbons (VPH) and extractable petroleum hydrocarbon (EPH) screen analyses. If the EPH screen result for soil is greater than 200 milligrams per kilogram, the sample will be submitted for EPH fractionation analysis without polycyclic aromatic hydrocarbons (PAHs). For this work plan, we are assuming that half of the samples will require EPH fractionation. Four soil samples with the highest presumed petroleum impacts will

be selected for lead scavengers 1,2-ethylene dibromide (EDB) and 1,2-dichloroethane (DCA). Chain of custody documentation will accompany the samples.

3.3 Task 3 – Surveying

Following well installation and development, the new wells will be surveyed by a licensed surveyor, and the top of casings will be determined to be within 0.01 feet of mean sea level. The survey crew will also survey nearby structures, utilities, Site features, and appurtenances.

3.4 Task 4 – Groundwater Monitoring

This work plan proposes performing one groundwater monitoring event. The groundwater monitoring event will be conducted at least 1 week after the new monitoring wells are developed. Pioneer will collect groundwater samples from the 4 newly installed monitoring wells and 11 existing monitoring wells. Pioneer will gauge and purge the wells prior to collecting groundwater samples.

Prior to groundwater sample collection, Pioneer will gauge all existing monitoring wells for the presence of LNAPL. Each well will be gauged using an electronic interface probe capable of detecting water or LNAPL hydrocarbons to within 0.01 feet. If the well does not contain LNAPL, the sampling team will collect groundwater samples. If LNAPL is detected, the team will not collect any samples, will note the conditions on a field data sheet, and notify DEQ's project manager.

The groundwater samples will be collected according to the DEQ's low-flow sampling guidance (DEQ, 2018). To ensure representative groundwater samples are collected, Pioneer will monitor the water quality parameters for the following intrinsic bioremediation indicators and allow them to stabilize during the purging process prior to sample collection: temperature (plus or minus 3%), pH (plus or minus 0.1), dissolved oxygen (plus or minus 10%), specific conductivity (plus or minus 3%), oxidation reduction potential (plus or minus 10 millivolts), and turbidity (plus or minus 10%). The wells will be gauged at each field parameter monitoring interval with a water level meter to ensure that excessive drawdown (plus or minus 0.3 feet) does not occur prior to sampling.

Pioneer will collect the groundwater samples with a peristaltic or bladder pump and disposable tubing and transfer the samples to the appropriate laboratory containers. New, decontaminated containers will be supplied by the laboratory prior to sample collection. Groundwater samples from all 15 monitoring wells will be submitted for laboratory analyses of VPH and EPH screen. For the purpose of this work plan, it is assumed that half of the EPH samples will require EPH fractionation without PAHs. Four monitoring wells with the highest presumed petroleum impacts will be selected for lead scavengers, EDB and DCA.

Analysis of groundwater samples will be in accordance with DEQ's *Risk-Based Corrective Action Guidance for Petroleum Releases* (DEQ, 2024). One field duplicate sample will be collected during the sampling event. Each sample container will be preserved as directed by the laboratory, labeled, and packaged on ice. The samples will be hand delivered to Energy in Billings, Montana. Chain of custody documentation will accompany the samples.

Purge water generated during the sampling activities will be infiltrated into the grassy areas available at the Site in accordance with Montana DEQ's standards.

3.5 Task 5 – Reporting

Following evaluation of the existing wells, advancement of the soil borings, construction of the new monitoring wells, and groundwater monitoring event, Pioneer will prepare and submit a remedial investigation report according to DEQ's *Montana Remedial Investigation Guidance for Petroleum Releases* (DEQ, 2017). The report will include:

- Updated Site maps illustrating the locations of the new and existing monitoring wells, underground utilities, and surface features.
- Cumulative tables summarizing field data and laboratory analytical data for both soil and groundwater.
- Laboratory analytical reports for soil and groundwater samples.
- Logs, field data sheets, and related field data.
- Laboratory data validation.
- Recommendations relevant for further investigation or remedial action.
- Data validation forms.
- Newly created RCP.

The report will be submitted electronically following the Petroleum Tank Cleanup Section submittal requirements.

4 COST ESTIMATE

A detailed cost estimate to perform this scope of work is presented on the worksheet in Attachment 2.

5 SCHEDULES

Pioneer proposes to perform groundwater monitoring well installation (Task 2), surveying (Task 3), and groundwater sampling (Task 4), during the spring of 2026. The remedial investigation report will be completed and submitted within 45 days of receipt of all laboratory

analytical reports for groundwater samples. The full duration of the project is approximately 6 months, and the final report will be issued sometime in the summer of 2026.

6 REFERENCES

DEQ, 2017. Montana Remedial Investigation Guidance for Petroleum Releases. Montana Department of Environmental Quality. October 2017.Available at https://deq.mt.gov/files/Land/LUST/Documents/downloadables/RI_Guidance_Draft_3Oct17.pdf.

DEQ, 2018. Groundwater Sampling Guidance. Montana Department of Environmental Quality. March 2018. Available at https://deq.mt.gov/files/Land/LUST/Documents/downloadables/GWSamplingGuidance-FINAL.pdf.

DEQ, 2024. Montana Risk-Based Corrective Action Guidance for Petroleum Releases. Montana Department of Environmental Quality. February 2024. Available at https://deq.mt.gov/files/Land/LUST/Documents/RBCA/2024_Update/Final%202024%20RBCA%20Guide/Final%20RBCA%202024%20Update_Compiled%20PDF.pdf.

RTI, 2012. Abbreviated Free-Product Recovery Report; Kwik Way #18; 1239 South 27th Street, Billings, MT; Facility ID #56-04955; Release #2853. Prepared by Resource Technologies, Inc. January 2012.

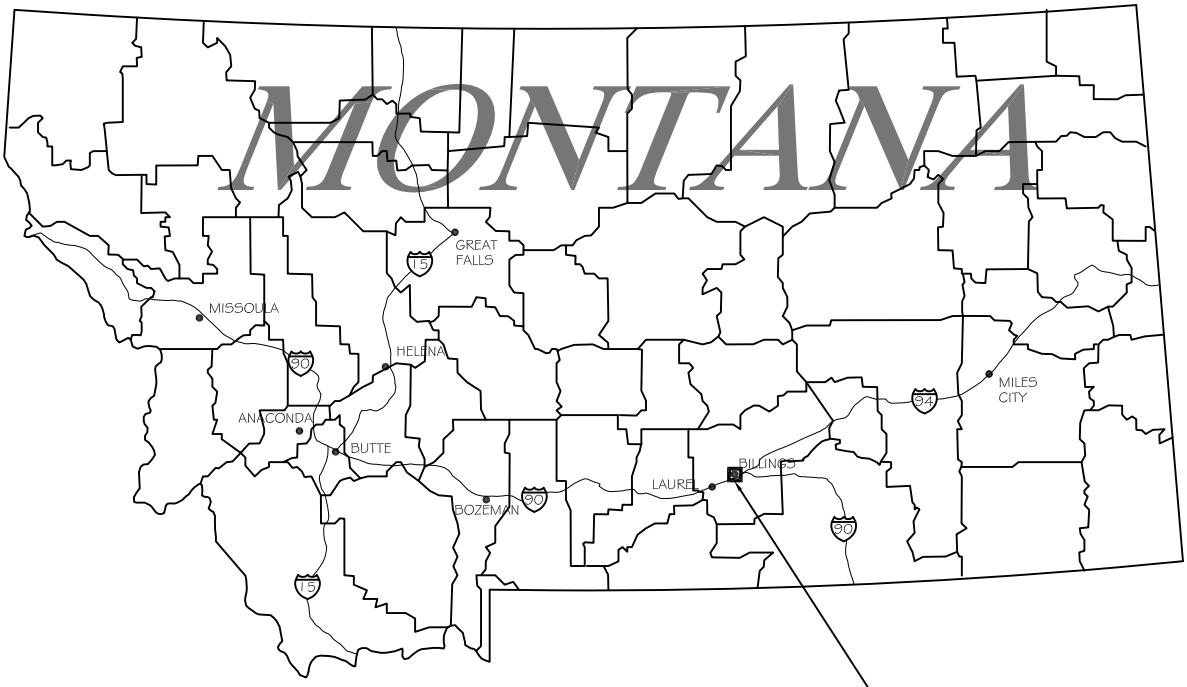
RTI, 2013. Abbreviated LIF Investigation Report; Kwik Way #18; 1239 South 27th Street, Billings, MT; Facility ID #56-04955; Release #2853. Prepared by Resource Technologies, Inc. September 2013.

RTI, 2016. Abbreviated Contaminated Soil Excavation and Disposal Report; Kwik Way #18; 1239 South 27th Street; Billings, Montana; Facility ID #56-04955: Release #2853; Workplan #7624. Prepared by Resource Technologies, Inc. April 2016.

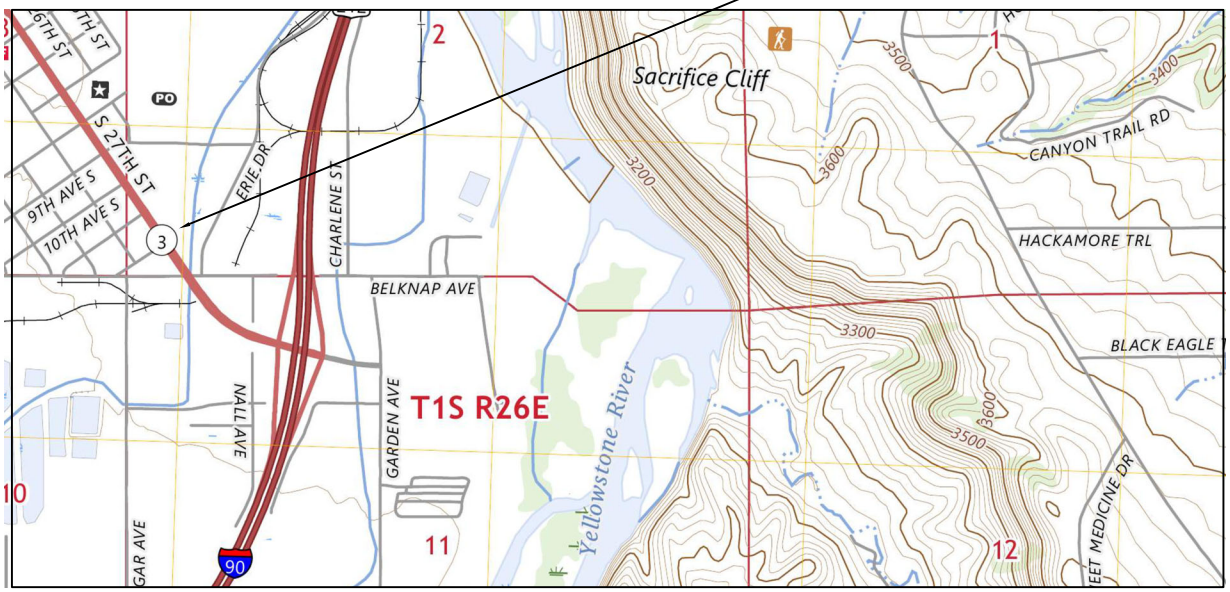
RTI, 2025. Soil Excavation and Groundwater Monitoring Report, Former Kwik Way #18 in Billings, MT. Resource Technologies, Inc. October 1, 2025.

Attachment 1
Figures

Figure 1. Location and Vicinity Map
Figure 2. Site Map



PROJECT LOCATION



SITE VICINITY MAP

DEQ FACILITY ID: 56-04955
RELEASE NUMBER: 2853
WORK PLAN NUMBER: 35102

FORMER S 27TH EXPRESS CENTER
(FORMER KWIK WAY #18)
1239 SOUTH 27TH STREET
BILLINGS, MONTANA 59101

DISPLAYED AS:
COORD SYS/ZONE: NAD83, NAVD88
DATUM: MSP
UNITS: INT. FEET
SOURCE: USGS

SCALE IN FEET
0 1,000 2,000

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FIGURE 1

FORMER KWIK WAY #18
SITE VICNITY AND LOCATION MAP

DATE: DECEMBER 2025

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DEQ FACILITY ID: 56-04955
RELEASE NUMBER: 2853
WORK PLAN NUMBER: 35102

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DISPLAYED AS:
COORD SYS/ZONE: NAD83, NAVD88
DATUM: MSP
UNITS: INT. FEET
SOURCE: BING

SCALE IN FEET
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FIGURE 2

FORMER KWIK WAY #18 SITE MAP

DATE: DECEMBER 2025

12/16/2025 10:58:28 AM Z:\SHARED\ACTIVE PROJECTS\BILLINGSREGIONLUSTPROJECTS\KWIKWAY18\CAD\FIGURES\FIG-002-25.DWG