

June 8, 2026

Mr. Donnie McCurry  
Petroleum Tank Cleanup Section  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

RE: Remedial Investigation Work Plan (WP) for the Petroleum Release at  
Bell Motors Quick Lube, 122 East Main Street, Cut Bank, Glacier County, Montana  
Facility ID #18-0126 (TID 21921), Release 3820, Work Plan 35191

Dear Mr. McCurry,

Big Sky Civil & Environmental, Inc. (BSCE) has prepared this Remedial Investigation Work Plan (WP) for completion of soil boreholes, subsurface soil sampling, well installation, topographic survey, groundwater sampling, and laboratory analytical testing at the subject petroleum release site. In accordance with the Montana DEQ request letter dated May 19, 2026, fieldwork and reporting will be completed as detailed herein.

#### Facility History and Release Background

The subject site is located at 122 East Main Street on the southwest corner of East Main Street and Second Avenue Southeast in Cut Bank, Montana. Nearby petroleum releases are as follows: Bell Motor Company (across Main Street to the north/northeast) and former Flying J (west/northwest of Bell Motor Company).

Site history is summarized in previous investigative reports as follows:

*Contamination was discovered at the site in October 1999 during closure of three (3) 1000-gallon gasoline UST's. The tanks, which were removed in October 1999, were newly installed in December 1988. During closure, visual staining and odors were noted. DEQ requested excavation within the safe reach of the backhoe and collection of a final soil sample before backfilling the excavation. Approximately 12 cubic yards of soil were removed.*

Following UST removal, six (6) monitoring wells were installed MW-1 through MW-6. One well (MW-3) has since been abandoned, and two other wells (MW-2 and MW-4) appear to have damaged/removed or covered with concrete surfacing and were not located during recent fieldwork.

#### Facility Conditions

As mentioned previously, tank removal was completed at the subject facility in 1999. An on-site building is present at the site, which is surrounded by concrete surfacing and landscape beds. No petroleum storage tanks are currently present.

During previous investigations, soil lithology was generally noted as follows: Sand and clay underlain by sandstone and siltstone.

Previous monitoring well construction is as follows: the screened intervals of MW-1 through MW-3 were 10-20' below ground surface (bgs), and the screened interval of MW-4 and MW-6 was 10-15' bgs. Historically, the measured depth to first groundwater at the site has ranged from approximately 9' to 19' bgs, and the groundwater flow direction was variable.

Suspected contaminants are gasoline and possibly diesel. Discussions of potential receptors and migration pathways are included in the 2025 Groundwater Monitoring Report.

### Objectives of Groundwater Monitoring

The objective of this remedial investigation is to more fully define the extent and magnitude of residual petroleum contamination in subsurface soils and groundwater at the subject facility. The extent and magnitude of contamination will be used along with site-specific characteristics (e.g., soil lithology, location of underground utilities and other potential receptors) to determine if further investigative or remedial work is required and, if so, which remedial options should be implemented to progress the release toward closure.

### Work Plan Tasks

BSCE proposes to conduct remedial investigation activities at the subject release site as defined herein.

- Soil Boreholes and Monitoring Well Installation
  - Prior to fieldwork, a utility locate request will be submitted to the utility locate notification center (Montana 811 or Montana One Call) using their online access portal.
  - Four (4) boreholes will be completed at the subject facility and converted into monitoring wells; the anticipated locations of the soil boreholes and wells are shown on **Fig. 2**. These locations are subject to change based on field observations or if any conflicts with underground utilities exist.
    - Based on Google Earth aerial and street view imagery, a sidewalk replacement project was completed at/near the subject facility between July 2014 and August 2019. It is our understanding that the sidewalk removal and replacement was part of a Montana Department of Transportation (MDT) highway project. As a result, monitoring wells MW-2 and MW-4 were covered in concrete surfacing and are no longer viable for sampling. The loss of the wells was not the fault of the owner, and therefore a replacement well for MW-2 is included in this work plan as this data will be pertinent to release closure.
  - During drilling, BSCE will collect soil samples in ~2' intervals and field screen the samples using heated head-space screening with a Photoionization Detector (PID). Samples from the interval containing the highest PID reading will be

- submitted for analytical testing. If no detectable PID readings are encountered, then soil samples will be submitted from the observed groundwater interface. One sample per borehole is anticipated. PID readings and soil descriptions (soil type, color, moisture content, etc.) will be recorded for creation of soil boring logs.
- Select soil samples will be sent to Energy Laboratories, Inc. in Helena, MT and analyzed for volatile petroleum hydrocarbons (VPH) and extractable petroleum hydrocarbons (EPH) screen (with fractionation if the screen exceeds 200 mg/kg).
  - The boreholes will be converted into monitoring wells with the following construction details: two-inch (2") well casing, screened from ~5'-20' bgs (or to the depth of refusal), and the annular space surrounding the casing will be backfilled with 10/20 silica sand and bentonite chips. Well construction details will be recorded in the field and well construction diagrams will accompany the soil boring logs.
  - The selected well installation contractor (Boland Drilling) will upload all monitoring well logs via the Groundwater Information Center (GWIC) website.
- Well Development
    - After well installation and assuming groundwater is encountered, the newly installed wells will be developed using a disposable plastic bailer until visibly non-turbid water is achieved. If purge water remains turbid, development will be completed for up to one hour (1 hr), or as conditions allow. Initial and final turbidity/clarity will be recorded during well development. Additional procedures are included in the attached SOPs. After installation, the wells will be allowed to equilibrate for a minimum of 30 days prior to sampling.
- Groundwater Monitoring
    - Two (2) groundwater monitoring events will be completed at the existing wells MW-1, MW-6, and CBFJ-12, and the newly installed wells using low-flow sampling techniques per the Groundwater Sampling Guidance document and the attached SOPs. First, water level measurements will be taken at all wells using an oil/water interface probe. Next, wells will be purged using a peristaltic pump and field parameters (dissolved oxygen, pH, temperature, conductivity, oxidation-reduction potential and turbidity) will be measured and recorded in 5-minute intervals on field sampling forms. Purge water will be disposed of as discussed in the *Disposal of IDW* section below. After stabilization of field parameters, samples will be collected and sent to Energy Laboratories, Inc. in Helena, MT.
    - Groundwater samples will be analyzed for VPH and EPH screen (with fractionation if the screen is greater than 1,000 ug/L).
    - If greater than 2' of water level drawdown is encountered during purging (using rates less than or equal to 0.20 L/min), then samples will be collected prior to stabilization of water levels and/or field parameters in order to minimize the hydraulic stress on the well and levels of turbidity in the sample(s).

- Topographic Survey
  - After monitoring well installation, a limited topographic survey will be completed. The survey will include the newly installed wells, and other appurtenant physical features for creation of the site plan and related figures.
- Project Management and Work Plan Objectives
  - All fieldwork will be scheduled and coordinated with site owners and the DEQ case manager. Modifications to the work plan, if deemed necessary to complete objectives, will be submitted via written communication.
- Reporting
  - If a change in scope appears necessary, an Interim Data Submittal (IDS) will be prepared and submitted to DEQ detailing the results of the soil and/or groundwater investigations. The IDS will include cumulative soil and groundwater data tables, updated figures, analytical data packages from the lab, and the completed DVSFs.
  - After completion of fieldwork, a Remedial Investigation (RI) Report will be prepared and submitted to DEQ. At a minimum the report will include the following: exhibits depicting the location of site features (utilities, former fueling systems, borehole/well locations), all pertinent data tables including cumulative analytical data in tabular format, receptor survey, data interpretations, conclusions, and recommendations of remedial action required to resolve the release. The following will be appended to the report: soil boring logs and well completion diagrams, field sampling forms, laboratory analytical data, completed DVSFs, and the updated RCP.
  - Standardized report formats will be used for all documents. Reports and supporting documentation will be submitted following DEQ submittal requirements.

#### Disposal of Investigation Derived Waste (IDW)

If necessary, contaminated soil from the soil borehole investigation will be disposed of at the landfill/landfarm. All soil from the borehole investigation will be segregated into clean vs contaminated soil as determined by field observations (presence of staining/odors) and PID readings (e.g., greater than 100 ppm) and disposed of accordingly. Contaminated soil will be temporarily stored onsite in 55-gal drums until acceptance from the landfill is obtained. All purge water from groundwater monitoring and well development will be disposed of in accordance with the disposal flow chart.

#### Quality Assurance and Quality Control (QA/QC)

Standard Operating Procedures (SOPs) pertaining to quality control and quality assurance (QA/QC) are attached.

Cost Estimate

For soil boreholes and well installation, BSCE sent bid invitations to: Boland Drilling, Haz-Tech Drilling and O’Keefe Drilling. O’Keefe did not respond, and Haz-Tech declined to bid. Therefore, the bid from Boland Drilling is included in the attached cost estimate; bids are attached.

For the topographic survey, BSCE sent bid invitations to: Backcountry Surveys and Engineering, Morris Land Surveys, Atlas Land Surveys, and Stahly Engineering. Atlas Land Surveys and Stahly Engineering did not respond. After reviewing the bids, Backcountry Surveys and Engineering appeared to be the most competitive and is included in the attached cost estimate; bids are attached.

Schedule and Reporting

Fieldwork is estimated to begin fall 2026 and finish by the end of 2027. The anticipated schedule by activity is as follows:

<b>Activity Description</b>	<b>Anticipated Completion Timeline</b>
Soil boreholes and well installation	Fall 2026
Groundwater monitoring (two events)	Fall 2026 and Spring 2027
Final RI Report	Summer 2027

Please feel free to contact us with any questions or concerns you may have.

Signature

Respectfully,  
**Big Sky Civil & Environmental, Inc.**



Paxton Ellis, P.E.



Joseph N. Murphy, P.E.

- encl. Figures
- Cost Estimate
- Bids for Soil Boreholes and Well Installation
- Bids for Topographic Survey
- Standard Operating Procedures (SOPs)

cc: Jackson Bell

## **References**

Big Sky Civil and Environmental, Inc. (2025). *Groundwater Monitoring Report, Bell Motors Quick Lube, 122 East Main Street, Cut Bank, MT 59427.*

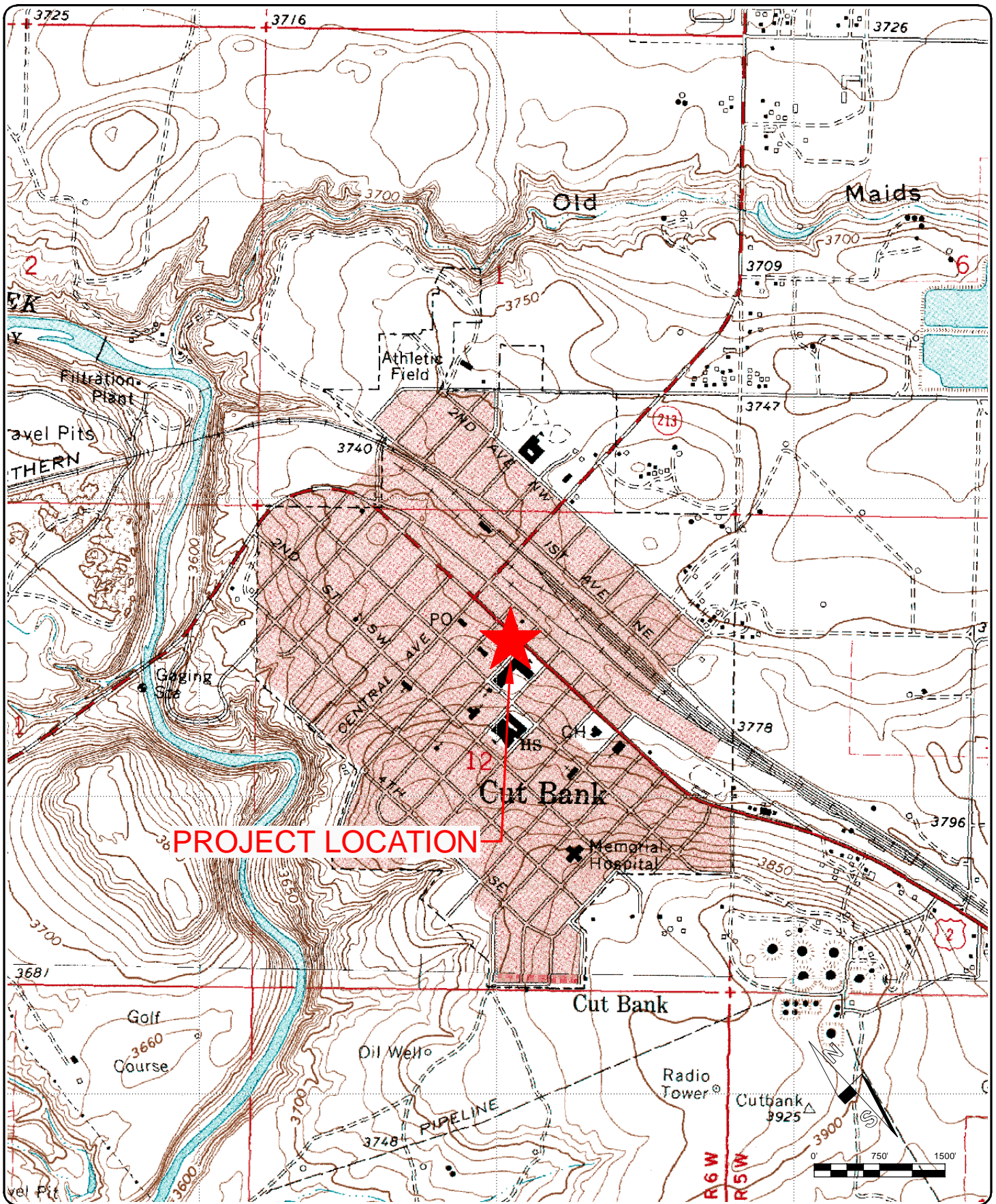
Neil Consultants, Inc. (2005). *Remedial Investigation Report, Bell Motors Quicklube, 122 East Main, Cut Bank, MT 59427.*

Neil Consultants, Inc. (2000). *Remedial Investigation Report, Bell Motors Quicklube, 122 East Main, Cut Bank, MT 59427.*

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## Figures



**TITLE:**  
VICINITY MAP

**PROJECT:**  
BELL MOTOR QUICK LUBE  
CUT BANK, MT

**EXHIBIT:**  
FIG. 1

**bsc&e**  
BIG SKY CIVIL & ENVIRONMENTAL, INC

ENGINEERS - PLANNERS - DESIGNERS -  
LAND SURVEYORS - ENVIRONMENTAL SPECIALISTS  
1324 13th Ave. SW  
P.O. BOX 3625  
GREAT FALLS, MT 59403  
(406) 727-2185 OFFICE  
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www.bsgskyce.com

PROFESSIONAL SEAL

BY: JPE  
DATE: 10/31/24

OWNER:

JADD INC.

PROJECT NAME:

BELL MOTOR QUICK LUBE

SHEET TITLE:

SITE MAP

DRAWING INFORMATION:

OFFICE PROJECT NUMBER: 241  
OWNER FILE NUMBER: XXXX  
CADD FILE NAME: 241-SITE MAP  
ASSOCIATED PROJECTS: 0908

FIGURE:

FIG. 2

