



February 10, 2025

William Bergum  
Petroleum Tank Cleanup Section  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59600-0901

Re: Monitoring Well Abandonment Work Plan  
Allen Oil Bulk Plant,  
1131 Phoenix Avenue,  
Helena, Lewis & Clark County, Montana  
Facility ID 25-01025, TID 23396, Release 4031, WPID 34988

Dear Mr. Bergum:

This letter presents a work plan developed by Olympus Technical Services (Olympus), on behalf of BNSF Railway Company (BNSF), for monitoring well abandonment at the Former Allen Oil Bulk Plant (Site) property located at 1131 Phoenix Avenue in Helena, Montana. A Site location map is shown on Figure 1 and a Site features map is shown on Figure 2. The work plan was developed in response to a work plan request issued by the Department of Environmental Quality (DEQ) in a letter dated December 30, 2024, for a Monitoring Well Abandonment Work Plan. DEQ has requested that all remaining Site monitoring wells (M1R, M2R, M3R, M6, M7, and M9 through M12) be abandoned. Olympus proposes abandoning the two remediation wells R1 and R2, as well. All appropriate corrective actions have been completed for Release 4031, and the monitoring and remediation wells are no longer needed at the Site. A well abandonment cost estimate and Petroleum Tank Release Compensation Board (PTRCB) Well Abandonment Form are attached to this work plan.

## **Scope of Work**

### ***Monitoring Well Abandonment***

Nine existing Site monitoring wells, M1R, M2R, M3R, M6, M7, and M9 through M12, and two remediation wells, R1 and R2, are to be abandoned in accordance with the Montana Department of Natural Resources and Conservation (DNRC) regulations and Administrative Rules of Montana (ARM) 36.21.810. The well locations are shown on Figure 2. The monitoring wells are constructed of 2-inch diameter polyvinyl chloride (PVC) well materials and installed to a depth of 20-25 feet below ground surface (bgs). All Site wells are secured within flush mount monuments cemented in place. The Site is unpaved with hard packed sand and gravel. Access areas will be returned to grade with native gravel material following well abandonment activities.

A Montana OneCall Public Utility Locate ticket and BNSF utility locate ticket will be submitted a minimum of 3 business days prior to abandonment activities. A private utility locate will be conducted prior to excavation activities. Olympus and BNSF staff will coordinate with the lease tenant, Montana Custom Sheds, to ensure that all wells are accessible. A Montana-licensed Monitoring Well Contractor will be present during abandonment activities. Well abandonment will be overseen by an Olympus geologist, as requested by DEQ. Monitoring wells will be abandoned

in accordance with Montana Department of Natural Resources (ARM) 36.21.810. Prior to well abandonment, the wells will be gauged to include measurement of static water levels and the depth to the bottom of the boring. PVC well casing will be removed to a minimum of 3 feet bgs using an excavator and Olympus will attempt to remove full well screens, casing, and monuments to the extent practicable. The well annulus will be backfilled with bentonite crumbles from the total depth to approximately 3 feet below ground surface (bgs). Native soil will be placed in the remaining annulus from three feet bgs to grade, and ground cover may be supplemented by imported gravel fill.

A well abandonment report will be prepared by a licensed Monitoring Well Contractor and submitted to the Montana Bureau of Mines and Geology (MBMG) Ground Water Information Center (GWIC) within 30 days of well abandonment activities.

### **Schedule**

Well abandonment would ideally begin in April 2025, upon DEQ approval of this work plan. The abandonment activities are expected to be completed in one day.

### **Well Abandonment Report**

Olympus will submit a letter report that summarizes the well abandonment method and provide copies of the well abandonment form for the eleven remaining Site wells.

### **Cost Estimate**

A detailed time and materials cost estimate is attached, but invoices will reflect actual hours, equipment, and quantities used.

The cost estimate includes work plan development, project management, mobilization, well abandonment, and preparation of a well abandonment report. Work plan development, mobilization, well abandonment, and report preparation will be invoiced on a unit cost basis. Time and materials tasks, including Project Management and Fieldwork Oversight, will be invoiced at PTRCB-approved rates at the time the work takes place. A detailed cost estimate and PTRCB Well Abandonment Form unit cost estimate worksheet are attached.

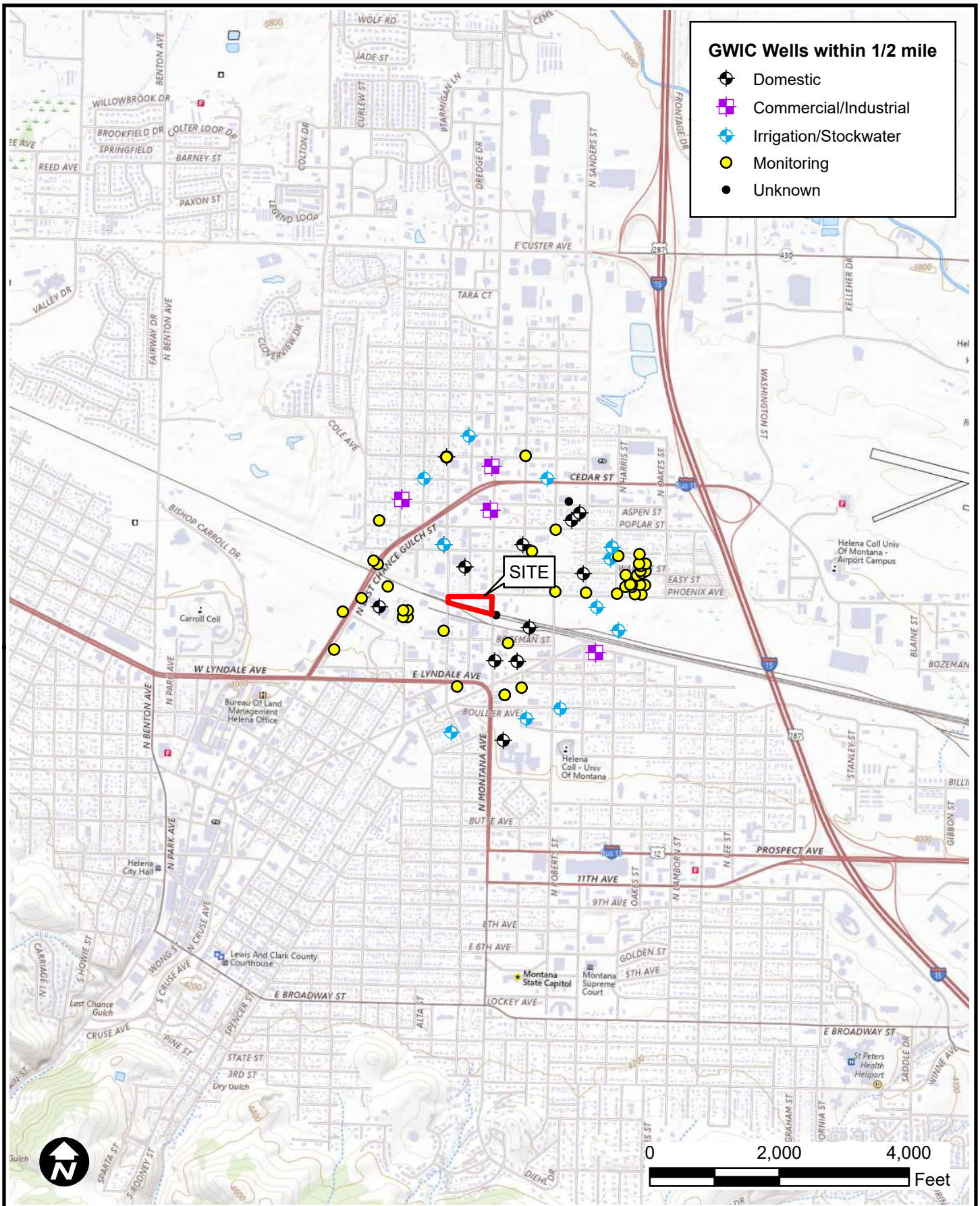
Sincerely,

*Olympus Technical Services, Inc.*



Diane Tackett, PG  
Project Geologist

Attachments: Figures 1& 2, Detailed Cost Estimate, and PTRCB Well Abandonment Form



**Olympus Technical Services, Inc.**

Site Location Map  
Former Allen Oil Bulk Plant  
Helena, MT

FIGURE  
1



