



September 16, 2026

Mr. Donnie McCurry
Environmental Science Specialist
Montana Department of Environmental Quality
P.O. Box 200901
Helena, MT 59600-0901

RE: Groundwater Monitoring Work Plan

Superpumper Store No. 23, 902 South Central Avenue, Sidney, Richland County
MT 59270
Facility ID 42-09718, TREADS ID 27348, Release # 4282, Work Plan ID # 35158
RP Contact: Mr. Paul Kramer, Sidney Superpumper/Farstad Oil, 1722 Mandan
Ave, Mandan, ND 58554, Paul.Kramer@parklandusa.com

Dear Mr. McCurry:

Pinnacle Engineering, Inc. (Pinnacle) is presenting this work plan for semi-annual groundwater monitoring at the Superpumper Store No. 23 in Sidney, MT (Site) from July 1 2026 through June 30, 2027. The Site location and layout are shown on Figure 1 and Figure 2, respectively.

The work plan was prepared following Montana Department of Environmental Quality (DEQ) guidance document *Montana Groundwater Monitoring Work Plan and Report Guidance for Petroleum Releases* (Draft March 2021) and in response to a request for additional corrective action made DEQ in a letter dated March 10, 2026. In the letter, DEQ noted that Pinnacle recommended continued groundwater monitoring on a semi-annual basis to coincide with high and low groundwater conditions.

Facility History/Release Background

A significant amount of facility history and release background information has been submitted to DEQ since release discovery in 2003. Site groundwater has been monitored for decades with no significant change to site or facility operations. There has been no change to the subsurface for at least 7 years that would materially affect monitored natural attenuation (MNA), which is resulting in a stable to decreasing plume of petroleum impacts to groundwater.

Objectives of Groundwater Monitoring

The site-specific objectives for groundwater monitoring are to evaluate trends in petroleum hydrocarbon impacts that demonstrate a stable to decreasing plume in terms on concentration and extent. Criteria that will be measured to assess objectives include field parameters and laboratory analytical parameters required by DEQ. Based on site historical results, we do not anticipate modifications to the work plan at this time.



Scope of Work / Work Plan Tasks

Pinnacle will conduct 2 groundwater monitoring events, one in the fall of 2026 and one in the spring of 2027, with the intent to complete work during seasonal high and low groundwater conditions. Static water levels and samples will be collected from all 9 monitoring wells. Upgradient, clean well MW-16 was removed, or paved over during parking lot construction, by others some time prior to October 11, 2024. Standard operating procedures (SOPs) for equipment decontamination, collection of groundwater level measurements, groundwater sample collection, and chain of custody are attached in Appendix A.

Static water levels will be measured with an electronic measuring tape. The wells will be purged using a peristaltic pump and disposable polyethylene tubing. Field parameters of pH, oxidation reduction potential (ORP), dissolved oxygen (DO), temperature, and specific conductivity (SC) will be measured during purging. Laboratory samples will be collected when field parameters have met the stabilization criteria listed below or after 3 well volumes have been removed, whichever comes first.

<u>Field Parameter</u>	<u>Stabilization Range</u>
pH	± 0.1 Units
Specific Conductance	± 3%
Dissolved Oxygen	± 10%
Oxidation Reduction Potential	± 10 mv

Based on knowledge of site conditions, site history, and our review of the “purge water disposal flow chart” (*Disposal of Untreated Purge Water from Monitoring Wells*, DEQ, 7/27/2015), we propose to discharge purge water to ground surface adjacent to the wellhead.

All groundwater samples will be submitted to Pace National Laboratory in Mt Joliet, TN and analyzed, along with one blind duplicate sample, for volatile petroleum hydrocarbons (VPH) and extractable petroleum hydrocarbon (EPH) screen analysis. Any samples that contain an EPH screen concentration greater than 1,000 µg/L will be fractionated without reporting PAHs. A trip blank will be analyzed for VPH for each sampling event. We are not recommending additional sampling or analyses for natural attenuation parameters, or geochemical indicators.

Upon completion of the first semi-annual monitoring event in the fall of 2026 and receipt of analytical data, updated tables and figures will be prepared and submitted as an Interim Data Submittal.



Groundwater monitoring results will be summarized in a standard groundwater monitoring report (following DEQ's MR-01 format). The groundwater monitoring report will include an updated Release Closure Plan (RCP). The report and RCP will be prepared upon completion of the second semi-annual monitoring event in the spring of 2027 and receipt of the associated analytical results.

Cost of Services

Costs associated with the preparation of this work plan, groundwater monitoring events, and report preparation will be submitted to the petroleum tank release compensation board (PTRCB) at approved unit rates. A Groundwater Monitoring and Sampling Unit Cost Worksheet is attached.

Closing

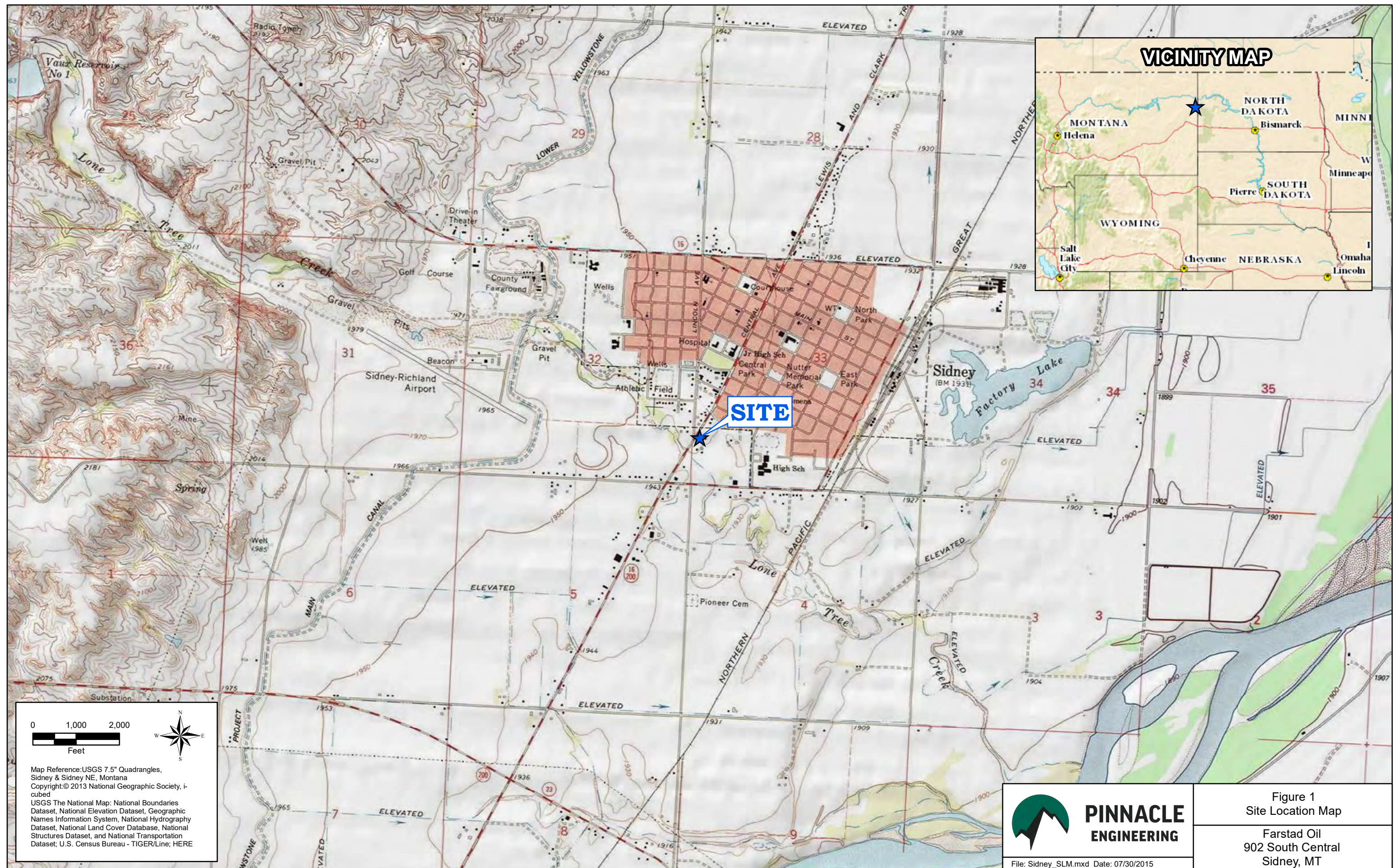
Fall 2026 site work will begin upon DEQ and PTRCB approval of this work plan. Please contact me at 763-516-0450 or at pcarter@pineng.com if you have any questions or need any additional information.

Sincerely,

PINNACLE ENGINEERING, INC.

Paul Carter
Senior Project Manager

Attachments
Figures 1 & 2
Unit Cost Worksheet
Appendix A



Lincoln Ave S

Upgradient, clean well MW-16 was removed, or paved over during parking lot construction, by others some time prior to October 11, 2024.

MW-16

S Central Ave

MW-14

MW-7

MW-11D

MW-11S

MW-9

MW-6

MW-8

MW-12

MW-15

Legend

Monitoring Well

Utility Lines

Electric

Gas

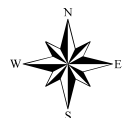
Fiber

UST Basin

Excavation Limits - 2015
Corrective Action Excavation
Former UST Area

Approximate Property Boundary

0 20 40
Feet



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



**PINNACLE
ENGINEERING**

File: 0519-Sidney_F1_Basemap.mxd Date: 05/21/2019

Figure 2
Site Layout

Farstad Oil
902 South Central Ave
Sidney, Montana

APPENDIX A

Standard Operating Procedures

Methods and Procedures

Title: Equipment Decontamination

Purpose: This SOP is designed to provide guidelines for the proper decontamination of field equipment used during assessment, sampling, construction, and remedial actions.

Equipment:

Steam Cleaner
Tap Water
Deionized/Distilled Water
Laboratory Grade Detergent
Buckets
Brushes
Paper Towels and Chem-Wipes
Trash Bags
Isopropyl Alcohol

Procedures for Equipment Decontamination:

1. Hand tools and augers are cleaned with laboratory soap solutions, rinsed with tap water and deionized water.
2. Equipment used on site that will be used for collecting more than one sample is cleaned with detergent solutions and brushes, rinsed with tap water, and rinsed with deionized water prior to each use. The equipment includes hand augers, spoons, spatulas, bowls, and hand augers, etc.

Procedures for Sampling Equipment Decontamination:

All non-disposable equipment used for the collection, preparation, preservation, and storage of the environmental samples must be cleaned prior to use and after each subsequent use. Unless the equipment and materials being used are disposable or of sufficient number so as not to be reused during any one sampling period, decontamination will have to be performed in the field. If possible, attempts should be made to minimize field decontamination by using dedicated or disposable equipment.

The minimum procedure to be used to decontaminate non-disposable sampling equipment is described below:

1. Be aware of Safety. Don appropriate PPE.
2. Manually scrub the equipment with detergent using a bucket, tap water and detergent.
3. Rinse the equipment with tap water. Unless otherwise specified by the Work Plan, rinse water should be containerized.
4. Rinse the equipment with distilled water.
5. Air dry.
6. Containerize the waste decontamination solutions and store for future disposal, unless otherwise specified in the work plan.

Procedures for Decontaminating Water Level Probe:

1. Wipe along the length of the probe with detergent and water or isopropyl alcohol.
2. Place the probe in a clean container.
3. Containerize the waste decontamination solutions as outlined in the work plan and store for future disposal.

Procedures for Decontaminating Pumps and Lines:

1. Assuming pump does not come in contact with product, decontamination of pump and lines is as follows:
 - a. Submerge pump and lines in detergent solution. Purge solution through pump and lines. Containerize rinsate, unless otherwise specified in work plan.
 - b. Triple rinse pump and submerged part of lines with potable water. Containerize rinsate unless otherwise specified in work plan.
2. The pump and discharge line will be allowed to air dry before placing the pump into a clean container.

Groundwater Level Measurement: Electronic Tape

Title: Standard Operating Procedures No. 2400

Purpose: This SOP provides guidelines for the use of an electronic tape to be used for water-level measurements.

Necessary Equipment:

Electronic Tape
Deionized Water/Paper Towels
Field Form – Water Level Measurements

This tape is a portable reel-mounted device. The tape shall be graduated in 100ths of a foot. The tape relies on fluid conductivity to determine the presence of water and emits an audible signal and/or a light.

Procedures:

1. Don appropriate PPE, as prescribed by the Health and Safety Plan.
2. Lower the probe into the well by pulling the cable from the hand-held reel until the light comes on or the buzzer sounds.
3. Move the cable up and down fractionally while observing the indicator and note the exact length of cable to the 100th of a foot extended from the tip of the probe to the notch or highest point (or marked location) of the well casing. Record the cable length, station number, and time and date of the measurement on the Water Level Measurements Field Form. The water level measurement should be repeated a second time. If the two measurements are different, repeat a third time.
4. Decontaminate the probe and cable length previously submerged by spraying the cable with deionized water and wiping with paper towels as the cable is rewound onto the reel. Unless stated otherwise in the work plan, proceed from the wells least likely to be contaminated to those closest to the source area.



Project Name: _____ Date: _____

Pinnacle Project No.: _____ Temp.: _____

Location: _____ Weather: _____

Client Name: _____ Site Conditions: _____

Personnel: _____ Equipment: _____

Well ID	Time	Depth to Product (ft bTOC)	Depth to Water (ft bTOC)	Total Well Depth ¹ (ft bTOC)	Comments on Well Condition/Observations

Decontamination notes: _____ Circle one: Alconox Tri-sodium phosphate

Notes:
ft bTOC: feet below top of casing
Where possible, measure to the mark on the TOC. If there is no mark, measure to the north side of the casing.
¹Total well depth measurement not required on all sites. Only measure total depth where no free product is present. Measurement of total well depth may help to identify siltation issues associated with long-term monitoring wells.

Methods and Procedures

Title: Groundwater Sample Collection

Purpose: This SOP provides guidelines for the collection of groundwater samples for analytical testing for the presence of: organic compounds, inorganic constituents, and biological parameters.

Equipment/Supplies:

Low-flow Pump or Bottom Filling Disposable Polyethylene Bailer and Polypropylene Rope
Appropriate Sample Containers and Preservatives
Sample Container Labels
Chain-of-Custody Form
Cooler and Ice

Procedures:

1. Don appropriate PPE.
2. Sample from least to most contaminated well or as specified in the work plan.
3. Perform stabilization for recharging wells.
4. After stabilization, follow the procedures in 4a or 4b, as appropriate.
 - 4a. If using pump for sampling:
 1. If a pump was used to purge the well for stabilization, remove the necessary well volumes from the well and discard the water prior to sample collection. Purge the well at the rate specified in the work plan. Then, direct a steady stream of water into the appropriate sample container(s).
 - 4b. If using bailer for sampling:
 1. Attach an appropriate length of new polypropylene rope to a bailer.
 2. When using a bailer to remove the groundwater sample, take care to minimize agitation or aeration of the water. Lower the bailer slowly into the well, allow it to fill, and then lift it out while preventing the bailer or the rope from contacting any potentially contaminated surface, such as the ground.
 3. Slowly pour the contents of the bailer into the appropriate sample container(s).

5. Containerize samples by order of the volatilization potential of the desired analytes. For example, volatile organic analysis (VOA) vials should be filled first, followed by semi-volatiles.
6. For VOA samples, fill the container to the top of the container so that a positive meniscus is formed. Allow air bubbles to rise to the surface; carefully and quickly screw the cap onto the container and finger tighten. Invert the sample and tap it gently, looking for any air bubbles. If the sample contains air bubbles, discard the sample and repeat the sampling process with new sampling containers. For sample containers with preservative, be careful not to overfill the container.
7. Complete the appropriate sample container label on all containers. Include the following information: sample identification number, date and time of collection, sampling personnel, job site location, well number, preservation, and analysis requested.
8. Place all samples on ice in a cooler.

Methods and Procedures

Title: Chain of Custody

Purpose: This SOP is designed to provide guidelines for proper chain-of-custody procedures for handling samples to be submitted for chemical analysis.

Equipment:
Chain-of-Custody Record (laboratory supplied)
Custody Tape or Seals

Procedures:

1. This procedure governs the handling of all chemical samples from the time of sampling to the time of submittal to the analytical laboratory. Chain-of-custody procedures will be continued by the laboratory.
2. All samples will be accompanied by a chain-of-custody record from the time of sampling through sample analysis. The original chain-of-custody record will be attached to the final laboratory report.
3. The majority of the chain-of-custody form will be filled out by the individual conducting the sampling. This includes site identification, project number, sample identification, sample matrix (e.g., soil), collection date and time, name of project manager, name of sampler, analytical parameters and any pertinent notes.
4. When transferring samples, the individuals relinquishing and receiving will sign, date, and note the time on the chain-of-custody record. There should be no time gap between the relinquishing and receiving of samples.
5. When the samples will not be within eyesight of the individual currently having custody, they should be placed in a locked room or vehicle.
6. If samples are to be shipped to the laboratory, the chain-of-custody record should be placed in a waterproof bag in the cooler and custody tape applied to seal the cooler. The shipping receipt should be retained and kept with the chain-of-custody record.