



May 21, 2026

Mr. Mitch Goplen
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Delivered via email: mgoplen@billingsclinic.org

**SUBJECT: Work Plan to Monitor Petroleum-Contaminated Media
 Former Downtown Conoco
 2710 6th Avenue North, Billings, Montana
 MDEQ Facility ID# 56-06967 (TID 30152); Release 4465 and Work Plan 35132;
 Tetra Tech Project No. 117-8035113D**

Dear Mr. Goplen:

Tetra Tech, Inc. (Tetra Tech), on behalf of Billings Clinic, has prepared this work plan to monitor petroleum-contaminated media at the Former Downtown Conoco release located at 1710 6th Avenue North, Billings, Montana (the “site”) as presented on Figures 1 and 2. This work plan has been prepared in response to a Work Plan Request from Mr. Jay Shearer of the Montana Department of Environmental Quality (MDEQ) in correspondence dated January 11, 2026 (MDEQ, 2026).

BACKGROUND INFORMATION

On January 10, 2006, petroleum-impacted soils were discovered near the fill port containment sumps (spill buckets) of the three on-site underground storage tanks (USTs). The cause of the release was determined to be overfills. In 2006, two cubic yards of soil were excavated from the top of the tanks and disposed of in the Billings Regional Landfill (HKM, 2007a). Subsurface investigations have revealed petroleum-impacted soils exceeding the MDEQ risk-based screening levels (RBSLs; MDEQ, 2024) in samples collected from monitoring wells MW-2 and MW13-04 (HKM, 2007b, and Northern Industrial Hygiene, 2013; see Figure 2). Groundwater impacts associated with this release were also discovered at the site. However, data from the most recent monitoring event indicate that petroleum constituents in the groundwater are less than the RBSLs (Pioneer Technical Services, 2023). Additionally, Pioneer Technical Services conducted a preliminary vapor intrusion investigation. Results indicated that vapor intrusion is not a concern at the site (Pioneer Technical Services, 2023).

Billings Clinic purchased the Downtown Conoco property and assumed responsibility for Release 4465 on August 29, 2023. In the fall of 2023, Billings Clinic contracted to demolish the former convenience store and fueling facility. This demolition was conducted in preparation for the removal of the site’s fueling systems and any existing petroleum contamination.

Excavation activities were initiated on January 23, 2024 (Tetra Tech, 2024). Minor hydrocarbon impacts were observed directly under the dispensers along 6th Avenue. The majority of hydrocarbon impacts were identified in the UST basin and in the soils south and east of the USTs. A total of 900 tons (approximately 600 cubic yards) of petroleum hydrocarbon-impacted soil was excavated from the site and disposed of at the Billings Regional Landfill.

Confirmation soil samples collected from the two floor samples near the center of the excavation

indicated volatile petroleum hydrocarbons (VPH) and extractable petroleum hydrocarbons (EPH) constituents greater than MDEQ RBSLs. Additionally, the concentrations of total petroleum hydrocarbons (TPH) reported for the floor samples exceeded the petroleum vapor intrusion (PVI) screening level of 250 milligrams per kilogram (mg/Kg; MDEQ, 2021), indicating a potential PVI risk for future buildings constructed at the release site. Confirmation samples collected from the excavation walls did not detect VPH and EPH constituents at concentrations greater than MDEQ RBSLs.

Furthermore, 920 pounds of Regenesys ORC Advanced® were mixed with clean backfill material and placed at the base of the excavation, which coincided with the groundwater interface.

PROPOSED SCOPE OF WORK

The objective of the proposed scope of work is to perform additional investigation and monitoring of petroleum contaminated media at the site to help develop a release closure plan and recommendations related to the release. The tasks in this work plan are described below.

Work Plan Preparation and Project Management

These tasks include preparing this work plan and the project management time required for coordinating and scheduling the project. In addition, a site-specific health and safety plan (HASP) will be prepared to address activities in this work plan prior to conducting any on-site activities.

Utility Locates

Tetra Tech will submit a utility locate request with Montana 811 to locate public utilities at the site.

Soil Investigation

One soil boring will be placed within the former UST basin as indicated on **Figure 2**. The soil boring will be advanced using direct push methods to an approximate depth of 20 feet bgs. Soil samples will be collected continuously and evaluated based on grain size, color, and moisture content, and evidence of petroleum hydrocarbon staining and odor.

Each soil sample will be field screened with a photoionization detector (PID) for the presence of VOCs. The PID will be equipped with a 10.6 electron volt lamp and calibrated in the field using 100 parts per million (ppm) isobutylene span gas and air.

A total of two soil samples will be collected from the top and bottom of the smear zone. Each soil sample will be placed in clean laboratory-supplied containers and submitted to Energy Laboratories in Billings, Montana, for analysis of VPH and EPH screen by the Montana Method based on the MADEP method. In accordance with MDEQ guidance, if the EPH concentration in the soil sample exceeds 200 mg/Kg, then an EPH fractionation analysis will be requested.

Monitoring Well Installation

The soil boring will be over-drilled with 4 ¼-inch inner diameter hollow stem augers (HSA). The monitoring well will be constructed with a two-inch diameter schedule 40 PVC. The well screen will be 10 feet long, 0.010-inch slot size, and installed from 10 to 20 feet bgs. Solid PVC riser will be threaded from the top of the well screen and raised to the surface, and will be fitted with a two-inch diameter water-tight locking plug. The borehole annulus surrounding the monitoring well screen will consist of 10/20 silica sand and will extend one to two feet above the well screen. A hydrated bentonite chip seal will be placed above the filter pack sand and will extend to no less than one foot from the ground surface. The monitoring well will be completed

with an eight-inch diameter flush-mount traffic rated well vault concreted in place.

Following construction of the monitoring well, the well will be developed using a surge block and water pumping techniques. The well will be surged and pumped until the pumped water is clear and free of sediment.

Soil Gas Probe Installation

Three soil gas probes will be advanced at the locations depicted on **Figure 2**. The soil gas probes will be advanced using direct push methods to an approximate depth of 10 feet bgs. Soil samples will be collected continuously and evaluated based on grain size, color, and moisture content, and evidence of petroleum hydrocarbon staining and odor. In addition, samples will be field screened with a PID for the presence of VOCs. If soil impacts are noted during the soil gas probe advancement, additional soil samples will be collected for laboratory analysis of VPH and EPH constituents. For cost estimation purposes, it is assumed that one sample per boring will be submitted for laboratory analysis.

The soil gas probes will be constructed with a stainless steel vapor screen. The screen will be 6-inches long, and installed from 9.5 to 10 feet bgs. Tubing ¼-inch in diameter will be connected to the vapor screen, raised to the surface, and plugged to limit ambient air exposure. The borehole annulus surrounding the soil gas probe will consist of 10/20 silica sand, extended one to two feet above the soil gas screen. A hydrated bentonite chip seal will be placed above the sand pack and will extend one foot from the ground surface. The soil gas probe will be completed with an 8-inch diameter flush-mount traffic rated well vault concreted in place.

Groundwater Monitoring

Two years of semi-annual sampling (four total events) will be completed at the site. The semi-annual sampling will be conducted to collect groundwater quality information at high and low groundwater conditions. The following methods will be used for the groundwater monitoring events:

- Depth to groundwater will be measured at all site monitoring wells. The depth to water will be measured using an electronic oil/water interface meter. The meter will be decontaminated between each well measurement using Liquinox[®] soap solution and clean potable water rinse.
- Groundwater samples will be collected from the following monitoring wells: MW-2, MW13-05, MW23-01, MW23-02, MW23-04, MW23-05, and the newly installed well, MW26-01. The wells will be purged with low-flow pumping method using a peristaltic pump or bladder pump. Dedicated polyethylene tubing will be used during sampling. During purging, field instruments will analyze the water for pH, temperature, dissolved oxygen, specific conductivity, oxidation-reduction potential, and turbidity. The pump will be decontaminated between wells using a Liquinox solution, followed by a triple rinse technique. Additionally, a new bladder will be installed between each well.
- Groundwater samples collected from each monitoring well will be analyzed for VPH and EPH screen constituents by the Montana Method based on the MADEP method. By MDEQ guidance, if the EPH concentration in water exceeds 1,000 micrograms per liter (µg/L), then an EPH fractionation analysis will be requested (MDEQ, 2024). For cost-estimating purposes, it will be assumed that one groundwater sample per event will be analyzed for EPH fractions.

Soil Gas Monitoring

Two years of semi-annual sampling (four events total) will be conducted for soil gas monitoring. The semi-annual sampling will be conducted to coincide with high and low groundwater conditions. The following methods will be used for the soil gas monitoring events:

- Prior to sample collection, three volumes of air will be purged from each sampling point using a hand pump not exceeding 200 milliliters per minute to evacuate stagnant air within the tubing and the soil gas probe.
- Short lengths of new nylon tubing and new compression fittings/valves will be used to connect each monitoring point to a laboratory-provided, 6-liter Summa canister. Each Summa canister will be equipped with a flow regulator set to allow the sample to be collected over an approximate 30-minute period (limiting the rate of sample collected to less than 200 millimeters per minute).
- The tightness of the sampling line and connections between each soil gas probe and the Summa canister will be confirmed using a hand-operated vacuum pump with a pressure gauge for a minimum of two minutes. Following the completion of the sample line tightness tests, vapor sample collection will be initiated by opening the Summa canister valve.
- After sampling, each Summa canister and associated tubing will be disconnected from the soil gas probe.
- The soil gas samples will be submitted to Eurofins Environment Testing (Eurofins) under standard chain-of-custody procedures for laboratory analysis of select volatile organic compounds (1,3-butadiene, benzene, ethylbenzene, toluene, xylenes, methyl tert-butyl ether, and naphthalene) via method TO-15 and air-phase petroleum hydrocarbons (C5-C8 aliphatics, C9-C10 aromatics, and C9-C12 aliphatics) via the Massachusetts APH method.

Investigative Derived Waste

Drill cuttings will be containerized on-site in labeled 55-gallon drums. Upon receipt of soil analytical results, the drill cuttings will be disposed of properly.

Purge water from the well development and sampling events will be containerized on-site in labeled 55-gallon drums. Following receipt of laboratory results, the purge water will be appropriately disposed of by following the MDEQ's *Disposal of Untreated Water from Monitoring Wells Flow Chart* (MDEQ, 2015).

Surveying

The vertical elevation and horizontal location of each new monitoring well and soil gas probe will be surveyed by a licensed engineer or a licensed surveyor. The locations will be surveyed to a vertical accuracy of 0.01 feet above mean sea level.

Data Validation

A data validation will be performed for each laboratory report. Each analytical data package will include a summary report that cross-references the sample identification with the laboratory identification and identifies variations from standard operating procedures; laboratory analytical results; quality control data, which may include but is not limited to surrogate recoveries, initial and continuing calibration blanks and spikes, method blanks, laboratory control blanks and spikes, and matrix spike and matrix spike duplicates; FID chromatograms; chain of custody form(s); and a sample receipt checklist. Additionally, data validation will be included with the investigation report and will follow DEQ's data validation guidelines as per <https://deq.mt.gov/Portals/112/Land/StateSuperfund/Documents/DataValidationReport.pdf>.

Reporting

Following completion of all field activities and receipt of the laboratory analytical reports, Tetra Tech will prepare a report summarizing methodologies, results of field activities, figures depicting site features, a summary of analytical results, findings, and conclusions. Furthermore, the release closure plan will be updated.

SCHEDULE AND COSTS

Tetra Tech will initiate this work plan upon receiving written authorization to proceed from Billings Clinic and approval of the work plan from the DEQ.

Tetra Tech's estimated project costs are shown on the estimated cost worksheet included in **Appendix A**. Please note we have named the tasks according to the Montana Petroleum Tank Release and Compensation Board guidance for Standard Corrective Action Task Names. Subcontractor bids are included in **Appendix B**.

We appreciate the opportunity to provide this work plan and look forward to working with you on this project. If you have any questions or comments regarding this work plan, please do not hesitate to call me in our Billings, Montana office at (406) 248-9161.

Respectfully Submitted,

Tetra Tech, Inc.



Nickolas Woehlert
Environmental Geologist



Pam Reed
Project Manager

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Attachments:

Figures

Appendix A: Tetra Tech Cost Estimate

Appendix B: Subcontractor Bids

cc: Jay Shearer, MDEQ jshearer@mt.gov
Montana Petroleum Tank Release Compensation Board

REFERENCES

HKM, 2007a. Remedial Investigation Summary Report, ConoMart Superstore #5, 2701 6th Avenue North, Billings, Montana. Facility ID #56-06967, Release #4465. April 11.

HKM, 2007b. September 2007 Groundwater Monitoring Report, ConoMart Superstore #5, 2701 6th Avenue North, Billings, Montana. Facility ID #56-06967, Release #4465. October 18.

MDEQ, 2021. Montana Vapor Intrusion Guide, Montana Department of Environmental Quality. September

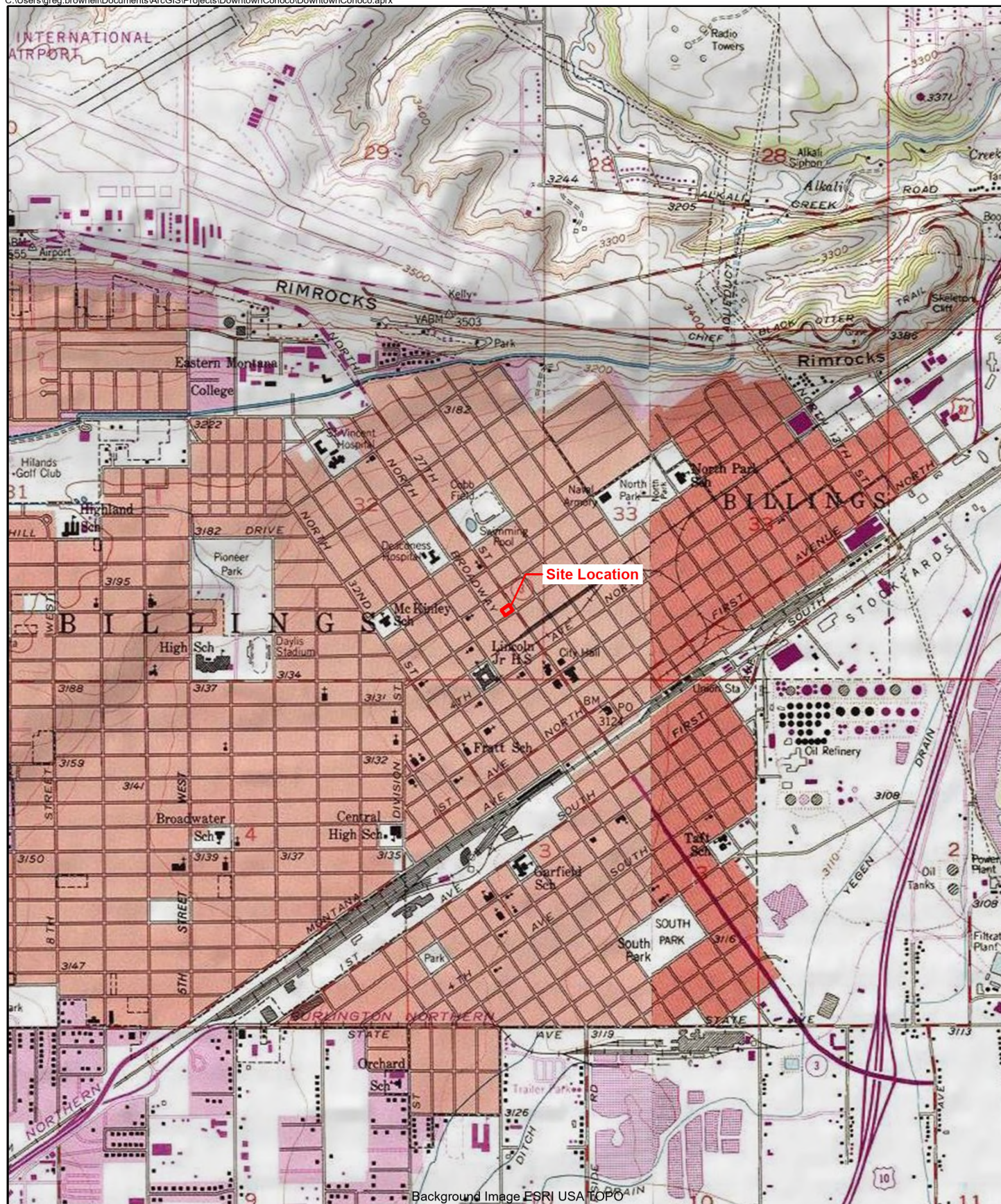
MDEQ, 2026. Work Plan Requested to Monitor Petroleum-Contaminated Media at the former Downtown Conoco, 2701 6th Ave North, Billings, Yellowstone County, Montana; Facility ID 56-06967 (TID 30152), Release 4465, Work Plan 35132. February 11.

Northern Industrial Hygiene, 2013. Phase II Remedial Investigation Report, ConoMart #5, 2701 6th Avenue North, Billings, Montana. Facility ID #56-06967, Release #4465. May 21.

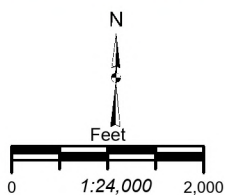
Pioneer Technical Service, 2023. Revision 2-Remedial Investigation Report for a Petroleum Release at Downtown Conoco, 2701 6th Avenue, Billings, Montana; Facility ID #56-06967, Release #4465, Work Plan ID #34614. June 7.

Tetra Tech, 2024. Revised 2024 Cleanup Report Petroleum Hydrocarbon-Impacted Soil Excavation and Disposal Former Downtown Conoco, 2701 6th Ave. North, Billings, MT. Facility ID #56-06967 (TID 30152), Release 4465, Work Plan 34770.

FIGURES



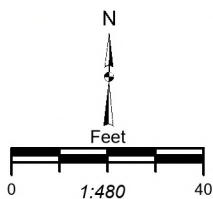
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Location Map
Downtown Conoco
2701 6th Avenue North
Billings, Montana
Figure 1



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|--|--------------------------|--|----------------------|
| | Proposed Monitoring Well | | Sewer |
| | Proposed Soil Gas Probe | | Underground Electric |
| | Monitoring Wells | | Communications |
| | Abandoned Wells | | Product Lines |
| | Gas | | |

Site Plan Map
Downtown Conoco
2701 6th Avenue North
Billings, Montana
Figure 2