



Olympus Technical Services, Inc.

February 20, 2026

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

Re: Groundwater Monitoring Work Plan Required for the Petroleum Release at the Former Peavey CO Richey
Wheat Avenue, Richey, Dawson County, Montana
Facility ID No. 11-06487 (TID 19772), Release No. 0469
DEQ Work Plan ID No. 35144
Olympus Work Order No. A4013

Dear Mr. Krueger:

Olympus Technical Services, Inc. (Olympus), on behalf of Bunge USA Grain, LLC (Bunge), is submitting this Groundwater Monitoring Work Plan for the above-referenced Facility (Site). The Montana Department of Environmental Quality (DEQ) Petroleum Tank Cleanup Section requested a Groundwater Monitoring Work Plan in correspondence dated February 4, 2026. The purpose of the work is to investigate petroleum-contaminated media at the Site. This will be achieved by performing two semiannual groundwater monitoring events and preparing and submitting a Groundwater Monitoring Report, Interim Data Submittal (IDS), and Release Closure Plan (RCP) detailing the results of the investigation and the path for closure of the release.

Site Description

The facility is located on BNSF Railway Company right-of-way (ROW) near the northern edge of Richey, Montana and occupies a portion of Section 20, Township 22 North, Range 52 East, Dawson County, Montana Principal Meridian. The facility is bounded by Wheat Avenue to the north and the railroad ROW to the south. An abandoned elevator occupies property to the west and the Farmers Union Elevator (Cenex) occupies property to the east. Residential areas are located north and south of the facility. Utility corridors in the immediate area are generally aligned east-west parallel to Wheat Avenue and north-south in Main Street to the west. A Topographic Map, Aerial Photograph map, and Site Map are included as Figures 1, 2, and 3, respectively.

Previous Site Investigations

A petroleum hydrocarbon release was discovered in November 1990 during the closure of two underground storage tanks (USTs). According to closure reports, the USTs (one 8,000-gallon and one 10,000-gallon) were in good condition and the contamination appeared to result from leaking piping or tanks that were removed from the facility prior to 1990. Laboratory analyses of soil and water samples collected during tank closures and subsequent investigations indicated elevated levels of gasoline-range compounds. Remedial investigations, which included completion of soil borings and installation of seven monitoring wells, were conducted by Montana Tank Testing (MTT) in 1991 and Abenaki Geoenvironmental, Inc. (AGI) in 1993.

Details of previous investigations and site monitoring are provided in reports prepared by MTT and AGI.

Olympus was contracted by the Peavey Company in December 1996 to continue work started by the previous consultants. Gavilon acquired Peavey in June 2008 and retained Olympus to continue the work. All remedial activities have been conducted in accordance with work plans approved by the Montana Department of Environmental Quality (DEQ).

From 1996 to 2001, remedial activities primarily consisted of semiannual groundwater monitoring, natural attenuation modeling, and investigations to assess the extent and magnitude of subsurface impact. In August 2001, approximately 1,600 cubic yards of impacted soil were removed from the former tank basin and spread for land treatment. Oxygen Release Compound® (ORC) was applied in the bottom of the excavation prior to backfilling to augment low dissolved oxygen levels in the uppermost aquifer. Groundwater was not encountered at the base of the excavation at 24 feet below ground surface (bgs). The excavated soil was treated at a landfarm and after two sampling events the petroleum hydrocarbon concentrations in the excavated soil were below treatment guidelines (Olympus, June 2002). The DEQ issued a letter dated August 30, 2002, stating that no further action was necessary for soil treatment. After the June 2003 groundwater monitoring event, DEQ required that groundwater monitoring be reduced to a biennial basis.

Groundwater was monitored in 2005, 2007, 2009, and 2011. During the most recent monitoring event in June 2011, benzene and C5-C8 aliphatics were detected in wells M2 and M5 (benzene only) at concentrations exceeding the Risk-Based Screening Levels (RBSLs) and Human Health Standard (HHS) for groundwater.

The objective of this GWM WP is to evaluate Site data to determine if groundwater impacts have attenuated below DEQ HHS/RBSLs or if additional corrective action is required at the Site.

Scope of Work

The scope of work consists of the following primary tasks:

Task 1 – Work Plan

This WP fulfills DEQ's request for a Groundwater Monitoring Work Plan.

Task 2 – Project Management

Project management will include coordination with DEQ, the client, and Petroleum Tank Release Compensation Board (PTRCB) personnel, preparation of the Site Health and Safety Plan, project planning, scheduling, oversight of project details, equipment, and personnel, setup of project files, reviewing historical reports, maps and data for the Facility, and other various tasks related to project management. The costs for project management are included in Task 2 of the cost estimate.

Task 3 – Mobilization

Task 3 in the cost estimate details mobilization costs out of our Billings, Montana office for:

- One trip for a Technician III to inspect the monitoring well network and redevelop each well with mobilization costs included for lodging in Glendive, Montana; and,
- Two mobilizations for a Technician III to complete groundwater monitoring during each sampling event (2 events) with mobilization costs included for lodging in Glendive, Montana.

Task 4 – Fieldwork (Well Redevelopment and Network Survey)

The last sampling event was performed in 2011. As such, a Technician III will mobilize to the Site to inspect the groundwater monitoring network and redevelop each Site well. Each well will be developed following a pumping and surging method before sampling according to Olympus' Standard Operating Procedures (SOPs) and DEQ guidance. Purge water will be disposed of according to *Disposal of Untreated Purge Water from Monitoring Wells* (DEQ, 2015). Disposal costs are not included in this estimate, as it is unknown whether purge water will be discharged to the surface or require disposal. The wells will not be sampled for at least one week following development.

Task 5 – Monitoring (Groundwater)

Groundwater monitoring will be conducted semi-annually for one year during high groundwater (late Spring 2026) and low groundwater (Fall 2026). Monitoring will include:

- Measurement of groundwater static water levels (SWLs) in all seven Site monitoring wells during each groundwater monitoring event using an electronic water level probe.
- Collection of groundwater samples, including a field duplicate, using low-flow methods in general accordance with DEQ's *Groundwater Sampling Guidance* and Olympus' SOP. Groundwater samples will be collected with a bladder pump. Field measurements of groundwater quality parameters, including pH, oxidation-reduction potential, specific conductivity, dissolved oxygen, and turbidity, will be recorded during groundwater sample collection. Depth to groundwater measurements will be recorded during the low-flow pumping and sampling procedure.
- All groundwater samples will be submitted for laboratory analysis of volatile petroleum hydrocarbons (VPH), extractable petroleum hydrocarbons (EPH) screen, and lead scavengers. The cost estimate assumes up to 50% of samples may require further fractionation of EPH compounds.

Task 5 in the cost estimate includes the costs for project setup, mobilization, and well sampling on a unit cost basis. It is anticipated that the wells will not be completed in a low-yield aquifer. A groundwater monitoring worksheet is attached to this work plan.

Task 6 – Lodging/Per Diem

It is estimated that redevelopment will take two days including mobilization. It is estimated each sampling event will take two days including mobilization. Mobilization fees have been included for lodging in Glendive, Montana. Task 6 includes per diem and lodging costs.

Task 7 – Laboratory Analysis w/ Fee (Groundwater Monitoring)

Task 7 in the cost estimate presents the laboratory analytical costs for the two groundwater monitoring events. Groundwater samples will be analyzed for VPH, EPH screen, and lead scavengers. The cost estimate assumes up to 50% of collected samples may require further fractionation of EPH compounds. Samples will be submitted to Energy Laboratories, Inc. in Billings, Montana (Energy) under proper COC protocols. One duplicate will be collected during each event and analyzed for VPH only.

Task 8 – Data Validation

Task 8 in the cost estimate includes two hours of staff scientist time to validate analytical data for each sampling event.

Task 9 – Interim Data Submittal

An IDS will be prepared and submitted after the first sampling event. The IDS will include a cover letter, figures, tables, groundwater sampling forms, data validation summary forms and review, and laboratory analytical reports. After completion of the IDS, decisions will be made pertaining to the well network and its completeness or if additional wells are required to delineate the plume. Task 9 of the cost estimate includes unit cost prices for completing the IDS.

Task 10 – Release Closure Plan

A Release Closure Plan will be created for the Site which will evaluate the current data and corrective actions if required. Task 10 of the cost estimate includes unit cost prices for completing the RCP.

Task 11 – Reporting

A Groundwater Monitoring Report will be prepared following the second sampling event which will include tabulated data, figures, evaluation of Site data, results, conclusions, and recommendations. Task 11 of the cost estimate includes unit cost prices for completing the report.

Cost

The cost to complete the scope of work outlined above is estimated at \$33,654.40, detailed on the attached cost schedule. The cost estimate is based on the following assumptions:

- Existing Facility wells do not require replacement or repair; and,
- Semi-annual groundwater sampling will be conducted for one year.

Please contact me if you have any questions regarding this plan.

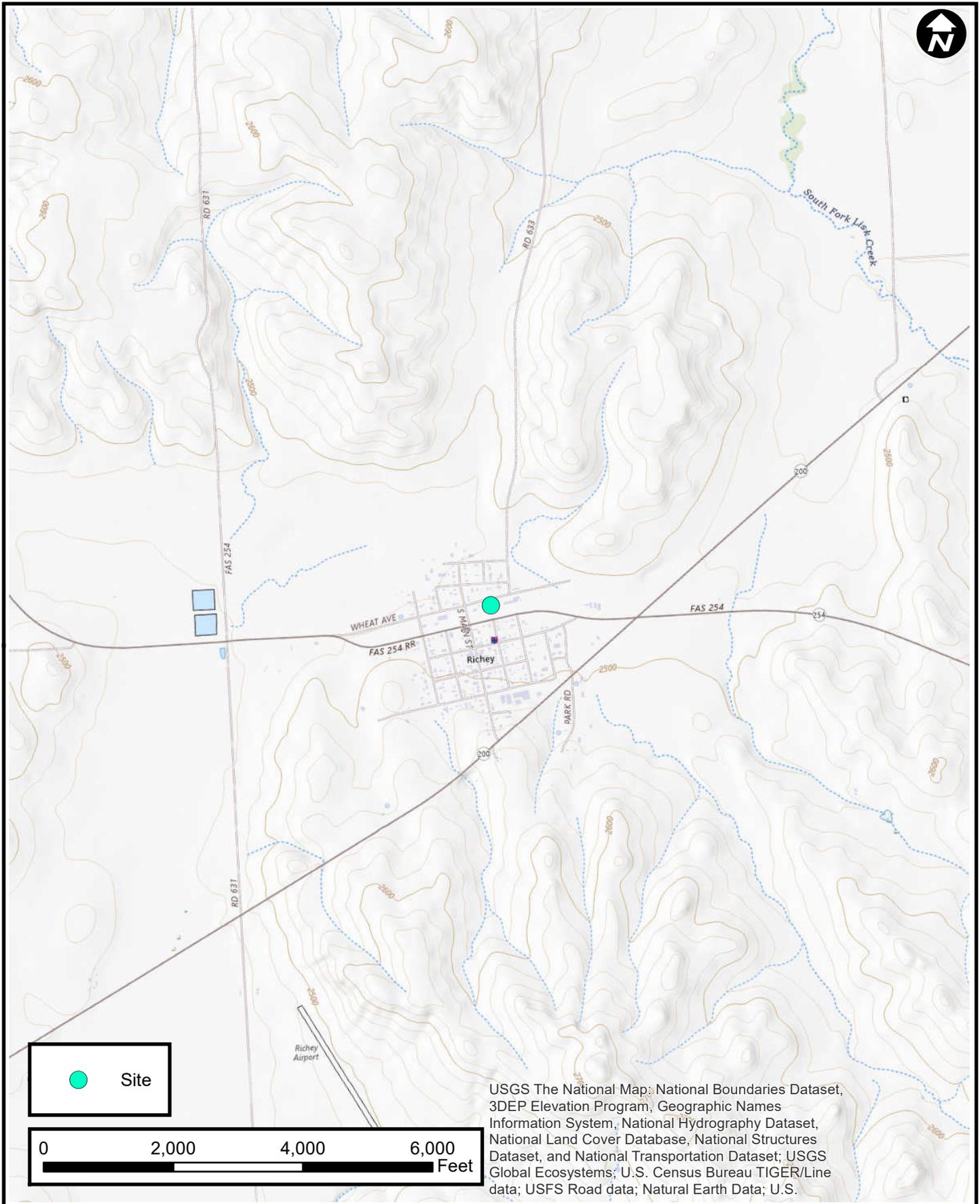
Sincerely,



Ethan J. Perro, PG
Project Geologist

Attachments: Figure 1: Topographic Map
Figure 2: Aerial Photograph
Figure 3: Site Map
Work Plan Cost Estimate
Groundwater Monitoring and Sampling Unit Cost Worksheet

cc: Will Euwer, Bunge, 1331 Capital Avenue, Omaha, NE 68102

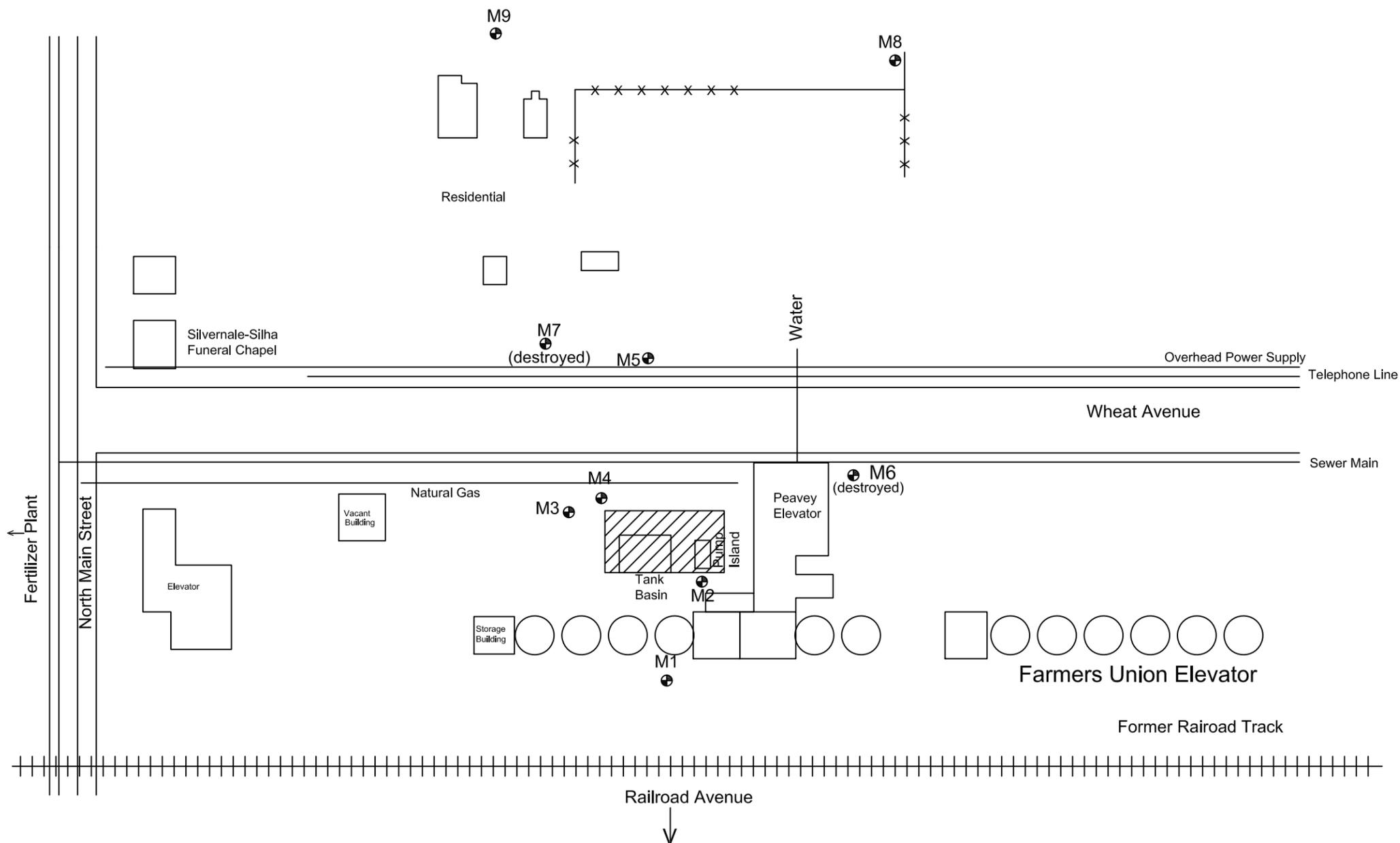




Olympus Technical Services, Inc.

Aerial Photograph

**FIGURE
2**



LEGEND

-  M2 Monitoring Well #2
-  Excavated Area

 Olympus Technical Services, Inc.				Site Map	FIGURE 3
				Drawn: KR Checked: EP Date: 02/02/2026 Job No: A4013 Design: Approved: Scale: As Shown File: 4013.DWG	