

April 28, 2026

Mr. Jonathan Love  
Environmental Science Specialist  
Petroleum Tank Cleanup Section  
Montana Department of Environmental Quality  
P.O. Box 200901  
Helena, MT 59620-0901

**RE: Groundwater Monitoring Work Plan for GM Petroleum Distributors (former B&C Oil)  
500 North Fifth Street, Miles City, Custer County, Montana  
Facility ID #09-05859, TID #19449, Release #5027, Work Plan ID #35161**

**Owner/  
Responsible  
Party:** Petro Services Company, Inc.  
Dennis Whitmore  
PO Box 80405  
Billings, MT 59107

**Consultant/  
Work Plan  
Preparer:** Pioneer Technical Services, Inc.  
Charles Peterson, PG  
2310 Broadwater Ave, Suite 1  
Billings, MT 59102  
[cpeterson@pioneer-technical.com](mailto:cpeterson@pioneer-technical.com)

Dear Mr. Love:

On behalf of Petro Services Company, Inc., Pioneer Technical Services, Inc. prepared the following Groundwater Monitoring Work Plan and cost estimate for performing groundwater monitoring at the GM Petroleum Distributors (former B&C Oil) in Miles City, Montana. As requested in correspondence dated March 11, 2026, from the Montana Department of Environmental Quality, our scope of work and associated proposed costs are outlined below.

If you have any questions concerning this project or the proposed scope of work, please contact me at (406) 702-2430 or [cpeterson@pioneer-technical.com](mailto:cpeterson@pioneer-technical.com).

Sincerely,



Charles Peterson, PG  
Program Manager  
Pioneer Technical Services, Inc.

Attachment 1: Figures

Attachment 2: Cost Estimates

cc: Mr. Dennis Whitmore, Petro Services Company, Inc.  
Mr. Taylor Bienvenue, GIT, Pioneer Technical Services, Inc.

## EXECUTIVE SUMMARY

The purpose of this document is to provide a Groundwater Monitoring Work Plan (work plan) for the GM Petroleum Distributors facility (site), located at 500 North Fifth Street, Miles City, Custer County, Montana, Facility ID #09-05859, as requested in electronic correspondence from Montana Department of Environmental Quality (DEQ) dated March 11, 2026. The purpose of the proposed work activities is to evaluate the impacts within the saturated zone associated with Release #5027 by conducting two groundwater monitoring events. The results from the groundwater monitoring will be used to propose additional remediation work, if needed, and determine a pathway to resolve Release #5027.

Montana DEQ outlined their recommendations in the work plan request letter dated March 11, 2026. These recommended actions are included in this work plan, which involves conducting two semi-annual groundwater monitoring events and preparing a Groundwater Monitoring Report appended with an updated Release Closure Plan (RCP) upon completion of all activities. These activities are detailed in the following work plan.

## 1 FACILITY SUMMARY AND CURRENT CONDITIONS

### ***1.1 Site Location and Current Use***

The GM Petroleum Distributors (former B&C Oil) facility is located at 500 North Fifth Street, in Miles City, Montana. The subject property is in a mixed commercial and residential area within the Miles City boundaries. The property is bounded to the north by River Street, to the east by a commercial grain elevator and storage facility, to the south by former Milwaukee Road railroad tracks, and to the west by North Fifth Street. There are residential single-family homes and trailer houses across the street on River Street and North Fifth Street. The site is fairly level with an approximate elevation of 2,355 feet above mean sea level. This area of the city is served by public utility city services (potable water and sanitary and storm sewer). The location of the site is shown on the Location and Vicinity Map, Figure 1, and Area Map, Figure 2, in Attachment 1.

The facility is currently being used as a fuel storage and distribution facility. Per Montana DEQ's discover database, there is a 17,335-gallon gasoline aboveground storage tank (AST), two 17,335-gallon diesel ASTs, and a 10,123-gallon gasoline AST active on site. All ASTs were installed in 1998. During the site sampling in 2025, Pioneer Technical Services, Inc. (Pioneer) noted seven ASTs on site; however, only four are listed as active per DEQ (DEQ, 2026).

### ***1.2 Historical Operation of Petroleum Storage Tanks at the Facility***

The B&C Oil Company facility has been operating as a fuel storage and distribution facility since the 1960s. On July 23, 2014, four soil borings were installed at the facility and constructed into temporary groundwater monitoring wells as part of a property due diligence investigation (Hydrometrics, 2014). These wells were removed from the ground shortly after soil and groundwater sample collection. Groundwater and soil testing results from that investigation indicated that a petroleum release had impacted subsurface soil and groundwater at the site near the AST loading rack area. The petroleum release appeared to consist mainly of diesel-range petroleum hydrocarbons. In response to these findings, the release was reported to DEQ, and the site was submitted for eligibility to the Petroleum Tank Release Compensation Board (Petro Board). The site was deemed eligible for the reimbursement of cleanup costs and was assigned Release #5027. The source of the release is unknown.

Per the Discover DEQ database, a separate release occurred on December 17, 2015. This release was assigned Release #5120. Release #5120 states that a vehicle drove off with a fuel nozzle still in the vehicle. Approximately 200 gallons of diesel fuel spilled on the frozen ground. Sand was used to absorb the fuel and prevent further spreading. The spill area was excavated the following day to a depth of approximately 2 feet below ground surface. The release was resolved on May 4, 2017 (DEQ, 2026).

Montana DEQ requested that a Phase I Remedial Investigation be performed for Release #5027 as detailed in a work plan request letter dated February 12, 2015. On May 14, 2015, Portage, Inc. submitted Work Plan #9950, and it was approved by DEQ on July 24, 2015. The funding for Work Plan #9950 was obligated by the Petro Board on December 21, 2015. The Phase I Remedial Investigation occurred during January 2016 and included drilling soil borings, installing five monitoring wells, performing a utility and receptor investigation, and collecting soil and groundwater samples (Portage, 2016). The monitoring wells were installed to help investigate the impact of petroleum releases from the site to subsurface soil and groundwater. The investigation focused on several suspect source areas including a former underground storage tank location, the existing cardlock pump island, and the AST loading rack location. Based on the findings, DEQ requested that a Standardized Generic Application Corrective Action Plan (AC-07) be prepared and submitted (correspondence dated October 19, 2017). On November 16, 2017, Pioneer submitted Work Plan #10747 to DEQ outlining the scope to perform additional investigative tasks to further define the extent and magnitude of petroleum contamination near the petroleum retail fueling island and focus on the downgradient area of the fueling island near an 8-inch city water main located in the nearby city alley. The Petro Board and DEQ approved the work plan on December 14, 2017. The scope included installing four soil borings, constructing two groundwater monitoring wells, and collecting soil and groundwater samples. The initial fieldwork (well installation and groundwater sampling) was completed in May 2018, as described in the *Standardized Soil Boring and Groundwater Monitoring Well Installation Report*, dated August 2, 2018 (Pioneer, 2018).

An additional groundwater monitoring event was conducted in December 2018, and the results of the monitoring were described and presented in the *Standardized Groundwater Monitoring Report*, dated January 9, 2019 (Pioneer, 2019).

Based on the results of the January 2019 report (Pioneer, 2019) and previous investigations, DEQ requested on July 22, 2019, that additional soil borings and a monitoring well be installed at the facility focusing on the area near the AST loading rack location. In response, on October 16, 2019, Pioneer prepared and submitted a Soil Boring and Monitoring Well Installation Corrective Action Plan (AC-03), Work Plan #33890, to further define the extent and magnitude of petroleum contamination near the loading rack. Work Plan #33890 was approved by DEQ on November 1, 2019, and funds were obligated by the Petro Board on February 7, 2020. Work Plan #33890 included the installation of four soil borings, construction of one groundwater monitoring well, and associated soil and groundwater sampling in the immediate area of the loading rack. The soil boring installation and well construction activities were completed on May 11, 2020, and the groundwater monitoring activities were conducted on June 2, 2020, as listed in Work Plan #33890 (Pioneer, 2020).

Based on the analysis of the results of the 2020 investigation, Pioneer recommended continuing the groundwater monitoring program to monitor the natural attenuation of the dissolved plume (Pioneer, 2020). On September 5, 2024, Montana DEQ issued a work plan request (Work Plan #34935) for an Additional Corrective Action Work Plan for the GM Petroleum Distributors

(former B&C Oil) facility. Under Work Plan #34935, Pioneer performed groundwater monitoring events in May and October 2025. Only groundwater monitoring wells BC-16-04, BC-16-05, BC-18-06, BC-18-07, and MW20-01 were sampled under WP #34935. In May 2025, benzene was measured at 6.8 micrograms per liter ( $\mu\text{g/L}$ ) in monitoring well BC-18-06, which is above the risk-based screening level (RBSL) of 5  $\mu\text{g/L}$  (DEQ, 2024). No other monitoring wells had volatile petroleum hydrocarbon (VPH) constituents above RBSLs during the May 2025 event. All VPH constituents were below RBSLs for the October 2025 event. No extractable petroleum hydrocarbon (EPH) constituents were measured above RBSLs for either event.

Benzene was measured for the first time above RBSLs in monitoring well BC-18-06 during the May 2025 sampling event. Monitoring wells MW20-01 and BC-16-05 had previously recorded benzene RBSL exceedances but were below the RBSL for the 2025 monitoring events. Based on these results, the benzene plume appears to be simultaneously migrating downgradient and naturally attenuating. Pioneer summarized the results in a groundwater monitoring report and recommended one more year of semi-annual groundwater monitoring to observe the natural attenuation and migration of the plume. If the results of the additional monitoring are below all respective RBSLs (DEQ, 2024), Pioneer recommends Release #5027 be considered for closure (Pioneer, 2026).

In response to Work Plan #34935 (Pioneer, 2024), DEQ issued a work plan request under Work Plan #35161 dated March 11, 2026. Work Plan #35161 requested groundwater monitoring be performed to monitor Release #5027. The details regarding the task required to complete the items outlined in Work Plan #35161 are outlined below.

## **2 OBJECTIVES OF GROUNDWATER MONITORING WORK PLAN**

The primary objective of this work plan is to define the current extent and magnitude of the groundwater contamination at the site to help determine a pathway to remediation and resolution of the release.

In summary, this work plan involves conducting two semi-annual groundwater monitoring events and preparing a Groundwater Monitoring Report appended with a RCP upon completion of all activities. These activities are detailed in the following work plan.

Specifically, this work plan proposes the following actions to achieve these goals:

- Performing two semi-annual groundwater monitoring events.
- Validating all laboratory analytical data using DEQ's Data Validation Summary Form.
- Discussing work plan tasks and results with DEQ's project manager; any modifications required to complete the work plan objectives will be submitted and agreed upon.
- Updating the RCP and discussing the results with DEQ's project manager.

- Submitting work plan and reports electronically following the Petroleum Tank Cleanup Section submittal requirements.

These investigation activities will be provided to delineate the magnitude and extent of the release to resolve Release #5027. As requested by DEQ, Pioneer proposes the following scope of work:

- Task 1: Project Management, Permitting, and Planning
- Task 2: Semi-Annual Groundwater Monitoring
- Task 3: Reporting

The following sections describe each task for the proposed work along with Pioneer's cost estimate and proposed schedule.

## ***2.1 Task 1 – Project Management and Planning***

Task 1 Project Management and Planning work will include:

- Work plan and cost estimate preparation
- Project scheduling
- Health and Safety Plan preparation
- Coordination with subcontractors, owners, and regulators
- Site work preparation

## ***2.2 Task 2 – Semi-Annual Groundwater Monitoring***

This work plan proposes performing two semi-annual groundwater monitoring events. During each semi-annual event, Pioneer will gauge all existing monitoring wells (BC-16-01, BC-16-02, BC-16-03, BC-16-04, BC-16-05, BC-18-06, BC-18-07, and MW20-01) and collect groundwater samples from BC-16-05, BC-18-06, and MW20-01. For each event, the Pioneer team will gauge and purge the wells and collect groundwater samples. Our team will attempt to complete the sampling events in conjunction with the typically high and low groundwater conditions.

Prior to groundwater sample collection, the team will gauge each of the eight monitoring wells for the presence of light non-aqueous phase liquid (LNAPL). Each well will be gauged using an electronic interface probe capable of detecting water or LNAPL hydrocarbons to within 0.01 foot. If the well does not contain LNAPL, the team will collect groundwater samples. If LNAPL is detected, the team will not collect any samples, will note the conditions in a logbook, and notify the DEQ project manager.

The groundwater samples will be collected according to low-flow sampling techniques. To ensure representative groundwater samples are collected, the team will monitor the water

quality parameters for the following intrinsic bioremediation indicators and allow them to stabilize during the purging process prior to sample collection: temperature (plus or minus 3%), pH (plus or minus 0.1), dissolved oxygen (plus or minus 10%), specific conductance (plus or minus 3%), oxidation-reduction potential (plus or minus 10 millivolts), and turbidity (plus or minus 10%). To complete groundwater sampling according to DEQ's low-flow sampling guidance, the wells will be gauged at each field parameter monitoring interval with a water level meter to ensure that excessive drawdown (plus or minus 0.3 feet) does not occur prior to sampling.

Pioneer's team will collect the groundwater samples with a peristaltic pump and disposable tubing and transfer the samples to the appropriate laboratory containers. The laboratory will supply new, decontaminated containers prior to sample collection. Groundwater samples from monitoring wells BC-16-05, BC-18-06, and MW20-01 will be submitted for laboratory analysis of VPH and EPH. Based on their absence during the historical sampling at the site, lead scavengers have been excluded.

Analysis of groundwater samples will be in accordance with DEQ's *Risk-Based Corrective Action (RBCA) Guidance for Petroleum Releases* (DEQ, 2024). Pioneer's team will collect one field duplicate during each sampling event. Each sample container will be preserved as directed by the laboratory, labeled, and packaged on ice. The samples will be delivered to Energy Laboratories, Inc. Chain of custody documentation will accompany the samples.

Purge water generated during the sampling activities will be infiltrated into the grassy areas available at the site in accordance with Montana DEQ's standards.

### **2.3 Task 3 – Reporting**

Pioneer will prepare one Groundwater Monitoring Report, which will include the results of both groundwater sampling events and an updated RCP. Following the second round of groundwater sampling, Pioneer will analyze the results and compile and submit a Groundwater Monitoring Report, prepared according to DEQ's Montana Report Guidance for Petroleum Releases (DEQ, 2021) that will include the following:

- Updated site maps, illustrating the locations of the new and existing monitoring wells, underground utilities, and surface features.
- Tables summarizing locations/depths of field data and laboratory analytical data for the new monitoring wells and the first and second round of groundwater monitoring.
- Laboratory analytical reports for groundwater samples.
- Logs, field data sheets, and related field data.
- Laboratory data validation.
- Recommendations relevant for further investigation or remedial action.
- An updated RCP.

### **3 COST ESTIMATE**

A detailed cost estimate to perform this scope of work is presented on the worksheet in Attachment 2.

### **4 SCHEDULES**

Pioneer proposes to perform the first groundwater sampling event (Task 2) during late spring of 2026. The second groundwater sampling event will be completed during the fall of 2026. The groundwater monitoring report will be completed and submitted within 45 days of receipt of all laboratory analytical reports for groundwater samples. The full duration of the project is approximately 12 months, and the final report will be issued in the winter of 2026.

## 5 REFERENCES

- DEQ, 2021. Montana Groundwater Monitoring Work Plan and Report Guidance for Petroleum Releases. Montana Department of Environmental Quality, Waste Management and Remediation Division, Petroleum Tank Cleanup Section. March 2021.
- DEQ, 2024. Montana Risk-Based Corrective Action Guidance for Petroleum Releases. Montana Department of Environmental Quality. February 2024.
- DEQ, 2026. Montana Department of Environmental Quality Cleanup website. Cleanup and Waste Management and Remediation Information. Accessed February 2026 at <https://discover-mtdeq.hub.arcgis.com/>.
- Hydrometrics, 2014. Phase II Environmental Site Assessment Results at B&C Oil, Miles City, MT. Letter report to Mr. Tim O'Neal, City Service Valcon, LLC. Hydrometrics, Inc. July 31, 2014.
- Pioneer, 2018. Standardized Soil Boring and Groundwater Monitoring Well Installation Report. B&C Oil Company, 500 North 5<sup>th</sup> Street, Miles City MT. Facility ID #09-05859, Release #5027, WP ID #10747. Prepared for Mr. Dennis Whitmore, Petro Services Company, Inc. Submitted to Montana Department of Environmental Quality Petroleum Technical Section. Prepared by Pioneer Technical Services, Inc. August 2018.
- Pioneer, 2019. Standardized Groundwater Monitoring Report. B&C Oil Company, 500 North 5<sup>th</sup> Street, Miles City, MT. Facility ID #09-05859 Release #5027, WP ID #10747. Prepared for Mr. Dennis Whitmore, Petro Services Company, Inc. Submitted to Montana Department of Environmental Quality Petroleum Technical Section. Prepared by Pioneer Technical Services, Inc. January 9, 2019.
- Pioneer, 2020. Standardized Soil Boring and Groundwater Monitoring Well Installation Report. B&C Oil Company, 500 North 5<sup>th</sup> Street, Miles City MT. Facility ID #09-05859 Release #5027, WP ID #33890. Prepared for Mr. Dennis Whitmore, Petro Services Company, Inc. Submitted to Montana Department of Environmental Quality Petroleum Technical Section. Prepared by Pioneer Technical Services, Inc. August 2020.
- Pioneer, 2024. Groundwater Monitoring Work Plan for GM Petroleum Distributors (former B&C Oil), 500 North Fifth Street, Miles City, Custer County, Montana, Facility ID #09-05859, TID #19449, Release #5027, Work Plan ID #34935. Prepared by Pioneer Technical Services, Inc. November 2024.

Pioneer, 2026. Groundwater Monitoring Report for GM Petroleum Distributors (former B&C Oil), 500 North Fifth Street, Miles City, Custer County, Montana, Facility ID #09-05859, TID #19449, Release #5027, Work Plan ID #34935. Prepared by Pioneer Technical Services, Inc. February 25, 2026.

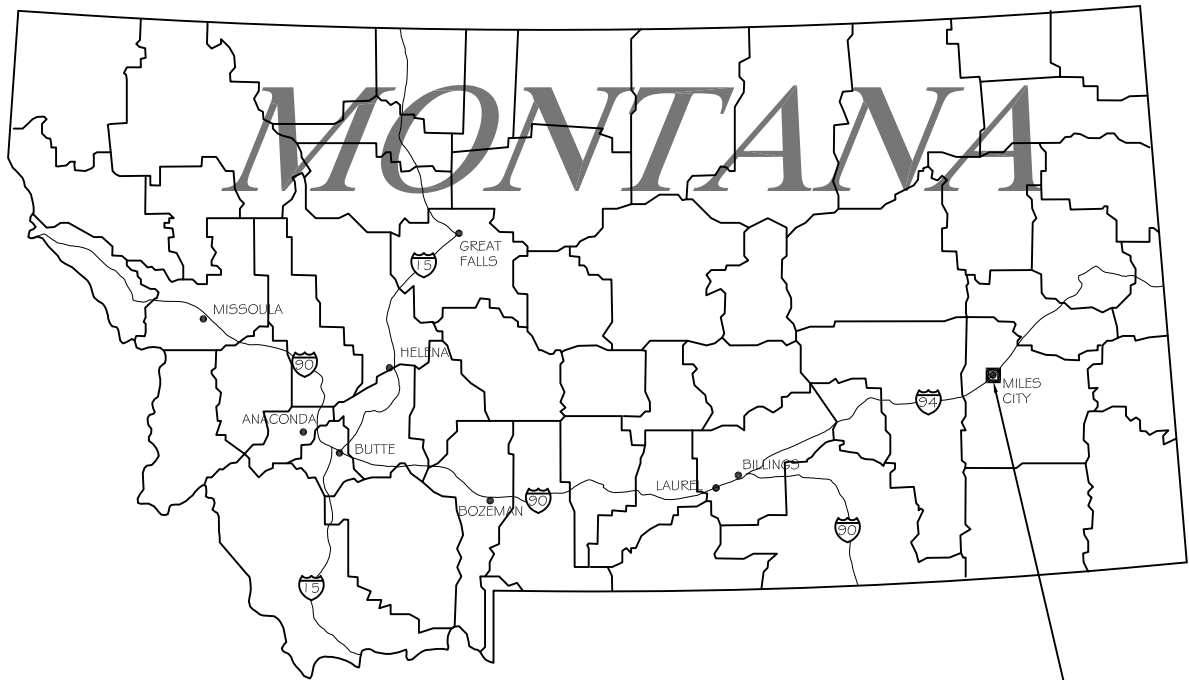
Portage, 2016. Summary Report Phase I Remedial Investigation and Sampling Activities. B&C Oil Company, 500 North 5<sup>th</sup> Street, Miles City, MT. Facility ID #09-05859, Release #5027, WP ID 9950. Prepared for Mr. Dennis Whitmore, Petro Services Company, Inc. Submitted to Montana Department of Environmental Quality Petroleum Technical Section. Prepared by Portage. February 2016.

## **Attachment 1**

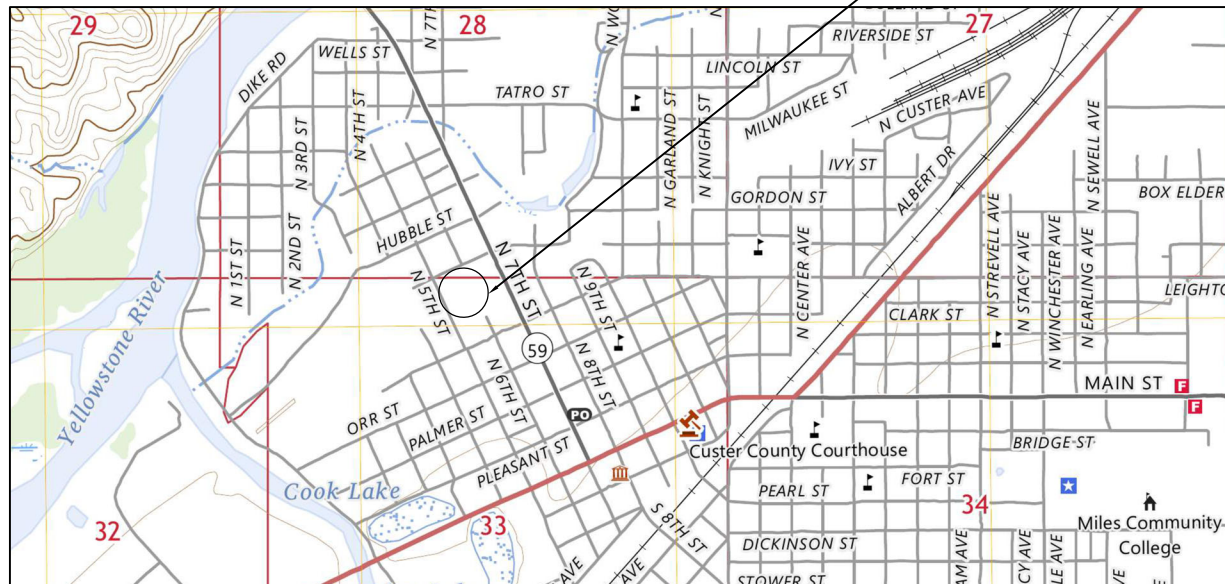
### **Figures**

**Figure 1. Location and Vicinity Map**

**Figure 2. Site Map**



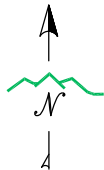
**PROJECT  
LOCATION**



**SITE VICINITY MAP**

DEQ FACILITY ID: 09-05859  
 RELEASE NUMBER: 5027  
 WORK PLAN NUMBER: 35161

B&C OIL COMPANY FACILITY  
 500 NORTH 5TH STREET  
 MILES CITY, MT 59301



DISPLAYED AS:  
 COORD SYS/ZONE: NAD83, NAVD88  
 DATUM: MSP  
 UNITS: INT. FEET  
 SOURCE: USGS



FIGURE 1



(406) 545-4805

GM PETROLEUM  
 DISTRIBUTORS  
 (FORMER B&C OIL)  
 LOCATION AND VICINITY MAP

DATE: APRIL 2026



© 2025 Microsoft Corporation © 2025 Maxar © CNES (2025) Distribution Airbus DS © 2025 TMAP MOBILITY Earthstar Geographics SIO

**LEGEND:**

MONITORING WELL

DEQ FACILITY ID: 09-05859  
 RELEASE NUMBER: 5027  
 WORK PLAN NUMBER: 35161

DISPLAYED AS:

COORD SYS/ZONE: NAD83, NAVD88  
 DATUM: MSP  
 UNITS: INT. FEET  
 SOURCE: BING

SCALE IN FEET

0 25 50

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 (406) 782-5177

**FIGURE 2**

**GM PETROLEUM DISTRIBUTORS (FORMER B&C OIL) SITE MAP**

DATE: APRIL 2026