



June 1, 2026

William Bergum
Environmental Project Officer
Petroleum Tank Cleanup Section
P.O. Box 200901
Helena, MT 59601-0901

Subject: Abbreviated Corrective Action Plan for the Abandonment of Monitoring Wells (CAP-AC-08) Associated with the Petroleum Release at Town Pump #4, 3700 Harrison Avenue, Butte, Silver Bow County, Montana; Facility ID 56-13911 (TID 30581), Petroleum Release 6274, Work Plan 35183

Dear Mr. Bergum:

Water & Environmental Technologies, Inc. (WET) is pleased to provide this abbreviated corrective action plan (CAP) and cost estimate to provide environmental consulting services at Town Pump #4 in Butte, MT. The proposed work is in response to a Montana Department of Environmental Quality (DEQ) letter dated April 28, 2026, requiring additional corrective action at the site. The following paragraphs present WET's proposed approach to satisfy the requirements listed in the letter, the estimated costs associated with each work task, and an estimated schedule for the work to be completed.

Scope of Work

The scope of work includes preparation of this CAP for Monitoring Well Abandonment (CAP-AC-08), abandonment of five groundwater monitoring wells at the Facility (MDT property), and preparation of a letter report and well abandonment forms summarizing the work.

A Standardized CAP-AC-08 Form is also attached to this letter, as well as a map depicting the locations of the five wells to be abandoned (MW-1, MW-2, MW-3, MW-4, and MW-5). Following DEQ approval of the CAP, a WET technician will mobilize to the site and the five site monitoring wells will be abandoned using a GeoProbe® direct-push drill rig in accordance with the requirements of Administrative Rules of Montana (ARM) Chapter 36.21, Subchapter 810. The technician will attach a chain to the upper end of each well casing and remove them from their respective boreholes using the rig's hydraulics. Once the casing and well screen have been removed, the borehole will be backfilled with hydrated bentonite chips from the bottom of the borehole to a depth of three feet below ground surface (bgs), and with natural soil from three feet bgs to the ground surface. If the well casing breaks in the act of pulling, or if it cannot be removed from the borehole, the technician will fill the well casing and screen with bentonite chips to three feet bgs, cut off the upper three feet of well casing, and backfill the upper three feet of exposed borehole with natural soils. The existing monuments will be removed.

Upon completion of field activities, WET will prepare a letter summary report for submittal to DEQ, along with well abandonment forms for submittal to both DEQ and the Montana Bureau of Mines and Geology's Groundwater Information Center.

Costs

A detailed cost estimate is attached.

Schedule

The wells will be abandoned within 90 days of DEQ approval of the CAP, and the letter report will be submitted to DEQ within 30 days of well abandonment. The estimated completion date for the project is September 30th, 2026.

If you have any questions or concerns about this CAP, please contact me at (406) 782-5220 or dleas@waterenvtech.com.

Sincerely,



Danny Leas
Staff Environmental Engineer, Water & Environmental Technologies

Enclosures - Cost Estimate (incl. bid from Enviro Probe Services)
- CAP-AC-08 Form
- Well Location Map

CC Paul Townsend, Property Owner



June 1, 2026

Attn: Danny Leas
Water & Environmental Technologies
480 East Park Street
Butte, MT 59701

RE: Project: WD-260601
Well Abandonment
Butte, MT

Dear Mr. Leas

Wiley Drilling has developed this Proposal for Water & Environmental Technologies (WET) to provide Subsurface Exploration Services for the above-mentioned project. This Proposal was developed based on information provided by WET. The purpose of this project is to provide well abandonment services in Butte, MT.

Scope of Services

Wiley has developed this proposal to include scope, costs and assumptions based on the information provided by WET. The Scope of Services is broken down into the tasks listed below.

Task 1: Project Preparation and Mobilization

Wiley will call in utility locations in accordance with Montana State law within 3 days prior to the start of drilling. WET will provide Wiley with a site map identifying the well locations to be used to call in locates. Wiley will mobilize the drill rig, materials, and crew from their drill shop in Montana City, MT to the project site.

Task 2: Well Abandonment

Wiley will abandon five (5), 0.75-inch diameter wells in accordance with MTDEQ guidelines. In general, this process will be completed as follows:

1. Surface completions such as flush mounted well vaults or steel protective risers will be removed.
2. The well casing and screen will be pulled using a drill rig winch cable.
3. If the well casing and screen cannot be removed, the upper three feet of well material will be removed and the remaining well material will remain in place.
4. The borehole and/or well casing will be backfilled with bentonite chips from the bottom of the hole to 6-inches below the surface.
5. Native soil will be used to patch the surface.

Cost Estimate and Assumptions

The total cost estimate for this project is **\$2,475**. A breakdown of these costs is provided in Table 1 attached to this Proposal. These costs are based on our project understanding, schedule, and the following assumptions:

- Wiley will call in public utility locations in accordance with Montana State law. Additional locate services are not included in this proposal, WET will be responsible for private utility locates.

- Access to borehole locations for a truck mounted drill rig and support equipment is available.
- We will do our best to minimize impacts to curbs and lawns, however, any damage to landscaping associated with borehole access will be the responsibility of others.
- Wiley will have access to operate a minimum of 50-feet away from any overhead power.
- Traffic control and permitting, if necessary, will be the responsibility of others.
- Work can be performed in Level-D Personal Protective Equipment including hard hat, safety toe boots, safety glasses, hearing protection, and hand protection.
- No air space monitoring is required.
- Any delays that are not the responsibility of Wiley will be charged to the project at a Standby Rate of \$210/hour.
- Any changes to the scope outlined in this proposal will require an updated cost estimate and proposal.

Schedule

Wiley will be available after June 7th, 2026, contingent upon receiving this signed proposal in time to call in utility locates. Wiley anticipates the work will be completed in one 8-hour business day. Wiley will reach out to you to schedule this project upon receiving this signed Proposal.

Closing

We appreciate the opportunity to provide WET with this Proposal. Your authorization for Wiley to proceed in accordance with this Proposal can be issued by signing and returning this Proposal (Project: WD-260601). The costs associated with this Proposal are valid for 90-days.

AGREED TO:

CLIENT

TITLE

DATE

TABLE 1: COSTS ESTIMATE

Geoprobe 3100 Services	Quantity	Unit	Unit Price	Total
Project Setup/Mobilization				
Mobilization	1	Lump Sum	\$ 1,100.00	\$ 1,100.00
Total:				\$ 1,100.00
Drilling				
Well Abandonment	5	Each	\$ 275.00	\$ 1,375.00
Total:				\$ 1,375.00
Total Cost:				\$ 2,475.00



AC-08
MONITORING WELL ABANDONMENT WORK PLAN
and BUDGET FORMAT

This Monitoring Well Abandonment Work Plan (WP) is for the routine abandonment of monitoring wells no longer needed for petroleum release investigation or cleanup, or needed by the owner/operator for their own purposes. Monitoring wells to which this WP applies include groundwater monitoring wells, soil vapor extraction wells, recovery wells, observation wells, sparge/injection wells, and piezometers.

Administrative Rules of Montana (ARM) 36.21.810 sets forth the legal requirements for properly abandoning monitoring wells. ARM 36.21.810 is attached and may be found at the following Internet address: http://www.mtrules.org/gateway/RuleNo.asp?RN=36.21.810.

Return this WP to: Petroleum Tank Cleanup Section, Montana Department of Environmental Quality, P.O. Box 200901, Helena, MT 59620-0901. Please note that incomplete and/or unsigned WPs will be returned and may delay processing of claims submitted to the Petroleum Tank Release Compensation Board.

Facility Name Town Pump #4 Facility ID# 56-13911 Release # 6274
Facility Address 3700 Harrison Avenue, Butte, Silver Bow County, Montana, 59701
Owner/Operator Name Paul Townsend, Town Pump
Owner/Operator mailing address, if different from above: Town Pump, Inc. P.O. Box 6000 Butte, MT 59702

Consultant's name, address, and phone number: Water Environmental Technologies,
480 E Park St, Butte, MT 59701, (406) 782-5220

List monitoring wells by name and number to be abandoned: MW-1, MW-2, MW-3, MW-4, MW-5

List monitoring wells by name and number to be maintained: N/A

Specify the method by which the monitoring wells will be abandoned: Attempt to remove entire casing by chain and geo-probe, then filling with bentonite chips as pulled out. If casing cannot be removed, fill casing with bentonite chips & remove at least upper three feet of casing and fill with naturally occurring soils

Target date for abandonment of the monitoring well(s): July 30th 2026

Unit cost per monitoring well for abandonment (include mobilization, Portland cement, grout or bentonite, equipment, and consultant or contractor labor costs): \$ /well \$ /ft

Total cost of abandoning the above-listed monitoring wells: \$

I elect to maintain the monitoring wells located at the above-referenced Facility and will monitor the wells at least every three years and in accordance with applicable requirements of the Montana Department of Natural Resources & Conservation Division.

I elect to abandon the monitoring wells located at the above-referenced Facility and certify that the above-referenced monitoring wells are to be properly abandoned in accordance with the provisions ARM 36.21.810 and other applicable requirements of the Montana Department of Natural Resources & Conservation Division.

(Signature of Facility owner or operator or authorized representative)

6/1/2026
(date)

36.21.810 ABANDONMENT

(1) Wells which have not been monitored for more than three years shall be deemed abandoned unless written permission is obtained from the board to maintain the well.

(2) Monitoring wells that have outlived their useful purpose shall be abandoned by one of the following methods:

(a) if the casing and screen are left in place, the casing and screen shall be sealed from the bottom up by the following methods:

(i) using a pump and hose or tremie pipe to conduct the sealing material to the bottom of the well; or

(ii) by filling the casing and screen with bentonite pellets or chips placed in a manner that will prevent bridging. Metal casings shall be cut off three feet below the ground surface and the last three feet backfilled with naturally occurring soils;

(b) the department recommends that the casing be removed in all possible instances. If the casing and/or screen are removed, the hole shall be filled with sealing material, concrete, or bentonite pellets or chips from the bottom up, as the casing and/or screen is removed. From six to three feet from the surface, bentonite shall be added to the well. The last three feet shall be filled with naturally occurring soils;

(c) the sealing material shall be bentonite pellets or chips, bentonite clay grout, neat cement grout, or concrete. The material may contain nonbiodegradable fluidizing admixtures, provided they will not contaminate the groundwater. Sealing materials which settle shall be topped to provide a continuous column of grout to within three feet of the surface; or

(d) other methods for abandonment with prior board approval.

(3) For flowing wells, the abandonment procedures outlined in ARM [36.21.671](#) shall apply.

(4) A properly abandoned well shall not produce water nor serve as a channel for movement of water.

(5) A water well log report, fully describing all abandonment procedures, shall be submitted to the Ground Water Information Center (GWIC) of the MBMG within 60 days of abandoning the well.

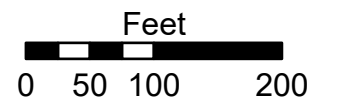
History: [37-43-202](#), MCA; [IMP](#), [37-43-202](#), MCA; [NEW](#), 1990 MAR p. 739, Eff. 4/13/90; [AMD](#), 1991 MAR p. 913, Eff. 6/14/91; [AMD](#), 1997 MAR p. 65, Eff. 1/17/97; [AMD](#), 2010 MAR p. 1614, Eff. 7/16/10.

For additional information or requirements for abandoning or maintaining monitoring wells, please contact the Montana Department of Natural Resources & Conservation, Board of Water Well Contractors at (406) 444-6643.



Legend

- Piezometer Location
- Groundwater Flow Direction
- Groundwater Elevation Contour (CI = 0.5 ft.)



Groundwater Elevation Contour Map	
<i>Silver Bow County T03N, R08W, S29 Measured on 05/06/2021</i>	
Job#: TownPumpM18	FIGURE x
Date: 5/11/2021	
File: W:\Town Pump\TownPumpM18\GIS\MapDocs\Contour\Wet\Bowl\Contour.aprx, Author: jrb	