February 12, 2026

Mr. Cole Mort
Red Tail Development Company
805 24th Street West, Suite 8A
Billings, Montana 59102

Delivered via email: cmort@redtailmt.com

SUBJECT: February 2026 Groundwater Monitoring Investigation Work Plan
Casey's Corner #6 47650 Gallatin Road, Big Sky, Montana
DEQ Facility ID 16-06923; Release 6292, Work Plan 35122
Tetra Tech Project Number 117-8300005A

Dear Mr. Mort:

Tetra Tech, Inc. (Tetra Tech) is pleased to submit this work plan to conduct groundwater monitoring for the release at Casey's Corner #6 located at 47650 Gallatin Road, Big Sky, Gallatin County, Montana (Figure 1). This work plan has been prepared in response to a request from Eric Krueger of the Montana Department of Environmental Quality (MDEQ) in correspondence dated December 12, 2025 (MDEQ, 2025).

The following sections summarize Tetra Tech's proposed scope of work and schedule to complete the requested tasks. An estimated budget is presented in the attached Unit Cost Worksheet.

BACKGROUND INFORMATION

The site consists of a convenience store building, private residences, fuel dispenser canopy, one above ground storage tank (AST) and associated fuel dispenser, and an active underground storage tank (UST) basin with three USTs (Figure 2). The passenger vehicle dispensers are located on the eastern end of the store and the UST basin adjoins the convenience store to the south. The AST and associated fuel dispenser are located southeast of the convenience store.

Multiple above and below ground petroleum releases have been identified at this facility between the years 1986 and 2021. In 1986, a concrete form pin was driven through a product line. This release was not discovered until six months after, when gasoline was observed on the downgradient pond. At the request of the DEQ soil borings were installed to investigate the release. Petroleum hydrocarbon concentrations were detected in soil and surface water samples. According to DEQ records, no further action was taken (RAM Environmental, 1999).

A second release was discovered during facility upgrades conducted in 1994. Gasoline odor was observed in soils during facility upgrades of product lines; however, it was noted that the existing piping was in good condition. The release was thought to be caused by customer over-fills at the facility dispensers. Approximately eight cubic yards was excavated during the facility upgrades. The excavated soils were sampled and analyzed for diesel range organics (DRO) and gasoline range organics (GRO). Minimal concentrations of petroleum hydrocarbons were detected. No further actions were conducted (RAM Environmental, 1999).

On May 8, 1997, the MDEQ received correspondence stating fuel was spilling onto an unpaved area near the diesel dispensers. In response to the MDEQ inquiry, the facility manager stated

approximately 20 gallons of fuel had spilled due to a malfunctioning shut-off control. Two cubic yards of impacted soil was removed from the facility. MDEQ personnel subsequently sampled the domestic well at the facility for DRO and volatile organic compounds (VOCs). No concentrations of DRO or VOCs were detected in the domestic well samples (RAM Environmental, 1999).

In April 1999, RAM Environmental installed three monitoring wells at the request of MDEQ to determine if groundwater at the property was impacted by the historic releases discussed above. The monitoring wells were installed downgradient of the suspected release area and sampled for GRO and DRO. Additionally, one domestic well was sample and analyzed for VOCs. No petroleum hydrocarbons were detected in samples collected during this investigation (RAM Environmental, 1999).

In January 2021, Antea Group conducted a phase II investigation at the property to investigate the presence of petroleum hydrocarbon impacts at the facility. Five soil borings were installed downgradient of the fuel dispensers. Soil and groundwater samples were collected from each soil boring and analyzed for volatile petroleum hydrocarbons (VPH), extractable petroleum hydrocarbons (EPH), and BTEX (benzene, toluene, ethylbenzene, and xylene. Results from phase II investigation indicate petroleum hydrocarbon impacts to the soil and groundwater at the facility are present. The concentrations reported during this investigation indicate multiple MDEQ risk-based screening levels (RBSLs) exceedances in the soils and groundwater at the facility (Antea Group, 2021).

In June 2025, four monitoring wells and three soil borings (Figure 2) were installed using rotosonic drilling (Tetra Tech, 2025). Each monitoring well and soil boring were completed in the gravel, cobble, and sand aquifer at depth of 15 feet bgs. Petroleum hydrocarbons were present in wells MW-3 and MW-4 and slight petroleum hydrocarbons were present in soil boring BH-2.

Groundwater was sampled in July 2025 in all five monitoring wells (Figure 2) and analyzed for VPH and EPH. Water samples were also collected from the two water wells and analyzed for volatile organic constituents (VOC). Petroleum hydrocarbons were not detected in any sample except for monitoring well MW-3 which had low concentrations of total extractable hydrocarbons which did not exceed MDEQ RBSLs.

SCOPE OF WORK

GROUNDWATER MONITORING

Groundwater monitoring will be completed in accordance with Tetra Techs standard operating procedures (SOPs) included in Attachment A and as described below:

- Depth to groundwater will be measured for each monitoring well (MW-1, MW-1A, MW-2, MW-3, MW-4) shown on Figure 2 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.
- Each monitoring well will be purged with low-flow slow-purge pumping method using a submersible bladder pump and dedicated polyethylene tubing. During purging, the water will be analyzed for pH, temperature, dissolved oxygen, specific conductivity, oxidation-reduction potential, and turbidity using field instruments. Purge water will be containerized in accordance with the Disposal of Untreated Water from Monitoring Wells Flow Chart and disposed of appropriately following receipt of laboratory results (MDEQ,2015). 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.

- A groundwater sample will be collected from each monitoring well using a submersible bladder pump and dedicated polyethylene tubing. Groundwater samples will be analyzed for VPH and EPH using the Massachusetts Department of Environmental Protection methods (MDEP, 2008a; MDEP, 2008b). In accordance with DEQ guidance, if the EPH concentration in water exceeds 1,000 micrograms per liter (µg/L), then an EPH fractionation analysis is required (DEQ, 2018).
- There are two water wells located on the facility that provide drinking water to the convenience store and residences. A sample will be collected from the hydrant or faucet nearest the service line and upstream of any filtration device or water softener. The water will be allowed to run for a minimum of 10 minutes prior to sample collection. These water samples will be analyzed for volatile organic constituents via EPA Method 524.2.

DATA VALIDATION

The 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, as indicated below, a data validation will also be included with the investigation report and will follow DEQ's data validation guideline as per https//deq.mt.gov/Portals/112/Land/StateSuperfund/Documents/DataValidationReport.pdf. It is anticipated that three or four separate data validations will need to be completed for this project.

REPORTING

A groundwater monitoring report will be prepared and submitted to MDEQ. The report will present the field and analytical results of this investigation and compare laboratory analytical results to MDEQ risk-based screening levels. Conclusions and recommendations detailing site conditions, and the extent and magnitude of the plume will be discussed, along with a to-scale map presenting necessary site information. Additionally, the report will include updates to the RCP to evaluate the potential path for closure of the release.

SCHEDULE AND COSTS

The above tasks will be initiated following receipt of project authorization by Red Tail Development and the DEQ. Upon authorization, groundwater monitoring is to be conducted in March of 2026. Subsequent reporting of the completed activities is to be completed by May 31, 2026. The work described in this work plan will be conducted on a unit cost basis per the Cost Estimate Breakdown and Sampling Unit Cost Worksheets included in Attachment B.

PROPOSAL AUTHORIZATION

Should you find this work plan acceptable, please sign the Work Authorization #8 included in Attachment C and return a signed copy to our Billings, Montana office. If you have questions or comments regarding this work plan, don't hesitate to call us at (406) 248-9161. For your

convenience, we have forwarded a copy of this work plan to DEQ for their review. We appreciate the opportunity to provide you with environmental consulting services.

Sincerely,

Tetra Tech, Inc.

Paul E. Lemire
Project Manager

Jake Conver
Senior Engineer

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Cc: Eric Krueger, DEQ; Eric.Krueger@mt.gov

Figures
Attachment A: Unit Cost Worksheets
Attachment B: Work Authorization #8

REFERENCES

Antea Group, 2021. Phase II Investigation Casey # 6, 47650 Gallatin Rd., Gallatin Gateway, Gallatin County, Montana. January.

MDEP, 2008a. Massachusetts Department of Environmental Protection (MADEP), 2008. Method for Determination of Volatile Petroleum Hydrocarbons (VPH). Revision 1.1. May.

MDEP, 2008b. Massachusetts Department of Environmental Protection (MADEP), 2008. Method for Determination of Extractable Petroleum Hydrocarbons (EPH). Revision 1.1.

MDEQ, 2015. Disposal of Untreated Purge Water from Monitoring Well. July 27.

MDEQ, 2021. January 8, 2021, Petroleum Release at Casey #6, 47650 Gallatin Rd., Gallatin Gateway, Gallatin County, Montana; Facility ID 16-06923, (TID 21410), Release 6292, Work Plan 34345. July 12.

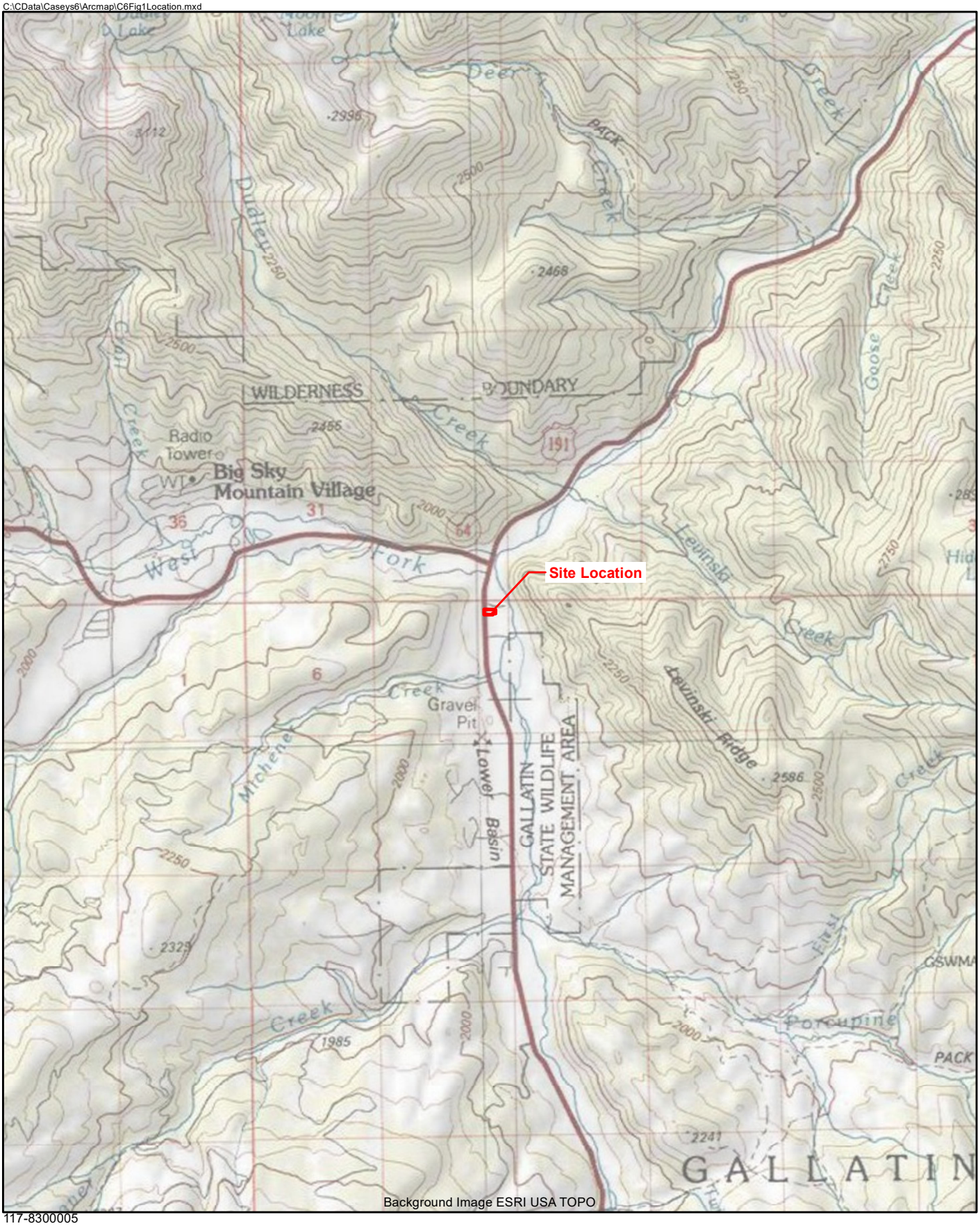
RAM Environmental, LLC, 1999. Phase I Remedial Investigation Report, Jasper's Exxon, Big Sky, Montana. May 27.

Tetra Tech, 2025. Remedial Investigation Report October 2025, Casey's Corner #6, 47650 Gallatin Road, Big Sky, Montana. Unpublished report prepared by Tetra Tech for Red Tail Development Company, Billings, Montana. December.

TETRA TECH

FIGURES

C:\CData\Caseys6\Arcmap\C6Fig1Location.mxd



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Miles
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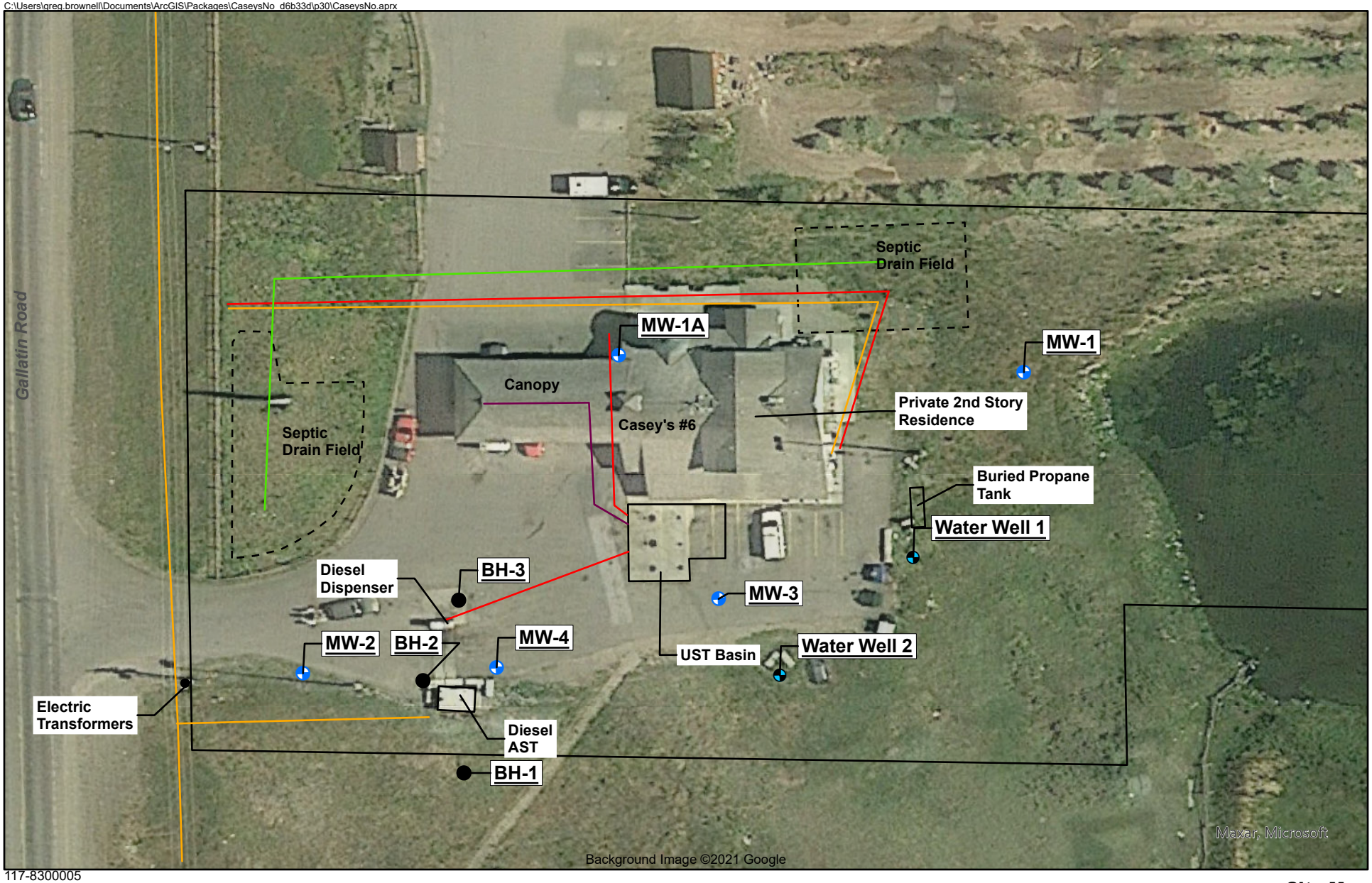
Approximate Site Boundary

Location Map
Casey's Corner #6
47650 Gallatin Road
Big Sky, Montana
FIGURE 1

C:\Users\greg.brownell\Documents\ArcGIS\Packages\CaseysNo_d6b33d\p30\CaseysNo.aprx



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Feet
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Monitor Well
Borehole
Domestic Well

Underground Communications Line
Underground Electric Line
Underground Product Line
Underground Sanitary Line
Approximate Site Boundary

Site Map
July 31, 2025
Casey's Corner #6
47650 Gallatin Road
Gallatin Gateway, Montana
FIGURE 2