

February 28, 2025

Bradley Thompson, Personal Representative of the Estate of Irvin Wayne Thompson Thompson Distributing 320 South 1st Street Hamilton, MT 59840

Delivered via email: 566bthompson@gmail.com, gdorrington@crowleyfleck.com

**SUBJECT:** Well Abandonment Work Plan

**Thompson Distributing** 

320 South First Street, Hamilton, MT 59840

Facility ID 41-06301 (TID 26913), Release 6612, Work Plan ID 35006

Tetra Tech Project No. 103Z889503

Dear Mr. Thompson:

Tetra Tech is pleased to present you with this Well Abandonment Work Plan for the former Thompson Distributing Bulk Plant located in Hamilton, Montana. This Work Plan has been prepared in response to a request from Mr. Chris Herman of the Montana Department of Environmental Quality (MDEQ) in correspondence dated February 10, 2025 (MDEQ, 2025). In this correspondence Mr. Herman requested the following actions:

- Complete a DEQ AC-08 form indicating you elect to maintain or abandon wells according to Montana Department of Natural Resources and Conservation (DNRC) regulations.
- DEQ is recommends that your consultant to be on-site for well abandonment to ensure the safety of all personnel and the public, to ensure the appropriate wells are abandoned, document to DEQ and DNRC that abandonment was completed, and the site was restored to its pre-corrective action state.
- Prepare a letter report that includes a description of the well abandonment method and a copy of the well abandonment form for each well abandoned.
- Submit your letter report to DEQ within 30 days of well abandonment and submit a copy to DNRC according to their regulations.
- Use standardized DEQ WP and report formats found under the Forms dropdown at the Petroleum Tank Cleanup Section (PTCS) webpage.
- Submit WP and reports electronically following the PTCS submittal requirements found online under the Guidance dropdown at the PTCS webpage.



#### PROPOSED SCOPE OF WORK

#### **Well Abandonment**

Tetra Tech will abandon monitoring wells MW-1, MW-2, and MW-3. The monitor wells will be abandoned using the methods detailed below:

- Flushmounts and manholes will be removed or broken from surrounding materials and disposed of as municipal waste.
- A well removal bracket will be attached to the top of the well casing. With a geoprobe, the well casing will be completely removed from the ground.
- Well holes will be filled with bentonite from the bottom to within 6 inches of the surface and hydrated to ensure a seal with surrounding material.
- The last 6 inches of each well location will be filled with clean surrounding soil materials until level with the ground surface.

## Reporting

Tetra Tech will prepare an abandonment of wells letter report. The report will provide details of well abandonment activities and Department of Natural Resources and Conservation (DNRC) well abandonment forms pursuant to Administrative Rules of Montana ARM 36.21.810. A water well log report, fully describing all abandonment procedures, shall be submitted to the Groundwater Information Center (GWIC) of the Montana Bureau of Mines and Geology within 60 days of well abandonment.

#### SCHEDULE AND BUDGET

Tetra Tech will schedule this work upon receiving authorization by MDEQ. The work described above will be conducted on a unit cost basis per the budget for the abandonment of 3 wells. Anticipated abandonment date: March 24, 2025

Task 1 Well Abandonment Work Plan

CAP\_AC-08: \$471.00

Task 2 Project Management

5 hrs @ \$157.00/hr, 1 hr @ 84.00: \$869.00

\*Task 3 Well Removal Contractor Pioneer Technical Services

3 wells @ \$805.71/well: \$2,259.00 x 1.07% markup= \$2,417.13

Task 4: Well Abandonment Letter Report: \$471.00

\*Abandonment Cost/well: 805.71

Total: \$4,228.00



We appreciate the opportunity to provide this plan and look forward to working with you on this project. For your convenience, we have also forwarded this work plan to Mr. Chris Herman of the MTDEQ. If you have any questions or comments regarding this proposal, please do not hesitate to call us in our Helena, Montana office at (406) 437-9869 or (239) 994-0474

Respectfully Submitted,

Tetra Tech, Inc.

Brandon Kingsbury, P.G.

Brandon Kingsbury

**Project Manager** 

### **Enclosures:**

AC-08 Monitoring Well Abandonment Work Plan and Budget Format

cc: Chris Herman, MTDEQ <a href="mailto:christopher.herman@mt.gov">christopher.herman@mt.gov</a>



# **ATTACHMENT A**

AC-08



# 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: <a href="http://www.mtrules.org/gateway/RuleNo.asp?RN=36.21.810">http://www.mtrules.org/gateway/RuleNo.asp?RN=36.21.810</a>.

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 _ Thompson [	Distributing	_ Facility ID#_41-06301, TID 26913	Release # 6612
Facility Address 320 South Fire		Hamilton	59840
(Street)		(City) tative of the estate of Irvin Thompson	(Zip)
Owner/Operator mailing address, if different from above:			
Consultant's name, address, and phone number: Brandon Kingsbury, Tetra Tech, Inc. 825 W Custer Ave., Helena, MT 59602			
List monitoring wells by name and number to be abandoned: MW-1, MW-2, and MW-3			
List monitoring wells by name and number to be maintained: NA			
Specify the method by which the monitoring wells will be abandoned: Geoprobe to pull well casings from ground. Holes to be backfilled with bentonite to within 6 inches of ground surface.			
Target date for abandonment of the monitoring well(s): March 24, 2025			
Unit cost per monitoring well for equipment, and consultant or co Total cost of abandoning the ab	or abandonment (include rontractor labor costs): ove-listed monitoring wel	mobilization, Portland cement, grous 8 805.71 /well \$ 32.23	<u>/ft</u>
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.			
Brandon Kingst  (Signature of Facility owner or operator or a	rury	2/28/202	25
(Signature of Facility owner or operator or	authorized representative)	(da	ite)

### **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 nonbiodegradeable 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.

Revised: July 26, 2018