



Environmental Resources, LLC

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July 25, 2026

Mr. Donnie McCurry
DEQ-PTCS
P.O. Box 200901
Helena, MT 59620

Subject: Groundwater Monitoring Work Plan
Cromwell's Convenience and Petroleum, Scobey, Montana
DEQ Facility ID No. 10-01223
DEQ Leak No. 6662, TID 19533
Work Plan ID 35213

Responsible Party: Mr. Shane Cromwell
Cromwell's Convenience and Petroleum
101 Railroad Avenue
Scobey, Montana 59263
(406)-487-2441

Dear Mr. McCurry:

Environmental Resources, LLC is pleased to submit this Groundwater Monitoring Work Plan to outline activities associated with groundwater monitoring and reporting at the above referenced petroleum release site. Submittal of this work plan was requested by the Montana Department of Environmental Quality (DEQ) in a letter dated July 21, 2026.

Submitted by
Environmental Resources, LLC

Robert H. Waller, Principal Geologist

Attachments: Unit Cost Worksheets



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1.0 Executive Summary

Environmental Resources, LLC has been retained by Cromwell Petroleum to investigate and remediate petroleum contamination resulting from a dyed diesel fuel release at the Cromwell Petroleum facility in Scobey, Montana. The project site is underlain by silty clay and silty sand. Groundwater occurs at approximately 2-5 feet below ground surface. The Cromwell Petroleum release site is located within the city limits of Scobey, Montana at 101 Railroad Avenue as shown on Figure 1 (Appendix A). The project site is situated in the northeast quarter of the northwest quarter of Section 15, Township 35 North, Range 48 East, Montana Principal Meridian.

The project site has served as an automobile refueling facility and convenience store since construction. The petroleum storage and dispensing facility consists of five aboveground storage tanks used for storing gasoline and diesel fuel, a bulk fuel loading rack and a dispenser island served by underground piping. The aboveground storage tanks are currently in use.

Approximately 2500 gallons of dyed diesel fuel were released from a perforated aboveground storage tank (AST) on May 23, 2024. The Montana Department of Environmental Quality was immediately notified of the release and the leak call was received by Mr. Chris Herman. In addition, the City of Scobey, the local fire department, Disaster and Emergency Services (DES) and the Montana Department of Natural Resources and Conservation (DNRC) were also notified as the release was suspected to impact Montana State School Trust land (the release was later determined not to have potential to impact State School Trust land). The National Response Center (NRC) was not notified since navigable surface water was not impacted.

Dyed diesel fuel was observed in a 36-inch diameter concrete storm drain and the storm drain discharge ditch. The storm drain does not discharge to live surface water. Initial response actions consisted of placing absorbent booms in standing water within the discharge ditch. Subsequent actions consisted of vacuuming all visible dyed diesel fuel product contained within the discharge ditch using a vacuum truck and flushing the storm drain with 1500 gallons of water. Four four-inch diameter recovery wells were installed and actively pumped to recover light non-aqueous phase liquid (LNAPL) beneath the release area.

DEQ requested a Remedial Investigation Work Plan to determine the extent and magnitude of the petroleum release. The following sections outline methods that will be used to conduct the subsurface investigation.

2.0 Facility Summary and Current Conditions

The AST containment area was constructed in the 1970's and consists of five ASTs used for storage of gasoline and diesel fuel as shown on Figure 2. The ASTs serve a bulk fuel fill rack and a dispenser island for retail fuel sales. The containment area consists of an unlined gravel surface surrounded by a concrete containment wall.

On Thursday May 23, 2024, a petroleum release was discovered in the AST containment resulting from a perforation in the bottom of a dyed diesel fuel tank. It is estimated that approximately 2500 gallons of dyed diesel fuel were released. Dyed diesel fuel was observed on the containment floor and subsequently within a storm water discharge ditch. DEQ was immediately notified of the release. The perforated tank was immediately emptied and secured to prevent further discharge.

An anonymous complaint was received by the DEQ Enforcement Bureau regarding the presence of diesel fuel noticed in a storm water discharge ditch as shown on Figure 3. Remedial actions that were taken upon notification of impacts to the ditch consisted of placing absorbent booms and pads in the discharge ditch. It became obvious that the volume of product within the ditch was more than could be handled by the absorbents and a vacuum truck was subsequently deployed to remove the product. Badger Daylighting arrived onsite on Thursday May 30, 2024 and removed approximately 2800 gallons of mixed stormwater and diesel fuel. An additional 1500 gallons of water resulting from flushing the storm drain were removed. All of the recovered liquids were disposed at Clean Solutions, LLC, 503 U.S. Highway 2 in Bainville, Montana, a licensed Class II resource recovery facility (406) 525-5175.

Additional work conducted on Thursday May 30, 2024 consisted of investigating the extent of LNAPL near the AST containment. Four four-inch diameter recovery wells were installed using a ten-inch diameter post hole auger. The borings were installed to a depth of approximately 6-7 feet below ground surface. The borings were cased with an eight foot section of four inch PVC pipe perforated vertically. The annulus around each recovery pipe was filled with ½ inch washed gravel. LNAPL recovery was facilitated using a surface mounted transfer pump discharging into a 250-gallon plastic tank. Approximately 100 gallons of diesel fuel were recovered as of Friday May 31, 2024. LNAPL recovery was also conducted in the well bore of monitoring well MW-9 associated with a neighboring petroleum release site (Figure 3). Product recovery continued with approximately 500 gallons of diesel fuel recovered as of Friday June 7, 2024.

Upon further investigation, it was discovered that diesel product entered the storm drain through a four-inch diameter French drain that was presumably installed to

dewater the site during construction of the AST containment. The drainpipe discharged directly into the storm drain collection box. The French drain was capped with a PVC plug. On Friday May 31, 2024 the City of Scobey flushed the impacted storm drain with approximately 1500 gallons of water discharged from a nearby fire hydrant. All of the flush water was removed with the vacuum truck. No appreciable amounts of LNAPL were observed during the flushing operation. Layout of the impacted storm sewer and discharge ditch is shown on Figure 4.

Four product recovery wells were installed at the project site on June 11, 2024 as shown on Figure 5. Active product recovery is ongoing with approximately 850-900 gallons of dyed diesel fuel product recovered to date.

3.0 Purpose and Objectives

The purpose of this investigation is to assess current groundwater quality beneath the project site. Specific objectives of the investigation include:

- 1) Monitor groundwater on a quarterly schedule for one year. Gauge fluid levels at all site monitoring wells.
- 2) Collect groundwater samples for laboratory analysis from monitoring wells MW-1-5 and from neighboring Grain Growers monitoring wells MW-7 and MW-9 using low flow sampling methodology.
- 3) Analyze samples at an analytical laboratory in accordance with Montana Tier 1 Risk-Based Corrective Action Guidance for Petroleum Releases.
- 4) Validate all laboratory data.
- 5) Prepare a Groundwater Monitoring Report.

4.0 Scope of Work

4.1 Groundwater Sample Collection and Analysis

Groundwater samples will be collected from monitoring wells MW-1-5 and from neighboring Grain Growers monitoring wells MW-8 and MW-9 on a quarterly schedule beginning in October 2026. Groundwater elevations will be measured in all of the site monitoring wells prior to purging and sample collection. All of the well covers will be opened and the locking caps removed at least 30 minutes prior to obtaining water level measurements. Static water levels will be measured from a reference point on top of the north side of each well casing using a Keck ET-89 electronic water levels indicator. The water level indicator will be decontaminated prior to each measurement.

Decontamination will be accomplished by scrubbing the indicator tip in an *Alconox®* wash solution, rinsing with a 10% methanol solution and triple rinsing with distilled water.

Following measurement of the static water levels, sample collection will commence using a submersible pump and low flow sampling methods. Indicator parameters oxidation-reduction potential, dissolved oxygen, pH, specific conductance and temperature will be measured during sample purging. Samples will be collected when the measured indicator parameters stabilize according to Section 2.5 of the DEQ Groundwater Sampling Guidance (2018). Samples will be decanted into appropriate sample containers, preserved and placed on ice while awaiting delivery to the analytical laboratory. Groundwater samples will be analyzed for Extractable Petroleum Hydrocarbons (EPH) Screen and for Volatile Petroleum Hydrocarbons (VPH) at Energy Labs in Billings, MT.

4.2 Investigation Derived Waste

Drill cuttings, excess sample materials, drilling fluids, and water removed from a well during installation, development, and sampling and all other investigation derived wastes will be disposed of according to all applicable local, state and federal laws and regulations governing the disposition of investigation derived wastes.

4.3 Reporting

One Groundwater Monitoring Report will be prepared following completion of the second groundwater monitoring event.

4.4 Investigative Methods

Methods practiced during this investigation will follow generally accepted practices of similar consulting firms in the same geographical area. Quality Assurance/ Quality Control methods will be employed throughout all phases of this investigation to ensure meaningful and reproducible results and data.

4.5 Health and Safety

Health and safety issues will be addressed throughout this investigation to prevent exposure of site workers and other onsite personnel to potentially hazardous situations and chemical compounds. Several physical hazards will inherently be present throughout the field investigation while heavy equipment is being utilized for soil borings and monitoring well installation. Site specific health and safety precautions and information will be contained in a Health and Safety Plan which will remain onsite during all field activities.

5.0 Budget/Scheduling

Costs for groundwater monitoring are outlined on the attached Unit Cost Worksheets included in Appendix B. Groundwater monitoring will be completed quarterly beginning in October 2026. A Groundwater Monitoring Report will be submitted following completion of four quarters of groundwater monitoring by September 31, 2027.

6.0 Limitations

This work was performed in accordance with generally accepted practices of other consulting firms conducting similar studies. Environmental Resources, LLC observed that degree of care and skill generally exercised by other consultants under similar conditions. Our findings and conclusions must not be considered as scientific certainties, but as opinions based upon our professional judgment based upon the data gathered during the course of this investigation. Other than this, no warranty is implied or intended.

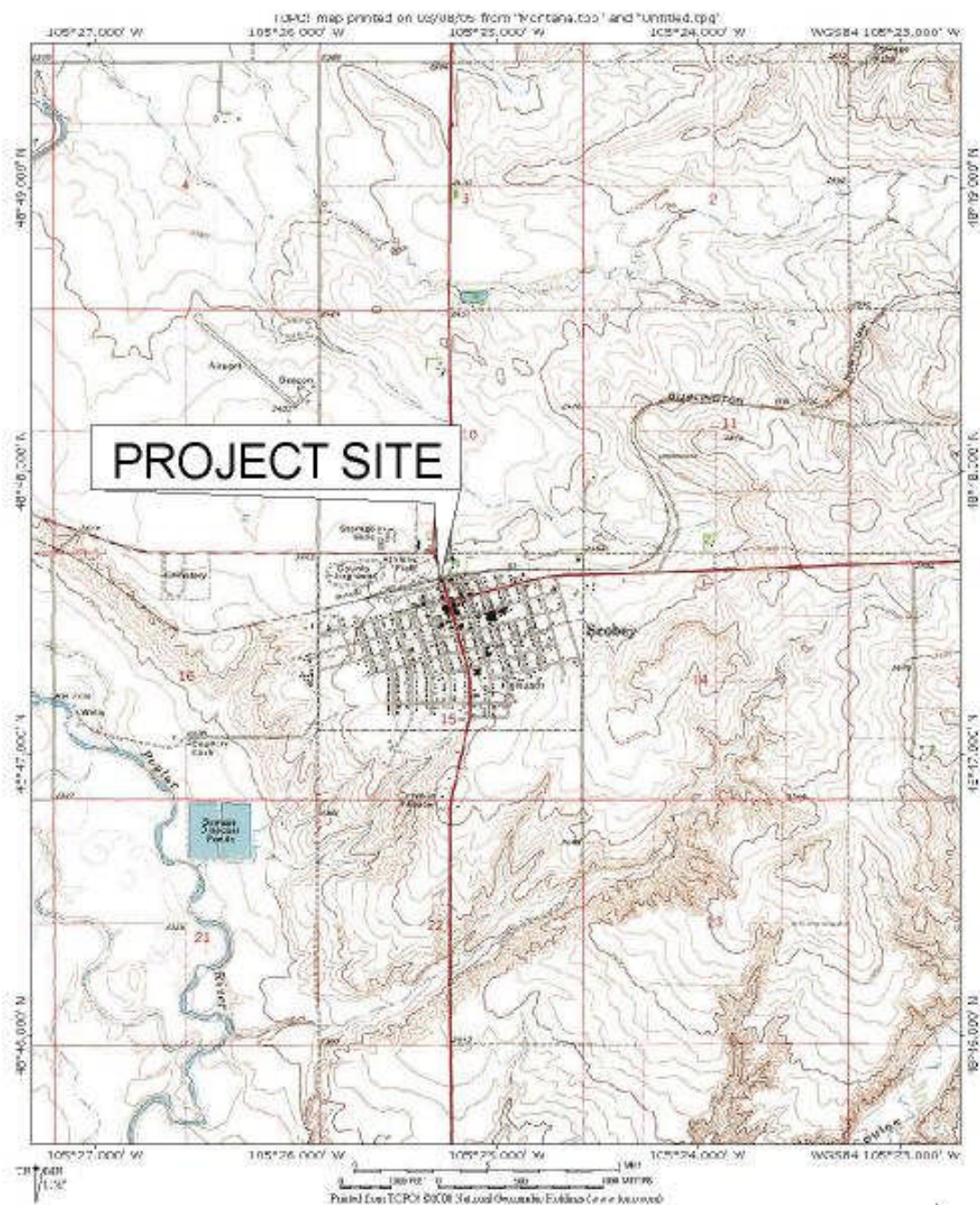
Submitted by
Environmental Resources, LLC

A handwritten signature in black ink, appearing to read "Robert H. Waller". The signature is fluid and cursive, with a long horizontal stroke at the end.

Robert H. Waller, Principal Geologist

Appendix A

Figures



ENVIRONMENTAL RESOURCES
Consulting Geologists and Environmental Scientists

CROMWELL PETROLEUM
SCOBEE, MONTANA
SITE INVESTIGATION
FIGURE 1, REGIONAL SITE LOCATION MAP

