

October 1, 2026

Mr. Donnie McCurry
Environmental Project Officer
Petroleum Tank Cleanup Section
Montana Department of Environmental Quality
P.O. Box 200901
Helena MT 59620-0901

**RE: Remedial Investigation Work Plan for the Petroleum Release at the Rocker Flying J (Town Pump)
122000 Rocker Interchange, Rocker, Silver Bow County, Montana
Facility ID #47-09893 (TID #28472), Petroleum Release #6698, Work Plan #35240**

Owner/ Responsible Party:	Town Pump, Inc. Attn: Paul Townsend PO Box 6000 Butte, MT 59702 paul.townsend@townpump.com	Consultant/ Work Plan Preparer:	Pioneer Technical Services, Inc. Charles L. Peterson, P.G. 2310 Broadwater Ave, Suite 1 Billings, MT 59102 cpeterson@pioneer-technical.com
--	--	--	---

Dear Mr. McCurry:

On behalf of Town Pump, Inc. (Town Pump), Pioneer Technical Services, Inc., prepared the following Remedial Investigation Work Plan and cost estimate for the Rocker Flying J (Town Pump) facility in Rocker, Montana. As requested in correspondence from Montana Department of Environmental Quality dated August 21, 2026, our scope of work and associated proposed costs are outlined in the attached work plan.

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.

Sincerely,

Pioneer Technical Services, Inc.



Charles L Peterson, P.G.
Program Manager

Attachment 1: Figures
Attachment 2: Cost Estimate

cc: Mr. Taylor Bienvenue, G.I.T., Pioneer Technical Services, Inc
Mr. Paul Townsend, Town Pump, Inc., Responsible Party

EXECUTIVE SUMMARY

The purpose of this document is to provide a Remedial Investigation Work Plan (Work Plan #35240) for the Rocker Flying J (Town Pump) facility, Facility ID #47-09893, as requested in electronic correspondence from Montana Department of Environmental Quality (DEQ) dated August 21, 2026 (DEQ, 2026a). The purpose of the proposed work activities is to further determine the extent and magnitude of petroleum impacts to soil at the site from Release #6698 and prepare a Release Closure Plan (RCP) to identify and propose additional work needed to resolve the release, if needed.

A diesel release was discovered on November 3, 2025, during piping replacement activities between the south and east dispenser islands. Soil samples collected in the release area were collected and submitted for laboratory analysis, and the results indicated that petroleum concentrations exist in the piping trench soil above applicable Montana Risk-Based Screening Levels (RBSLs) (DEQ, 2024). The release was assigned Release #6698.

Discussions between DEQ, the responsible party, and Pioneer Technical Services, Inc. (Pioneer) defined the scope of this work plan, which includes installing a series of soil borings in and near the release location. Under Work Plan #35240, Pioneer will advance eight soil borings to a depth of 20 feet.

Details regarding the soil investigation are provided in this work plan. Upon completion of the relevant tasks, Pioneer will prepare a remedial investigation report detailing the results of the soil boring investigation. A RCP will be generated and appended to the remedial investigation report. These activities are described in the following work plan.

1 FACILITY SUMMARY AND CURRENT CONDITIONS

Site Description

The Rocker Town Pump facility is located at 122000 Rocker Interchange, Rocker, Silver Bow County, Montana. The site is in a mixed rural and commercial area. The site is on a level to sloping lot with an elevation of approximately 5,433 feet above mean sea level. The site is bordered by North Browns Gulch Road to the south, across from which is Interstate Highway 90; North Browns Gulch Road to the east, across from which is a gravel pit; and by undeveloped grazing land to the north and west. This facility is served by Rocker public utility services (e.g., potable water and sanitary and storm sewer systems). The location of the site is shown on the Location and Vicinity Map (Figure 1) and Site Map (Figure 2) in Attachment 1.

The site is currently an active, recently reconstructed commercial retail gas and diesel sales facility, convenience store, casino, and tractor-trailer parking area. The central and southern half of the site hosts the infrastructure associated with retail gas and diesel operations. Per information available on the DEQ website (DEQ, 2026b), there are 11 tanks on site:

- One 8,000-gallon diesel underground storage tank (UST), installed in 2012
- One 15,000-gallon gasoline UST, installed in 2012
- One 8,000-gallon dyed diesel UST, installed in 2012
- One 30,000-gallon gasoline UST, installed in 2012
- Three 30,000-gallon diesel USTs, installed in 2012
- One 8,000-gallon gasoline UST, installed in 2025
- One 22,000-gallon gasoline UST, installed in 2025
- One 8,000-gallon gasoline E10 UST, installed in 2025
- One 22,000-gallon diesel, UST installed in 2025

There are currently three dispenser canopies on site. The site is mostly covered by buildings and concrete or asphalt with some grassy landscaped areas.

Facility History and Release Background

Based on readily available aerial photographs, the site has operated as a retail fueling facility since at least 1995. Prior to 2012, the retail fueling infrastructure was constrained to the southwest corner of the site. In 2012, the site was reconstructed and new dispensers, product supply piping, and USTs were installed to the east of the original infrastructure location. On April 16, 2025, during an active fuel construction project, approximately 50 gallons of Diesel #2 were released onto the surrounding asphalt and concrete between the south and east dispenser canopies. The diesel entered the sumps, which eventually filled up and poured onto the parking lot. The fuel all-stop was pressed to stop the flow of fuel at the site. The on-site personnel used floor dry to contain and clean the spill. This release was reported in person to Donnie McCurry at 9:45 on April 17, 2025, at DEQ's Consultants Day, which was taking place at Fairmont Hot Springs. Since there was an open piping excavation for the fuel project, a portion

of Diesel #2 entered the excavation and impacted the soil. A representative of Pioneer Technical Services obtained soil samples from the excavation on April 17, 2025, and additional samples on April 21, 2025. The soil samples showed hydrocarbon exceedances above respective RBSLs. Approximately 20 cubic yards of petroleum impacted soil were removed from the site and disposed of at the Butte-Silver Bow Landfill. A 30-day report was completed on November 3, 2025 (DEQ, 2025). The impacted soil was assigned Release #6698 by DEQ, and the release was deemed eligible for reimbursement by the Petroleum Tank Release Compensation Board on February 11, 2026 (PTRCB, 2026).

In addition to Release #6698, the site has one additional open release (Release #3374) (DEQ, 2026b). This release was confirmed on December 24, 1997. Release #3374 is associated with a gasoline release from a closed in-place 4000-gallon gasoline UST located at the southwest corner of the site. To investigate and monitor Release #3374, 24 monitoring wells have been installed at the site. Remedial actions completed to address Release #3374 include installation and operation of a soil vapor extraction system in 2000, installation of an Accelerated Remediation System in 2006, and application of ChemOx in 2007. As of 2023, ongoing groundwater monitoring was being conducted to further evaluate remedial options (ATC, 2023).

In addition to the two open releases (Releases #6698 and #3374), the subject property has four closed releases (DEQ, 2026b):

- Release #4566 resulted from a malfunctioned or failed component at the product piping or dispenser island. The release was confirmed April 3, 2007, and resolved on June 23, 2007.
- Release #5246 resulted from a spill (not overflow). The release was confirmed October 5, 2017, and resolved on March 7, 2018.
- Release #5301 resulted from overfill (tank) during delivery into a tank fill pipe. Approximately 30 to 40 gallons of Diesel #2 spilled onto the asphalt. The release was confirmed December 14, 2018, and resolved on May 21, 2021.
- Release #6319 resulted from overfill (tank) at the dispenser island. The release was confirmed October 29, 2021, and resolved on March 31, 2022.

There is a closed release (Release #190) at Special Resource Management (Facility ID #47-09421) located on the southeast adjoining property. Release #190 was opened on December 13, 1989, and resolved on June 5, 1991. The cause of the release is listed as the corrosion/deterioration of a tank (DEQ, 2026b).

2 OBJECTIVES OF CORRECTIVE ACTION WORK PLAN

The primary objective of this work plan is to determine the current extent and magnitude of petroleum impacts to soil near Release #6698 and to recommend remediation work required to clean up and resolve the release.

3 PROPOSED SCOPE OF SERVICES

In summary, this work plan involves conducting a subsurface investigation, preparing a remedial investigation report, and creating a RCP upon completion of all activities. This work plan proposes the following actions to achieve these goals:

- Install eight soil borings to determine the extent and magnitude of petroleum contamination in soil.
- Validate all laboratory analytical data using DEQ's Data Validation Summary Form.
- Discuss 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.
- Prepare and submit a remedial investigation report detailing the results of the investigation.
- Prepare a RCP and discuss the results with DEQ's project manager.
- Work plan and reports will be submitted electronically following the Petroleum Tank Cleanup Section submittal requirements.

These investigation activities will be used to delineate the magnitude and extent of the release and, if necessary, develop a path forward to resolve Release #6698. As requested by DEQ, Pioneer proposes the following scope of work:

- Task 1: Project Management and Planning
- Task 2: Soil Boring Installation
- Task 3: Reporting

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

3.1 Task 1 – Project Management and Planning

Task 1 Project Management and Planning work will include:

- Preparing a work plan and cost estimate
- Coordinating utility locates
- Project scheduling
- Preparing a Health and Safety Plan
- Coordinating with subcontractors, owners, and regulators
- Site work preparation

Pioneer will notify 811 for utility locates prior to drilling activities. Pioneer will also contract a private utility locator to mark the power and supply piping lines in the vicinity of the

investigation area. Pioneer field personnel will document the locations of marked underground and aboveground utilities on the figures provided with the final report.

3.2 Task 2 – Soil Boring Installation

The work plan includes advancing eight soil borings. Pioneer is proposing advancing four soil borings in the vicinity of the identified source area and four additional borings downgradient of the source area. The Proposed Soil Boring Locations (Figure 3 in Attachment 1) shows the location of the proposed soil borings.

The anticipated total depth of the monitoring wells is 20 feet bgs. Pioneer will advance the soil borings using Pioneer's direct-push Geoprobe® drill rig and associated equipment to conduct the soil investigation. Using a direct-push drill rig will minimize site disturbance, minimize the amount of investigation-derived waste (cuttings), and allow access for drilling near and around the existing site infrastructure.

Final boring locations will be determined in the field after consulting Montana DEQ's project manager and will be based on accessibility, underground utilities, the presence of unforeseen impedances, or other factors.

A Pioneer geologist will supervise drilling operations and be present to collect, screen, and log soil types. Soil samples will be collected at continuous intervals, and personnel will log the soil type and consistencies and document any visible signs of petroleum impacts. Standard headspace readings will be collected using a photoionization detector (PID) meter. A portion of each soil sample will be placed into an airtight container, labeled, and allowed sufficient time for the hydrocarbons, if present, to volatilize. After the equilibration period, each sample will be scanned with a PID meter by inserting the sampling probe into the headspace of the container. The PID readings from each soil sample collected from each borehole will be reviewed and recorded. The sample with the highest reading or with other signs indicating petroleum impacts will be selected for laboratory analysis. In addition to the sample with highest presumed petroleum impact, analytical samples will also be collected at the top and bottom extents of the petroleum impacted soil. A maximum of three soil samples from each boring and two duplicate samples will be submitted for laboratory analysis for a total of 26 submitted soil samples. The selected samples will be placed into a laboratory-supplied container, labeled, stored on ice, and submitted to Energy Laboratories, Inc. (Energy) in Helena, Montana, for volatile petroleum hydrocarbon and extractable petroleum hydrocarbon (EPH) screen analyses. If the EPH screen result for soil is greater than 200 milligrams per kilogram, the sample will be submitted for EPH fractionation analysis without polycyclic aromatic hydrocarbons. For this work plan, we are assuming that half of the samples will require EPH fractionation. Chain of custody documentation will accompany the samples.

3.3 Task 3 – Reporting

Following advancement of the soil borings, Pioneer will prepare and submit a remedial investigation report according to DEQ's Montana Remedial Investigation Guidance for Petroleum Releases (DEQ, 2017). The report will include:

- Updated site maps illustrating the locations of the borings, underground utilities, and surface features
- Cumulative tables summarizing field data and laboratory analytical data for soil
- Laboratory analytical reports for soil samples
- Logs, field data sheets, and related field data
- Laboratory data validation
- Recommendations relevant for further investigation or remedial action
- Data validation forms
- Newly created RCP

The report will be submitted electronically following the Petroleum Tank Clean-Up Section submittal requirements.

4 COST ESTIMATE

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

5 SCHEDULES

Pioneer proposes to perform and complete the soil borings (Task 2) and reporting (Task 3) during the early spring of 2027. The remedial investigation 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 3 months, and the final report will be issued sometime in the late spring/early summer of 2027.

6 REFERENCES

- ATC, 2023. Well Installation and Groundwater Monitoring Report, Former Flying J Travel Plaza No. 680, 11200 Rocker Interchange & Interstate 90, Butte, Silver Bow County, Montana, MTDEQ FID No. 47-09893; Release ID No. 3374; Work Plan ID No. 34660 Atlas Project No. MT00068004. Atlas Technical LLC. November 13, 2023.
- DEQ, 2017. Montana Remedial Investigation Guidance for Petroleum Releases. Montana Department of Environmental Quality. October 2017. https://deq.mt.gov/files/Land/LUST/Documents/downloadables/RI_Guidance_Draft_3Oct17.pdf.
- DEQ, 2024. Montana Risk-Based Corrective Action Guidance for Petroleum Releases. Montana Department of Environmental Quality. February 2024. https://deq.mt.gov/files/Land/LUST/Documents/RBCA/2024_Update/Final%202024%20RBCA%20Guide/Final%20RBCA%202024%20Update_Compiled%20PDF.pdf.
- DEQ, 2025. 30-Day Release Report for the Rocker Flying J. Prepared by Town Pump Inc. for the Montana Department of Environmental Quality. November 3, 2025.
- DEQ, 2026a. Work Plan Requested to Investigate Petroleum-Contaminated Media at the Rocker Flying J (Town Pump), 122000 Rocker Interchange, Rocker, Silver Bow County, Montana; Facility ID 47-09893, (TID 28472), Release 6698, Work Plan 35240. Montana Department of Environmental Quality. August 21, 2026.
- DEQ, 2026b. Discover DEQ Throughout Montana Web Map. Montana Department of Environmental Quality. Available at <https://gis.mtdeq.us/portal/apps/experiencebuilder/experience/?id=7d21968f0a514f9abb95d4103b6d1cc8&page=Discover-DEQ&views=Permitting-and-Compliance>. Accessed on September 29, 2026.
- PTRCB, 2026. Correspondence Re: Eligibility Determination for Release #6698 at Rocker Flying J, 122000 N Browns Gulch Rd, Butte; Facility #47-09893 (TID 28472). February 11, 2026.

Attachment 1

Figures

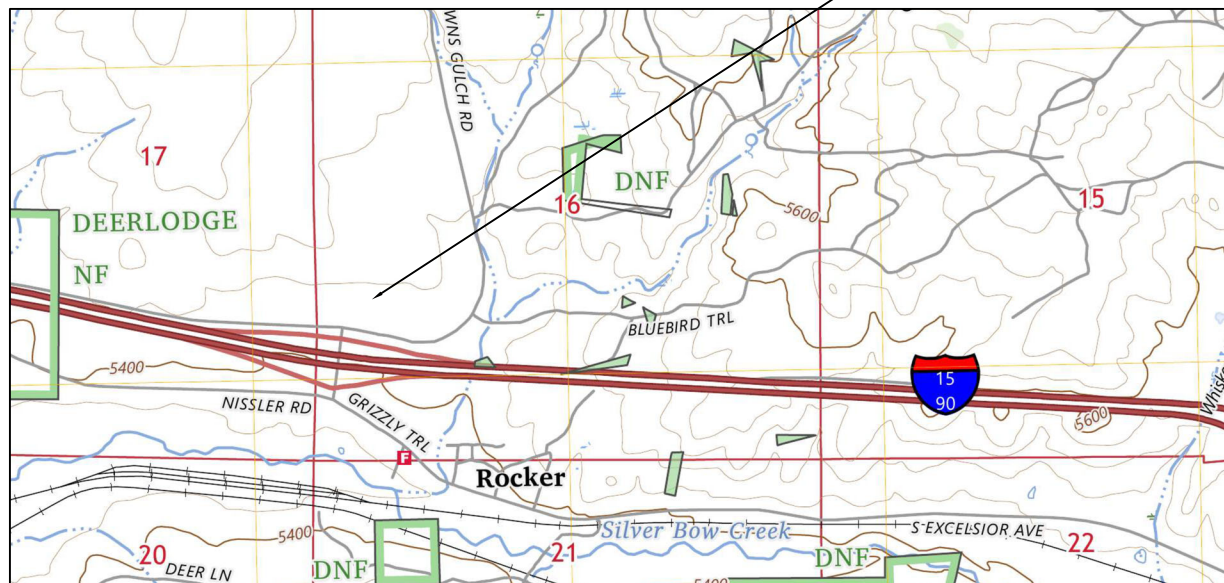
Figure 1. Location and Vicinity Map

Figure 2. Site Map

Figure 3. Proposed Soil Boring Locations

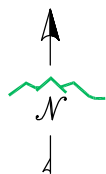


**PROJECT
LOCATION**



SITE VICINITY MAP

SITE: ROCKER FLYING J
122000 ROCKER INTERCHANGE
ROCKER, MT
FACILITY ID #47-09893
RELEASE #6698



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

SCALE IN FEET
0 1000 2000

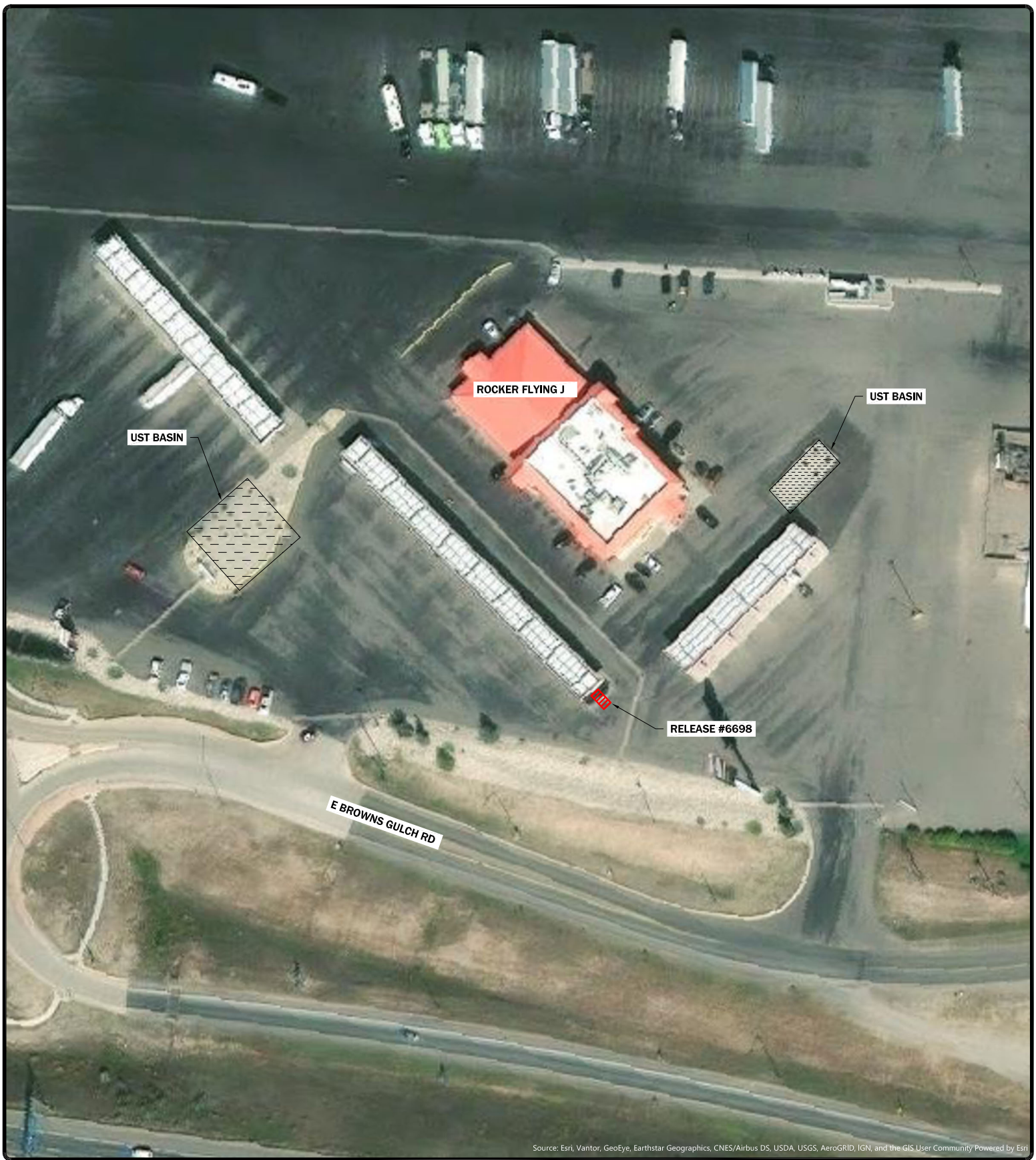


FIGURE 1

**ROCKER FLYING J
LOCATION AND
VICINITY MAP**

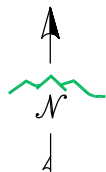
www.pioneer-technical.com
(406) 782-5177

DATE: SEPTEMBER 2026



Source: Esri, Vantor, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community Powered by Esri

SITE: ROCKER FLYING J
122000 ROCKER INTERCHANGE
ROCKER, MT
FACILITY ID #47-09893
RELEASE #6698



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

SCALE IN FEET
0 50 100



FIGURE 2
ROCKER FLYING J
SITE MAP

DATE: SEPTEMBER 2026

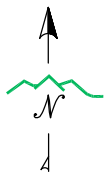


Source: Esri, Vantor, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community Powered by Esri

LEGEND:

- PROPOSED BORING LOCATION

SITE: ROCKER FLYING J
122000 ROCKER INTERCHANGE
ROCKER, MT
FACILITY ID #47-09893
RELEASE #6698



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

SCALE IN FEET
0 15 30



FIGURE 3

ROCKER FLYING J
PROPOSED SOIL
BORING LOCATIONS

DATE: SEPTEMBER 2026

Attachment 2

Cost Estimate