Seeds, Tena (ECY)

From: Seeds, Tena (ECY)
Sent: Tuesday, June 16, 2026 3:47 PM
To: 'Meg McCann'; Kristin Anderson
Cc: Kim Hempel; DeBoer, Chris (ECY)
Subject: RE: Time Oil Bulk Terminal well network update plan

Hi all,

Thanks again for providing the well network update plan and the draft Q1 2026 groundwater data for the Time Oil Bulk Terminal site. Our comments and approvals are provided below. Also, **please wait on decommissioning any wells until after the permit is issued**. We want to be sure that this project will be moving forward and not risk losing any monitoring locations if permitting and construction plans fall through.

Bulk Terminal property

- Ecology approves of decommissioning 01MW40 and installing/monitoring replacement well 01MW12R in the proposed location.
- We agree that there does not appear to be a suitable replacement location for 01MW90 at this time. If concentration trends at 01MW12R appear to increase then we may need to consider installing another well in the CAA-1 area upgradient of 01MW12R in the future.

ASKO property

- Ecology approves of decommissioning the wells that are in (or too close to) the planned footprints of the new structures: 01MW15, 01MW46, 01MW56, 01MW57, 01MW80, 01MW108, MW05, and MW06.
- **For the two intermediate wells (01MW57 and 01MW108), please sample groundwater and analyze for CVOCs to confirm conditions prior to decommissioning.** With everything going on upgradient, Ecology needs to make sure that there is still no issue with the intermediate zone.
- Ecology approves of the three replacement well locations for MW04R, 01MW60R, and 01MW80R and generally agrees with the modifications to the GMP for the ASKO parcel.
- **Please add a fourth replacement monitoring well west of 01MW80R, directly upgradient of MW06 to continue monitoring what appears to be an area of increasing concentrations.**

In addition to the above items, and looking at the proposed post-construction monitoring from the GMP, the location of planned shallow well 01MW113 should be shifted east to be more in line with MW06 and 01MW106. Will this well be installed when the replacement wells will be installed (~Q1 2027)?

Keep me posted about the status of the construction permit and when field activities are scheduled to begin.

Thanks,
Tena

From: Meg McCann <meg.mccann@floydsnider.com>
Sent: Monday, June 1, 2026 3:02 PM
To: Seeds, Tena (ECY) <TSEE461@ECY.WA.GOV>; Kristin Anderson <Kristin.Anderson@floydsnider.com>
Cc: Kim Hempel <khempel@pioneerees.com>
Subject: Re: Time Oil Bulk Terminal well network update plan

External Email

Hi Tena,

I've attached tables with the water elevations and groundwater data from Q1 sampling.

Thanks!

Meg McCann (she/her), Environmental Scientist
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From: Seeds, Tena (ECY) <TSEE461@ECY.WA.GOV>
Sent: Monday, June 1, 2026 2:33 PM
To: Kristin Anderson <Kristin.Anderson@floydsnider.com>
Cc: Kim Hempel <khempel@pioneerees.com>; Meg McCann <meg.mccann@floydsnider.com>
Subject: RE: Time Oil Bulk Terminal well network update plan

Hi Kristin,

Thanks for sending this. Can you send me the data from the Q1 sampling? Ecology would like to look at that along with the proposed well network changes before giving a final response.

Tena

From: Kristin Anderson <Kristin.Anderson@floydsnider.com>
Sent: Friday, May 29, 2026 3:03 PM
To: Seeds, Tena (ECY) <TSEE461@ECY.WA.GOV>
Cc: Kim Hempel <khempel@pioneerees.com>; Meg McCann <meg.mccann@floydsnider.com>
Subject: Time Oil Bulk Terminal well network update plan

External Email

Tena, Thanks again for meeting with us to review the redevelopment and well decommission/replacement plan for the Time Oil Bulk Terminal site. The markup we discussed yesterday is attached and summarized below. The relevant GMP well network figures are also attached for reference.

Bulk Terminal property

- Q1 2026 results show continued progress toward CULs for TPH and benzene at the CPOC
- A planned building on this parcel (building C) will be situated over most of CAA-1 and will also extend west of CAA-1
- 01MW40 (beneath building footprint) will be decommissioned as anticipated in the GMP
- The available area for 01MW90R may be too far west of CAA-1 to obtain useful attenuation data; 01MW12R to the north of CAA-1 is proposed as an appropriate on-property replacement to monitor attenuation.

ASKO property

- Q1 results show ongoing source control issues for TCE. TCE was also newly detected at 01MW106 downgradient of the CPOC (well was last monitored during the RI)
- A planned building on this parcel (building A) and stormwater detention structure will be situated over most of CAA-4
- 01MW15, 01MW46, 01MW57, 01MW80, 01MW108 and MW05 (beneath building footprint) will be decommissioned as anticipated in the GMP. 01MW56 and MW06 are also beneath or too close to planned structures and require decommissioning.
- Two replacement performance wells are proposed on-property upgradient of the CPOC, consistent with the GMP. After Ecology discussion last week and observed results at 01MW106, these wells are shifted west to intercept the current TCE plume and include 01MW80R and MW04R.
- Upgradient performance well 01MW60R will be installed consistent with the GMP
- Planned performance well 01MW45R is beneath a building footprint. The monitoring purpose of this well, which is intended to intercept potential TCE flowing from upgradient, will be served by 01MW60R
- Planned contingency performance well 01MW46R is also beneath a building footprint. 01MW46 is in a likely stagnation area adjacent to the ISS monolith and not a priority location for continued performance monitoring
- Data from new wells MW04R and 01MW60R will be assessed to determine whether additional contingency monitoring is needed, in coordination with Ecology

Our planned scope for Q3 2026 includes regular semiannual monitoring per the GMP and 2025 GMAR, including sampling ROW well 01MW87 which was delayed from Q1. During this event, we will also sample 01MW106 to verify Q1 TCE impacts, assess the condition of 02MW14, and redevelop if 02MW14 remains intact. If the results of the Q3 sampling at 01MW106 confirm the TCE exceedance observed in Q1 2026, we will sample the downgradient 02MW14 (assuming it is a viable well).

Following monitoring, we plan to decommission wells including the ROW scope delayed from Q1 and the construction preparation scope described above. We are currently hoping to install replacement wells in Q1 2027 following earthwork.

Thanks!

Kristin Anderson, LHG (Associate Principal, Senior Geologist (she/her)
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