

**Wiepking Fullerton Energy LLC
Ma State TB
Spill Event Remediation Plan of Action
12-1-2024**

Location Details:

Operator Name: Wiepking Fullerton Energy LLC

Operator Number: 96340

Location Name: Ma State Tank Battery

Lat/Long: 39.162180, -103.619250

Remediation Project #: 33007

Summary:

The initial spill at the Ma State Tank battery occurred on June 27, 2023. Location was controlled and spill size cleaned and controlled. (4) different sampling events across (3) different excavation events were scheduled and occurred to address the cleanup. The summary of the events is below. The size of the area, and level of contamination continues to decrease with each excavation event. A follow up event is scheduled for early spring when the location is accessible after winter storm conditions reside.

Remediation to date:

First Excavation/Sampling:

Date: 7/20/2023

Summary: Immediately post spill, location and contamination was secured and cleaned. An excavation attempt was made to clean any contaminated soil. Environmental consulting group took soil samples to address spill. All (7) locations came back with elevated levels above ECOM Table 915-1 standards. Additional excavation scheduled.

Sample locations:

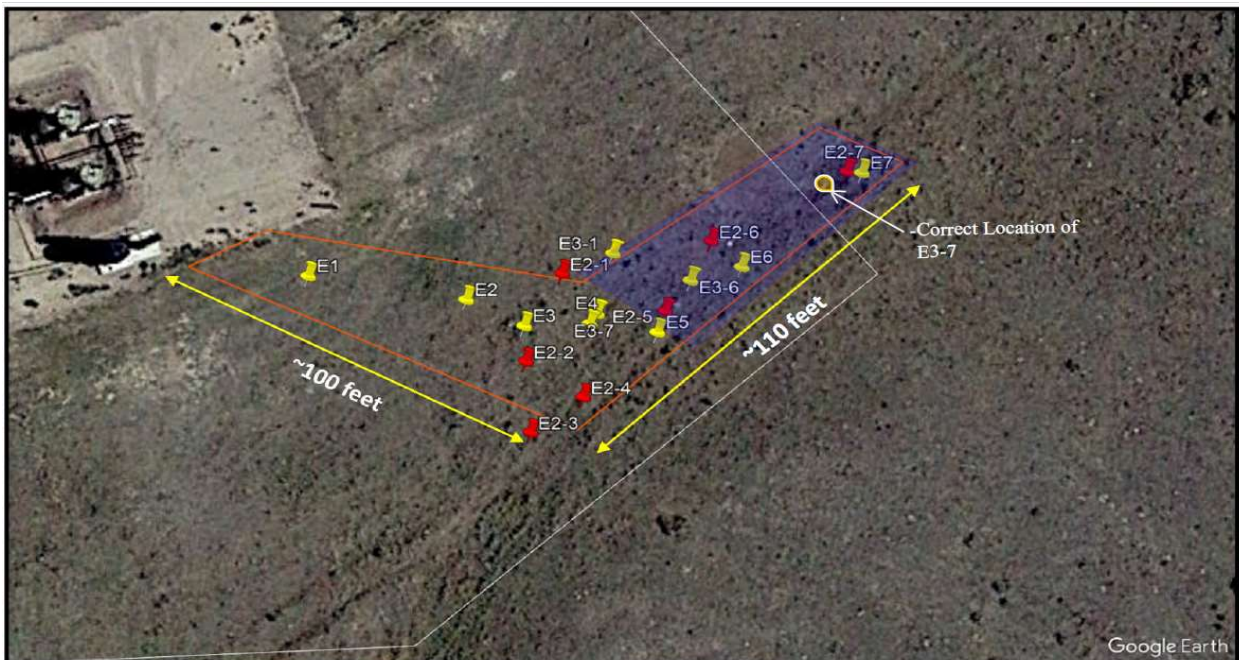


Second & Third Excavation/Sampling:

Date: 08/09/2023 and 09/28/2023

Summary: Follow up excavation events occurring on both 8/9/23 and 9/28/2023 based off initial testing. Locations E2-5, E2-6 and E2-7 showed elevated levels of contamination on the first sample. Locations E3-1, E3-6 and E3-7 showed elevated levels of contamination on the second sampling event. An additional excavation event scheduled.

Sample locations:

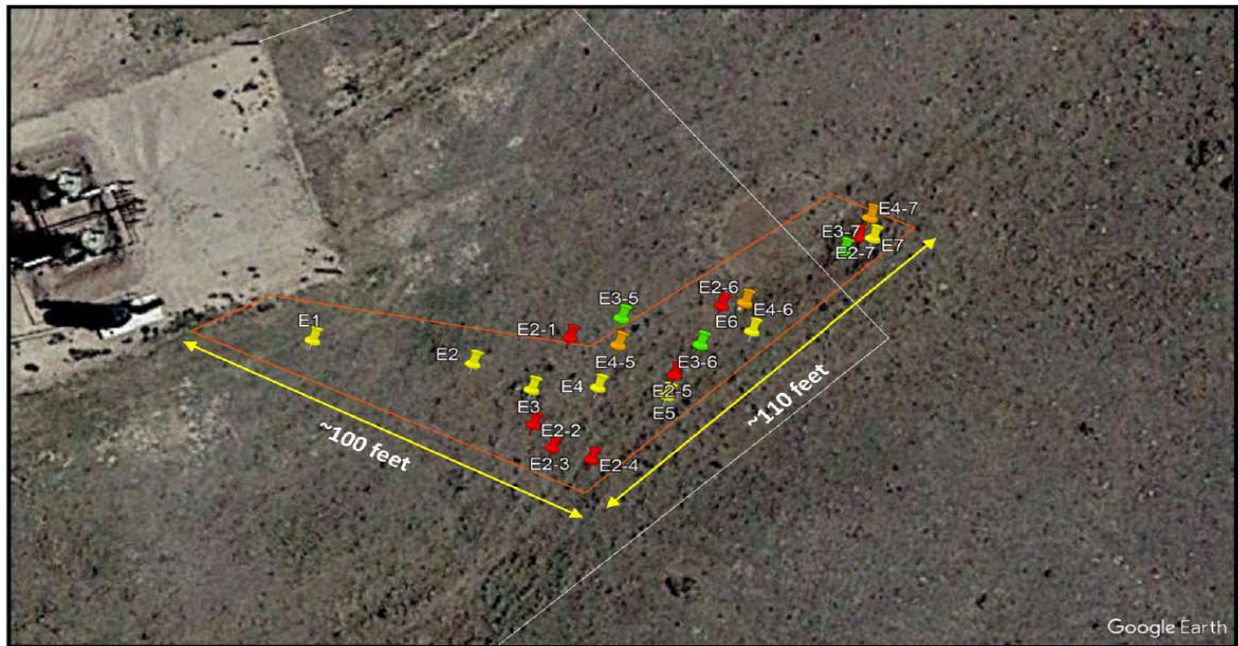


Fourth Excavation/Sampling:

Date: 11/21/2024

Summary: Additional excavation event occurred at localized contamination locations on 12/19/2024. Locations E4-5, E4-6 and E4-7 showed elevated contamination levels. However, contamination levels were decreased from previous excavation events.

Sample locations:



Contaminated Samples Summary:

Sample Number	Date Sampled	GRO/DRO/ORO (mg/kg)	BTEX/TMBs (mg/kg)	pH (su)	EC (mmhos/cm)	SAR	Boron (mg/L)
E1	7/5/2023	GRO: 0.686 DRO: 306 ORO: 308	ND	7.27	25.1	12.4	1.05
E2	7/5/2023	GRO: 0.374 DRO: ND ORO: ND	ND	7.62	23.2	7.07	0.370
E3	7/5/2023	GRO: 3.92 DRO: 547 ORO: 443	<COGCC Table 915-1 Concentrations	6.82	9.51	10.5	0.569
E4	7/5/2023	GRO: 75.2 DRO: 2,190 ORO: 1,540	<COGCC Table 915-1 Concentrations	6.35	28.7	21.2	0.784
E5	7/5/2023	GRO: 3.16 DRO: 285 ORO: 331	<COGCC Table 915-1 Concentrations	6.09	47.5	34.1	4.12
E6	7/5/2023	GRO: 5.09 DRO: 1,350 ORO: 1,150	<COGCC Table 915-1 Concentrations	6.55	40.5	28.3	2.65
E7	7/5/2023	GRO: 0.810 DRO: ND ORO: ND	ND	5.55	5.18	5.03	ND
E2-1	8/1/2023	GRO: ND DRO: 94.2 ORO: 127	ND	8.05	2.97	2.97	0.342
E2-2	8/1/2023	ND	ND	7.14	0.705	0.607	ND
E2-3	8/1/2023	ND	ND	7.40	0.722	4.28	ND
E2-4	8/1/2023	ND	ND	7.04	1.86	3.92	0.137
E2-5	8/1/2023	ND	ND	6.75	6.72	11.5	0.219
E2-6	8/1/2023	GRO: ND DRO: 313 ORO: 404	ND	6.70	12.0	17.4	1.03
E2-7	8/1/2023	GRO: ND DRO: 61.9 ORO: ND	<COGCC Table 915-1 Concentrations	6.25	5.64	6.52	ND
BG-1	NA			6.58	0.381	0.865	ND
BG-2				6.84	0.545	0.243	0.287
BG-3				5.52	0.172	0.578	ND
E3-5	9/26/2023	ND	ND	7.14	1.34	9.78	ND
E3-6	9/26/2023	ND	ND	5.90	17.8	15.8	0.319
E3-7	9/26/2023	ND	ND	6.66	0.684	9.25	0.0268
E4-5	11/21/23	GRO: 0.269 DRO: ND ORO: ND	ND	6.71	0.380	6.71	ND
E4-6	11/21/23	ND	ND	6.04	9.25	11.30	ND
E4-7	11/21/23	ND	ND	5.94	2.72	6.51	ND
Table 915-1 Concentrations		TPH: 500	1,2,4-Trimethylbenzene: 30 1,3,5-Trimethylbenzene: 27 B: 1.2 T: 490 E: 5.8 Total Xylenes: 58	6-8.3	<4	<6	2

Remediation plan forward:

Wiepking Fullerton plans an updated excavation and soil sampling event in the later winter/early spring of 2024. Soil excavation will be aimed at locations (5), (6) and (7), with In-Situ sampling occurring post excavation, as well as updated background samples. All (3) locations are close to being within ECMC table 915-1 standards and will be excavated until below the threshold.