



April 26, 2024

Mr. Peter Campbell
Alaska Department of Environmental Conservation
43335 Kalifornsky Beach Rd #11
Soldotna, AK 99669

RE: Kenai Pipeline Company 2022 Groundwater Monitoring Report ADEC Report Approval,
Request for Work Plan

Dear Mr. Campbell:

Trihydro is submitting this 2024 Tank 2400 Pipeline Release Monitoring and Well Installation Work Plan for the Tesoro Alaska Company, LLC (Tesoro) Kenai Pipe Line Terminal (KPL) located in Kenai, Alaska. This letter work plan (Work Plan) was prepared by Trihydro Corporation (Trihydro) on behalf of Marathon Petroleum Company (Marathon) in response to the Alaska Department of Environmental Conservation (ADEC) letter “Kenai Pipeline Company 2022 Groundwater Monitoring Report ADEC Report Approval, Request for Work Plan” dated March 1, 2024. ADEC requested that Marathon perform follow-up activities to further assess impacts to the surface water and the perched aquifer from the Tank 2400 pipeline release in December 2016.

Surface Water Monitoring

Trihydro plans to gauge surface water elevations in all three Ponds (Pond 1, Pond 2, and Pond 3) and perform supplemental sampling for total aromatic hydrocarbons (TAH) and total aqueous hydrocarbons (TAqH) in Pond 2 and Pond 3 (Figure 1). Surface water sampling activities are planned to coincide with the Annual Monitoring performed in July of 2024. Surface water elevation measurements and analytical data will be included in the 2024 Groundwater Monitoring Report, to be submitted in March 2025. The continuation of surface water monitoring will be evaluated and proposed at this time.

In addition, Pond surface water elevations will be added to the 2024 perched aquifer potentiometric surface map to assist in establishing flow characteristics within the perched aquifer and how pond water may or may not interact with the perched aquifer.

Well Installation

Trihydro plans to install at least one temporary monitoring well (TMW-15) within the perched aquifer to fill the gap in the monitoring well network between Tank 2400 and Pond 2. The proposed location of TMW-15 is presented on Figure 1. As shown in Figure 1, there is above-ground and below-ground infrastructure in the area that may limit or restrict the final location of TMW-15. The location will likely need to be adjusted in the field based on field conditions and possible underground utility obstructions. If



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site constraints allow and Trihydro feels additional data gaps could be filled, an additional temporary monitoring well may be installed in a possible gap not filled by TMW-15.

The perched aquifer is located approximately 5-7 feet below the ground surface (bgs). Well installation will be completed using a combination of vac-truck pre-clearing and manual drive-point installation methods. The borehole will be pre-clear to approximately 8-10 feet bgs and the well screen/casing will be manually installed above the confining layer.

Well installation(s) will be completed according to the following general details:

Well Casing

- 2-inch schedule 40 PVC well casing
- Drive-Point Tip
- 2-foot 0.02-slot well screen with a sand pre-pack (10/20 silica sand)

Well Annulus

- 10/20 Silica sand – bottom of well to 2-feet above screen
- Hydrated Bentonite chips – top of silica sand to 4-feet below ground surface
- Compacted backfill to match existing – top of bentonite mix to surface (mound to drain)

Following installation, the wells will be developed using surging and pumping techniques, following ADEC Field Sampling Guidance (January 2022) to remove fine sediments from the filter pack and well interior.

If analytical results at TMW-15 are non-detect and/or the well location does not provide adequate information, a work plan to decommission TMW-15 will be submitted to ADEC for approval by December 2025.

Waste Management

Soil will be screened in accordance with the ADEC Field Sampling Guidance using a photoionization detector (PID). Soil screened with heated head space PID readings above 15 ppm will be collected in 55-gallon drums, labeled, sealed, and stored on-site. After containers reach capacity, Marathon will appropriately dispose of waste material. Soil from above the water table that is excavated during recovery well removal, as well as soil determined to be clean shall be staged onsite to be used for backfilling and regrading.



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Well Surface Completions

Well surface completions will match existing well completions. Typically, KPL monitoring wells are completed with an aboveground steel casing, but if needed because of location in a traffic area, a surface mount completion will be utilized.

Schedule

The proposed schedule for 2024 surface water monitoring and well installation activities is:

- July 2024 – Collect surface water elevations and analytical data from Pond 1, Pond 2, and Pond 3.
- July-August 2024 – TMW-15 Installation and analytical sampling.
- March 2025 – Summarize and submit surface water monitoring data and well installation activities as part of the KPL 2024 Groundwater Monitoring Report.

If you have questions or comments, please contact me at (907) 262-2315 or bforce@trihydro.com.

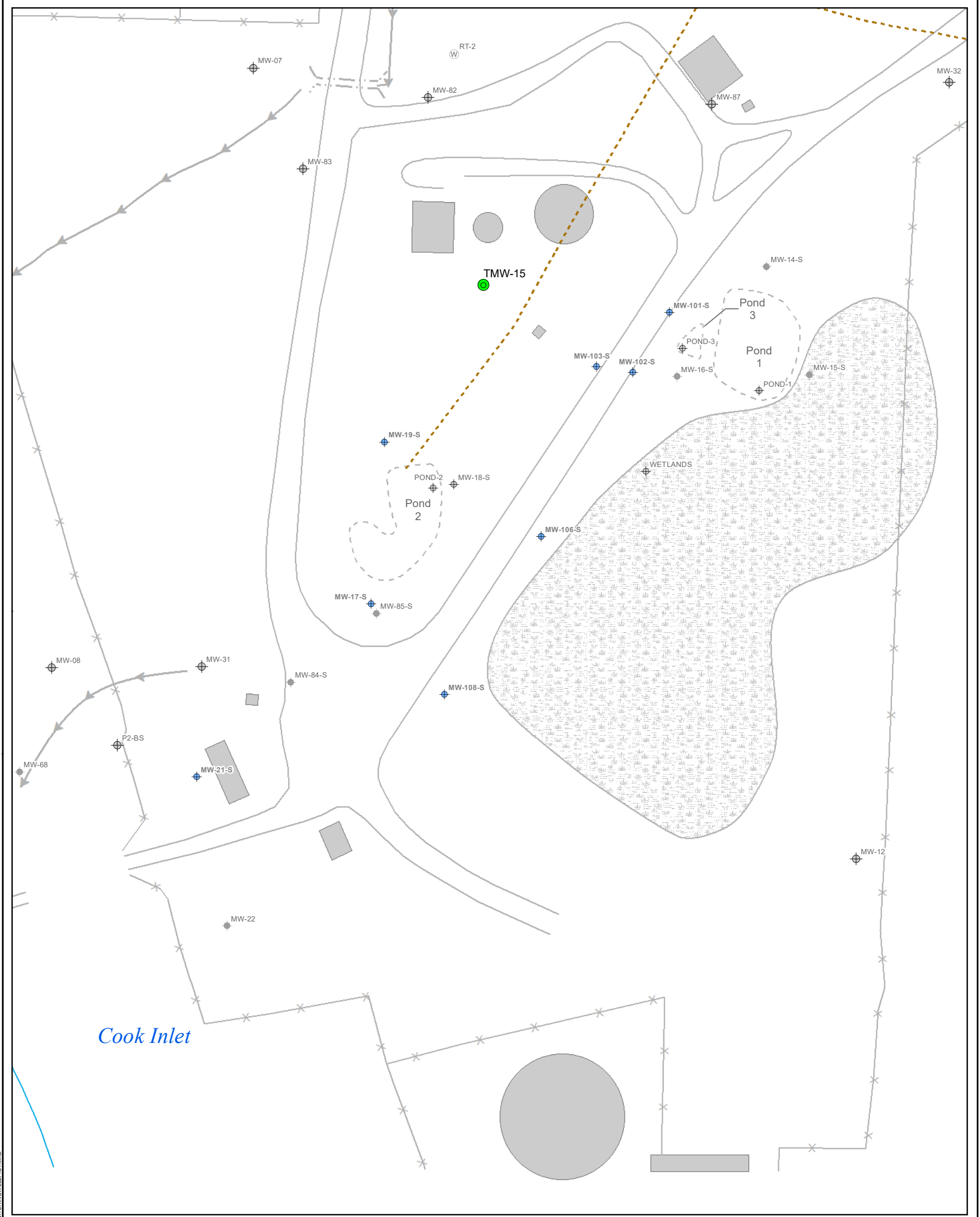
Sincerely,
Trihydro Corporation

A handwritten signature in blue ink that reads "Brianna Force".

Brianna Force
Project Geologist/Project Manager

TESAL-024-0005

Attachment

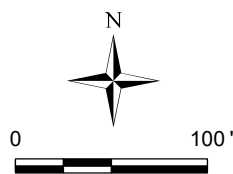


EXPLANATION

- | | | | |
|---------------|---|------------------|------------------------------------|
| MW-103-S | MONITORING WELL AND DESIGNATION | [Gray rectangle] | BUILDING, TANK, OR OTHER STRUCTURE |
| MW-14S | ABANDONED OR DECOMMISSIONED WELL | [Dashed line] | DETENTION POND |
| TMW-15 | PROPOSED TEMPORARY MONITORING WELL LOCATION | [Stippled area] | SWAMP AREA |
| [Blue line] | SHORELINE | | |
| [Dotted line] | CREEK | | |
| [Arrow] | DITCH SHOWING FLOW DIRECTION | | |
| [X symbol] | FENCE | | |

NOTES:

1. SITE FEATURES ARE APPROXIMATE.
2. WELL DESIGNATIONS THAT END IN -S DENOTE A PERCHED AQUIFER MONITORING WELL.
3. WELLS NOT MEASURED IN THIS EVENT ARE SHOWN IN GRAY COLOR.



<p>1252 Commerce Drive Laramie, WY 82070 www.trihydro.com (P) 307/745.7474 (F) 307/745.7729</p>	<p>FIGURE 1</p> <p>PROPOSED TEMPORARY MONITORING WELL LOCATION</p>			
	<p>2024 TANK 2400 PIPELINE RELEASE MONITORING AND WELL INSTALLATION WORK PLAN</p>			
<p>Drawn By: DH</p>	<p>Checked By: BF</p>	<p>Scale: 1" = 100'</p>	<p>Date: 4/26/24</p>	<p>File: KPL_TempMonitoringWellFig1.mxd</p>

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