

CCR Groundwater Monitoring System Report

Antelope Valley Station Beulah, North Dakota

Basin Electric Power Cooperative

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List of Acronyms

amsl	above mean sea level
ANOVA	analysis of variance
AVS	Antelope Valley Station
Basin	Basin Electric Power Cooperative
bgs	below ground surface
CCR	Coal Combustion Residuals
CFR	Code of Federal Regulations
cm/sec	centimeters per second
EPA	United States Environmental Protection Agency
FGD	Flue Gas Desulfurization
ft	feet
gpm	gallons per minute
GWPS	Groundwater Protection Standards
MW	megawatt
PVC	polyvinyl chloride
RCRA	Resource Conservation and Recovery Act

Monitoring System Certification

Basin Electric Power Cooperative Antelope Valley Station CCR Unit: Ash Landfill

AECOM ("Consultant") has been retained by Basin Electric Power Cooperative to prepare the following assessment to determine whether the groundwater monitoring system at the coal combustion residuals ("CCR") landfill at the Antelope Valley Station has been designed and constructed to meet the requirements set out in 40 Code of Federal \$Regulations (CFR) § 257.91.

BACKGROUND

Pursuant to 40 CFR § 257.90(b), owners and operators of new and existing CCR landfills, and new and existing CCR surface impoundments, and all lateral expansions of a CCR unit must install a groundwater monitoring system. 40 CFR § 257.91 requires owners and operators of a CCR unit to install a groundwater monitoring system that, relying on site-specific technical information, consists of a sufficient number of wells, installed at appropriate locations and depths, to yield groundwater samples from the uppermost aquifer that accurately represent the quality of background groundwater that has not been affected by leakage from the CCR unit and accurately represent the quality of groundwater passing the waste boundary of the CCR unit.

Pursuant to 40 CFR § 257.91(f), the owner or operator must obtain a certification from a qualified professional engineer stating that the groundwater monitoring system has been designed and constructed to meet the requirements of 40 CFR § 257.91, including the performance standards specified in 40 CFR § 257.91(a), based on the site-specific information specified in 40 CFR § 257.91(b). If the groundwater monitoring system includes only the minimum number of downgradient monitoring wells specified in 40 CFR § 257.91(c)(1) (three wells), the certification must document the basis supporting this determination.

In support of Consultant's assessment, Consultant evaluated the groundwater monitoring system for the abovereferenced CCR units to determine that sufficient information is available to make the certification required under 40 CFR § 257.91(f).

LIMITATIONS

The signature of Consultant's authorized representative on this document represents that to the best of Consultant's knowledge, information, and belief in the exercise of its professional judgment, it is Consultant's professional opinion that the aforementioned information is accurate as of the date of such signature. Any opinion or decisions by Consultant are made on the basis of Consultant's experience, qualifications, and professional judgment and are not to be construed as warranties or guaranties. In addition, opinions relating to environmental, geologic, and geotechnical conditions or other estimates are based on available data, and actual conditions may vary from those encountered at the times and locations where data are obtained, despite the use of due care.

CERTIFICATION

I, Daryl R. Beck, PE, being a Registered Professional Engineer in the State of North Dakota, certify to the best of my knowledge, information, and belief, that the groundwater monitoring system(s) for the CCR unit(s) that is the subject of this certification has been designed and constructed to meet the requirements of 40 CFR § 257.91, and that this certification is true and correct and has been prepared in accordance with generally accepted good engineering practices.

SIGNATURE: _____ Daryl R. Beck, PE-10696 Senior Project Engineer DATE: October 17, 2017

Statistical Method Certification

Basin Electric Power Cooperative Antelope Valley Station CCR Unit: Ash Landfill

AECOM ("Consultant") has been retained by Basin Electric Power Cooperative to prepare the following assessment of whether the statistical method(s) selected for the evaluation of groundwater monitoring data for the above-referenced coal combustion residuals ("CCR") surface impoundments and landfill meets the requirements set out in 40 Code of Federal Regulations (CFR) § 257.93(f)(6).

BACKGROUND

Pursuant to 40 CFR § 257.90(b), owners and operators of new and existing CCR landfills, and new and existing CCR surface impoundments, and all lateral expansions of a CCR unit must install the groundwater monitoring system. 40 CFR § 257.91 requires owners and operators of a CCR unit to install a groundwater monitoring system that, relying on site-specific technical information, consists of a sufficient number of wells, installed at appropriate locations and depths, to yield groundwater samples from the uppermost aquifer that accurately represent the quality of background groundwater that has not been affected by leakage from the CCR unit and accurately represent the quality of groundwater passing the waste boundary of the CCR unit.

Pursuant to 40 CFR § 257.93(f), the owner or operator of the CCR unit must select one of the statistical methods specified in paragraphs (f)(1) through (5) of this section to be used in evaluating groundwater monitoring data for each specified constituent. The statistical test chosen shall be conducted separately for each constituent in each monitoring well, and shall comply with the performance standards specified in 40 CFR § 257.93(g). Per 40 CFR § 257.93(f)(6), the owner or operator must obtain a certification from a qualified professional engineer stating that the statistical method for the evaluation of groundwater monitoring data for the groundwater monitoring system meets the requirements of 40 CFR § 257.93(f)(6), including the performance standards specified in 40 CFR § 257.91(a), based on the site-specific information specified in 40 CFR § 257.91(b).

LIMITATIONS

The signature of Consultant's authorized representative on this document represents that to the best of Consultant's knowledge, information, and belief in the exercise of its professional judgment, it is Consultant's professional opinion that the aforementioned information is accurate as of the date of such signature. Any opinion or decisions by Consultant are made on the basis of Consultant's experience, qualifications, and professional judgment and are not to be construed as warranties or guaranties. In addition, opinions relating to environmental, geologic, and geotechnical conditions or other estimates are based on available data, and actual conditions may vary from those encountered at the times and locations where data are obtained, despite the use of due care.

CERTIFICATION

I, Daryl R. Beck, PE, being a Registered Professional Engineer in the State of North Dakota, certify to the best of my knowledge, information, and belief, that the statistical method selected for the evaluation of groundwater monitoring data for the groundwater monitoring system for the CCR units that are the subject of this certification is appropriate for evaluating the groundwater monitoring data for the CCR management area comply with the performance standards specified in 40 CFR § 257.93(g), and that this certification is true and correct and has been prepared in accordance with generally accepted good engineering practices.

Sm/

SIGNATURE: _

Daryl R. Beck, PE-10696 Senior Project Engineer DATE: October 17, 2017

1. Introduction

On behalf of Basin Electric Power Cooperative, (Basin), AECOM prepared this report documenting the Coal Combustion Residuals (CCR) groundwater monitoring system for the CCR units at Basin's Antelope Valley Station (AVS) located in Beulah, North Dakota (see **Figure 1-1**). This report addresses the requirement under Chapter 40 Code of Federal Regulations (CFR) Part 257.105(h) to provide in the Operating Record, as it becomes available, "documentation of the design, installation, development, and decommissioning of any monitoring wells, piezometers and other measurement, sampling, and analytical devices..."

Pursuant to 40 CFR § 257.90(b)(1), by October 17, 2017, an owner and operator of a CCR unit must install a groundwater monitoring system that meets the requirements of 40 CFR § 257.91. The groundwater monitoring system must meet the CCR Rule's performance standard, which requires the system to consist of a sufficient number of wells, installed at appropriate locations and depths, to yield groundwater samples from the uppermost aquifer that accurately represent the quality of:

- 1. Background groundwater that has not been affected by leakage from a CCR unit; and
- 2. Groundwater passing the waste boundary of the CCR unit—the downgradient monitoring system must be installed at the waste boundary that ensures detection of groundwater contamination in the uppermost aquifer and must monitor all potential contaminant pathways.

This report summarizes the procedures and field activities associated with drilling and installation of monitoring wells that comprise the CCR monitoring network at AVS, as well as the results of groundwater samples collected from monitoring of monitoring wells to evaluate the network against the requirements of the Final Rule.

This report is organized as follows:

- Chapter 1 includes a brief introduction to this report;
- Chapter 2 provides a brief background with historical information concerning AVS and associated CCR units;
- Chapter 3 describes the geological and hydrogeological setting of AVS;
- Chapter 4 describes selection and installation of the AVS CCR monitoring well network for all CCR units at AVS, including the drilling and installation of monitoring wells to supplement existing monitoring wells at AVS;
- Chapter 5 presents an evaluation of the AVS CCR monitoring compared to the requirements of the CCR Rule;
- Chapter 6 describes the statistical methodology that will be used to evaluate CCR groundwater monitoring data;
- Chapter 7 describes the professional limitations that apply to this report; and
- Chapter 8 lists the references cited in this report.

Certifications pertaining to the design and construction of the groundwater monitoring system and selection of the statistical method for evaluating data acquired using the groundwater monitoring system, are presented before Chapter 1 in the Monitoring Well Certification Section.

2. Background

AVS is a coal-based generating station located in Mercer County near the city of Beulah, North Dakota. It has a total power output capacity of 669 megawatts (MW) from two coal-based units:

- Unit 1, with a rating of 450 net MW, which began operating in 1984; and
- Unit 2, with a rating of 450 net MW, which began operating in 1986.

CCR from these units is disposed at AVS in the Section 7 Landfill 0160 located approximately 1 mile northeast of the generating units and office complex (**Figure 1-1**). This CCR landfill was permitted for solid waste disposal in 1995. Construction was completed in 1996, with ash placement beginning the same year. The landfill is situated in an area mine spoils identified as the Couteau Properties Freedom Mine. Documentation provided by Basin reports that in 2014, the landfill received 812,304 tons of waste including fly ash, flue gas desulfurization (FGD) waste and a minor contribution of solid debris (~702 tons). The landfill is currently accessed via a haul road running generally east to west along the south side of the landfill.

Due to the presence of CCR, the AVS landfill is regulated by the CCR Rule promulgated by the U.S. Environmental Protection Agency (EPA) under Chapter 40 Code of Federal Regulations (CFR) Part 257, Subtitle D of the Resource Conservation and Recovery Act (RCRA). The CCR Rule establishes requirements for existing CCR landfills and surface impoundments, including groundwater monitoring and corrective action. The groundwater monitoring provisions of the CCR Rule require the installation of a system of monitoring wells, the specification of procedures for sampling these wells, and analysis of the resulting data to detect the presence of hazardous constituents. A corrective action process is required in the event that hazardous constituents are detected above background concentrations at levels exceeding groundwater protection standards.

3. Geological and Hydrogeological Setting

The geological and hydrogeological setting is important to understanding the groundwater environment in the vicinity of the AVS. The geology underlying the site includes mine spoils underlain by the Sentinel Butte Formation. This formation is comprised of continental deposits in excess of 1,000 feet of dense clay, weakly cemented sandstone, mudstone and lignite.

Precipitation supplies surface water to perennial and ephemeral streams that flow generally east toward the Beulah Trench then draining north towards Lake Sakakawea. Groundwater is recharged primarily through regional infiltration of melt water in the spring.

The base of the AVS CCR Landfill is underlain by 115 to 200 feet (approximately) of clay rich mine spoil that overlies the Lower Sentinel Butte Formation. The Sentinel Butte is comprised primarily of dense clay with trace very fine sand and beds of lignite typically ranging from 6- to 9-feet thick at the site. The 2016 AECOM drilling investigation did not penetrate to depths great enough to expose the lower portions of the Sentinel Butte.

Water precipitated in this environment is anticipated to move primarily as surface water runoff with infiltration typically limited to the upper few feet. The uppermost aquifer is found within the 6- to 9-foot unmined lignite bed located at depths ranging roughly from 180 to 260 feet below ground surface (ft, bgs). The potentiometric surface of the uppermost groundwater present within the lignite is approximately 1893 feet above mean sea level (ft, amsl) in the western portion of the Landfill facility sloping generally east to 1880 ft., amsl on the eastern side of the landfill. The hydraulic gradient for the uppermost aquifer is locally controlled by site-specific composition of the lignite with hydraulic conductivity typically ranging from 10^{-5} centimeters per second (cm/s) to 10^{-9} cm/s.

4. Monitoring Well System Selection and Installation

A monitoring well system has been established at AVS to comply with the requirements of the EPA CCR Rule published in the Federal Register on April 17, 2015.

Monitoring Well Installation in 2016

Seven monitoring wells were installed at AVS during the summer and winter of 2016 to target the uppermost aquifer in the vicinity of the AVS CCR units. Monitoring wells MW-14(S) through MW-19(S) were completed between May 18, 2016 and June 7, 2016. After the first baseline sampling event, MW-14(S) was not yielding significant water and MW-20(S) was installed to supplement the downgradient wells (**Figure 4-1**). The monitoring well locations were selected to evaluate the direction of groundwater flow in the vicinity of the AVS CCR units, and provide a minimum of three downgradient monitoring wells and one background monitoring well to satisfy the CCR Rule requirements.

Monitoring well installation involved drilling and soil sampling, well construction and development, and aquifer testing, as described below.

Drilling and Well Construction

Subsurface utilities in the vicinity of each planned monitoring well installation location were identified by utility representatives. The uppermost 5 feet of each boring was excavated using a hand-auger as an additional precaution against utility strikes.

Monitoring well drilling and construction occurred in two phases between May 17, 2016 through June 7, 2016 and November 7 through November 17, 2016. The monitoring wells were installed using sonic drilling methods. Soil cores recovered during drilling operations were photographed and logged by AECOM geologists. Boring logs are included in **Appendix A**. Each boring was drilled approximately 5 feet below the base of the lignite or roughly equivalent to 10 to 15 feet below the elevation at which groundwater was anticipated.

Monitoring wells MW-14(s) through MW-19(s) were constructed of 2-inch-diameter, schedule 80 polyvinyl chloride (PVC) riser pipe and slotted screen. One additional monitoring well, identified as MW-20(s), was constructed of 4inch-diameter, schedule 80 PVC riser pipe and slotted screen. The screen interval was constructed using 10 feet of 0.010-inch factory-slotted PVC screen straddling the water table. The annular space within the bore hole around the screen was filled with clean 10/20 silica sand filter pack to a minimum of 2 feet above top of screen. Two to 8 feet of bentonite chips were placed above the filter pack and hydrated with potable water to seal the filter pack from surface influence. The remaining annular space above the bentonite seal was filled with Portland Type I/II grout applied in lifts of approximately 30 feet and allowed to set for a minimum of 24 hours. Above-grade steel protective casings with lockable covers were installed to protect and secure the wellhead. Surface monuments were labeled with the well identification number and set within a 2-foot square concrete pad. Steel bollards were installed around wells located near traffic areas to enhance visibility and protect the wells. All bollards, protective casings and locking lids were painted yellow to help protect against corrosion and improve visibility. The location and elevation of the top of inner casing for each monitoring well was determined by Basin, North Dakota registered land surveyors. Well construction diagrams are included in **Appendix A**, and construction details, including survey information, are summarized in **Table 4-1**.

Well Development

Monitoring wells MW-14(s) through MW-19(s) were developed between June 4, 2016 and June 10, 2016. Development of MW-20(s) occurred November 17, 2016 through November 20, 2016. Well development activities included measuring the water level and total depth of the well, followed by surging and bailing of the well with a weighted bailer to remove initial influx of sediment into the well. After well measurements were taken, the weighted bailer was used as a surge block to surge water into and out of the screened portion of the well for a minimum of 10 to 15 minutes. Due to poor well yields and well depths, wells were bailed dry a minimum of three times during the course of development. Field parameters (pH, specific conductance and turbidity) were measured and recorded periodically during the development process. Water generated during well development was spread on the adjacent ground surface.

Aquifer Testing

A pump test and slug test were performed on background well MW-19(s) and downgradient well MW-16(s) respectively to assess the hydraulic characteristics of the geologic formation beneath the site. The tests were performed between October 6, 2017 and October 7, 2017. The test at MW-19(s) was allowed to proceed for approximately 30 minutes when it was determined that the water elevation in the well was approaching full recovery to pre-test levels, thereby concluding the test. The data from MW-16(s) was collected for over 23 hours after the start of the test. Water level measurements indicated that this well was recovering but had not yet reached pre-test elevation at the time the test was concluded. Manual measurements were recorded on field aquifer testing forms and electronic data was removed from the transducer and used for data evaluation.

Monitoring well MW-19(s) is located to the east of the landfill. After well measurements, a transducer was lowered to approximately 1 foot above the top of the dedicated pump. The water level was then allowed to stabilize before the test was started. After water level stabilization the transducer was turned on to allow the collection of a period of static water levels before the pump was turned on to a flow rate of 0.1 gallons per minute (gpm). The pumping rate was held constant during the test and drawdown in the well was recorded using periodic manual measurements using an electronic water level meter. The pump remained on until the water level in the well stabilized. Recovery of the water level was measured until 95 percent of the static initial water level was reached, at which time the test was stopped and equipment removed from the well.

The slug test was performed on MW-16(S) located to the east of the landfill. After well measurements, a transducer was lowered to approximately 1 foot above the top of the dedicated pump. The water level was then allowed to stabilize before the test was started. After water level stabilization the transducer was turned on to allow the collection of static water levels before the pump was turned on. The pump was turned on and 3 liters were removed before shutting off the pump. The water level was allowed to recover for approximately 24 hours before the test was stopped and the equipment removed from the well.

Pumping Test Analysis Process

Data from the test were processed and analyzed using the AQTESOLV software package (Duffield, 2007), which provides type curve solutions corresponding to various conceptual models, each with their own hydrologic assumptions. Type curve solutions for pumping tests available in AQTESOLV typically require observation well data. In cases where observations from only the pumping well are available, aquifer storage calculations are not usable; however, hydraulic conductivity calculations are still valid. Data were analyzed as single well recovery tests using the recovery solution for a pumping test in a non-leaky confined aquifer (Theis, 1935). The analysis involves matching a straight line to residual drawdown data collected after the termination of a pumping test. The Theis solution utilizes the following assumptions:

- Aquifer has infinite areal extent;
- Aquifer is homogeneous, isotropic and of uniform thickness;
- Control well is fully penetrating;
- Flow to control well is horizontal;
- Aquifer is non-leaky confined;
- Flow is unsteady;
- Water is released instantaneously from storage with decline of hydraulic head;

- Diameter of pumping well is very small so that storage in the well can be neglected;
- Values of *u*' are small (i.e., *r* is small and *t*' is large)

The AQTESOLV report of the constant rate pump test data for MW-19(S) is presented in **Appendix B**. The estimated hydraulic conductivity of the completed slug tests was 1.652×10^{-4} cm/sec.

Slug Test Analysis Process

Data from the test was processed and analyzed using the software AQTESOLV (Duffield, 2007), which provides type curve solutions from published methods corresponding to a range of conceptual models for various well completions and aquifer types (e.g., fully penetrating well in an unconfined aquifer), and simplifying hydrologic assumptions (e.g., infinite aquifer extent). After initial processing and analysis, the most appropriate conceptual model was determined to be the KGS Solution for Confined Aquifers (Bouwer & Rice 1976). This method uses a type curve fit to the observed water-level displacement and accounts for wellbore storage. Graphs of the slug test results are included in **Appendix B**. Due to the slow rate of recovery; wellbore storage will have an effect on the data in early time, but is accounted for with the KGS Solution. Some basic assumptions of the KGS solution include:

- Aquifer has infinite areal extent;
- Aquifer is homogeneous and has uniform thickness;
- Aquifer potentiometric surface is initially horizontal;
- Control well is fully or partially penetrating;
- A volume of water, V (the slug), is injected or discharged instantaneously from the control well;
- Flow is unsteady; and
- Aquifer is confined or unconfined.

The AQTESOLV report of the slug test data for MW-16(S) is presented in **Appendix B**. The estimated hydraulic conductivity of the completed slug tests was 2.482×10^{-9} cm/sec.

5. System Evaluation

The Final CCR Rule establishes the following general performance standard for CCR groundwater monitoring systems:

- All groundwater monitoring systems must consist of a sufficient number of appropriately located wells (at least one background and three downgradient wells) in order to yield groundwater samples from the uppermost aquifer that represent the quality of background groundwater and the quality of groundwater passing the CCR waste boundary.
- The objective of a groundwater monitoring system is to intercept groundwater to determine whether the
 groundwater has been contaminated by the CCR disposal unit. The number, spacing, and depths of the
 monitoring wells must be determined based on a thorough characterization of the site, including a number of
 specifically identified factors relating to the hydrogeology of the site.

The "uppermost aquifer" and "aquifer" are defined in the Final CCR Rule in § 257.53, as follows:

"Uppermost aquifer" means the geologic formation nearest the natural ground surface that is an aquifer, as well as lower aquifers that are hydraulically interconnected with this aquifer within the facility's property boundary. Upper limit is measured at a point nearest to the natural ground surface to which the aquifer rises during the wet season.

"Aquifer" means a geologic formation, group of formations, or portion of a formation capable of yielding usable quantities of groundwater to wells or springs.

As described in the drilling and well construction discussion in **Chapter 4**, drilling equipment and procedures were employed to identify the uppermost aquifer and ensure each new monitoring well was installed with appropriate total depth and placement of the well screen to: (1) facilitate collection of representative samples of the uppermost aquifer, and (2) accurately measure water table elevations to support evaluation of groundwater gradient and flow direction.

Also as described in **Chapter 4**, selection and construction of the CCR monitoring system for AVS evolved and was adapted based on the results obtained from baseline groundwater monitoring in 2016 and 2017. The final monitoring system consists of six monitoring wells that were sampled and will be included as part of the detection monitoring program going forward. The list of wells selected for sampling background and downgradient groundwater quality for each CCR unit is summarized below:

CCR unit/multi-unit	Background wells	Downgradient wells					
Landfill	MW-18(S), MW-19(S)	MW-15(S), MW-16(S), MW-17(S), MW-20(S)					

Monitoring well MW-14(S) is being excluded from the groundwater monitoring network due to insufficient water production to obtain a representative sample. However, it remains in place for groundwater level measurements.

Potentiometric surface maps have been constructed using the depth-to-groundwater measurements obtained during baseline groundwater monitoring. Maps of the potentiometric surface for the eight baseline events are presented as **Figures 5-1** through **Figure 5-8** respectively. The associated depth-to-groundwater measurements and calculated groundwater elevations are presented in **Table 5-1** through **Table 5-8** respectively. Groundwater elevations were calculated at each well by subtracting the measured depth-to-groundwater from the surveyed top of casing elevation. Groundwater elevations for each monitoring well are posted on the figures, with inferred elevation contours of the groundwater potentiometric surface. The direction of groundwater flow is generally to the east, perpendicular to the potentiometric contour lines. **Figures 5-1** though **Figure 5-8** illustrate the relatively consistent pattern between events with a low gradient groundwater flow from west to east beneath the AVS CCR unit. The data evaluated for this report support the selection of the wells listed above to represent background groundwater quality and the quality of groundwater downgradient of the CCR units.

6. Statistical Methodology

Regulatory Guidance

Regulatory guidance provided in 40 CFR §257.90 specifies that a CCR groundwater monitoring program include selection of the statistical procedures to be used for evaluating groundwater quality data as required by 40 CFR §257.93. Groundwater quality monitoring data will be collected under the detection monitoring program outlined in this plan and will include collection and analysis of a minimum of eight independent groundwater samples from each background and downgradient compliance well, for each CCR unit or multi-unit, as required by 40 CFR §257.94(b). The groundwater samples will be analyzed for the constituents listed in 40 CFR §257 Appendices III and IV.

After the eight sets of groundwater samples are collected and analyzed, these data must be statistically evaluated to determine if there are any statistically significant increases over background concentrations for the Appendix III and IV constituents. In determining whether a statistically significant increase has occurred, the constituent concentrations at the downgradient wells and the background wells for each unit/multi-unit will be compared using one or more of the statistical methods discussed below.

40 CFR §257.93(f) outlines the statistical methods available to evaluate groundwater monitoring data. The statistical test(s) chosen will be conducted separately for each constituent in each monitoring well and will be appropriate for the constituent data and their distribution. The available statistical methods include the following:

- A parametric analysis of variance (ANOVA) followed by multiple comparison procedures to identify statistically significant evidence of contamination. The method must include estimation and testing of the contrasts between each compliance well's mean and the background mean levels for each constituent;
- An ANOVA based on ranks followed by multiple comparison procedures to identify statistically significant evidence of impacts. The method must include estimation and testing of the contrasts between each compliance well's median and the background median levels for each constituent;
- A tolerance or prediction interval procedure, in which an interval for each constituent is established from the distribution of the background data and the level of each constituent in each compliance well is compared to the upper tolerance or prediction limit;
- A control chart approach that gives control limits for each constituent; or
- Another statistical test method that meets the performance standards of 40 CFR 257.94(g) outlined in the paragraph below.

The chosen statistical method will comply with the following performance standards, as appropriate, based on the statistical test method used. The performance standards include the following:

- The statistical method used to evaluate groundwater monitoring data will be appropriate for the constituent distribution (i.e., parametric or nonparametric).
- If an individual well comparison procedure is used to compare an individual compliance well constituent concentration with background constituent concentrations or a groundwater protection standard, the test shall be done at a Type I error level no less than 0.01 or 0.05, depending on the method chosen. This performance standard does not apply to tolerance intervals, prediction intervals, or control charts.
- If a control chart approach is used to evaluate groundwater monitoring data, the specific type of control chart and its associated parameter values shall be such that this approach is at least as effective as any of the other statistical analysis approaches specified above.
- If a tolerance interval or a prediction interval is used to evaluate groundwater monitoring data, the levels of confidence and, for tolerance intervals, the percentage of the population that the interval must contain, shall be such that this approach is at least as effective as any of the other statistical analysis approaches specified above.

- The statistical method must account for data below the limit of detection with one or more statistical procedures that shall be at least as effective as any of the other statistical analysis approaches specified above.
- If necessary, the statistical method must include procedures to control or correct for seasonal and spatial variability as well as temporal correlation in the data.

Per 40 CFR §257.93(h)(2), statistical analysis of the first eight rounds of data must be completed within 90 days after completing the detection groundwater sampling and analysis to determine whether there has been a statistically significant increase over background for any constituent. The first eight rounds of groundwater sampling and analysis must be completed no later than October 17, 2017. In accordance with 40 CFR §257, AVS must obtain a certification from a qualified professional engineer stating that the selected statistical method is appropriate for evaluating the groundwater monitoring data for the CCR management area. The certification must include a narrative description of the statistical method selected to evaluate the groundwater monitoring data.

Assessment monitoring is required per 40 CFR §257.95 whenever a statistically significant increase over background levels has been detected for one or more of the indicator parameters listed in 40 CFR §257 Appendix III. An assessment monitoring program also includes annual groundwater sampling and analysis for the constituents listed in 40 CFR §257 Appendix IV. The purpose of assessment monitoring is to determine if releases of CCR constituents have occurred.

The facility can return to detection monitoring once assessment monitoring results are at or below background values for two consecutive assessment monitoring events. If the assessment monitoring demonstrates an exceedance of a GWPS for any of the CCR constituents specified in 40 CFR 257 Appendices III and IV, groundwater corrective action must be initiated.

Statistical Analysis Approach

There is no single method of statistical analysis that is appropriate for each groundwater constituent dataset. It is most prudent to use a suite of statistical methods that are dependent on the data and their distributions. The statistical analyses will be based on an interwell and/or an intrawell approach for the purpose of determining if an AVS CCR unit has impacted groundwater quality. The statistical algorithms used for the interwell and intrawell approaches will be chosen based on the groundwater constituent data and their distributions as well as consideration of natural seasonally- or spatially-varying groundwater constituent concentrations.

Eight rounds of baseline groundwater monitoring data were collected and analyzed for the 40 CFR 257 Appendices III and IV constituents. These data will be used to represent background groundwater quality for the AVS CCR unit. The detection monitoring data collected at the downgradient wells will be used to determine if the CCR unit has impacted groundwater quality. The initial eight rounds of detection monitoring sampling and analysis were completed by the October 17, 2017 deadline established in the CCR Rule (40 CFR §257.94).

A preliminary, exploratory statistical analysis was conducted after the eight rounds of baseline data were obtained to initially assess the constituent data and determine the most appropriate statistical approach(es) for the data. The data were examined for outliers and the percentage of non-detect values to verify that the data collected are suitable for statistical analysis. The data were also examined using goodness-of-fit tests to determine the most appropriate statistical distribution and time series plots and areal maps were used to determine if seasonal or spatial variations in constituent concentrations were present. Based on this preliminary evaluation of the data, an interwell statistical approach was selected as appropriate for evaluating groundwater at AVS, as described below.

Per 40 CFR 257.93(h)(2), statistical analysis of all eight rounds of data must be completed within 90 days after completing groundwater sampling and analysis to determine whether there has been a statistically significant increase over background for any Appendix III constituent.

Interwell Statistical Approach

Interwell tests compare the statistical differences between background and downgradient compliance wells. An interwell statistical approach will be used during detection monitoring for the following reasons:

- Sufficient data are available in the background well to ensure adequate degrees of statistical power to detect real exceedances above background levels, and also reasonable control over the site-wide false positive rate so that spurious exceedances have little chance of being identified.
- Although there is evident spatial variation among most, if not all, of the Appendix III constituents, it is unclear to
 what extent the similarly evident variation among the downgradient wells is due strictly to natural differences in
 groundwater quality and/or other factors unrelated to management of the CCR ash. Because of this uncertainty,
 an interwell comparison strategy appears to be initially more appropriate for AVS.

As a caveat to this approach, for constituents that occur naturally and vary substantially in concentration across AVS due to natural hydrogeologic or geochemical factors — thus, exhibiting significant spatial variability — an interwell testing scheme will not always be helpful. Using an interwell approach, constituent concentrations greater than background might be attributed to anthropogenic contamination, when the differences are actually natural and due to locally varying distributions of groundwater constituents. In such cases, an intrawell approach may be warranted.

Furthermore, there is no requirement either in RCRA or the CCR Rule to use exactly the same statistical method or approach for every constituent. Depending on characteristics of AVS and data that are collected, a mix of interwell and intrawell tests may be warranted. At this site, the initial statistical screening suggests that interwell comparisons are most appropriate despite evident spatial variability. However, that conclusion could change as additional data are collected during future detection monitoring. If new information indicates that constituent concentrations remain relatively stable and that the existing spatial variation is unrelated to the CCR units, a modification of the statistical approach to intrawell testing may be recommended for one or more constituents.

Under an interwell statistical approach in detection monitoring, the actual statistical method(s) chosen will be determined based on the constituent data distribution (as outlined below), which in turn is influenced both by the percentage and pattern of non-detect measurements as well as the temporal stability of the concentration levels.

When (1) the percentage of non-detects is low to moderate (i.e., less than 50-60 percent), (2) the background data can be normalized (perhaps via a standard transformation), and (3) the results are stationary (i.e., stable over time), the following statistical methods are highly recommended by EPA (2009):

- Interwell control charts with retesting; or
- Parametric interwell prediction limit methods with retesting.

When the background data cannot be normalized (perhaps due to a large percentage of non-detects), but the data are stationary (i.e., stable over time), the following statistical method is recommended by EPA (2009):

• Non-parametric interwell prediction limits with retesting.

Note that the specific retesting method in each of these options will be chosen to account for the size of the well network, the amount of background data available, the number of constituents being monitored, the site-specific mix of intrawell and interwell tests, and the impact of these factors on the statistical power and accuracy of the test. At this site, the background wells relative to the number of downgradient wells to be tested on a semi-annual basis will enable use of a 1-of-2 retesting plan. This necessitates collection of a single independent resample at any location in which the initial routine measurement exceeds its respective statistical limit. A confirmed statistical exceedance will not be recorded unless both the initial measurement and resample value both exceed the statistical limit.

If the background data are non-stationary and thus exhibit a clear trend, it will suggest that factors unrelated to the CCR unit are impacting background groundwater quality. Three general scenarios will be considered:

- Older background data may no longer be representative of current site conditions and may need to be excluded from statistical calculations. In this case, the interwell statistical limits will be updated to include only the most representative background data.
- The compliance wells will be examined to see if similar trends are occurring downgradient. If so, a common trend component will be estimated across the site and removed from every well. The residual data will then be used to construct revised statistical limits and tested as described above.

If the trend in background wells is not reflected in downgradient wells, further investigation may be needed to
determine if the background data still serve as a reasonable background with which to compare downgradient
compliance measurements. If not, the statistical approach will be modified to an appropriate intrawell strategy.

Because of the decision matrix needed to establish the correct statistical approach, the background data for each constituent will be periodically screened prior to construction of new or revised statistical limits. This screening will examine the proportion and pattern of outliers and potential data anomalies (perhaps due to laboratory or field sampling factors), the presence or absence of statistically significant trends over time, the presence or absence of statistically significant outliers, and the identification of an appropriate statistical distribution. In particular, any confirmed background outliers will be excluded from statistical calculations, so as not to unduly bias the statistical limits.

Proposed Statistical Methods for Appendix III Analytes

Table 6-1 provides a summary of the proposed statistical method by well for Appendix III analytes. The table is based on a preliminary screening of the background well data collected to date. The proposed statistical method may be modified when all of the background data has been statistically evaluated for the annual report to be submitted in January 2018.

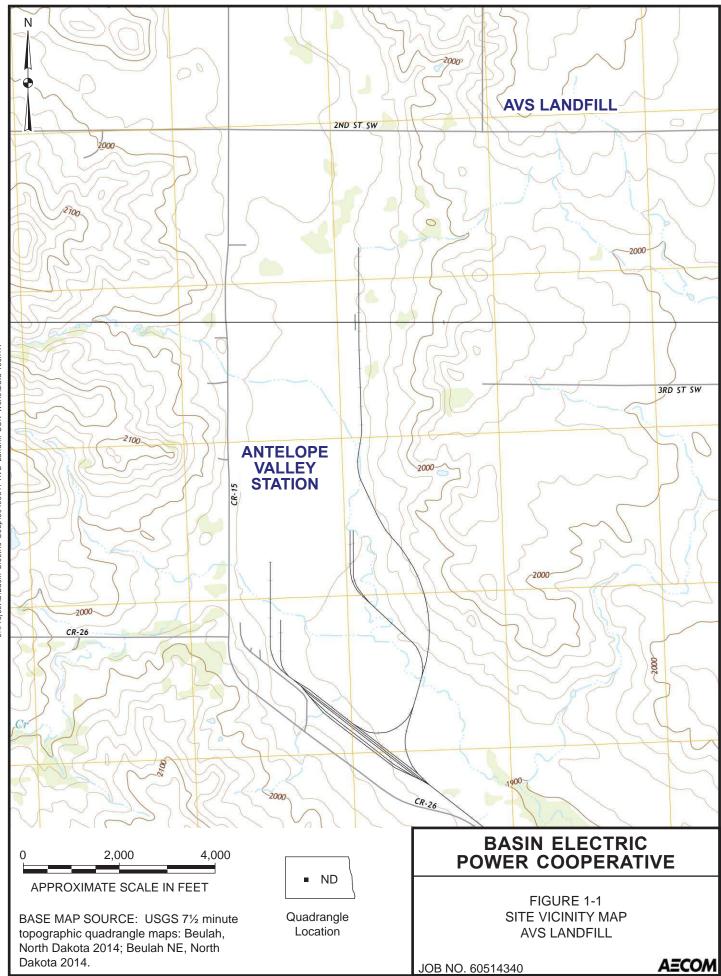
7. Limitations

The signature of AECOM's (Consultant's) authorized representative on this document represents that, to the best of Consultant's knowledge, information, and belief in the exercise of its professional judgment, it is Consultant's professional opinion that the aforementioned information is accurate as of the date of such signature. Any opinion or decisions by Consultant are made on the basis of Consultant's experience, qualifications, and professional judgment and are not to be construed as warranties or guaranties. In addition, opinions relating to environmental, geologic, and geotechnical conditions or other estimates are based on available data, and actual conditions may vary from those encountered at the times and locations where data are obtained, despite the use of due care.

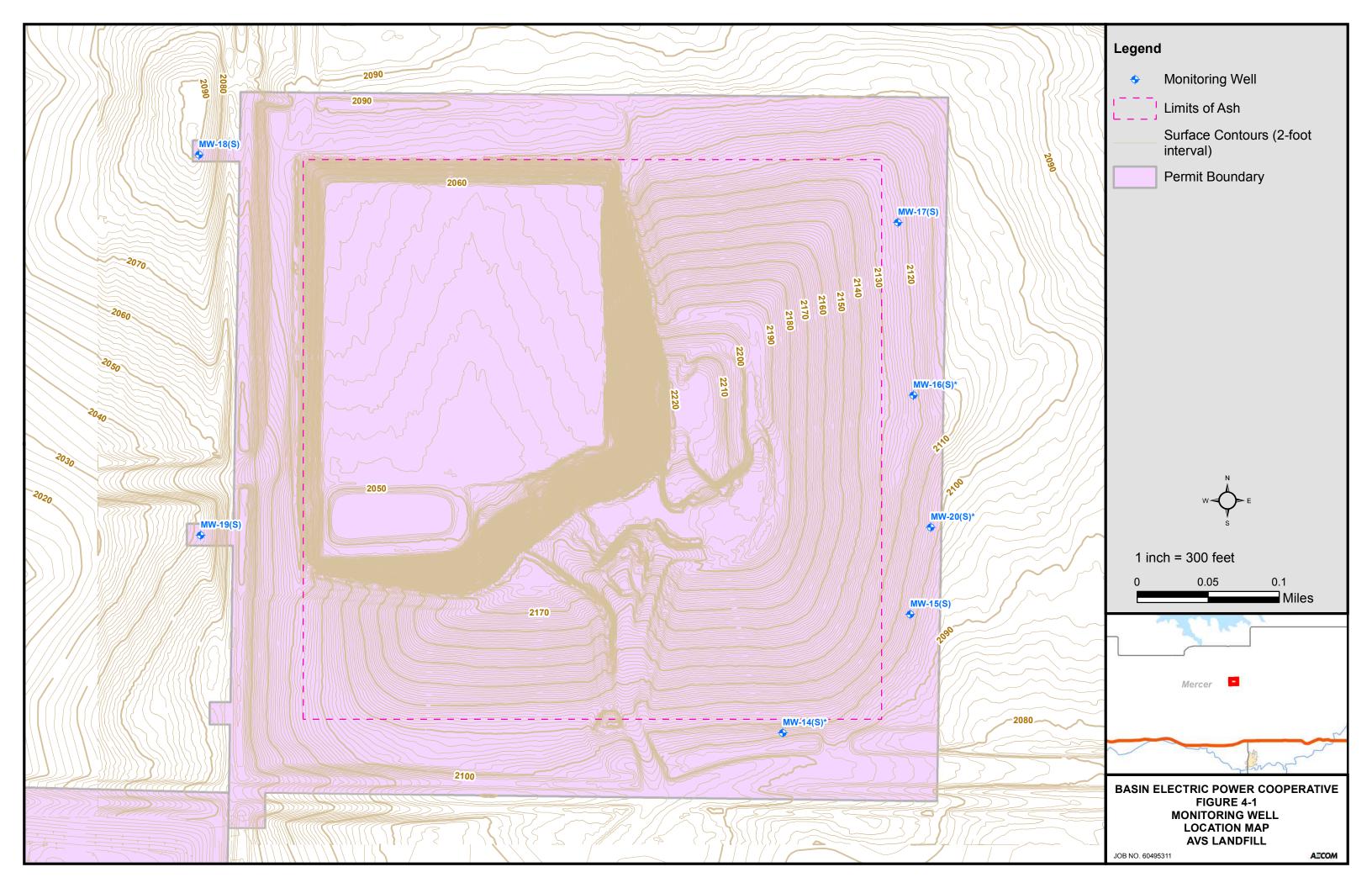
8. References

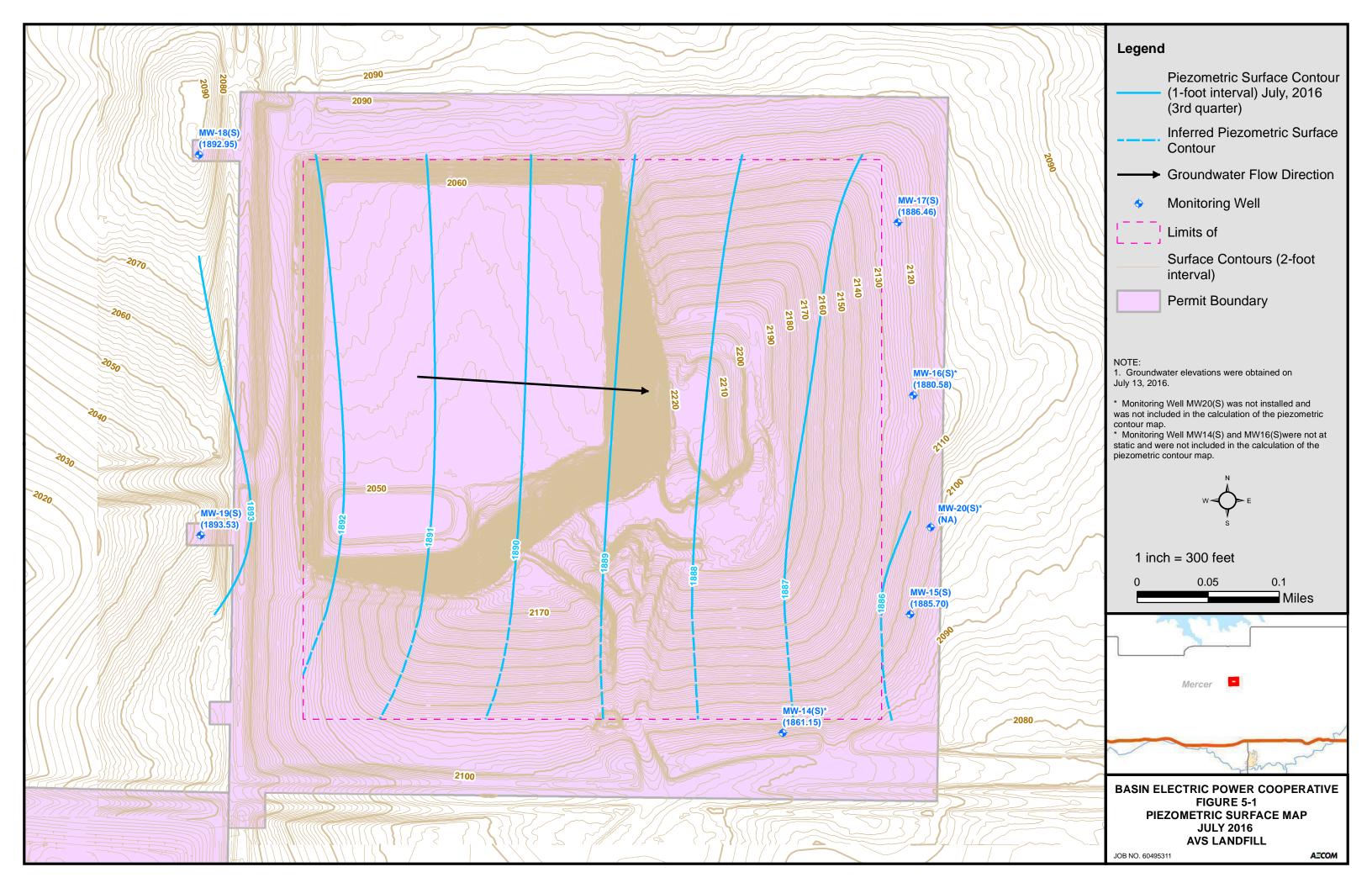
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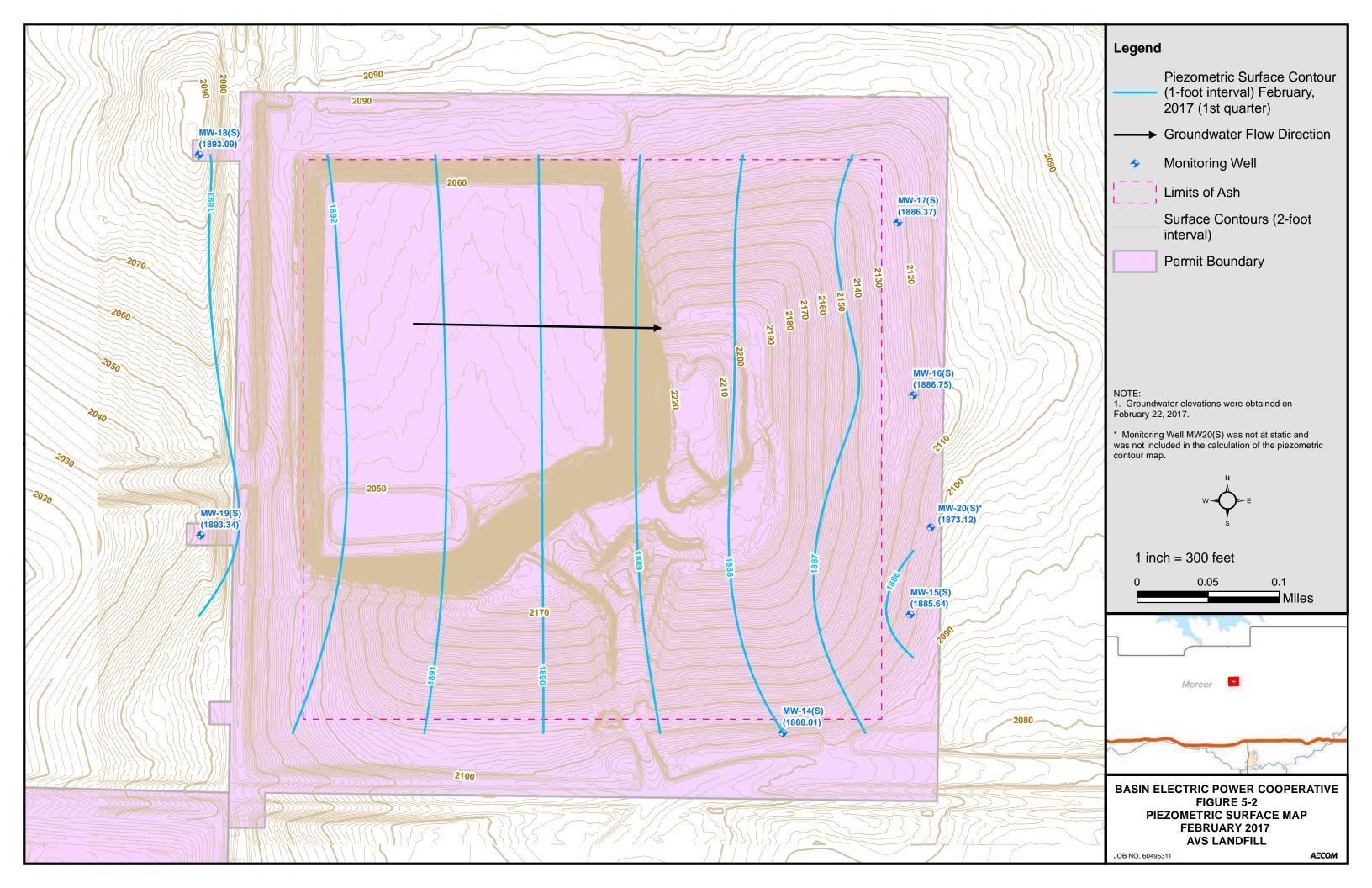
Figures

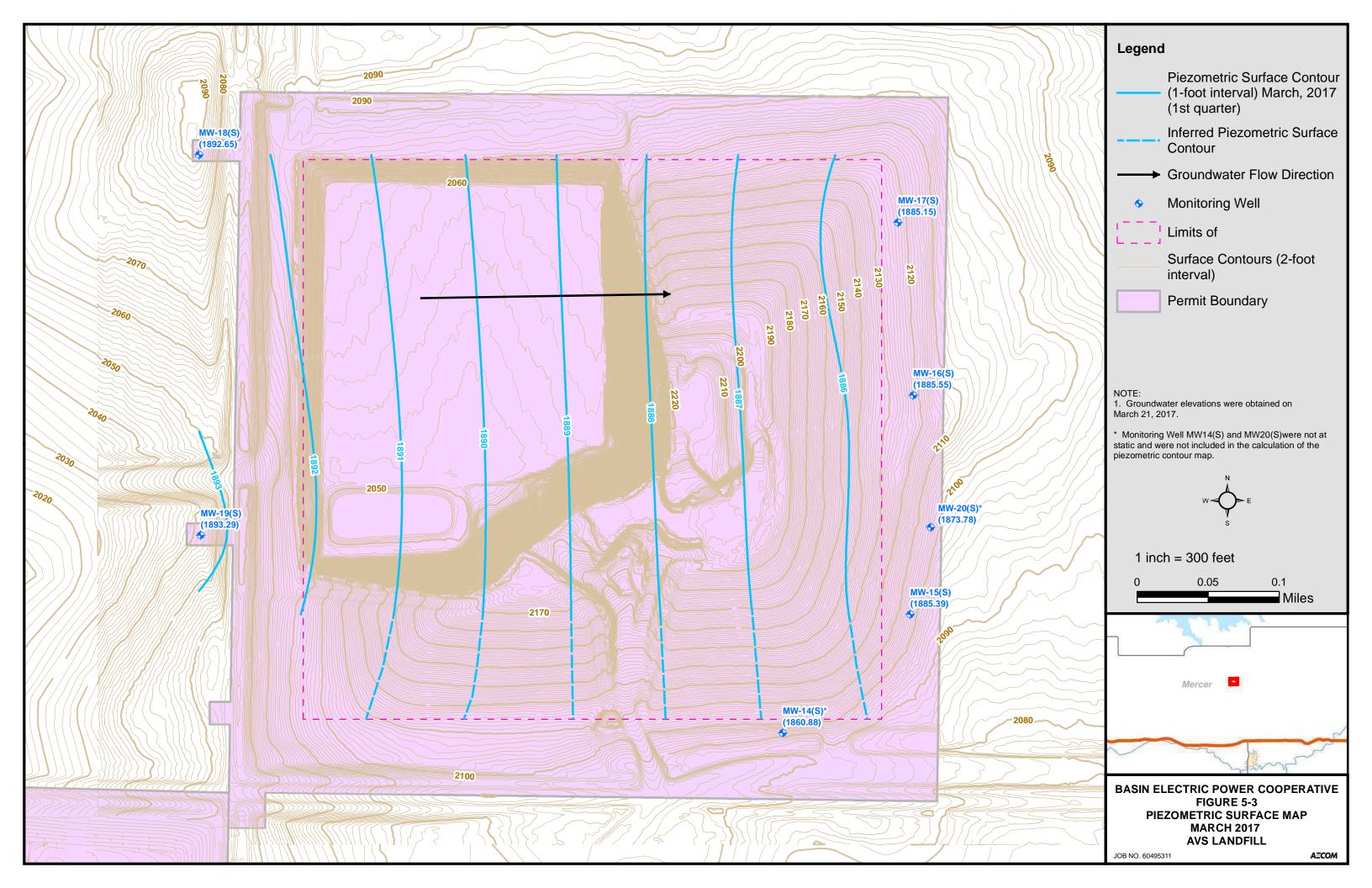


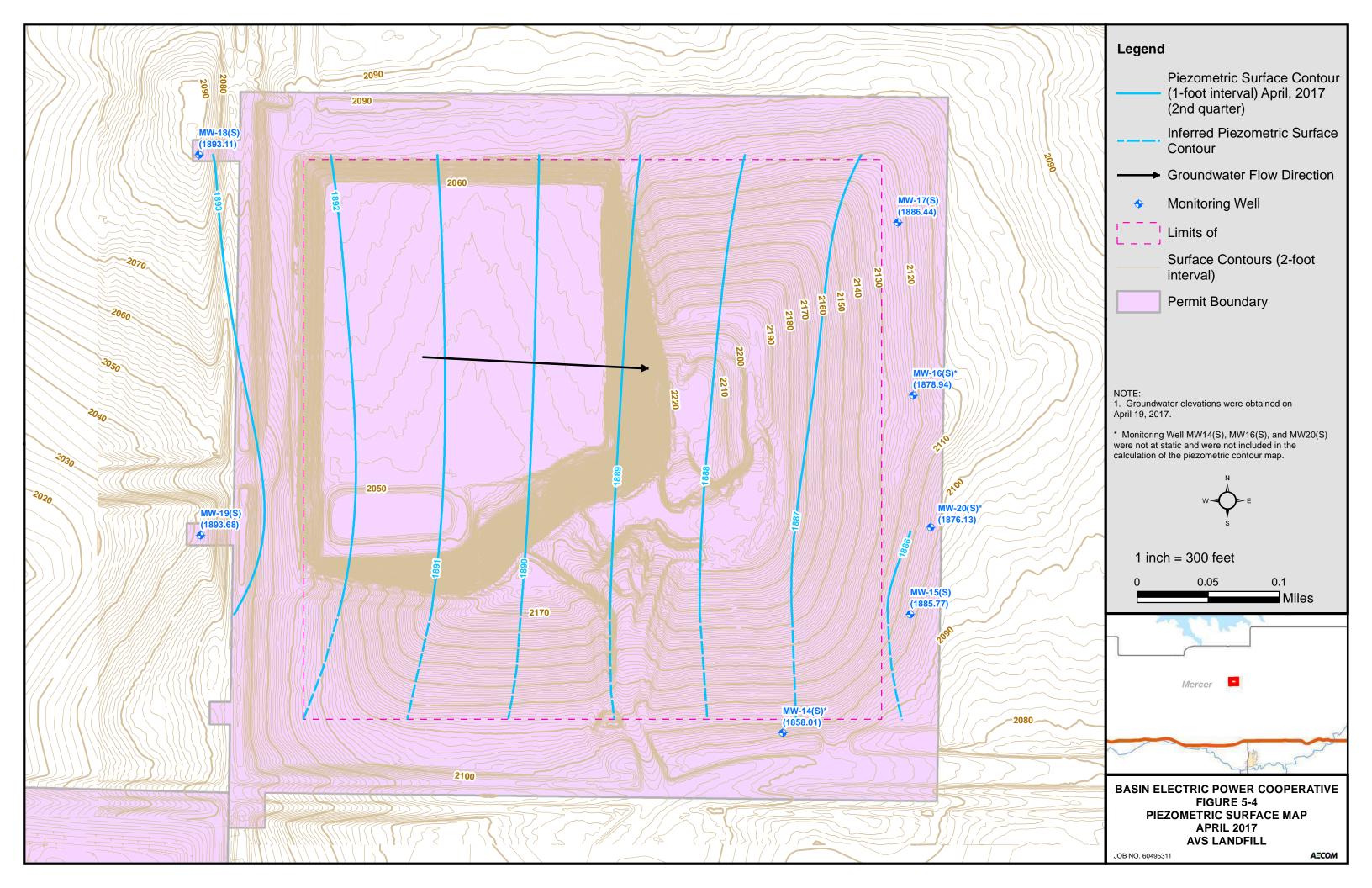
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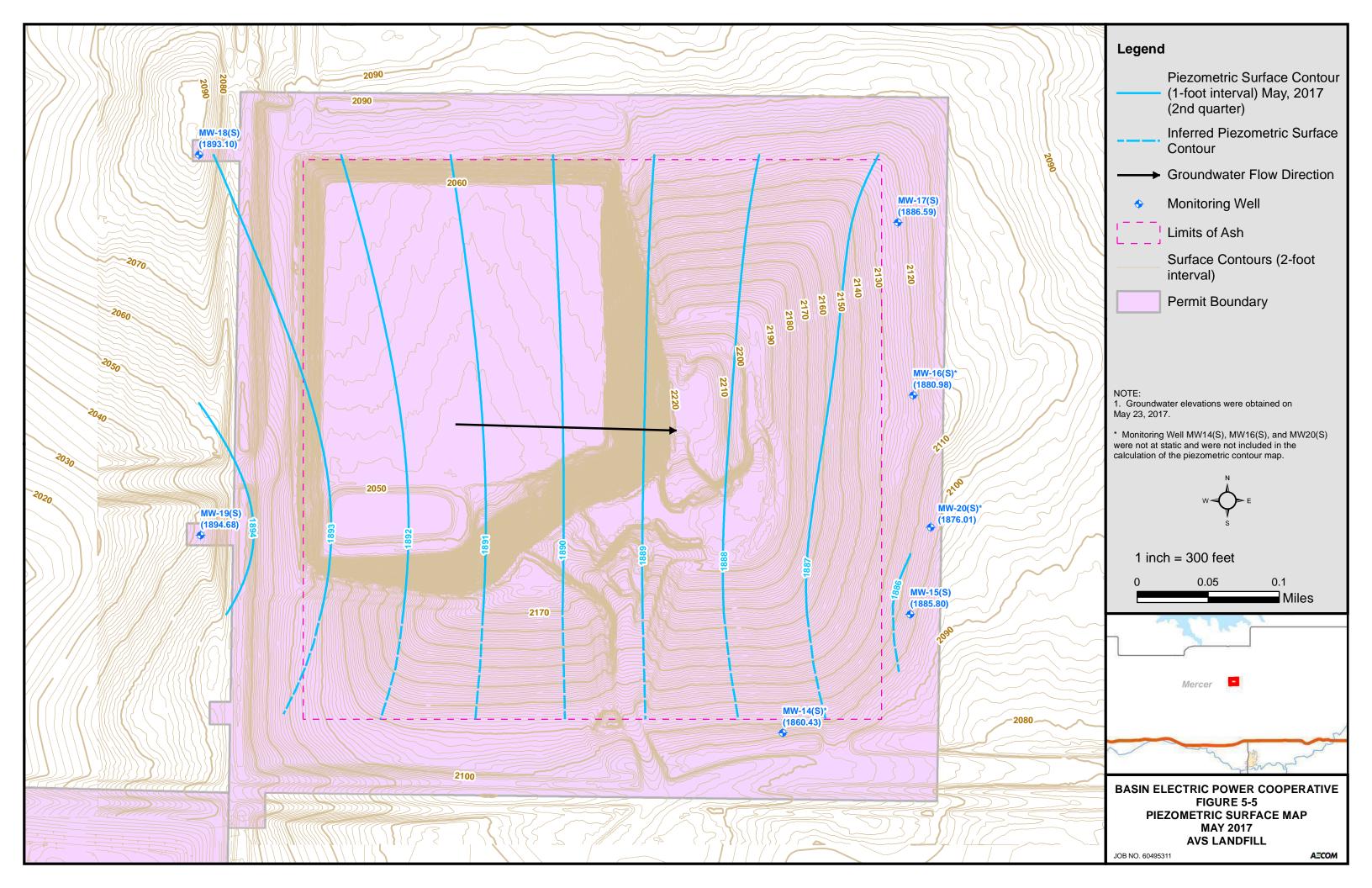


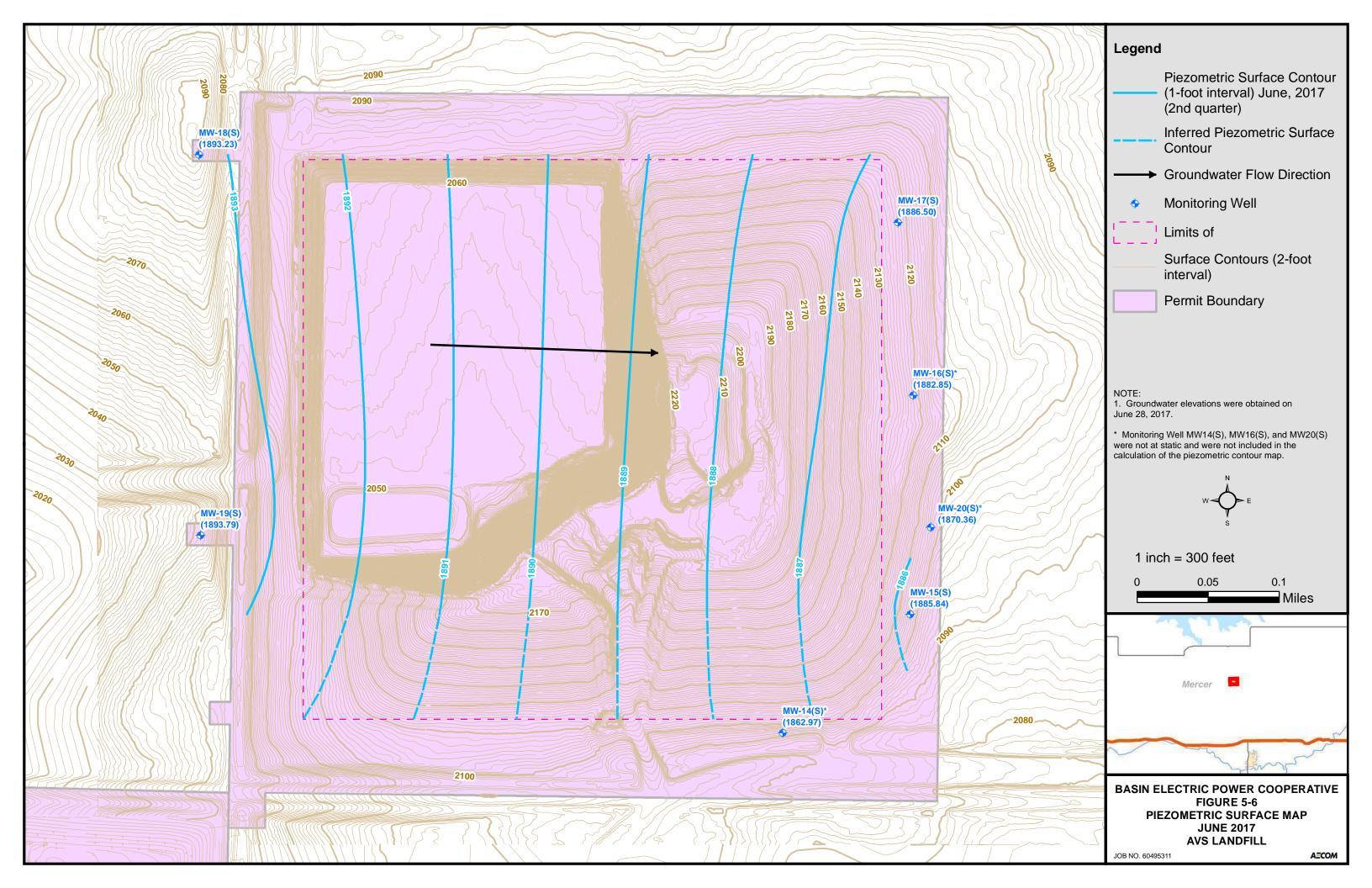


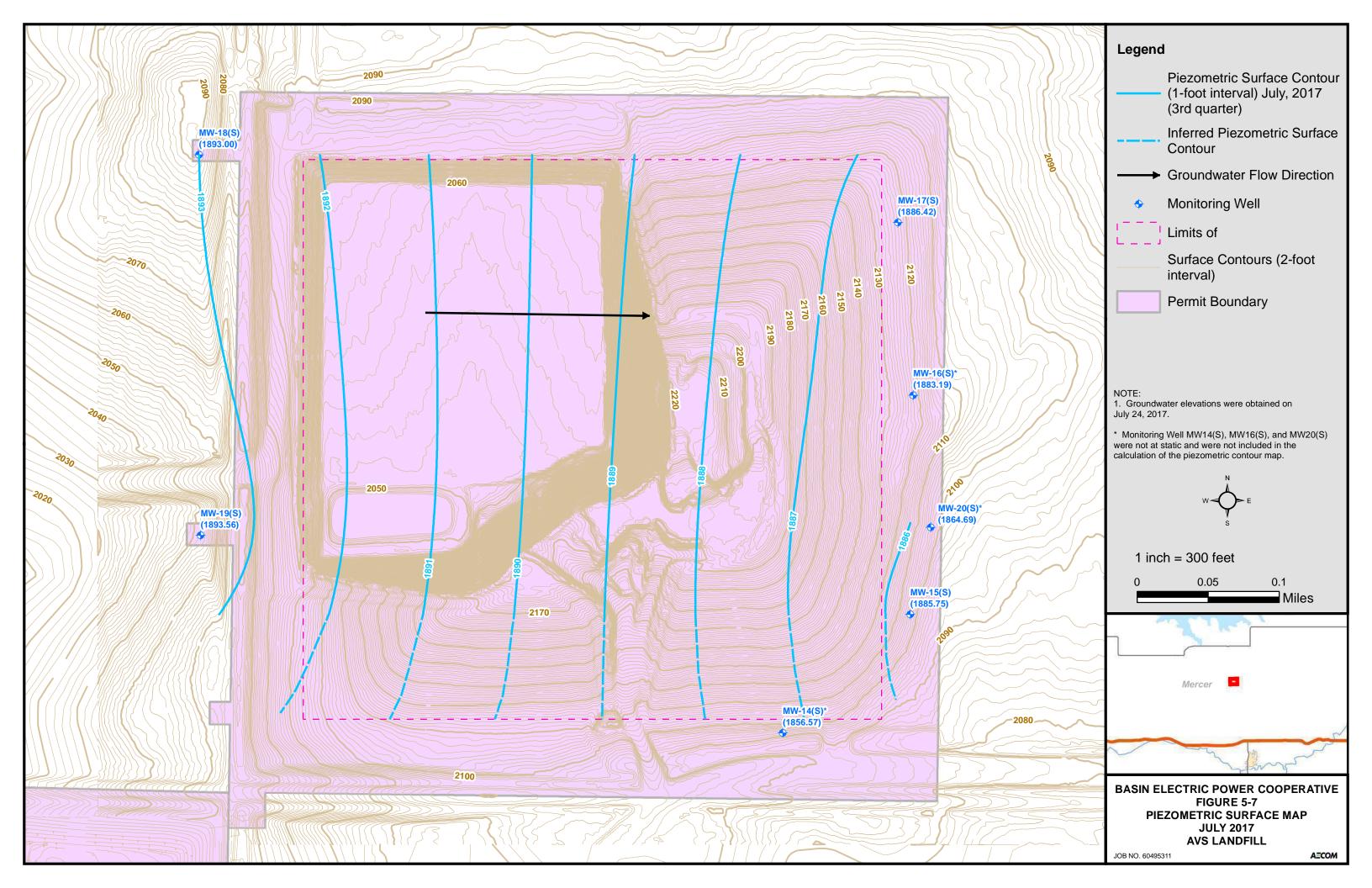


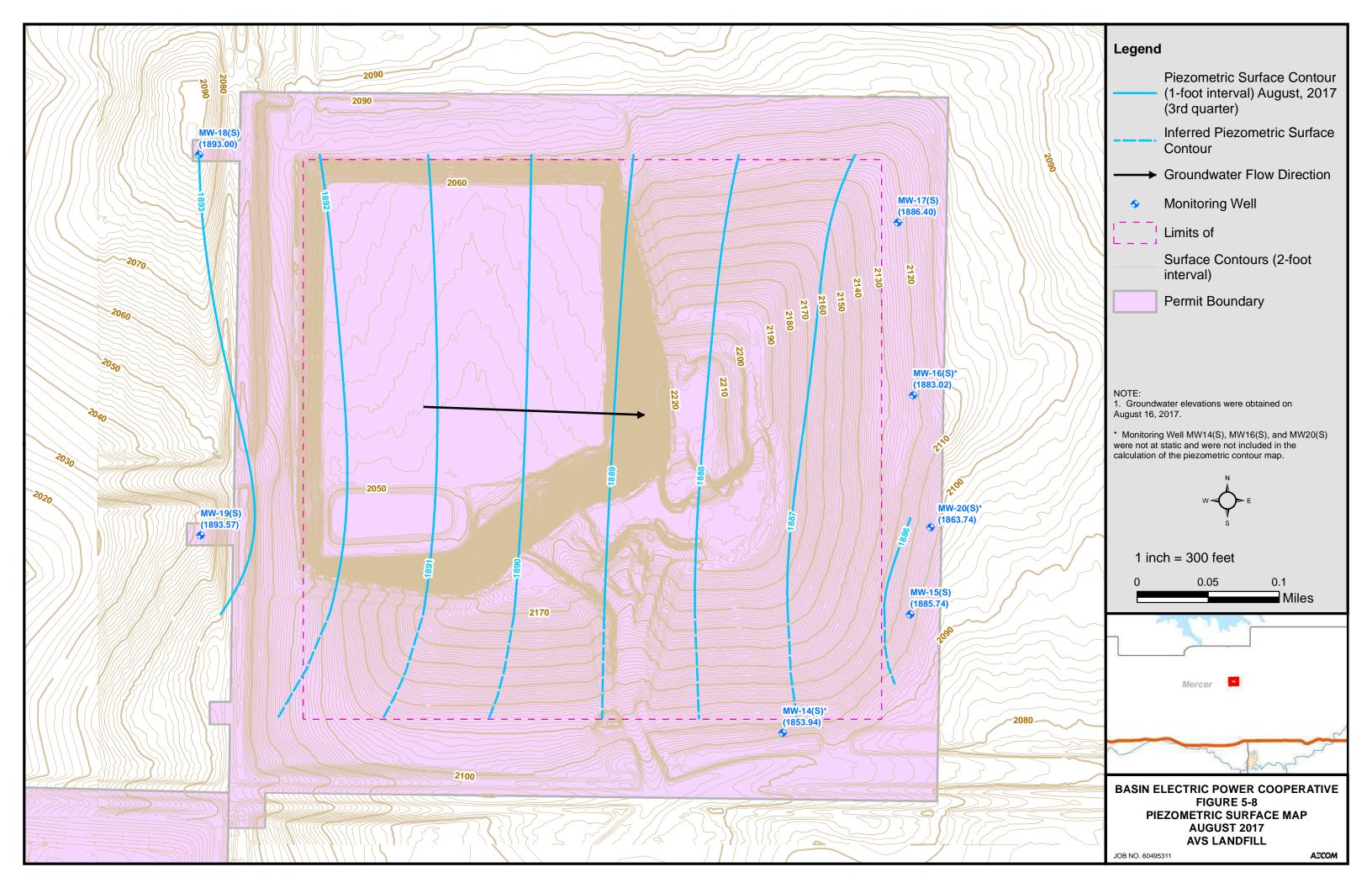












Tables

TABLE 4-1

CCR GROUNDWATER MONITORING SYSTEM

BASIN ELECTRIC - ANTELOPE VALLEY STATION CCR LANDFILL MERCER COUNTY, NORTH DAKOTA

						l Pack		Bottom of											
Well	Site Position	Loca	tion*	TOIC	GS	Length	Size / Type	Inte	erval		Interval		Boring						
Identification		Northing	Easting	(feet, NAVD)	(feet, NAVD)	(feet, TOIC)	eet, TOIC) (ID / Material) (f		(feet below GS)		(feet below GS)		(feet below GS)		(feet below GS)		tion, feet, I	NAVD)	(feet, GS)
											Pump								
								Тор	Bottom	Тор	Intake	Bottom	_						
													_						
MW-14(s)	Cross-Gradient	629969.02	1674533.2	2093.54	2091.54	249	2 inch / PVC	235	248	1854.54	NA	1844.54	256						
MW-15(s)	Down-gradient	630410.64	1675007.2	2104.89	2102.89	252	2 inch / PVC	236	251	1862.89	1853.89	1852.89	264						
MW-16(s)	Down-gradient	631224.67	1675017.9	2123.7	2121.7	270	2 inch / PVC	255	268	1863.70	1855.20	1853.70	276						
MW-17(s)	Down-gradient	631865.98	1674961.2	2125.06	2123.26	268	2 inch / PVC	250	268	1867.26	1860.06	1857.26	278						
MW-18(s)	Up-gradient	632117.57	1672362.9	2091.7	2090	246	2 inch / PVC	231	262	1856.00	1848.70	1846.00	262						
MW-19(s)	Up-gradient	630703.79	1672368.4	2042.68	2039.68	189	2 inch / PVC	174	186	1863.68	1854.68	1853.68	208						
MW-20(s)	Down-gradient	630733.34	1675082.7	2107.573	2106.143	252	4 inch / PVC	236	252	1865.14	1857.57	1855.14	255						

Reference elevation of monitoring wells surveyed by Basin Electric Registered Land Surveyors.

- Horizontal Datum* NAD 83 (1983), Vertical Datum** NAVD 88 GPS
- NAVD = North American Vertical Datum of 1988 (NAVD 88)
- PVC = Polyvinyl chloride
- ID = Internal Diameter
- TOIC = Top of internal casing
- GS = Ground Surface Estimated from Top of Casing reported on boring log
- NA = Pump not installed due to insufficient recharge.

TABLE 5-1

MONITORING WELL GROUNDWATER ELEVATIONS - JULY 2016 THROUGH AUGUST 2017

BASIN ELECTRIC ANTELOPE VALLEY STATION - MERCER COUNTY, NORTH DAKOTA

LANDFILL

	Reference	Jul	y 13, 2016	Febr	uary 1, 2017	Febru	ary 22, 2017	Mare	ch 21, 2017	Apr	il 19, 2017	Ма	ıy 23, 2017	Jun	e 28, 2017	July	y 24, 2017	Augu	ust 16, 2017
Well ID	Elevation Top of Casing* (feet, NAVD 88)	DTW (feet)	Groundwater Elevation (ft, NAVD 88)																
MW-14(S)	2093.54	232.39	1861.15	NS	NA	205.53	1888.01	232.66	1860.88	235.53	1858.01	233.11	1860.43	230.57	1862.97	236.97	1856.57	239.60	1853.94
MW-15(S)	2104.89	219.19	1885.70	NA	NA	219.25	1885.64	219.50	1885.39	219.12	1885.77	219.09	1885.80	219.05	1885.84	219.14	1885.75	219.15	1885.74
MW-16(S)	2123.70	243.12	1880.58	NA	NA	236.95	1886.75	238.15	1885.55	244.76	1878.94	242.72	1880.98	240.85	1882.85	240.51	1883.19	240.68	1883.02
MW-17(S)	2125.06	238.60	1886.46	NA	NA	238.69	1886.37	239.91	1885.15	238.62	1886.44	238.47	1886.59	238.56	1886.50	238.64	1886.42	238.66	1886.40
MW-18(S)	2091.70	198.75	1892.95	NA	NA	198.61	1893.09	199.05	1892.65	198.59	1893.11	198.60	1893.10	198.47	1893.23	198.70	1893.00	198.70	1893.00
MW-19(S)	2042.68	149.15	1893.53	149.66	1893.02	149.34	1893.34	149.39	1893.29	149.00	1893.68	148.00	1894.68	148.89	1893.79	149.12	1893.56	149.11	1893.57
MW-20(S)	2107.57	NA	NA	242.21	1865.36	234.45	1873.12	233.79	1873.78	231.44	1876.13	231.56	1876.01	237.21	1870.36	242.88	1864.69	243.83	1863.74

⁽Horizontal Datum* - NAD 83 (1983), Vertical Datum** - NAVD 88 GPS) NAVD = North American Vertical Datum of 1988 (NAVD 88)

C = Crossgradient NM = Not Measured (Well did not exist or no longer sampled) DTW = Depth To Water

GW = Groundwater

TOIC = Top of internal casing U = Upgradient / Background D = Downgradient

TABLE 6-1

PROPOSED STATISTICAL METHODS FOR APPENDIX III CONSTITUENTS IN BACKGROUND WELLS

BASIN ELECTRIC – ANTELOPE VALLEY STATION CCR LANDFILL MERCER COUNTY, NORTH DAKOTA

CCR Unit	Background Wells	Statistical Method	Constituent
AVS Landfill	MW-18(s), MW-19(S)	Parametric Prediction Interval	Calcium, Chloride, Fluoride, pH, TDS
AVS Landfill	MW-18(s), MW-19(S)	Nonparametric Prediction Interval	Boron, Sulfate

Appendix A

Boring Logs and Well Construction Diagrams

EA	CON					WELL NUM	BER MW-14 (S) PAGE 1 OF 4
PROJE DATE DRILL DRILL LOGG	STARTE ING CON ING MET ED BY _	BER D <u>5/2</u> TRAC HOD	60495 21/201 TOR _ Rotar	5311 6 Casc y Soni	COI ade Drilling ic CHECKED	PROJECT NAME _Antelope Valley PROJECT LOCATION _Beulah, ND IPLETED _5/22/2016 GROUND ELEVATION _2091.54 ft HAMME GROUND WATER LEVELS: AT TIME OF DRILLING BY _A. Lanning AT END OF DRILLING Y AFTER DRILLING _243.50 ft / Elev 1848.04	ER TYPE Not Applicable
o DEPTH (ft)	SAMPLE TYPE NUMBER	% RECOVERY	POCKET PENE- TROMETER, TSF	U.S.C.S.	GRAPHIC LOG	MATERIAL DESCRIPTION	Casing Top Elev: 2 (ft) Casing Type: 2" PVC Pipe WELL DIAGRAM Top of Casing (estimated 2' ags)
 10	SONIC	100				CLAY, with gravel, yellow clay intrusions; moist, brown (Mine Spoils)	Grout
	SONIC	100			20.0	2071.5	(0' - 233' bgs) PVC Pipe (2' ags - 247' bgs)
 - 30	SONIC	100	-			S.A.A, with silt and black intrusions, very crumbly; gray	
 40	SONIC	100		CL	37.0	S.A.A., very moist	
SAVS 071317.GPJ	SONIC	100	_			S.A.A.; gravel with pebble intrusions	
AVS SOIL-WELL LOG.GDT - 7/13/17 13:16 - C: WVS.MVS 071317.GPJ	SONIC	100	-		59.0	@ 57' bgs: <1 inch lense of lignite S.A.A., sandy clay	
AVS SOIL-WELL LOG.G	SONIC	100					

A	ECON	8				WELL NUM	BER MW-14 (S) PAGE 2 OF 4		
	INT <u>Basin</u> JECT NUM			311		PROJECT NAME _ Antelope Valley PROJECT LOCATION _ Beulah, ND			
02 DEPTH (ft)	SAMPLE TYPE NUMBER	% RECOVERY	POCKET PENE- TROMETER, TSF	U.S.C.S.	GRAPHIC LOG	MATERIAL DESCRIPTION	WELL DIAGRAM		
- - - 80	- - - - -	100				S.A.A., sandy clay	Grout (0' - 233' bgs) PVC Pipe (2' ags - 247' bgs)		
- - - 90	- - - - -	100				S.A.A., clay, with small lignite lenses; gray to brown	bgs)		
_ _ _ 	- - - -	100				92.0 1999.5 S.A.A., trace sand, no lignite fragments; gray 100.0 100.0 1991.5			
- - - - 110	- - - -	100		CL		S.A.A., trace lignite fragments			
- - - 120	- - - -	100				119.0 S.A.A.; sandy clay, no lignite fragments, crumbly			
	- - - -	100	_						
AVS SOIL-WELL LOG.GDT - 7/13/17 13:16 - C:MVSIAVS, 071317.6PJ 01 01 01 01 01 01 01 01 01 01 01 01 01	- - - - -	100				140.0 1951.5			
AVS SOIL-WELL LOG.GI	- - - - -	100				S.A.A.; with gravel, no sand; very moist			

	ECOM WELL NUMBER MW-14 (S) PAGE 3 OF 4										
	NT <u>Basir</u> IECT NUN			5311			PROJECT NAME _Antelope Valley PROJECT LOCATION _Beulah, ND				
HLGDU (tj) 150	SAMPLE TYPE NUMBER	% RECOVERY	POCKET PENE- TROMETER, TSF	U.S.C.S.	GRAPHIC LOG		MATERIAL DESCRIPTION	WELL DIAGRAM			
 160	SONIC	100		CL		152.0 160.0 160.5	1939 S.A.A., with lignite fragments, hard; gray to brown 1931 SHALE (6" lense)	(0' - 233' bgs) PVC Pipe (2' ags - 247' bgs)			
 170	- Sonic	100		<u>enaci</u>			SHALE (6" lense)				
 - 180	SONIC	100				<u>174.0</u> 180.0	1917 S.A.A., crumbly; gray				
 190	- Sonic	100	-	CL			S.A.A., very hard				
 200	SONIC	100									
AVS 071317.GPJ	SONIC	100				203.0 208.0	1888 S.A.A., with lignite fragments; brown and black 1883 S.A.A., no lignite fragments, very hard; gray				
022 - 7/13/17 13:16 - C:\AVS	SONIC	: 100		CL		<u>219.0</u> 219.5 ۲	1872 LIGNITE, crumbly, (6" lense); black and brown	5 <u>6</u>			
AVS SOIL-WELL LOG.GDT - 7/13/17 13:16 - C.AVSBAVS_071317.GPJ 201 201 201 201 201 201 201 201	SONIC	100		CL			CLAY, very hard; gray				

A	AECOM WELL NUMBER MW-14 (S) PAGE 4 OF 4									
	IT <u>Basin</u> ECT NUM			5311		PROJECT NAME _Antelope Valley PROJECT LOCATION _Beulah, ND				
HLdad (t) 230	SAMPLE TYPE NUMBER	% RECOVERY	POCKET PENE- TROMETER, TSF	U.S.C.S.	GRAPHIC LOG	MATERIAL DESCRIPTION	WELL DIAGRAM			
	SONIC	100		CL		CLAY, very hard; gray 238.0 1853.5 LIGNITE, crumbly; very dry, black and brown	Grout (0' - 233' bgs) Bentonite Seal (233'-235' bgs) 2" Sch. 80 PVC Pipe			
 	SONIC	100		CL			 #40 Sand (235' - 248' bgs) 0.010 Slotted Pipe (237' - 247' bgs) Total Depth of Well 249' BOTC 			
 	SONIC	100	(CL CHER CL		252.5 1839.0 254.0 CHERT; light brown 1837.5 256.0 CLAY, very hard; gray 1835.5 Bottom of borehole at 256.0 feet.	Bentonite Chip Fill Below Well			

A	EC	<i>X</i> ON						WELL NUMB	ER MW-15 (S) PAGE 1 OF 4		
PRC DA DRI DRI LOC	DJEC FE S LLIN LLIN GGEI	TARTE IG CON IG MET D BY _	BER D <u>5/2</u> TRAC HOD	60495 23/201 TOR _ Rotar	5311 6 Casca y Soni	ade Dril c CHECK	PROJECT LOCATION OMPLETED 5/24/2016 GROUND ELE ng GROUND WAT COMPLETED 5/24/2016 GROUND WAT COMPLETED 6/24/2016 GROUND WAT COMPLETE	AT TIME OF DRILLING AT END OF DRILLING			
o DEPTH	(11)	SAMPLE TYPE NUMBER	% RECOVERY	POCKET PENE- TROMETER, TSF	U.S.C.S.	GRAPHIC LOG	MATERIAL DESCRIF		Casing Top Elev: 2 (ft) Casing Type: 2" PVC Pipe WELL DIAGRAM Top of Casing (estimated 2' ags)		
- - - - 10	-	SONIC	100				CLAY, with gravel; brown (Mine Spoils)		← Grout (0' - 232' bgs)		
- - - 20		SONIC	100						(0 - 222 bys) PVC Pipe (2' ags - 250' bgs)		
- - - 30	-	SONIC	100				6.0 S.A.A., gray	2076.9			
- - - 40		SONIC	100		CL		S.A.A., brown clay mixed with gray clay	2070.9			
MVS_071317.GPJ	- - -	SONIC	100	_			S.A.A., no gray coloring				
07 - 7/13/17 13:16 - C:\AVS 	-	SONIC	100	-			0.0	2042.9			
AVS SOIL-WELL LOG.GDT - 7/13/17 13:16 - C:/AVSIAVS_071317.GPJ	-	SONIC	100				S.A.A., brown and gray clay 4.0 S.A.A., trace lignite, no gravel	2038.9			

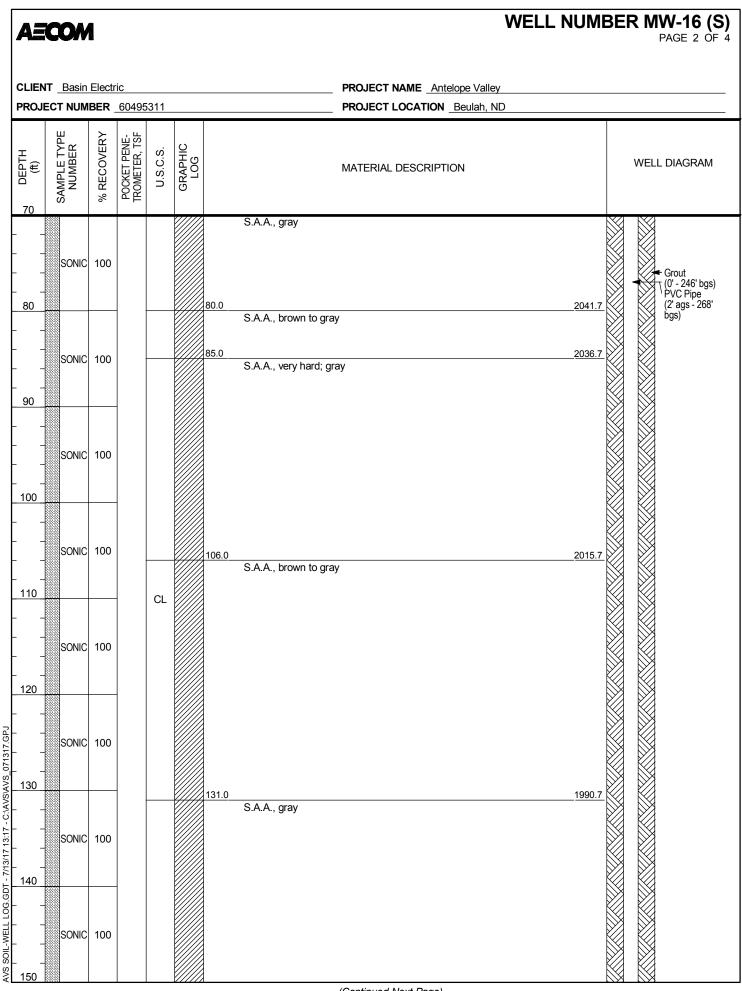
AE	CON					WELL NUM	WELL NUMBER MW-15 (S) PAGE 2 OF 4		
	IT <u>Basin</u> ECT NUM			5311		PROJECT NAME _ Antelope Valley PROJECT LOCATION _ Beulah, ND			
6 DEPTH (ft)	SAMPLE TYPE NUMBER	% RECOVERY	POCKET PENE- TROMETER, TSF	U.S.C.S.	GRAPHIC LOG	MATERIAL DESCRIPTION	WELL DIAGRAM		
 80	SONIC	100				S.A.A., trace lignite, no gravel	Grout (0' - 232' bgs) PVC Pipe (2' ags - 250' bgs)		
 90	SONIC	100				S.A.A., with gravel, no lignite	bgs)		
 100	SONIC	100				100.0 <u>2002.9</u>			
 110	SONIC	100		CI		S.A.A., no gravel			
 120	SONIC	100				120.0 1982.9			
	SONIC	100				S.A.A., very hard <u>126.0</u> S.A.A., silty clay; gray 1976.9			
140	SONIC	100				140.0 1962.9			
	SONIC	100				S.A.A., no silt 150.0 1952.9			

EA	ĊŎŴ	8				WELL NUN	IBER MW-15 (S) PAGE 3 OF 4		
	IT <u>Basin</u> ECT NUM			5311		PROJECT NAME _ Antelope Valley PROJECT LOCATION _ Beulah, ND			
HTH (ft) (ft)	SAMPLE TYPE NUMBER	% RECOVERY	POCKET PENE- TROMETER, TSF	U.S.C.S.	GRAPHIC LOG	MATERIAL DESCRIPTION	WELL DIAGRAM		
 160	SONIC	100		CL		S.A.A., with gravel; brown and gray	Grout (0' - 232' bgs) PVC Pipe (2' ags - 250' bgs)		
 170	SONIC	100		COAL		168.0			
 180	SONIC	100				CLAY, trace silt; gray 180.0 1922.			
 190	SONIC	100		CL		S.A.A., trace sand			
 200	SONIC	100				191.0 1911. S.A.A., sandy clay 1911. 196.0 1906. S.A.A., with shale, no sand, very hard 1906.			
	SONIC	100							
	SONIC	100		COAL		211.0 1891. 212.0 LIGNITE (1' lense); brown 1890. CLAY, very hard; gray 1890.			
	SONIC	100		<u>ŞHALI</u> CL		¥ 1877. 226.0 SHALE (1' lense); gray 1876. CLAY, very hard; gray 1876.			

EA	COM	I				WELL NUM	BER MW-15 (S) PAGE 4 OF 4
	T <u>Basin</u>			5311		PROJECT NAME _Antelope Valley PROJECT LOCATION _Beulah, ND	
нц (II) 230	SAMPLE TYPE NUMBER	% RECOVERY	POCKET PENE- TROMETER, TSF	U.S.C.S.	GRAPHIC LOG	MATERIAL DESCRIPTION	WELL DIAGRAM
 240	SONIC	100		CL		CLAY, very hard; gray 235.0 1867.9 S.A.A., crumbly	Grout (0' - 232' bgs) PVC Pipe (2' ags - 250' bgs) Bentonite Seal (232'-236' bgs)
 250	SONIC	100		COAL		242.0 1860.9 LIGNITE; brown 250.0 1852.9	
 260	SONIC	100		CL		CLAY, very hard; gray	Total Depth of Well 252' BOTC Bentonite Chip Fill Below Well
	SONIC	100				264.0 1838.9	
						Bottom of borehole at 264.0 feet.	

S SOIL-WELL LOG.GDT - 7/13/17 13:17 - C:\AVS\AVS_0713

EA		8						WELL NUMBE	ER MW-16 (S) PAGE 1 OF 4	
PROJE	STARTE NG CON NG MET ED BY _	iber D <u>5/2</u> itrac itrac itrod	60495 25/201 TOR _ Rotar Klutes	5311 6 Casc y Soni	ade Drilli ic CHECKI	COMPLETED _6/1/2016	AT END OF DRILLING			
o DEPTH (ft)	SAMPLE TYPE NUMBER	% RECOVERY	POCKET PENE- TROMETER, TSF	U.S.C.S.	GRAPHIC LOG		MATERIAL DESCRIPTION	C	asing Top Elev: 2 (ft) asing Type: 2" PVC Pipe WELL DIAGRAM Top of Casing (estimated 2' ags)	
 10	SONIC	100				CLAY, with gravel; bro	own (Mine Spoils)		Grout (0' - 246' bgs)	
 20	SONIC	100				20.0		2101.7	PVC Pipe (2' ags - 268' bgs)	
 30	SONIC	100				S.A.A., brown to gray				
 40	SONIC	100		CL						
0.11317.GPJ	SONIC	100								
7/13/17 13:17 - C: MVSIAVS	SONIC	100				S.A.A., gray		2069.7		
AVS SOIL-WELL LOGT - 7/13/17 13: 17 - C:WVSIAVS_071317. GPJ	SONIC	100								



⁽Continued Next Page)

A	ECC	W							WELL NUMBER MW-16 (S) PAGE 3 OF 4			
	IENT <u>B</u>				5311				PROJECT NAME _Antelope Valley PROJECT LOCATION _Beulah, ND			
HLU DEPTH	SAI	NUMBER	% RECOVERY	POCKET PENE- TROMETER, TSF	U.S.C.S.	GRAPHIC LOG		MATERIAL DESCRIPTION	MATERIAL DESCRIPTION WELL DIAGRAM			
- - - 16	-	ONIC	100				<u>156.0</u>	S.A.A., gray S.A.A., brown to gray	1965.7	Grout (0' - 246' bgs) PVC Pipe (2' ags - 268' bgs)		
- - - - 17	- - - - - -	ONIC	100									
- - - 18	- - - - -	ONIC	100		CL							
- - - 19	-	DNIC	100									
- - - 20	-	NIC	100		COAL		194.0 198.0	LIGNITE; brown CLAY, hard; gray	<u>1927.7</u>			
-	- - - - -	ONIC	100	-	CL COAL		203.0 206.0 210.0	LIGNITE; brown CLAY, crumbly; brown	<u> 1918.7</u> <u> 1915.7</u> 1911.7			
AVS SOIL-WELL LOG.GDT - 7/13/17 13:17 - C:AVSIAVS, 071317.69J	- - - - -	NIC	100	-	CL		215.0	S.A.A., trace silt; gray S.A.A., no silt, very hard	1906.7			
	- - - - - -	ONIC	100				222.0 224.0 227.0	LIGNITE; brown CLAY, very hard; brown S.A.A., trace sand, very hard; light brown	<u>1899.7</u> <u>1897.7</u> <u>1894.7</u>			

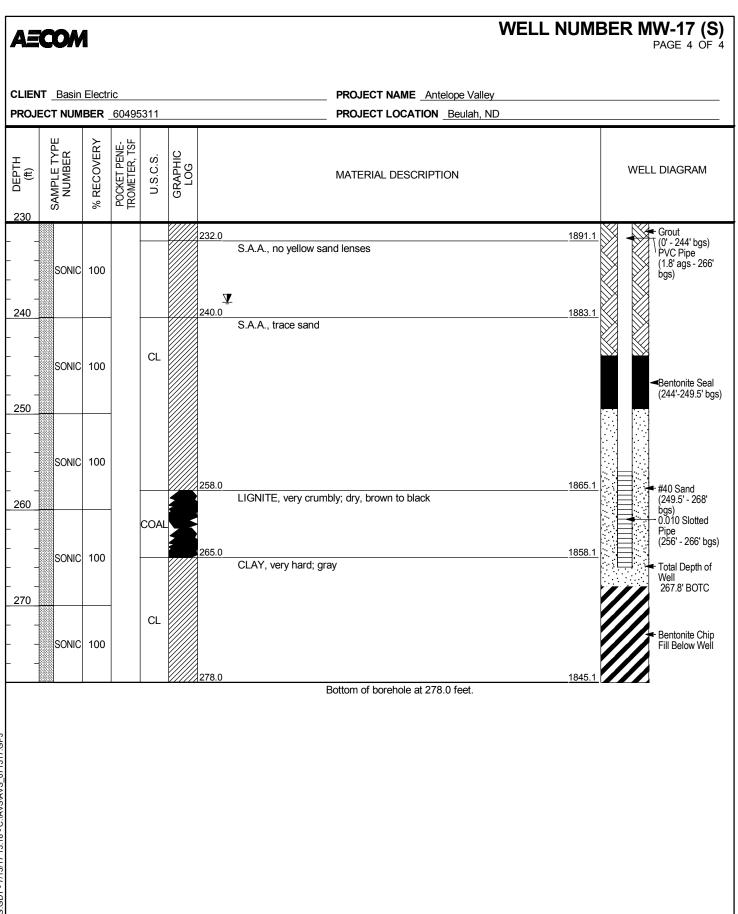
⁽Continued Next Page)

	CON					WELL NUM	BER MW-16 (S) PAGE 4 OF 4		
	IT <u>Basin</u> ECT NUM			5311		PROJECT NAME _Antelope Valley PROJECT LOCATION _Beulah, ND			
(t) (t) 230	SAN SAN POLICIES S					MATERIAL DESCRIPTION	WELL DIAGRAM		
	SONIC	100				S.A.A., trace sand, very hard; light brown 237.0 1884.7 S.A.A., very hard, crumbly; gray	Grout (0' - 246' bgs) PVC Pipe (2' ags - 268' bgs)		
240 250	SONIC	100		CL		¥			
	SONIC	100				255.0 1866.7 S.A.A., light brown to gray 258.0 1863.7	■Bentonite Seal (246'-254.5' bgs)		
 	SONIC	100	-	COAL		LIGNITE; brown 267.0 1854.7 CLAY, very hard; gray			
 	SONIC	100	-	CL		276.0	Well 270' BOTC A Native Clay Below Well - Natural Collapse		

A	C	0/							WELL NUMBER	MW-17 (S) PAGE 1 OF 4
PROJ DATE DRILI DRILI LOGO	iec 5 St Ling Ling Ged	G CON G CON G MET	iber D <u>6//</u> itrac itrac itrod	60495 2/2016 CTOR Rotar Klutes	5311 Casc y Son	ade Dri ic CHECP	COMPLETED _6/3/2016		E Not Applicable	
o DEPTH (ft)		SAMPLE TYPE NUMBER	% RECOVERY	POCKET PENE- TROMETER, TSF	U.S.C.S.	GRAPHIC LOG		MATERIAL DESCRIPTION	Casin	g Top Elev: 1.8 (ft) g Type: 2" PVC Pipe WELL DIAGRAM Top of Casing (estimated 1.8' ags)
 10		SONIC	100				CLAY, trace sand;	; brown to orange (Mine Spoils)		- Grout
 20		SONIC	100				20.0		2103.1	(0' - 244' bgs) PVC Pipe (1.8' ags - 266' bgs)
 30		SONIC	100				S.A.A., brown to li	ght brown		
 40		SONIC	100		CL		31.0S.A.A., with gravel	I, no sand; brown	2092.1	
	-	SONIC	100							
AVS SOIL-WELL LOG.GDT - 7/13/17 13:18 - C:ANVSAVS_071317.GPJ 02 09 00 00 00 00 00 00 00 00 00 00 00 00	-	SONIC	100				51.0 S.A.A., very sticky		2072.1	
	-	SONIC	100							

EA	ĊŎŴ	1					WELL NUMBER MW-17 (S) PAGE 2 OF 4		
	IT <u>Basin</u>						PROJECT NAME _ Antelope Valley		
PROJE	ECT NUM	BER		5311	1	PROJECT LOCATION _Beulah, NI	D		
o DEPTH (ft)	SAMPLE TYPE NUMBER	% RECOVERY	POCKET PENE- TROMETER, TSF	U.S.C.S.	GRAPHIC LOG	MATERIAL DESCRIPTION	WELL DIAGRAM		
						71.0 S.A.A., hard; brown to gray	2052.1		
 	SONIC	100	-				Grout (0' - 244' bgs) PVC Pipe (1.8' ags - 266' bgs)		
 90	SONIC	100				90.0	2033.1		
 100	SONIC	100				S.A.A., trace gravel, very hard 95.0 S.A.A., gray	2028.1		
 110	SONIC	100		CI		S.A.A., increasing gravel 107.0 S.A.A., with poorly cemented brown sandstone	2016.1		
 120	SONIC	100				116.0 S.A.A., no sandstone	2007.1		
	SONIC	100				125.0 S.A.A., gravel lenses of lignite and scoria; brown to gray	1998.1		
	SONIC	100				135.0 S.A.A., with gravel and gray clay; brown 140.0	1988.1		
	SONIC	100				S.A.A., trace gravel			

A	ECO	M				WELL NUM	BER MW-17 (S) PAGE 3 OF 4
CLIE	ENT Bas	in Elec	tric			PROJECT NAME _ Antelope Valley	
PRO	JECT N	IMBER	6049	5311	1	PROJECT LOCATION Beulah, ND	
HLd30	SAI	% RECOVERY	POCKET PENE- TROMETER, TSF	U.S.C.S.	GRAPHIC LOG	MATERIAL DESCRIPTION	WELL DIAGRAM
- - - 160	- - - - -	IC 100)			S.A.A., trace gravel 160.0 1963.1	Grout (0' - 244' bgs) PVC Pipe (1.8' ags - 266' bgs)
 	- - - - -	IC 100)			S.A.A., increasing gravel	
	- - - -	IC 100)	CL		S.A.A., no gravel; gray	
 	- - - - -	IC 100)			S.A.A., with gravel, trace brown clay 1949.1 185.0 1938.1 S.A.A., trace sand, no gravel 1938.1	
		IC 100)	COAL		191.0 1932.1 192.0 LIGNITE (less than 1' in thickness); brown 1931.1 CLAY, trace sand; gray	
SIAVS_071317.GPJ	-	IC 100)	CL			
7 - 7/13/17 13:18 - C:AVS	-	IC 100				215.0 1908.1 S.A.A., dark gray 220.0 1903.1	
AVS SOIL-WELL LOG.GDT - 7/13/17 13:18 - C.AVSAVS_071317.6PJ 071317.6PJ 071317.6PJ 071317.6PJ		IC 100)	SC CL		SANDY CLAY, crumbly; gray 226.0 1897.1 CLAY, crumbly; gray with yellow sand lenses	

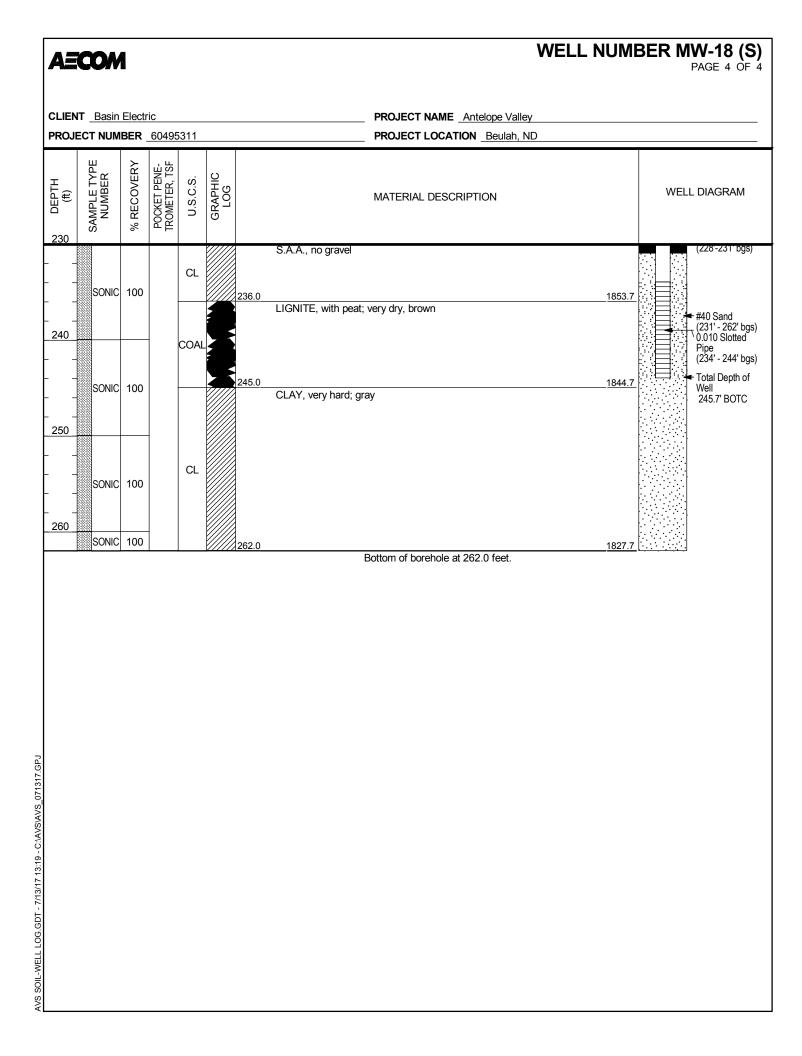


AVS SOIL-WELL LOG.GDT - 7/13/17 13:18 - C:\AVS\AVS_071317.GPJ

EA	cow						W	ELL NUMBE	R MW-18 (S) PAGE 1 OF 4	
PROJE	STARTE NG CON NG MET ED BY _	BER D <u>5/</u> TRAC HOD	60495 17/2010 TOR _ 	5311 6 Casc y Soni	ade Dri ic CHECI	COMPLETED <u>5/18/2016</u> illing	AT END OF DRILLING			
o DEPTH (ft)	SAMPLE TYPE NUMBER	% RECOVERY	POCKET PENE- TROMETER, TSF	U.S.C.S.	GRAPHIC LOG		MATERIAL DESCRIPTION		asing Top Elev: 1.7 (ft) asing Type: 2" PVC Pipe WELL DIAGRAM Top of Casing (estimated 1.7' aqs)	
 10	SONIC	100				CLAY; brown (Min	e Spoils)		Grout	
	SONIC	100				20.0		2069.7	(0' - 228' bgs) PVC Pipe (1.7' ags - 244' bgs)	
 30	SONIC	100		CI		S.A.A., with sand				
 40	SONIC	100								
	SONIC	100								
AVS SOIL-WELL LOG.GDT - 7/13/17 13:18 - C.IAVSAVS_071317.GDJ	SONIC	100						2029.7		
AVS SOIL-WELL LOG.GC	SONIC	100		ML		SIL I, with clay and	l gravel, stiff; brown to gray			

AE	ico/	1					WELL	NUME	BER MW-18 (S) PAGE 2 OF 4		
	IT <u>Basin</u> ECT NUM			5311			PROJECT NAME _Antelope Valley PROJECT LOCATION _Beulah, ND				
02 DEPTH (ft)	SAMPLE TYPE NUMBER	% RECOVERY	POCKET PENE- TROMETER, TSF	U.S.C.S.	GRAPHIC LOG		MATERIAL DESCRIPTION		WELL DIAGRAM		
 80	SONIC	100		ML		76.0	SILT, with clay and gravel, stiff; brown to gray S.A.A., trace sand, no gravel, crumbly; gray	2013.7	Grout (0' - 228' bgs) PVC Pipe (1.7' ags - 244'		
 90	SONIC	100				86.0	CLAY with silt and gravel, very hard; brown	2003.7	bgs)		
 100	SONIC	100		CL		100.0		1989.7			
 110	SONIC	100	_				SILT, with brown clay, trace gravel, trace coarse sand, crumbly; gray				
 120	SONIC	100		ML							
 130	SONIC	100		CL		123.0 129.0	CLAY, trace silt, very stiff; brown SILT, trace sand, crumbly; gray	<u>1966.7</u> <u>1960.7</u>			
	SONIC	100		ML		136.0	CLAY, trace sand and gravel, firm; brown	1953.7			
 - 130 	SONIC	100	-	CL SP		140.0 147.0	S.A.A., very stiff SAND, medium-grained, trace brown clay; orange	<u>1949.7</u> <u>1942.7</u>			

A	:00	M						WELL NUM	BER M	W-18 (S) PAGE 3 OF 4
	NT <u>Ba</u> IECT N				311			PROJECT NAME Antelope Valley PROJECT LOCATION Beulah, ND		
HTH (ff) 120	SAMPLE TYPE NI IMBER		% RECOVERY	POCKET PENE- TROMETER, TSF	U.S.C.S.	GRAPHIC LOG		MATERIAL DESCRIPTION	WEL	L DIAGRAM
	- - - - -	NC 10	00	-	SP ML		156.0	SAND, medium-grained, trace brown clay; orange 1933.7 SILT, trace brown clay, very stiff, crumbly; gray 1930.7		 Grout (0' - 228' bgs) PVC Pipe (1.7' ags - 244' bgs)
<u> 160</u> -		NC 10	00				167.0	CLAY, trace gravel, very stiff; brown 1922.7 S.A.A., with small lenses of medium-grained sand and gravel		
	- - - - - - -	JIC 10	00	-			<u>175.0</u> 180.0	1914.7 S.A.A., no sand or gravel lenses 1909.7		
 190	- - - - -	NIC 10	00	-			<u>185.0</u> 188.0	S.A.A., very hard S.A.A., with some gravel (possible slough) S.A.A., no gravel 1901.7		
	- - - -	IIC 10	00		CL		Ā			
AVS 071317.GPJ	- - - -	IIC 10	00							
T - 7/13/17 13:19 - C:\AVS	- 	IIC 10	00							
AVS SOIL-WELL LOG.GDT - 7/13/17 13:19 - C:\AVSIAVS_071317.GPJ	SOI	JIC 10	00							■Bentonite Seal



ROJECT NUM ATE STARTE RILLING COM RILLING MET OGGED BY _	<u>Electr</u> IBER D <u>5/</u> ITRAC ITRAC	60498 19/201 TOR Rotar Klutes	5311 6 Casca y Soni	COMPLETED _5/20/201 ade Drilling	PROJECT NAME <u>Antelope Valley</u> PROJECT LOCATION <u>Beulah, ND</u> G GROUND ELEVATION <u>2040.68 ft</u> GROUND WATER LEVELS: AT TIME OF DRILLING AT END OF DRILLING	HAMMER TYPE Not Applicable
(ft) SAMPLE TYPE NUMBER	% RECOVERY	POCKET PENE- TROMETER, TSF	U.S.C.S.	GRAPHIC LOG	MATERIAL DESCRIPTION	Casing Top Elev: 3 (ft) Casing Type: 2" PVC Pipe WELL DIAGRAM Top of Casing (estimated 3' a
0	100			CLAY, with mec	lium-grained gravel; dark brown (Mine Spoils)	Grout (0' - 172' bgs)
- - - - 20	100			20.0		2020.7
- - - - 30	100			S.A.A., grades r	noist; dark brown to light brown	
- _ SONIC 	100	-	CL	40.0SAA_trace.or	avel; brown with light brown horizons	2000.7
- - - - 50	100	-				
- _ _ 50	100			58.0 S.A.A., trace po	orly cemented sandstone fragments; brown	1982.7
- - - - 70	100					

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A	ΞC	ØW						WELL NUM	BER MW-19 (S) PAGE 2 OF 3
		Basin T NUM			5311			PROJECT NAME Antelope Valley PROJECT LOCATION Beulah, ND	
DEPTH		SAMPLE TYPE NUMBER	% RECOVERY	POCKET PENE- TROMETER, TSF	U.S.C.S.	GRAPHIC LOG		MATERIAL DESCRIPTION	WELL DIAGRAM
- - - 80		SONIC	100				80.0	S.A.A., trace poorly cemented sandstone fragments; brown 1960.7	Grout (0' - 172' bgs) PVC Pipe (3' ags - 186' bgs)
- - - 90	-	SONIC	100					S.A.A., sandy clay, dry, crumbly	bgs)
- - - - 10	-	SONIC	100		CL		100.0	1940.7	
- - - - 11	-	SONIC	100				<u>106.0</u>	S.A.A., grades moist <u>1934.7</u> S.A.A., moist; gray with small brown inclusions	
- - - 12	-	SONIC	100				116.0	1924.7 SILT, trace clay, very hard, very compacted; gray 1920.7 S.A.A., CLAYEY SILT	
SVAVS_071317.GPJ	-	SONIC	100		ML			S.A.A., CLATET SILT	
AVS SOIL-WELL LOG.GDT - 7/13/17 13:19 - C:AVSIAVS_071317.GPJ 1	-	SONIC	100				139.0	1901.7 CLAY, with chert, some shale, very hard, crumbly; gray	
AVS SOIL-WELL LOG.G	-	SONIC	100		CL		143.0 	S.A.A., grades without chert and shale	

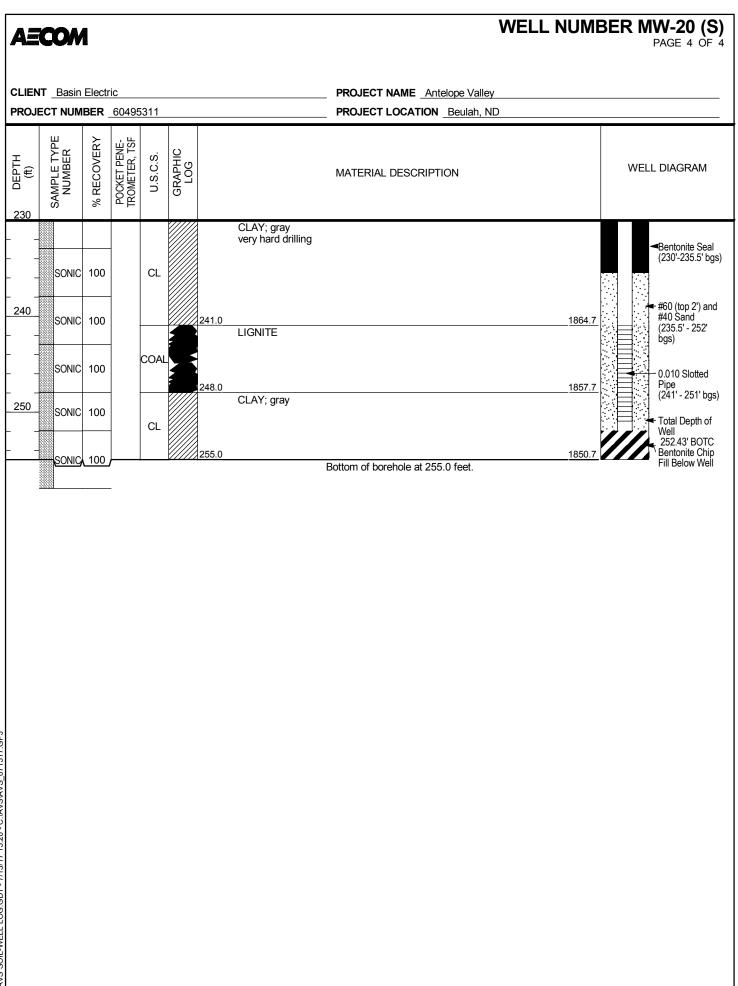
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	T Basir	<u>n E</u> lecti	ric_			PROJECT NAME _ Antelope Valley	
				5311		PROJECT LOCATION _Beulah, ND	
(#) 150	SAMPLE TYPE NUMBER	% RECOVERY	POCKET PENE- TROMETER, TSF	U.S.C.S.	GRAPHIC LOG	MATERIAL DESCRIPTION	WELL DIAGRAM
- - - 160	SONIC	100	_			152.0 1888. S.A.A., mottled black and brown	Global (0' - 172' bgs) PVC Pipe (3' ags - 186' bgs)
- - - - 70	SONIC	100	-	CL		161.0 1879. S.A.A., grades gray	
- - - 180	SONIC	: 100	-			174.0 1866. S.A.A., grades with silt 1862. 178.0 1862. LIGNITE, very crumbly; black to brown 1862.	- (1/2-1/4 bgs
- - - 90	SONIC	: 100	-	COAL		186.0	bgs) 0.010 Slotted Pipe
- - - -	SONIC	100	-	CL			Bentonite Chi Fill Below We
_	SONIC	100				208.0	

PROJECT NUMBER <u>60</u> DATE STARTED <u>11/7/2</u> DRILLING CONTRACTO DRILLING METHOD <u>Ra</u> DOGGED BY <u>Ryan Klut</u>	495311 2016 COM R Cascade Drilling Dtary Sonic es CHECKED E	PROJECT NAME Antelope Valley PROJECT LOCATION Beulah, ND LETED 11/16/2016 GROUND ELEVATION 2105.6 GROUND WATER LEVELS: AT TIME OF DRILLING (A. Lanning AT END OF DRILLING	
UEPTH (ft) (ft) (ft) (ft) (ft) (ft) (ft) (ft)	U.S.C.S. GRAPHIC LOG	MATERIAL DESCRIPTION	Casing Top Elev: 1.43 (ft) Casing Type: 4" PVC Pipe WELL DIAGRAM Top of Casing (estimated 1.43'
- - SONIC 100 10 - - - - SONIC 100 20 - - - 20 - - - 20 - - - 20 - - - 20 - - - 20 - - - 20 - - - 20 - - - 30 - - - 30 - - - 30 - - - 40 - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -	CL	CLAY, reworked; brown	ags)

A	ECOA	1				WELL N	UMBER	MW-20 (S) PAGE 2 OF 4	
	INT <u>Basir</u> JECT NUN			311		PROJECT NAME Antelope Valley PROJECT LOCATION Beulah, ND			
DEPTH (ft)	Ш	% RECOVERY	POCKET PENE- TROMETER, TSF	U.S.C.S.	GRAPHIC LOG	MATERIAL DESCRIPTION	W	/ELL DIAGRAM	
80	- - - -	100				CLAY, reworked; brown		Grout (0' - 230' bgs) PVC Pipe (1.43' ags - 251' bgs)	
- - - 90	- - - -	100						bgs)	
- - - - 100	-	: 100							
- - - - 110	-	: 100		CL					
- - - 120	-	: 100							
AVS_071317.GPJ	- - - -	100							
071 - 7/13/17 13:20 - C:\AVS\	-	100				40.0	1965.7		
AVS SOIL-WELL LOG.GDT - 7/13/17 13:20 - C:AVSAVS_071317.GPJ 01 01 02		100		CL		SILTY CLAY, very hard, reworked material; gray	1956.7		

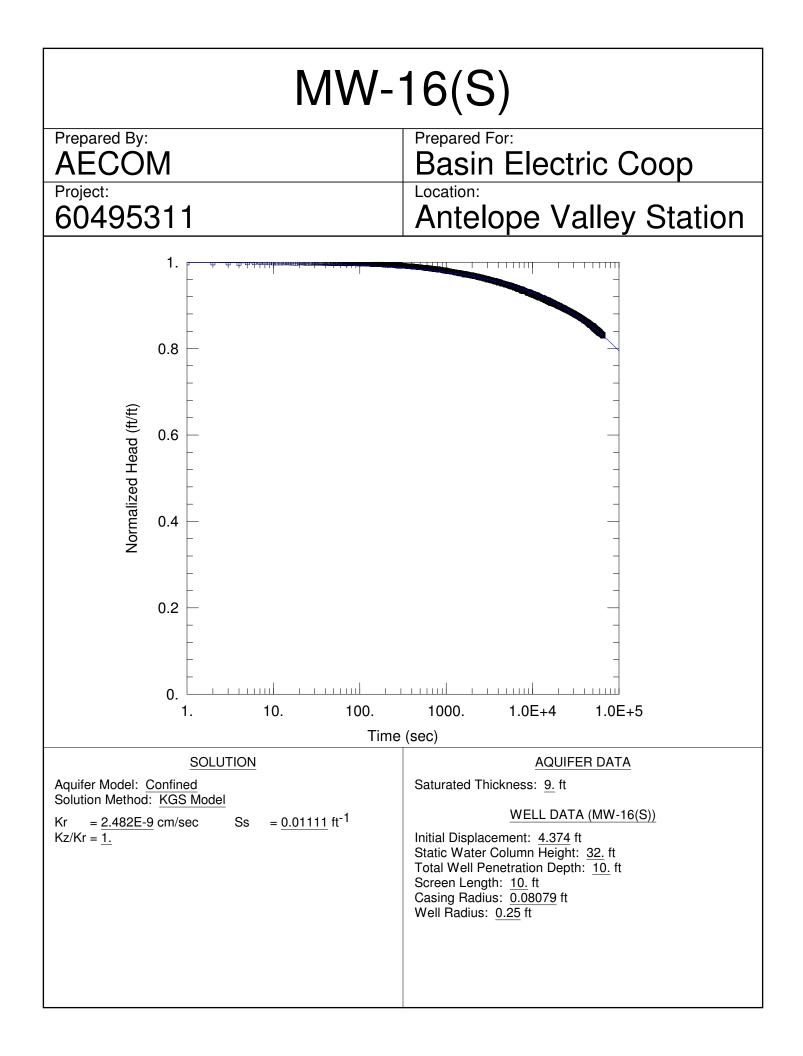
EA	CON					WELL	NUMBER MW-20 (S) PAGE 3 OF 4
	T <u>Basin</u> ECT NUM			5311		PROJECT NAME _Antelope Valley PROJECT LOCATION _Beulah, ND	
HTH (ff) 120	SAMPLE TYPE NUMBER	% RECOVERY	POCKET PENE- TROMETER, TSF	U.S.C.S.	GRAPHIC LOG	MATERIAL DESCRIPTION	WELL DIAGRAM
 160	SONIC	100				CLAY, reworked; brown	Grout (0' - 230' bgs) PVC Pipe (1.43' ags - 251' bgs)
 170	SONIC	100		CL			
 180	SONIC	100		CL	CL	172.0 CLAY/SILT, lignite fragments, native material; gray 180.0	1933.7
	SONIC	70		COAL		LIGNITE, clay; gray 185.0 LIGNITE (<1")	1920.7
 	SONIC		-				
200 	SONIC	100	-				
9.16 0	SONIC	100	-	CL			
	SONIC						
	SONIC						

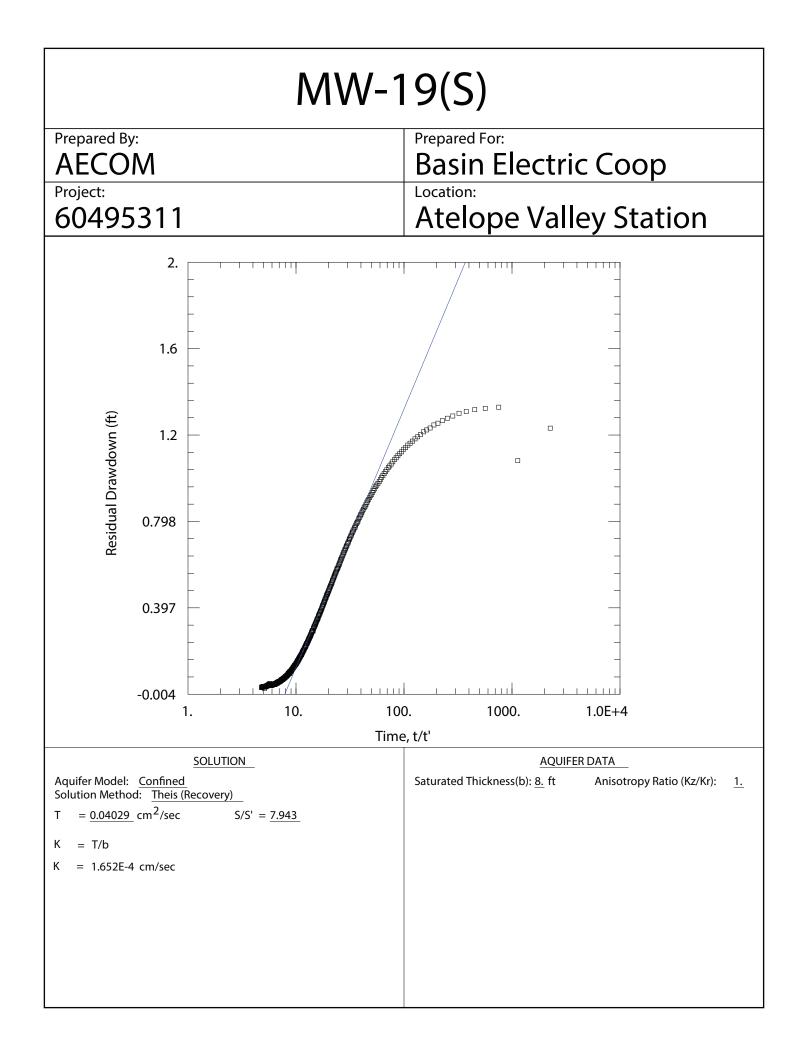


AVS SOIL-WELL LOG.GDT - 7/13/17 13:20 - C:\AVS\AVS_071317.GPJ

Appendix B

Aquifer Test Procedures, Data and Analysis





AECOM 1000 E Calgary Avenue, Suite 1 Bismarck, ND 58503 aecom.com