



February 18, 2025

Mr. John Lee
ExxonMobil Environmental and Property Solutions
c/o Infineum
1900 East Linden Avenue, Building 28a
Linden, NJ 07036

RE: RESPONSE TO POTABLE SUPPLY WELL SAMPLING REDUCTION WORK PLAN
Case No. 2006-0303-BA
Consent Decree
Former Exxon R/S No. 2-8077
14258 Jarrettsville Pike, Phoenix
Baltimore County, Maryland

Dear Mr. Lee:

The Maryland Department of the Environment's (MDE) Oil Control Program (OCP) completed a review of the *Potable Supply Well Sampling Reduction Work Plan*, dated June 11, 2024, and the *Third Quarter 2024 Groundwater Monitoring Report*, dated November 15, 2024, both prepared by Kleinfelder, Inc. (Kleinfelder) on behalf of ExxonMobil Environmental & Property Solutions (ExxonMobil). The work plan outlined a request to cease sampling of 24 of the 28 private supply wells (PSWs) that are currently sampled at various frequencies.

The proposal was based on the following conditions/criteria:

- The 24 PSWs have not had detections of petroleum hydrocarbon constituents in exceedance of MDE's drinking water standards for over 2 years;
- The 24 PSWs have not had detections of petroleum hydrocarbon constituents above half of MDE's drinking water standards for over 10 years;
- There are no ExxonMobil owned or managed point of entry treatment systems on any of the 24 properties proposed for discontinued PSW sampling; and
- There is no on-going remediation on any of the 24 properties proposed for discontinued PSW sampling.

The following items were considered as part of MDE's data review:

- The proximity of properties to the 2006 release area and areas of documented petroleum-related impacts (e.g., liquid, adsorbed, and dissolved phase hydrocarbons);
- The current concentrations in the PSWs;
- The historical sampling results and trends; and
- The proximity to groundwater monitoring and former recovery wells.

MDE has evaluated ExxonMobil's proposed changes to the PSW sampling requirements and based on the available information considered and reviewed provides the following summary with property specific details found in Table 1.

- MDE approves discontinuation of PSW sampling at 14 of the requested 24 properties, pending the results of a final round of sampling from each PSW. MDE will send a letter to each property owner notifying them of ExxonMobil's proposal and MDE's intention to approve the discontinuation of sampling from the PSW serving the property. The letter will inform them that the next sampling event will be the final event unless there is an unexpected result that needs further evaluation.
- MDE approves the continued PSW sampling of the four properties indicated and at the frequencies proposed by ExxonMobil.
- MDE requires the continued PSW sampling of the 10 properties indicated.

As discussed during the annual consent decree technical meeting on January 23, 2025, additional reductions to the PSW sampling program will be considered following completion of a minimum of two rounds of discrete zone sampling of the monitoring well network and a review of the sampling results in context with the spatial extents of the monitoring well network (i.e., in a three dimensional context).

While MDE agrees to these modifications to sampling pursuant to the Consent Decree and its negotiated requirements with respect to this case involving Former Exxon R/S No. 2-8077, the State of Maryland, including all its departments, reserves all rights against ExxonMobil with respect to all other past, present, and future cases to the State. The MDE reserves the right to require additional sampling based on new information, changing site conditions, or as a final sampling event prior to issuing case closure.

If you have any questions, please contact the case manager, Mr. Matthew Mueller, at 410-537-3574 or matthew.mueller@maryland.gov, or the regional supervisor, Ms. Ellen Jackson, at 410-537-3482 or ellen.jackson@maryland.gov.

Sincerely,



Susan Bull, Division Chief
Remediation Division
Oil Control Program

Enclosures: Table 1. MDE Approved Private Supply Well Sampling Program with Modifications

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cc: Alicyn Craig, Esquire, ExxonMobil Corporation
Mr. Mark Schaaf, Kleinfelder East, Inc.
Mr. Kevin Koepenick, Manager, Groundwater Management Section, Balt. County DEPS
Mr. Matthew Mueller, Case Manager, Remediation Division, Oil Control Program
Ms. Ellen Jackson, Regional Supervisor, Remediation Division, Oil Control Program
Julie Kuspa, Esquire, Office of Attorney General
Mr. Christopher H. Ralston, Program Manager, Oil Control Program

Table 1. MDE Approved Private Supply Well Sampling Program with Modifications

Address	Lot ID	Current Sampling Frequency	ExxonMobil Proposed Sampling Frequency	MDE Approval OR Require Sampling (Bold Type)	MW on Property	Current MTBE Concentration in PSW (ppb)**	Current Benzene Concentration in PSW (ppb)	Usage	MDE Comment
14102 Robcaste Road	M35P386LNA	SA	None	Approve discontinuation of PSW sampling pending results of final sampling event	No	ND(0.50)	ND(0.50)	Residential	
14217 Robcaste Road	M35P322L05	Q	None	Continued sampling required on Semiannual frequency	No	0.71	ND(0.50)	Residential	To be reevaluated pending final discrete sampling results and MW network finalization.
14232 Jarrettsville Pike	M35P210LNA	SA	None	Approve discontinuation of PSW sampling pending results of final sampling event	No	ND(0.50)	ND(0.50)	Commercial	
14240 Jarrettsville Pike *	M35P182LNA	SA	None	Continued sampling required on Semiannual frequency	No	0.22	ND(0.50)	Commercial	To be reevaluated pending final discrete sampling results and MW network finalization.
14242 Jarrettsville Pike	M35P183LNA	Q	None	Continued sampling required on Semiannual frequency	No	ND(0.50)	ND(0.50)	Commercial	To be reevaluated pending final discrete sampling results and MW network finalization.
14243 Jarrettsville Pike	M35P217LNA	SA	None	Approve discontinuation of PSW sampling pending results of final sampling event	No	ND(0.50)	ND(0.50)	Commercial	
14355 Hampshire Knob	M35P356L20	SA	None	Approve discontinuation of PSW sampling pending results of final sampling event	No	ND(0.50)	ND(0.50)	Residential	
3235 Paper Mill Road	M35P310L08	SA	None	Approve discontinuation of PSW sampling pending results of final sampling event	No	ND(0.50)	ND(0.50)	Residential	
3503 Hampshire Glen Ct	M35P356L24	Q	None	Approve discontinuation of PSW sampling pending results of final sampling event	No	ND(0.50)	ND(0.50)	Residential	
3504 Hampshire Glen Ct	M35P356L03	SA	None	Approve discontinuation of PSW sampling pending results of final sampling event	No	ND(0.50)	ND(0.50)	Residential	
3505 Hampshire Glen Ct	M35P356L23	SA	None	Approve discontinuation of PSW sampling pending results of final sampling event	No	ND(0.50)	ND(0.50)	Residential	
3506 Hampshire Glen Ct	M35P356L04	Q	Q	Approve continuation of quarterly sampling	Yes	0.19	ND(0.50)	Residential	
3510 Hampshire Glen Ct	M35P278L02H	SA	None	Approve discontinuation of PSW sampling pending results of final sampling event	No	ND(0.50)	ND(0.50)	Residential	

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3600 Hampshire Glen Ct	M35P356L06	SA	None	Approve discontinuation of PSW sampling pending results of final sampling event	No	ND(0.50)	ND(0.50)	Residential	
3605 B Southside Ave	M35P221L02	SA	None	Approve discontinuation of PSW sampling pending results of final sampling event	No	ND(0.50)	ND(0.50)	Residential	
3605 C Southside Ave	M35P221L03	SA	None	Approve discontinuation of PSW sampling pending results of final sampling event	No	ND(0.50)	ND(0.50)	Residential	
3606 Hampshire Glen Ct	M35P356L11	SA	None	Approve discontinuation of PSW sampling pending results of final sampling event	No	ND(0.50)	ND(0.50)	Residential	
3627A Southside Ave	M36P122LNA	M	M	Approve continuation of monthly sampling	No	ND(0.50)	ND(0.50)	Residential	
3635 Southside Ave	M36P226LNA	M	Q	Approve reduction to quarterly sampling	No	6.8	ND(0.50)	Residential	
14223 Robcaste Road	M35P322L02	Q	None	Continued sampling required on Semiannual frequency	Yes	ND(0.50)	ND(0.50)	Residential	To be reevaluated pending final discrete sampling results and MW network finalization.
14258 Jarrettsville Pike- Station	M35P185LNA	Q	None	Continued sampling required on Semiannual frequency	Yes	ND(0.50)	ND(0.50)	Commercial	To be reevaluated pending final discrete sampling results and MW network finalization.
14301 Jarrettsville Pike	M35P031LNA	Q	None	Continued sampling required on Semiannual frequency	Yes	0.12	ND(0.50)	Commercial	To be reevaluated pending final discrete sampling results and MW network finalization.
14315 Jarrettsville Pike	M35P152L01	Q	None	Continued sampling required on Semiannual frequency	Yes	ND(0.50)	ND(0.50)	Commercial	To be reevaluated pending final discrete sampling results and MW network finalization.
3313 Paper Mill Road	M35P054LNA	Q	None	Continued sampling required on Semiannual frequency	Yes	2.4	ND(0.50)	Commercial	To be reevaluated pending final discrete sampling results and MW network finalization.
3320 Paper Mill Road	M35P123LNAP	SA	None	Approve discontinuation of PSW sampling pending results of final sampling event	Yes	ND(0.50)	ND(0.50)	Commercial	Variance to Flow Chart.
3508 Hampshire Glen Ct	M359356L05	Q	None	Continued sampling required on Semiannual frequency	Yes	ND(0.50)	ND(0.50)	Residential	To be reevaluated pending final discrete sampling results and MW network finalization.

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3605 A Southside Ave	M35P221L01	SA	None	Continued sampling required on Semiannual frequency	Yes	ND(0.50)	ND(0.50)	Residential	To be reevaluated pending final discrete sampling results and MW network finalization.
14307 Jarrettsville Pike *	M35P151LNA	Q	Q	Approve continuation of quarterly sampling	Yes	0.17	ND(0.50)	Commercial	

Notes:

M = Monthly

Q = Quarterly

SA = Semi-Annual

* = two private supply wells on property

**=Refer to laboratory reports in Status Reports for qualifiers and sampling dates.

Exxon proposes to continue to sample