



Maryland
Department of
the Environment

Wes Moore, Governor
Aruna Miller, Lt. Governor

Serena McIlwain, Secretary
Suzanne E. Dorsey, Deputy Secretary
Adam Ortiz, Deputy Secretary

February 2, 2026

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

RE: SELECT MONITORING WELL ABANDONMENT APPROVAL
Case No. 2006-0303-BA
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 *Discrete Depth Sampling Results, Sampling Modification, and Well Abandonment Work Plan*, dated June 4, 2025, and the *Third Quarter 2025 Groundwater Monitoring Report*, dated November 13, 2025, prepared by Kleinfelder, on behalf of ExxonMobil Environmental and Property Solutions. In a letter dated December 19, 2023, OCP approved the remediation system shutdown, and the reduction of the post-monitoring network by approving the abandonment of 115 monitoring wells. In a letter dated September 24, 2025, OCP approved the discontinuation of private supply wells (PSW) sampling at thirteen properties.

Since the remediation system was shut down on December 21, 2023, approximately eight quarters of post-remediation gauging and groundwater sampling were performed, including two quarters of additional hydro-sleeve depth specific groundwater sampling. Based on a review of the existing monitoring well network, Kleinfelder proposed to properly abandon or suspend monitoring of wells that are considered redundant based upon adjacent monitoring wells, or in areas where concentrations of methyl tert-butyl ether (MTBE) have not been detected above MDE action levels for 10 years or longer. Specifically, 44 additional monitoring wells were proposed for abandonment, and sampling of three out-of-use water supply wells was proposed to be suspended (MW-166, PW-14311, and PW-3501).

The post-remedial network reduction proposal is summarized as follows:

- Forty-four of the forty-seven wells proposed for abandonment or suspension of groundwater sampling have been below groundwater standards for at least 2 years.
- Eleven of the wells have never exceeded standards, including the three water supply wells that are not in use.
- Three of the monitoring wells proposed for abandonment, MW-139, MW-178C, and SVE-2, demonstrated concentrations of petroleum impacts that exceeded the action level for MTBE at least once in the last year. However, all the concentrations exhibit decreasing trends.

Kleinfelder proposes to retain 25 monitoring wells for quarterly sampling, and monthly sampling of any monitoring well that has a concentration in an exceedance of the stipulated trigger values.

Based on the current land use, the available information reviewed, OCP approves abandonment of the monitoring wells and monitoring well sampling frequencies as detailed in the enclosed Table 1. A summary of the proposed and approved monitoring activities is provided below.

Summary of Proposed / Approved Monitoring Activities and Well Abandonments

| | Current Totals | EM Proposed Totals | MDE Approved Totals |
|---|-----------------------|---------------------------|----------------------------|
| Existing Monitoring Wells (including the three inactive Supply Wells) | 72 | 28 | 54 |
| Sampled | 72 | 25 | 51 |
| -Quarterly Sampling | 37 | 25 | 25 |
| - Semi-Annual Sampling | 35 | 0 | 26 |
| Suspend Sampling at inactive Supply Wells | 0 | 3 | 3 |
| Abandoned Wells | 237 | 281 | 255 |
| Total Wells | 309 | 309 | 309 |

MDE requires that of the **72** wells currently remaining, **54** monitoring wells (including the three inactive supply wells) are to be retained, with **51** retained for continued monitoring (sampling and gauging), and **3** inactive supply wells to be retained without sampling. Regarding the approval of the suspension of sampling of the 3 inactive supply wells, the Baltimore County Department of Environmental Protection and Sustainability is the permitting authority, and all permits and approvals must be obtained prior to placing these wells back in service. Exxon must keep OCP and Baltimore County Department of Environmental Protection and Sustainability updated on the status of these water supply wells.

The monitoring wells approved for abandonment must be properly abandoned by a Maryland-licensed well driller in accordance with all applicable requirements of Code of Maryland Regulations (COMAR) 26.04.04.34-36. Provide copies of the required well abandonment reports to both OCP (Attn: Mr. Matthew Mueller) and the Baltimore County Department of Environmental Protection and Sustainability (Attn: Mr. Kevin Koepenick). Notify OCP at least five working days

prior to performing well abandonment activities so OCP staff has an opportunity to observe the work activities.

This letter is not a not a waiver or limitation of MDE's right to take enforcement action in the future based upon contamination at and around the site. The MDE and the State of Maryland retain all authority and rights to seek all available relief, including equitable relief and damages of any nature, such as compensatory and natural resource damages, for contamination at and around the site.

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,



Mrs. Susan Bull, Chief
Remediation Division
Oil Control Program

Enclosure: Table 1 – MDE Approved Monitoring Activities

cc: Alicyn Craig, Esquire, ExxonMobil Corporation
Mrs. Leslie Steele, Principal Engineer / Project Manager, 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

Table 1

**MDE Approved Monitoring Activities with Trigger Values
Inactive Exxon Facility #28077
14258 Jarrettsville Pike
Phoenix, MD**

February 2026

| Well ID | Address | Screen Interval (feet below top of casing) | Sampling Method | Screen Interval Start (ft below TOC) | Date*** GW Recovery Activities Ceased | Last Sampling Date*** (update Quarterly) | Last MTBE Result*** (ppb) | Trigger Level for Action MTBE (ppb) | Last Benzene Result *** (ppb) | Trigger Level for Action Benzene (ppb) | Current Monitoring Activity * | Proposed Monitoring Activity ** | MDE Response 2026 | MDE Rationale 2026 |
|---------|-------------------------|---|-----------------|---|--|---|---------------------------------|---|---|--|-------------------------------------|---------------------------------------|----------------------|----------------------------------|
| MW-1 | Station | 20-45 | P/G | 20 | | 9/12/2025 | ND (1.0) | 100 | ND (1.0) | 25 | Quarterly | Abandon | Semi-Annual | Detections of other constituents |
| MW-2A | Station | 35-55 | P/G | 35 | 7/30/2019 | 7/23/2025 | ND (1.0) | 100 | ND (1.0) | 25 | Quarterly | Abandon | Abandon | |
| MW-3 | Station | 20-50 | P/G | 20 | 3/11/2022 | 9/12/2025 | 0.65J | 100 | ND (1.0) | 25 | Quarterly | Abandon | Abandon | |
| MW-6 | Station | 20-50 | P/G | 20 | 6/10/2019 | 7/23/2025 | 7.30 | 100 | ND (1.0) | 25 | Quarterly | Quarterly | Quarterly | Agreed as proposed |
| MW-12 | Station | 20-35 | P/G | 20 | | 9/12/2025 | ND (1.0) | 100 | ND (1.0) | 25 | Semi-Annual | Abandon | Abandon | |
| MW-15 | Station | 15-35 | P/G | 15 | | 9/12/2025 | ND (1.0) | 100 | ND (1.0) | 25 | Semi-Annual | Abandon | Semi-Annual | Source zone perimeter monitoring |
| MW-16R | Station | 45-60 | P/G | 45 | 3/11/2022 | 7/23/2025 | 20.00 | 100 | 9.80 | 25 | Quarterly | Quarterly | Quarterly | Agreed as proposed |
| MW-17 | Station | 25-50 | P/G | 25 | 9/11/2018 | 9/19/2025 | 28.00 | 100 | 0.75J | 25 | Semi-Annual | Abandon | Semi-Annual | Recent detection |
| MW-19 | Station | 20-45 | P/G | 20 | 10/1/2019 | 8/12/2025 | ND (1.0) | 100 | ND (1.0) | 25 | Quarterly | Abandon | Abandon | |
| MW-22 | Station | 20-45 | P/G | 20 | 7/8/2019 | 8/12/2025 | ND (1.0) | 100 | ND (1.0) | 25 | Quarterly | Quarterly | Quarterly | Agreed as proposed |
| MW-23 | Station | 20-45 | P/G | 20 | 10/1/2019 | 8/12/2025 | ND (1.0) | 100 | ND (1.0) | 25 | Semi-Annual | Abandon | Abandon | |
| MW-27 | Station | 27-43 | P/G | 27 | 6/28/2021 | 9/19/2025 | 0.56J | 100 | ND (1.0) | 25 | Quarterly | Abandon | Abandon | |
| MW-27B | Station | 60-125 | H/S | Shallow, Deep | | 8/12/2025 | 40.0, 68.0 | 100 | 2.6,1.3 | 25 | Quarterly | Quarterly - H/S (Shallow & Deep) | Quarterly | Agreed as proposed |
| MW-27R | Station | 30-60 | P/G | 30 | 7/1/2020 | 7/23/2025 | ND (1.0) | 100 | ND (1.0) | 25 | Quarterly | Abandon | Semi-Annual | Source zone monitoring |
| MW-36R | 14307 Jarrettsville Pk. | 30-80 | P/G | 30 | 10/8/2018 | 9/23/2025 | 0.70J | 100 | ND (1.0) | 25 | Quarterly | Abandon | Semi-Annual | Source zone monitoring |
| MW-38 | 14311 Jarrettsville Pk. | 23-63 | P/G | 23 | 7/31/2019 | 9/23/2025 | 0.44J | 100 | ND (1.0) | 25 | Quarterly | Abandon | Semi-Annual | Depth specific monitoring |
| MW-38B | 14311 Jarrettsville Pk. | 68-125 | P/G | 68 | | 9/23/2025 | 2.60 | 100 | ND (1.0) | 25 | Quarterly | Abandon | Semi-Annual | Depth specific monitoring |
| MW-38C | 14311 Jarrettsville Pk. | 125-300 | H/S | 210, 263, 298 | 12/15/2023 | 8/14/2025 | 34.0,30.0,21.0 | 137.5 | 2.3,1.8,1.2 | 25 | Quarterly | Quarterly - H/S (210 & 298) | Quarterly | Agreed as proposed |
| MW-40 | 14223 Robcaste Road | 5-30 | P/G | 5 | 8/31/2015 | 8/15/2025 | ND (1.0) | 100 | ND (1.0) | 25 | Quarterly | Quarterly | Quarterly | Agreed as proposed |
| MW-43A | Hampshire Glen Ct. | 20-40 | P/G | 20 | 1/31/2013 | 8/27/2024 | NS -DRY | 100 | NS-DRY | 25 | Semi-Annual | Abandon | Abandon | |
| MW-43B | Hampshire Glen Ct. | 45-55 | P/G | 45 | | 2/4/2025 | NS -DRY | 100 | NS-DRY | 25 | Semi-Annual | Abandon | Abandon | |
| MW-45 | 14307 Jarrettsville Pk. | 53-73 | P/G | 53 | 3/11/2022 | 9/19/2025 | 160.00 | 100 | 0.92J | 25 | Quarterly | Quarterly | Quarterly | Agreed as proposed |
| MW-45R | 14307 Jarrettsville Pk. | 70-90 | P/G | 70 | 3/11/2022 | 7/22/2025 | 15.00 | 105 | ND (1.0) | 25 | Quarterly | Quarterly | Quarterly | Agreed as proposed |
| MW-47BB | 3501 Hampshire Glen Ct. | 55-125 | P/G | 55 | | 9/17/2025 | ND (1.0) | 100 | ND (1.0) | 25 | Semi-Annual | Abandon | Semi-Annual | Source zone monitoring |
| MW-47C | 3501 Hampshire Glen Ct. | 125-300 | H/S | 126, 138.5, 190, 212.5, 287 | | 8/14/2025 | 12.0, 13.0, 37.0, 60.0, 49.0 | 100 | ND (1.0), ND (1.0), 0.63J, 0.90J, 0.74J | 25 | Semi-Annual | Quarterly - H/S (138.5, 212.5, & 287) | Quarterly | Agreed as proposed |

Table 1

**MDE Approved Monitoring Activities with Trigger Values
Inactive Exxon Facility #28077
14258 Jarrettsville Pike
Phoenix, MD**

February 2026

| Well ID | Address | Screen Interval (feet below top of casing) | Sampling Method | Screen Interval Start (ft below TOC) | Date*** GW Recovery Activities Ceased | Last Sampling Date*** (update Quarterly) | Last MTBE Result*** (ppb) | Trigger Level for Action MTBE (ppb) | Last Benzene Result *** (ppb) | Trigger Level for Action Benzene (ppb) | Current Monitoring Activity * | Proposed Monitoring Activity ** | MDE Response 2026 | MDE Rationale 2026 |
|---------|-------------------------|---|-----------------|---|--|---|---------------------------------|---|-------------------------------------|--|-------------------------------------|------------------------------------|---------------------------------|--------------------------|
| MW-50 | 3313 Paper Mill Road | 20-40 | P/G | 20 | | 9/10/2025 | ND (1.0) | 100 | ND (1.0) | 25 | Semi-Annual | Abandon | Abandon | |
| MW-50B | 3313 Paper Mill Road | 45-55 | P/G | 45 | | 9/10/2025 | ND (1.0) | 100 | ND (1.0) | 25 | Semi-Annual | Abandon | Abandon | |
| MW-50C | 3313 Paper Mill Road | 60-300 | H/S | 179, 240, 277 | | 9/10/2025 | ND (1.0), ND (1.0), ND (1.0) | 100 | ND (1.0), ND (1.0), ND (1.0) | 25 | Semi-Annual | Abandon | Semi-Annual (179, 277) | Source zone monitoring |
| MW-54 | 14307 Jarrettsville Pk. | 16-56 | P/G | 16 | | 9/18/2025 | 16.00 | 100 | 5.60 | 25 | Quarterly | Quarterly | Quarterly | Agreed as proposed |
| MW-54B | 14307 Jarrettsville Pk. | 57-125 | P/G | 57 | 12/15/2023 | 8/14/2025 | 150.00 | 662.5 | 13.00 | 91.25 | Quarterly | Quarterly | Quarterly | Agreed as proposed |
| MW-54C | 14307 Jarrettsville Pk. | 125-300 | H/S | 210, 295-298 | | 8/14/2025 | 18.0, 4.4 | 150 | 13.0, 6.4 | 50 | Quarterly | Quarterly - H/S (210 & 298) | Quarterly | Agreed as proposed |
| MW-56A | Robcaste Road | 15-35 | P/G | 15 | | 9/10/2025 | ND (1.0) | 100 | ND (1.0) | 25 | Semi-Annual | Abandon | Abandon | |
| MW-56B | Robcaste Road | 45-55 | P/G | 45 | | 1/29/2025 | NS- Well casing broken | 100 | NS- Well casing broken | 25 | Semi-Annual | Abandon | Abandon | |
| MW-56C | Robcaste Road | 60-350 | H/S | 100-110, 310-315, 320-325 | | 9/10/2025 | 5.70, 4.8, 4.9 | 100 | ND (1.0), ND (1.0), ND (1.0), | 25 | Semi-Annual | Abandon | Semi-Annual, (100-110, 320-325) | On strike, down gradient |
| MW-57 | 3501 Hampshire Glen Ct. | 25-65 | P/G | 25 | 8/13/2018 | 9/17/2025 | 0.40J | 100 | ND (1.0) | 25 | Semi-Annual | Abandon | Abandon | |
| MW-58 | 3501 Hampshire Glen Ct. | 35-65 | P/G | 35 | 3/28/2018 | 9/17/2025 | 11.00 | 100 | 0.49J | 25 | Semi-Annual | Abandon | Semi-Annual | Current concentration |
| MW-67 | 14221 Robcaste Road | 10-40 | P/G | 10 | | 9/23/2025 | ND (1.0) | 100 | ND (1.0) | 25 | Semi-Annual | Abandon | Abandon | |
| MW-72 | 14223 Robcaste Road | 10-40 | P/G | 10 | 8/31/2015 | 8/15/2025 | ND (1.0) | 100 | ND (1.0) | 25 | Semi-Annual | Quarterly | Quarterly | Agreed as proposed |

Table 1

MDE Approved Monitoring Activities with Trigger Values
Inactive Exxon Facility #28077
14258 Jarrettsville Pike
Phoenix, MD

February 2026

| Well ID | Address | Screen Interval (feet below top of casing) | Sampling Method | Screen Interval Start (ft below TOC) | Date*** GW Recovery Activities Ceased | Last Sampling Date*** (update Quarterly) | Last MTBE Result*** (ppb) | Trigger Level for Action MTBE (ppb) | Last Benzene Result *** (ppb) | Trigger Level for Action Benzene (ppb) | Current Monitoring Activity * | Proposed Monitoring Activity ** | MDE Response 2026 | MDE Rationale 2026 |
|---------|-------------------------|---|-----------------|---|--|---|---|---|--|--|-------------------------------------|------------------------------------|-------------------------|---|
| MW-73C | 14315 Jarrettsville Pk. | 125-300 | H/S | 210, 259.5, 298 | 3/11/2022 | 8/14/2025 | 19.0, 14.0, 5.10 | 100 | 0.95J, 0.6J, 0.34J | 25 | Quarterly | Quarterly - H/S (210 & 298) | Quarterly | Agreed as proposed |
| MW-82B | 3508 Hampshire Glen Ct. | 50-125 | H/S | Shallow, Deep | 8/30/2020 | 9/18/2025 | 87.0, 96.0 | 100 | 0.48J, 0.49J | 25 | Quarterly | Quarterly - H/S (Shallow & Deep) | Quarterly | |
| MW-82D | 3508 Hampshire Glen Ct. | 125-380 | H/S | 250, 317, 378 | 6/30/2021 | 7/23/2025 | 33.0, 15.0, 20.0 | 100 | ND (1.0), ND (1.0), ND (1.0) | 25 | Quarterly | Quarterly - H/S (250 & 378) | Quarterly | Agreed as proposed |
| MW-85 | 14301 Jarrettsville Pk. | 40-60 | P/G | 40 | 9/12/2018 | 9/22/2025 | ND (1.0) | 100 | ND (1.0) | 25 | Quarterly | Abandon | Semi-Annual | Intersection monitoring |
| MW-91C | 3501 Hampshire Glen Ct. | 80-297.4 | H/S | 92-102, 261-271 | 6/12/2019 | 8/15/2025 | 0.75J, 5.8 | 100 | ND (1.0), ND (1.0) | 25 | Quarterly | Quarterly - H/S (90-102 & 261-271) | Quarterly | Agreed as proposed |
| MW-138D | 3506 Hampshire Glen | 60-404 | H/S | 95-100, 115-120, 151-120, 151-156, 230-235 | 3/11/2022 | 8/15/2025 | 0.36J, ND (1.0), ND (1.0), ND (1.0) | 100 | ND (1.0), ND (1.0), ND (1.0), ND (1.0) | 25 | Quarterly | Quarterly - H/S (250-255) | Quarterly | Agreed as proposed |
| MW-139 | Station | 60-80 | P/G | 60 | 6/23/2017 | 7/23/2025 | 26.00 | 100 | ND (1.0) | 25 | Quarterly | Abandon | Semi-Annual | Current concentration, Source zone monitoring |
| MW-146 | 3320 Paper Mill Road | 35-60 | P/G | 35 | | 9/19/2025 | ND (1.0) | 100 | ND (1.0) | 25 | Semi-Annual | Abandon | Semi-Annual | Down dip monitoring of source zone monitoring |
| MW-146B | 3320 Paper Mill Road | 60-126.5 | P/G | 60 | | 9/19/2025 | ND (1.0) | 100 | ND (1.0) | 25 | Semi-Annual | Abandon | Semi-Annual | Down dip monitoring of source zone monitoring |
| MW-146C | 3320 Paper Mill Road | 125-300 | H/S | Shallow, Deep | | 9/12/2025 | ND (1.0), ND (1.0) | 100 | ND (1.0), ND (1.0) | 25 | Semi-Annual | Abandon | Semi-Annual | Down dip monitoring of source zone monitoring |
| MW-166C | 3418 Sweet Air | 60-615 | H/S | Shallow, Deep | | 9/12/2025 | ND (1.0), ND (1.0) | 100 | ND (1.0), ND (1.0) | 25 | Semi-Annual | Retain/suspend sampling | Retain/suspend sampling | Agreed as proposed |

Table 1

MDE Approved Monitoring Activities with Trigger Values
Inactive Exxon Facility #28077
14258 Jarrettsville Pike
Phoenix, MD

February 2026

| Well ID | Address | Screen Interval (feet below top of casing) | Sampling Method | Screen Interval Start (ft below TOC) | Date*** GW Recovery Activities Ceased | Last Sampling Date*** (update Quarterly) | Last MTBE Result*** (ppb) | Trigger Level for Action MTBE (ppb) | Last Benzene Result *** (ppb) | Trigger Level for Action Benzene (ppb) | Current Monitoring Activity * | Proposed Monitoring Activity ** | MDE Response 2026 | MDE Rationale 2026 |
|---------|-------------------------|---|-----------------|---|--|---|---|---|---|--|-------------------------------------|------------------------------------|-----------------------------|--|
| MW-168 | 3501 Hampshire Glen | 65-250 | H/S | 67, 75, 87, 115, 235 | 9/27/2018 | 9/10/2025 | ND (1.0), 0.22J, ND (1.0), ND (1.0), ND (1.0) | 100 | ND (1.0), ND (1.0), ND (1.0), ND (1.0), ND (1.0) | 25 | Quarterly | Abandon | Semi-Annual (235) | Due to history, relationship to nearby PW. |
| MW-171 | 3501 Hampshire Glen | 36-130 | P/G | 36 | | 9/17/2025 | 0.78J | 100 | ND (1.0) | 25 | Semi-Annual | Abandon | Abandon | |
| MW-176 | 3501 Hampshire Glen | 125-250.1 | H/S | 182-192, 233-243, | 8/5/2020 | 9/10/2025 | 3.0, 3.1 | 100 | ND (1.0), ND (1.0) | 25 | Semi-Annual | Abandon | Semi-Annual | Fracture monitoring |
| MW-177 | 3501 Hampshire Glen | 125-250.5 | H/S | 187.75, 215-225 | | 9/10/2025 | 0.76J, 0.64J | 100 | ND (1.0), ND (1.0) | 25 | Semi-Annual | Abandon | Abandon | |
| MW-178B | 3501 Hampshire Glen | 75-125 | P/G | 75 | | 9/17/2025 | ND (1.0) | 100 | ND (1.0) | 25 | Semi-Annual | Abandon | Semi-Annual | Down gradient monitoring of 54 series wells. |
| MW-178C | 3501 Hampshire Glen | 125-300 | H/S | 146, 168, 212, 300 | 1/27/2023 | 9/10/2025 | 6.8, 5.9, 6.4, 5.5 | 137.5 | 0.96J, 0.78J, 0.89J, 1.0 | 25 | Quarterly | Abandon | Semi-Annual, P/G | Current concentrations |
| MW-179C | 3501 Hampshire Glen | 80-250 | H/S | 250 | | 9/10/2025 | 7.60 | 100 | ND (1.0) | 25 | Semi-Annual | Abandon | Semi-Annual, H/S (165, 250) | Current concentrations, recent concentration trend |
| MW-181A | 14301 Jarrettsville Pk. | 30-60 | P/G | 30 | 6/30/2021 | 8/14/2025 | 1.30 | 100 | ND (1.0) | 25 | Quarterly | Quarterly | Quarterly | Agreed as proposed |

Table 1

MDE Approved Monitoring Activities with Trigger Values
Inactive Exxon Facility #28077
14258 Jarrettsville Pike
Phoenix, MD

February 2026

| Well ID | Address | Screen Interval (feet below top of casing) | Sampling Method | Screen Interval Start (ft below TOC) | Date*** GW Recovery Activities Ceased | Last Sampling Date*** (update Quarterly) | Last MTBE Result*** (ppb) | Trigger Level for Action MTBE (ppb) | Last Benzene Result *** (ppb) | Trigger Level for Action Benzene (ppb) | Current Monitoring Activity * | Proposed Monitoring Activity ** | MDE Response 2026 | MDE Rationale 2026 |
|---------|-------------------------|---|-----------------|---|--|---|---------------------------------|---|-------------------------------------|--|-------------------------------------|------------------------------------|----------------------|------------------------|
| MW-181B | 14301 Jarrettsville Pk. | 60-125 | P/G | 60 | 10/23/2017 | 9/22/2025 | 5.00 | 100 | 0.48J | 25 | Semi-Annual | Abandon | Semi-Annual | Source zone monitoring |
| MW-181C | 14301 Jarrettsville Pk. | 125-300 | H/S | 215.5 | | 8/14/2025 | 19.00 | 100 | ND (1.0) | 25 | Semi-Annual | Quarterly - H/S (215) | Quarterly | Agreed as proposed |
| MW-182 | 3501 Hampshire Glen | 100-300 | H/S | 200, 226.5 | | 9/10/2025 | 6.0, 8.0 | 100 | ND (1.0), ND (1.0) | 25 | Semi-Annual | Abandon | Semi-Annual | Current concentrations |
| MW-183 | 3501 Hampshire Glen | 100-300 | P/G | 100 | 3/11/2022 | 9/10/2025 | 0.34J | 100 | ND (1.0) | 25 | Quarterly | Abandon | Abandon | |
| MW-184 | 3501 Hampshire Glen | 100-300 | H/S | 187, 285 | 8/5/2020 | 9/10/2025 | 5.2, 9.1 | 100 | 0.3J, 0.90J | 25 | Semi-Annual | Abandon | Semi-Annual, P/G | Current concentrations |
| MW-187A | Intersection | 25-60 | P/G | 25 | 12/15/2023 | 9/16/2025 | 37.00 | 100 | 460.00 | 337.5 | Quarterly | Quarterly | Quarterly | Agreed as proposed |
| MW-187B | Intersection | 60-125 | P/G | 60 | 3/11/2022 | 9/19/2025 | 190.00 | 100 | 290.00 | 27.5 | Quarterly | Quarterly | Quarterly | |
| MW-187C | Intersection | 125-300 | H/S | 210, 298 | 12/15/2023 | 7/22/2025 | 82.0, 140.0 | 525 | 1.2, 1.9 | 25 | Quarterly | Quarterly - H/S (210 & 298) | Quarterly | Agreed as proposed |

Table 1

MDE Approved Monitoring Activities with Trigger Values
 Inactive Exxon Facility #28077
 14258 Jarrettsville Pike
 Phoenix, MD

February 2026

| Well ID | Address | Screen Interval (feet below top of casing) | Sampling Method | Screen Interval Start (ft below TOC) | Date*** GW Recovery Activities Ceased | Last Sampling Date*** (update Quarterly) | Last MTBE Result*** (ppb) | Trigger Level for Action MTBE (ppb) | Last Benzene Result *** (ppb) | Trigger Level for Action Benzene (ppb) | Current Monitoring Activity * | Proposed Monitoring Activity ** | MDE Response 2026 | MDE Rationale 2026 |
|----------|-------------------------|--|-----------------|--------------------------------------|---------------------------------------|--|--|-------------------------------------|--|--|-------------------------------|---------------------------------|-------------------------|------------------------|
| MW-188D | 14311 Jarrettsville Pk. | 125-436 | H/S | 280.5, 378 | | 8/14/2025 | 4.8, 3.4 | 100 | ND (1.0), ND (1.0) | 25 | Quarterly | Quarterly - H/S (280.5 & 378) | Quarterly | Agreed as proposed |
| MW-189D | 3605A Southside Ave | 35-384 | H/S | 79, 122, 161, 216, 278, 315, 374 | | 8/11/2025 | 53.0, 29.0, 56.0, 40.0, 32.0, 25.0, 32.0 | 425 | ND (1.0), ND (1.0), ND (1.0), ND (1.0), ND (1.0), ND (1.0) | 25 | Quarterly | Quarterly - H/S (79, 161 & 374) | Quarterly | Agreed as proposed |
| PW-14311 | 14311 Jarrettsville Pk. | 20-300 | H/S | Shallow, Deep | | 9/12/2025 | ND (1.0), ND (1.0) | 100 | ND (1.0), ND (1.0) | 25 | Semi-Annual | Retain/suspend sampling | Retain/suspend sampling | Agreed as proposed |
| PW-3501 | 3501 Hampshire Glen | 27-425 | H/S | Shallow, Deep | | 9/10/2025 | ND (1.0), ND (1.0) | 100 | ND (1.0), ND (1.0) | 25 | Semi-Annual | Retain/suspend sampling | Retain/suspend sampling | Agreed as proposed |
| SVE-1 | Station | 24-69 | P/G | 24 | 3/11/2022 | 7/23/2025 | 35.00 | 225 | 18.00 | 25 | Quarterly | Abandon | Semi-Annual | Current concentrations |
| SVE-2 | Station | 25-70.75 | P/G | 25 | 8/4/2020 | 9/16/2025 | 4.50 | 100 | ND (1.0) | 25 | Quarterly | Abandon | Semi-Annual | Current concentrations |
| SVE-3 | Station | 24-69 | P/G | 24 | 3/11/2022 | 9/18/2025 | ND (1.0) | 100 | ND (1.0) | 25 | Quarterly | Abandon | Abandon | |

**If a established trigger value is exceeded, monthly sampling will occur

*** Based off Third Quarter 2025 Groundwater Monitoring Report

P/G = Purge and grab sample

H/S = H/S® discrete depth sampler

[R] = Recovery Well