

**WDEQ VOLUNTARY REMEDIATION PROGRAM
PUBLIC PARTICIPATION PLAN
FORMER GLENROCK REFINERY, WYOMING
WDEQ SITE NO. 58.003, VRP NO. 1003**

August 15, 2011

Project #: 439-023-104

PREPARED FOR: ConocoPhillips Company

SUBMITTED BY: Trihydro Corporation



ENGINEERING SOLUTIONS. ADVANCING BUSINESS.

Home Office | 1252 Commerce Drive | Laramie, WY 82070 | phone 307/745.7474 | fax 307/745.7729 | www.trihydro.com

1.0 INTRODUCTION

This Public Participation Plan (Plan) reflects revisions made to the original version of the Plan dated October 17, 2001. The 2001 version has been implemented by ConocoPhillips Company (COP) to provide the public with information regarding the former Conoco Glenrock Refinery. The former refinery property was entered into the Wyoming Department of Environmental Quality's (WDEQ) Voluntary Remediation Program (VRP) on March 19, 2001. This 28-acre property is located approximately one-quarter mile west of the Town of Glenrock, Wyoming.

On May 12, 2011, COP submitted a request to the WDEQ to expand the existing VRP boundary by approximately 54 acres to incorporate the former Conoco Pipe Line Company Glenrock Station (Glenrock Station). WDEQ replied in a letter dated June 28, 2011, indicating that the former Glenrock Station site is eligible to participate in the VRP. This 54-acre parcel is directly south of the former Glenrock Refinery. This expanded boundary will include both the former Glenrock Refinery acreage and the former Glenrock Station acreage, hereinafter collectively referred to as the "Site." The location of both properties is illustrated on Figure 1 in Attachment A.

This Plan and its implementation is designed to inform neighbors, community members, officials and other interested parties of clean-up activities at the Site and explain when there will be opportunities for public comment and involvement.

PREVIOUS AND CURRENT PUBLIC COMMUNICATION

2001 Former Glenrock Refinery Property Communication

Upon acceptance of the former Glenrock Refinery into the VRP, a legal notice was published in the Glenrock Independent newspaper for 4 consecutive weeks, beginning on May 17, 2001. A copy of this notice is in Attachment B. Additionally, COP sent a letter dated April 24, 2001 to all surface owners of record for land contiguous and adjacent to the former Glenrock Refinery boundary. A second letter, dated July 3, 2001, was sent to all the known adjacent and contiguous landowners and Ms. Kathy Anderson, who represented the Town of Glenrock in 2001. This letter explained that COP and SECOR (the consultant on the project at the time) would be preparing a Public Participation Plan and encouraged recipients of the letter who had comments or suggestions for the Public Participation Plan to contact COP, SECOR or WDEQ. The April 24, 2001 and July 3, 2001 letters are included in Attachment B.



2011 Former Glenrock Station Property VRP Application Communication

A display advertisement will be published for four consecutive weeks in the Glenrock Independent newspaper. The advertisement will include information about the proposed inclusion of the Glenrock Station in the VRP and will provide information about where the public can obtain more information about the Site along with the contact information for personnel who can answer questions from the public. A copy of the planned newspaper display advertisement is included as Attachment C.

Additionally, COP will send a letter to all surface owners of record for land contiguous or adjacent to the Glenrock Station. This letter will provide the same information included in the display advertisement in addition to other pertinent information. A template of this letter is included in Attachment C.

2.0 PUBLIC INVOLVEMENT ACTIVITIES

The specific objectives of public involvement for the Site described herein include the following:

- Informing the community of the VRP plans and activities for the Site
- Facilitating public interaction regarding Site VRP activities
- Responding effectively to public requests for information

PROJECT MAILING LIST

A list of private citizens and public officials who are interested in receiving public information materials related to this Site has been developed (the Project Mailing List). This list currently includes adjacent and contiguous landowners to the Site, the Town of Glenrock, and Converse County. The Project Mailing List will be updated when necessary during the life of the project, particularly when COP becomes aware of ownership changes to adjacent or contiguous property.

PUBLIC INFORMATION REPOSITORY

Documents associated with the Site will be available for public review at the Converse County Library-Glenrock Branch. The library is located at 518 South 4th Street in Glenrock and is open to the public Tuesday and Thursday from 10:00 a.m. to 8:00 p.m., Wednesday and Friday from 10:00 a.m. to 6:00 p.m., and Saturday from 10:00 a.m. to 1:00 p.m.

DESIGNATED PROJECT CONTACTS

At least one designated project contact will be listed on public information materials to provide a point of contact for public inquiries. The designated project contacts for public inquiries are:

Mr. Louis Racchini
Trihydro Corp.
1252 Commerce Dr.
Laramie, WY 82070
(307) 745-7474
lracchini@trihydro.com

Mr. Terry Lauck
ConocoPhillips Company
1616-01 Phillips Building
420 South Keeler Avenue
Bartlesville, OK 74004
(918) 661-0935
terry.s.lauck@conocophillips.com

Ms. Paige Smith
WDEQ
Herschler Bldg, 4-W
122 West 25th St.
Cheyenne, WY 82002
(307) 777-2440
paige.smith@wyo.gov

PUBLIC MEETINGS

Public meetings will be held periodically to inform the public of the progress of remediation activities and discuss pertinent documents such as the draft and Final Remedy Agreement developed for the entire Site. Additional public meetings may be held during the cleanup of this Site if public interest warrants and at appropriate project milestones. These meetings will serve to heighten public awareness of cleanup actions completed by COP and provide an opportunity for community members to understand the information in documents presented for public comment by interacting with COP, Trihydro, and WDEQ representatives.

PUBLIC COMMENT PERIOD

Documents subject to public comment will be placed at the above-mentioned repository. After the public is invited to comment on a document (via public notice), the public will have 30 days to review and provide comment with the exception of the draft Remedy Agreement. The 30-day public comment period for the draft Remedy Agreement will begin after the public notice has been published for four consecutive weeks.

Based on the feedback received from the public, changes may be incorporated into the document to accommodate public concerns. Documents that will be made available for public comment will include, at a minimum, the draft Remediation Agreement(s), Remedial Action Plans (if needed), draft Use Control Area, and other documents/reports, as requested by WDEQ.

PUBLIC NOTICE OF AVAILABLE COMMENT PERIODS OR PUBLIC MEETINGS

A notice will be placed in the Glenrock Independent newspaper, in advance of any public meeting to notify the public of time, place, and subject of the meeting. A notice will also be put in the local newspaper to alert the public when documents ready for public review have been placed in the repository.

PROJECT STATUS UPDATES

Quarterly project status update letters will be mailed to persons included on the Project Mailing List. These letters will include a list of the documents filed in the repository during the previous calendar quarter, summaries of the various projects undertaken at the Site during the previous calendar quarter and will include a list of proposed near-term work to be conducted at the Site.

3.0 CONCLUSIONS

This Plan is intended to accomplish the following goals:

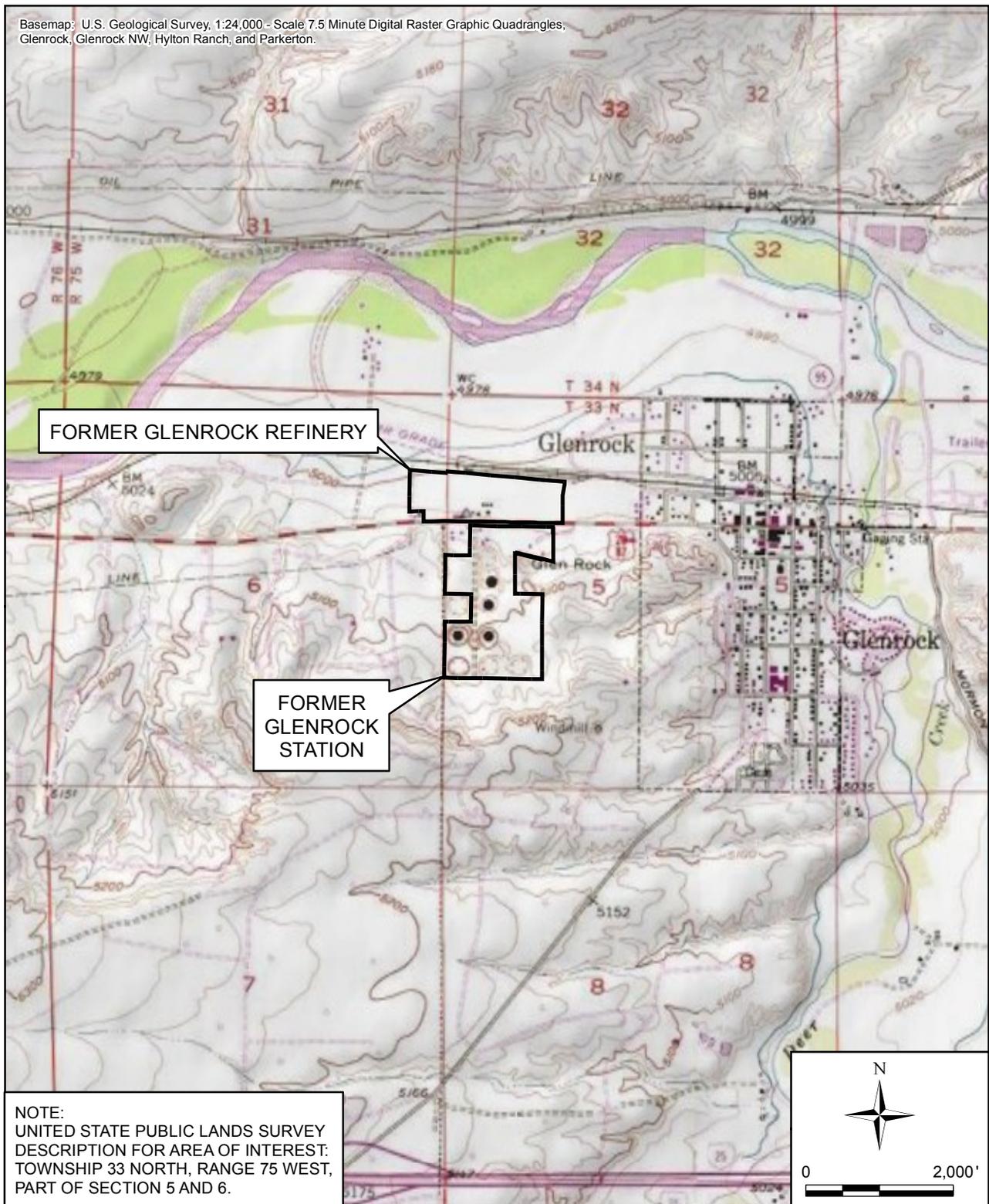
- Keep the public informed about the progress of this VRP project and enable the community to understand the purpose, scope, and results of the remedial efforts.
- Strengthen the COP-public partnership, which will allow meaningful community participation in the VRP process.
- Provide convenient mechanisms and guidance for dissemination of project information to the public.

This Plan will be updated upon request from WDEQ or when required by changes to the project administration.

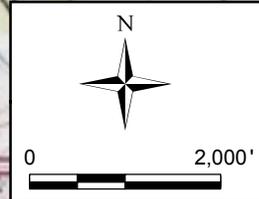
ATTACHMENT A

SITE LOCATION FIGURE

Basemap: U.S. Geological Survey, 1:24,000 - Scale 7.5 Minute Digital Raster Graphic Quadrangles, Glenrock, Glenrock NW, Hylton Ranch, and Parkerton.



NOTE:
UNITED STATE PUBLIC LANDS SURVEY
DESCRIPTION FOR AREA OF INTEREST:
TOWNSHIP 33 NORTH, RANGE 75 WEST,
PART OF SECTION 5 AND 6.



QUADRANGLE LOCATION



1252 Commerce Drive
Laramie, WY 82070
www.trihydro.com
(P) 307/745.7474 (F) 307/745.7729

FIGURE 1

SITE LOCATION MAP

**FORMER CONTINENTAL PIPE LINE COMPANY
GLENROCK STATION
GLENROCK, WYOMING**

Drawn By: BR | Checked By: LR | Scale: 1" = 2000' | Date: 8/15/11 | File: Fig1_Glnrc_SiteLocStkHldr.mxd

ATTACHMENT B

**2001 FORMER GLENROCK REFINERY PUBLIC NOTICE AND
ADJACENT LANDOWNER NOTIFICATION**

PUBLIC NOTICE
Conoco, Inc. accepted for
participation in the Voluntary
Remediation Process

Pursuant to W.S. 35-11-1604, notice is hereby given that Conoco, Inc. of Houston, TX has been accepted by the Wyoming Department of Environmental Quality for participation in the voluntary remediation program.

DEQ has determined that the former Conoco, Inc. refinery site is eligible for participation in the voluntary remediation program because they meet the eligibility criteria contained in W.S. 35-11-1602. Contaminant releases occurred before the effective date of the voluntary remediation law, and the site was not subject to the permit requirements of the Environmental Quality Act at the time of the release.

As provided in 35-11-1604, any interested party may request development of a public participation plan by Conoco, Inc., for approval by the director of the DEQ. Interested parties have thirty (30) days from the first publication of this notice to request development of a public participation plan, and may do so by sending a written request to: David Finley, administrator, Solid and Hazardous Waste Division, DEQ, 122 West 25th Street, Cheyenne, WY 82002.

For further information, interested individuals may contact Jerry Breed (307) 777-7752 with the DEQ or Paul Taylor with Conoco, Inc. at (281) 293-3593. Publish: May 17, 24, 31 and June 7, 2001.

Paul F. Taylor
Project Manager
Remediation Technology

Conoco Inc.
P. O. Box 2197
Houston TX 77252-2197
281-293-3593 Fax:281-293-3305
paul.f.taylor@usa.conoco.com

April 24, 2001

CERTIFIED MAIL

Re: Former Conoco Refinery

Dear :

The former Conoco Refinery site in Glenrock has recently been accepted into the new Voluntary Remediation Program (VRP) administered by the Wyoming Department of Environmental Quality in Cheyenne. Conoco Inc. will continue to work closely with the DEQ to address all the issues required by the Program.

A copy of the approval letter from the State is attached for your reference. As part of the regulations under the VRP, Conoco is required to publish a display advertisement in a newspaper of general circulation in Converse County announcing this action (to allow for public participation). We are also required to send a copy of the published notice to "adjacent surface owners of record", hence we are providing you this letter with attachments (some of which will soon be published in the Glenrock Independent).

You will also note that the letter states (on the second page) that "Owners of contiguous and/or adjacent properties that require remediation due to environmental impacts from past refinery operations may also be required to become signatories of the remedy agreement". At this point in time, Conoco does not know whether the State will require this or not (of adjacent land owners). The Program is still so new that some issues are still being worked out. We will let you know as we learn more.

If you have any questions, please contact me at (281) 293-3593 or Jerry Breed with the WDEQ at (307) 777-5617.

Sincerely,

Paul F. Taylor

Attachments

Cc: Derrick Vallance w/o attachments
Jerry Breed - WDEQ w/o attachments



Paul F. Taylor
Project Manager
Remediation Technology

Conoco Inc.
P. O. Box 2197
Houston TX 77252-2197
281-293-3593 Fax:281-293-3305
paul.f.taylor@usa.conoco.com

July 3, 2001

Ms. Kathy Anderson
Planner - Town of Glenrock
P. O. Box 417
Glenrock, Wyoming 82637

Re: Former Conoco Refinery
Glenrock, Wyoming

Dear Ms. Anderson:

As you are aware, the former Continental Oil Refinery site has been accepted into the Wyoming Department of Environmental Quality's (WDEQ) Voluntary Remediation Program (VRP). Over the next several weeks, Conoco Inc. will be developing a public participation plan (the Plan) for the site to ensure that neighbors, community members, officials and other interested parties are informed of the site clean-up activities and of opportunities for public comment and involvement. We invite your thoughts and comments concerning the structure and implementation of this public participation plan.

The consulting firm, SECOR International Inc., (*SECOR*) has been retained by Conoco to conduct VRP tasks for the former refinery site, including preparation of the Plan. To assure that the Plan fulfills community information needs, Conoco encourages any individuals interested in commenting on the development of the Plan to contact *SECOR*, Conoco, or WDEQ. The phone numbers and addresses for contact personnel are listed below.

Ms. Heidi Kaiser
SECOR
(406) 245-7600
2905 Montana Ave.
Billings, MT 59101

Mr. Paul Taylor
Conoco, Inc.
(218) 293-3593
600 North Dairy Ashford
P.O. Box 2197
Houston, TX 77252-2197

Mr. Jerry Breed
WDEQ
(307) 777-7752
Herschler Building
122 West 25th St.
Cheyenne, WY 82002

Upon completion, the Plan and future documents associated with the VRP clean-up activities will be available for public review at the Converse County Library – Glenrock Branch. The library is located at 518 South 4th Street in Glenrock and is open to the public Tuesday through Saturday.

Please do not hesitate to call us with any questions or concerns. We look forward to working with you in the future.

Sincerely,

A handwritten signature in cursive script that reads "Paul Taylor".

Paul Taylor
Project Manager, Conoco Inc.

Cc: Jerry Breed
Heidi Kaiser
Derrick Vallance
John Bennitt

ATTACHMENT C

**2011 FORMER GLENROCK STATION PUBLIC NOTICE AND
ADJACENT LANDOWNER NOTIFICATION**

PUBLIC NOTICE OF VOLUNTARY CLEANUP

Pursuant to W.S. §35-11-1604, notice is hereby given that the Wyoming Department of Environmental Quality (DEQ) has accepted an application from the ConocoPhillips Company to add additional acreage to the existing Voluntary Remediation Program (VRP) site known as the ConocoPhillips Former Glenrock Refinery (VRP site no. 1003). The VRP was established to provide a safe and efficient method for cleaning up contaminated sites and putting them back into productive use.

The property being entered into the program consists of 54 acres which was occupied by a tank farm to serve Conoco's former refinery until the refinery ceased operation in 1956. After refinery closure, this parcel was converted to a crude oil gathering and pumping station. This parcel is located directly south of the original 28-acre parcel already enrolled in the VRP and is located just south of Highway 20/26 approximately one quarter mile west of the Town of Glenrock, in Converse County, Wyoming.

DEQ has determined that this site is eligible for participation in the VRP. Eligibility is based on criteria in W.S. §35-11-1602. Contamination in soils and groundwater at this site has been identified and appears to be associated with historic refinery/crude oil storage and transfer operations.

ConocoPhillips Company is currently implementing a public participation plan (plan) that was initiated for the original VRP site. This plan has been revised by ConocoPhillips Company to reflect the inclusion of this additional acreage and now describes how the public can remain informed about and comment on the investigation and cleanup of all portions of this Site. This revised version of the plan is available at the Glenrock Branch of the Converse County Library located at 518 South 4th St. in Glenrock or electronically at the following DEQ website - <http://deq.state.wy.us/volremedi/publicpart.asp>.

For further information, you may contact Ms. Paige Smith, Project Manager with DEQ at 307-777-2440 or Mr. Terry Lauck, Project Manager with ConocoPhillips Company at 918-661-0935.



Terry S. Lauck
Site Manager

ConocoPhillips Company
Risk Management & Remediation
1616-01 Phillips Building
420 South Keeler Avenue
Bartlesville, OK 74004
Phone: 918.661.0935
E-mail: Terry.S.Lauck@conocophillips.com

[DATE]

[ADJACENT PROPERTY OWNER ADDRESS]

RE: Voluntary Remediation Program Eligibility, Boundary Modification and Amendment to the Former Glenrock Refinery (VRP #1003) to Include the Former Conoco Pipe Line Company, Glenrock Station Property.

DEAR PROPERTY OWNER:

ConocoPhillips Company (Volunteer) was recently accepted for participation in Wyoming's Voluntary Remediation Program (VRP), to investigate potential impacts to the environment from the former Conoco Pipe Line Company Glenrock Station as an amendment and boundary modification to the current VRP site known as the Former Glenrock Refinery (VRP #1003). The property to be amended consists of 54 acres which covers a portion of the operational footprint of the former Conoco Refinery and is located approximately one quarter mile west of the Town of Glenrock and directly south of Highway 20/26 in Converse County, (hereafter referred to as the Site). Contamination in soils and groundwater at this site has been identified and appears to be associated with historic refinery/crude oil storage and transfer operations. The Volunteer intends to investigate and cleanup the Site.

The VRP was established in 2000 by the Wyoming Legislature in order to safely and efficiently reach decisions about cleanup of contaminated sites. The Volunteer was accepted into the program because the eligibility requirements, as outlined in Wyoming law (Environmental Quality Act), were met.

You are receiving this letter because the Environmental Quality Act requires that, when investigation or cleanup begins, Volunteers must give notice to people with property adjacent to the VRP Site and/or to people who may have contamination that exists on or under their property due to activities which occurred on the VRP Site.

The VRP is administered by the Wyoming Department of Environmental Quality (DEQ). Under the Program, the Volunteer will investigate contamination at the Site and at potentially affected adjacent properties. Based on the data collected at the Site, the Volunteer will propose a remedy to cleanup contamination at the Site and other affected properties, as necessary. The Site is currently in the investigation phase.

ConocoPhillips Company is currently implementing a public participation plan (plan) that was initiated for the original VRP site. This plan has been revised by ConocoPhillips Company to reflect the inclusion of this additional acreage. This plan now describes how the public can remain informed about and comment on the investigation and cleanup of all portions of this Site. The revised version of the plan is available at the Glenrock Branch of the Converse County Library located at 518 South 4th St. in Glenrock or electronically at the following Wyoming Department of Environmental Quality website - <http://deq.state.wy.us/volremedi/publicpart.asp>.

For further information, you may contact Ms. Paige Smith, DEQ's Project Manager at 307-777-2440, Mr. Louis Racchini, Project Manager with Trihydro Corporation at 307-745-7474, or Mr. Terry Lauck, Project Manager with ConocoPhillips Company at 918-661-0935. Please note that if you do not want additional information, no response to this letter is needed. In accordance with the *Americans with Disabilities Act*, special assistance or alternative formats will be made available upon request for individuals with disabilities.

Sincerely,

Terry S. Lauck
Site Manager