

November 24, 2025

Mr. Rafi Alam New York State Department of Environmental Conservation Division of Environmental Remediation 625 Broadway Albany, New York 12233-7013

Re: Revised 410 Kingsland Avenue Monitoring Well Network Modification Request ExxonMobil Greenpoint Petroleum Remediation Project

Greenpoint, Brooklyn, New York

Dear Mr. Alam:

Roux Environmental Engineering and Geology, D.P.C. ("Roux"), on behalf of ExxonMobil Oil Corporation (ExxonMobil), has prepared this letter report (Report) to request New York State Department of Environmental Conservation (NYSDEC) approval of monitoring network modifications within the 410 Kingsland Avenue (410 Kingsland) property associated with the ExxonMobil Greenpoint Petroleum Remediation Project (EMGPRP).

Proposed 410 Kingsland Avenue Monitoring Well Network Modifications

Due to anticipated redevelopment activities by the property owner, the following modifications to the 410 Kingsland monitoring well network are proposed by Roux, on behalf of ExxonMobil. The modifications proposed here-in would reduce the monitoring well network within the 410 Kingsland property from 73 existing monitoring wells (35 shallow aquifer wells and 38 regional aquifer wells) to 40 monitoring wells (15 shallow aquifer wells and 25 regional aquifer wells). The monitoring wells proposed for the new network were selected to maintain sufficient coverage within the 410 Kingsland property to monitor groundwater flow in both the regional and shallow aquifers, monitor the existing product plume boundary, and ensure uninterrupted monitoring along Newtown Creek. The wells proposed for removal from the network, and the resulting proposed network, are detailed in Table 1. The proposed monitoring well network modifications would be performed in a phased approach over several years, as summarized below and further detailed in Table 2. The existing monitoring well network is shown on Figure 1. The approximate monitoring well locations for the proposed new monitoring well network phases are depicted on Figures 2 through 4.

Phase	Phase Implementation Timeline	Scope of Work
Phase 1	Pre-redevelopment activities	 Installation of nine new monitoring wells along Newtown Creek to monitor for potential migration of product, if any: S-104, S-105, S-106, D-103, D-104, D-105, D-106, D-114, and D-116 (Figure 2). Maintenance of existing monitoring wells until Phase 2.
Phase 2	Redevelopment activities	 Decommission all existing monitoring wells with the exception of those shown on Figure 3. Maintenance of Phase 2 portion of 410 Kingsland monitoring well network (Figure 3) for the duration of redevelopment activities. Monitoring wells included in Phase 2 of the network will be reinstalled, as needed, if impacted by redevelopment activities.
Phase 3	Post-redevelopment activities	Installation of all remaining monitoring wells to achieve the final phase (Phase 3) of the proposed 410 Kingsland monitoring well network (Figure 4).

In addition to the monitoring well network modifications proposed above, recovery wells RW-16 and RW-29 (Figures 1 and 2) are anticipated to be relocated to locations RW-16R and RW-29R, as depicted on Figures 3 and 4. The recovery well relocation activities will be performed in accordance with the Recovery Well RW-16 and RW-29 Relocation Request letter dated September 18, 2023 and the related response to comments letter dated April 12, 2024 and approved by the NYSDEC in a letter dated June 6, 2024. Further clarifications regarding an alternative location for RW-16R were provided to the NYSDEC in an email correspondence dated November 18, 2025 which was approved by the NYSDEC in an email dated November 20, 2025 (Attachment 1).

410 Kingsland Fluid-Level Monitoring and Groundwater Sampling Network

All existing accessible monitoring wells within the 410 Kingsland property are currently utilized for fluid-level monitoring on a quarterly basis. Prior to the commencement of redevelopment activities and following installation of the new monitoring wells proposed for installation during Phase 1, all monitoring wells in Phase 1 of the monitoring well network (Figure 2) will continue to be utilized during quarterly fluid-level monitoring events. Once property owner redevelopment activities have commenced at the property, all accessible wells in Phase 2 of the 410 Kingsland monitoring well network (Figure 3) will be utilized for quarterly fluid-level monitoring. Upon completion of property owner redevelopment activities, all monitoring wells in Phase 3 of the 410 Kingsland monitoring well network (Figure 4) will be utilized for quarterly Site-wide fluid-level monitoring. It is anticipated that the Interim Site Management Plan for 410 Kingsland will be amended following completion of Phase 3 to document the long-term monitoring well network at the property.

In addition to the existing 410 Kingsland monitoring wells currently being utilized during quarterly fluid-level monitoring events, it should be noted that 14 of the 73 existing 410 Kingsland monitoring wells are currently part of the annual groundwater sampling network, as detailed in Figure 1. During Phase 2 redevelopment activities, the annual groundwater sampling network would temporarily be reduced from 14 monitoring wells to five monitoring wells (S-15, S-105 [replacement for S-30], S-24, S-25 [replacement for S-26], and D-2), as shown on Figure 3. These five monitoring wells were strategically selected to ensure continued groundwater monitoring along Newtown Creek. Following redevelopment activities, a total of ten monitoring wells out of the 14 existing monitoring wells in the annual groundwater sampling network are expected to be maintained, reinstalled, or replaced by equivalent monitoring wells in the proposed new monitoring well network, as detailed in Table 3. The proposed new groundwater sampling network within the 410 Kingsland property is depicted on Figure 4. The four monitoring wells proposed for removal from the annual groundwater sampling network, without replacement, as a result of the 410 Kingsland monitoring well network modifications are S-51, D-511, D-851, and D-861. The rationale for removal of these four wells from the annual groundwater sampling network is provided below and in Table 3.

Monitoring Wells Requested for Removal from Annual Groundwater Sampling Network	Rationale for Removal from Annual Groundwater Sampling Network
D-51I, D-85I, and D-86I	The three "I" monitoring wells were installed during the remedial investigation as deeper regional wells to confirm a decrease in groundwater concentrations with depth. The objective of these wells has since been achieved and confirmed through multiple rounds of groundwater sampling.
S-51	Monitoring well has had minimal recent exceedances as detailed in the 2024 Groundwater Monitoring Report. Comparable data will continue to be collected from nearby S-30, or the equivalent replacement well (i.e., S-30R) if S-30 is impacted by redevelopment activities, during future annual groundwater sampling events.

Modification Request Summary

As detailed above, Roux, on behalf of ExxonMobil, is requesting NYSDEC approval of the following:

- Reduction of the 410 Kingsland monitoring well network from 73 existing monitoring wells to 40 monitoring wells utilizing a multi-year phased approach, as detailed above; and
- Reduction of the annual groundwater sampling network within the 410 Kingsland property from 14
 existing monitoring wells to ten comparable monitoring wells utilizing a multi-year phased approach.
 The current 410 Kingsland groundwater sampling network would temporarily be reduced to five
 monitoring wells during property owner redevelopment activities, with the final proposed reduced
 network of ten monitoring wells being achieved post- redevelopment activities.

Should you have any questions, please do not hesitate to contact us.

Sincerely,

ROWK ENVIRONMENTAL ENGINEERING AND GEOLOGY, D.P.C.

Jacqueline Carames Project Geologist

Andrew Baris, P.G.

Principal Hydrogeologist/ Executive Vice President

Attachments:

- Table 1 Proposed 410 Kingsland Monitoring Well Network Modifications
- Table 2 Proposed 410 Kingsland Monitoring Network Modification Phases
- Table 3 Proposed 410 Kingsland Annual Groundwater Sampling Network Modifications
- Figure 1 Existing 410 Kingsland Monitoring Well Network
- Figure 2 Proposed 410 Kingsland Monitoring Well Network Phase 1
- Figure 3 Proposed 410 Kingsland Monitoring Well Network Phase 2
- Figure 4 Proposed 410 Kingsland Monitoring Well Network Phase 3
- Attachment 1 NYSDEC Approval of Alternative RW-16R Location

Revised 410 Kingsland Avenue Monitoring Well Network Modification Request ExxonMobil Greenpoint Petroleum Remediation Project Greenpoint, Brooklyn, New York

TABLES

- 1. Proposed 410 Kingsland Monitoring Well Network Modifications
- 2. Proposed 410 Kingsland Monitoring Network Modification Phases
- 3. Proposed 410 Kingsland Annual Groundwater Sampling Network Modifications

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Table 1. Proposed 410 Kingsland Monitoring Well Network Modification

Aquifer	Monitoring Wells Proposed for Decommissioning without Reinstallation	Proposed Reduced 410 Kingsland Monitoring Well Network	
	Reinstallation D-4	D-2 ¹	
	D-5	D-3R	
	D-6	D-18R	
	D-7	D-21R	
	D-8	D-40R	
	D-10	D-42R	
	D-16	D-75R 2	
	D-32	D-77R	
	D-33	DM-1R	
	D-34	D-102 ²	
	D-40	D-103 ²	
	D-41	D-104 ²	
Regional	D-43	D-105 ²	
Regional	D-51	D-106 ²	
	D-52	D-107 ²	
	D-53	D-108 ²	
	D-55	D-100°	
	D-57	D-110 ²	
	D-67	D-111²	
	D-75	D-112 ²	
	D-75R	D-113 ²	
	D-76	D-114 ²	
	D-78	D-115 ²	
	D-79	D-116 ²	
	DM-7	D-117 ²	
	TRW-29		
	D-51I		
Deep Regional ³	D-55I		
Deep Regional	D-85I		
	D-86I		
	S-13	S-2 ¹	
	S-14	S-15 ¹	
	S-16	S-24 ¹	
	S-18	S-25 ¹	
	S-19		
		S-55R	
	S-20	W-12R	
	S-21	W-79R	
	S-22	S-104 ²	
	S-23	S-105 ²	
	S-26	S-106 ²	
	S-27	S-107 ²	
	S-29	S-108 ²	
	S-30	S-109 ²	
	S-33	S-110 ²	
Shallow	S-51	S-111²	
	S-54		
	S-55		
	S-56R		
	S-57		
	S-66		
	S-75		
	S-76		
	S-77		
	S-78		
	S-80		
	S-102		
	S-103		
	W-32		

- Notes

 1. Existing 410 Kingsland monitoring well anticipated to be maintained throughout property owner redevelopment activities. If impacted by third-party redevelopment activities, the monitoring well will be reinstalled and named an experiment of the control using the previoulsy existing well identification with an "R" on the end (i.e., D-2 would be reinstalled as D-2R).
- 2. New monitoring well proposed for installation within the 410 Kingsland property.
- 3. Deep regional aquifer monitoring wells were installed to confirm that groundwater concentrations decrease with depth which has since been confirmed through multiple rounds of groundwater sampling. Deep regional aquifer wells are typically ignored for fluid-level elevation analyses since they are screened at an intermediate depth.



Table 2. Proposed 410 Kingsland Monitoring Well Network Modification Phases

Phase 1: Installation of five new monitoring wells.		
Aquifer	Monitoring Wells to be Installed During Phase 1	
	D-103 ²	
	D-104 ²	
Regional	D-105 ²	
Regional	D-106 ²	
	D-114 ²	
	D-116 ²	
	S-104 ²	
Shallow	S-105 ²	
	S-106 ²	

Phase 2:					
Decommission existing monitoring wells not associated with Phase 2 of the					
410 Kingsl	410 Kingsland Monitoring Well Network. Maintain Phase 2 of the				
	410 Kingsland Monitoring Well Network.				
Monitoring Wells to be Monitoring Wells to be					
Aquifer	Decommissioned	Maintained / Replaced, as			
·	During Phase 2	Needed During Phase 2			
	D-3	D-2 ¹			
	D-4	D-103 ²			
	D-5	D-104 ²			
	D-6	D-105 ²			
	D-7	D-106 ²			
	D-8	D-114 ²			
	D-10	D-116 ²			
	D-16				
	D-18				
	D-21				
	D-32				
	D-33				
	D-34				
	D-35				
	D-40				
	D-41				
Regional	D-42				
_	D-43				
	D-51				
	D-52				
	D-53				
	D-55				
	D-57				
	D-67				
	D-75				
	D-75R				
	D-76				
	D-77				
	D-78				
	D-79				
	DM-1				
	DM-7				
	TRW-29				



Table 2. Proposed 410 Kingsland Monitoring Well Network Modification Phases

Phase 2 (continued): Decommission existing monitoring wells not associated with Phase 2 of the 410 Kingsland Monitoring Well Network. Maintain Phase 2 of the			
	410 Kingsland Monitoring Well Net		
Aquifer	Monitoring Wells to be Decommissioned During Phase 2	Monitoring Wells to be Maintained / Replaced, as Needed During Phase 2	
Regional (Deep) ³	D-51I D-55I D-85I D-86I		
	S-2 S-13 S-14	S-15 ² S-24 ² S-25 ²	
	S-14 S-16 S-18	S-25° S-104² S-105²	
	S-19 S-20	S-106 ²	
	S-21 S-22		
	S-23 S-26 S-27		
	S-29 S-30		
Oballass	S-33 S-51		
Shallow	S-54 S-55		
	S-56R S-57		
	S-66 S-75		
	S-76 S-77		
	S-78 S-80		
	S-102 S-103		
	W-12 W-32		
	W-79 W-35		



Table 2. Proposed 410 Kingsland Monitoring Well Network Modification Phases

Phase 3: Installation of all remaining monitoring wells to achieve the final state of the proposed 410 Kingsland monitoring well network			
Aquifer	Monitoring Wells to be Installed		
	During Phase 3		
	D-3R ¹		
	D-18R ¹		
	D-21R ¹		
	D-40R1		
	D-42R ¹		
	D-75R_2 ¹		
	D-77R ¹		
	DM-1R ¹		
Regional	D-102 ²		
rtegional	D-107 ²		
	D-108 ²		
	D-109 ²		
	D-110 ²		
	D-111 ²		
	D-112 ²		
	D-113 ²		
	D-115 ²		
	D-117 ²		
	S-2 ¹		
	S-55R1		
	W-12R ¹		
	W-79R ¹		
Shallow	S-107 ²		
	S-108 ²		
	S-109 ²		
	S-110 ²		
	S-111²		

<u>Notes</u>

- 1. Existing 410 Kingsland monitoring well proposed for reinstallation, if impacted by property owner redevelopment activities. Reinstalled monitoring wells will be named using the existing well identification with an "R" or "R_2" on the end, as indicated in the table above (i.e., D-2 would be reinstalled as D-2R and D-75R would be reinstalled as D-75R 2).
- 2. New monitoring well proposed for installation within the 410 Kingsland property.
- 3. Deep regional aquifer monitoring wells were installed to confirm that groundwater concentrations decrease with depth which has since been confirmed through multiple rounds of groundwater sampling. Deep regional aquifer wells are typically ignored for fluid-level elevation analyses since they are screened at an intermediate depth.



Table 3. Proposed 410 Kingsland Monitoring Well Network Modification

Aquifer	Current Groundwater Sampling Network (Figure 1)	Proposed Groundwater Sampling Network (Figure 4)	Comments
	D-2	D-2 ¹	
Regional	D-51	D-115	D-51R is planned to be decommissioned without reinstallation, however, the newly installed D-113 would be utilized as a replacement in the annual groundwater sampling network
	D-77	D-77R	
	D-51I	no replacement	"I" monitoring wells were installed as deeper regional wells to confirm a decrease in
Deep Regional	D-85I	no replacement	groundwater concentrations with depth which has since been confirmed through
	D-86I	no replacement	multiple rounds of groundwater sampling.
	S-15	S-15 ¹	
	S-23	S-108	S-23 is planned to be decommissioned without reinstallation, however, the newly installed S-106 would be utilized as a replacement in the annual groundwater sampling network
	S-24	S-24 ¹	
	S-26	S-25¹	S-26 is planned to be decommissioned without reinstallation, however, neighboring MW-25 would be used as a replacement in the annual groundwater sampling network.
Shallow	S-30	S-105	S-30 is planned to be decommissioned without reinstallation, however, the newly installed S-104 would be utilized as a replacement in the annual groundwater sampling network
	S-29	S-110	S-29 is planned to be decommissioned without reinstallation, however, the newly installed S-108 would be utilized as a replacement in the annual groundwater sampling network
	S-51	no replacement	S-51 has had minimal recent exceedances as detailed in the 2024 Groundwater Monitoring Report. Comparable data will continue to be collected from nearby S-30 during future annual groundwater sampling events.
	W-79	W-79R	

Notes

1. If monitoring well is impacted during property owner redevelopment activities, it will be reinstalled and named using the existing well identification with an "R" on the end (i.e., D-2 would be reinstalled as D-2R).

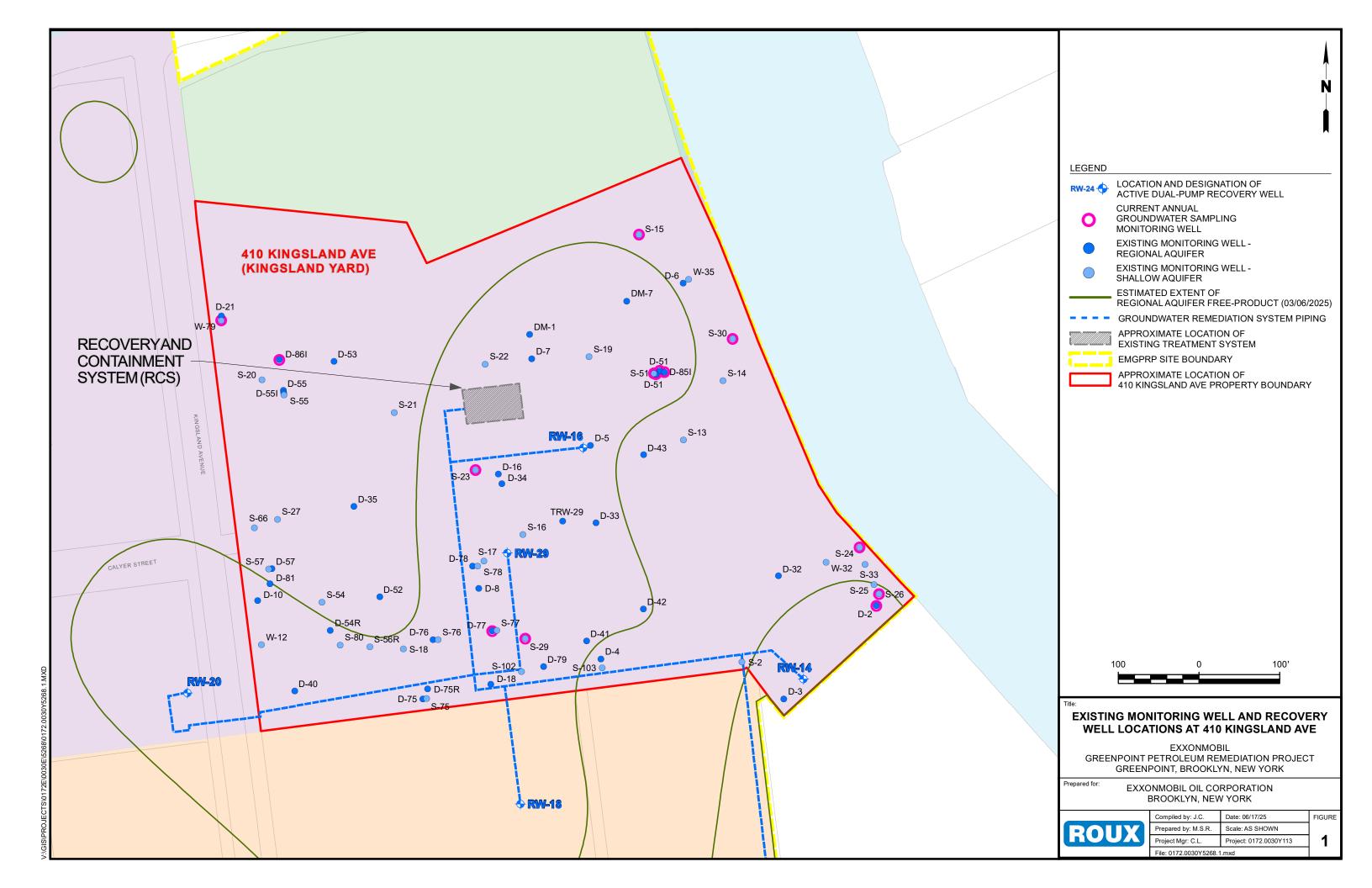


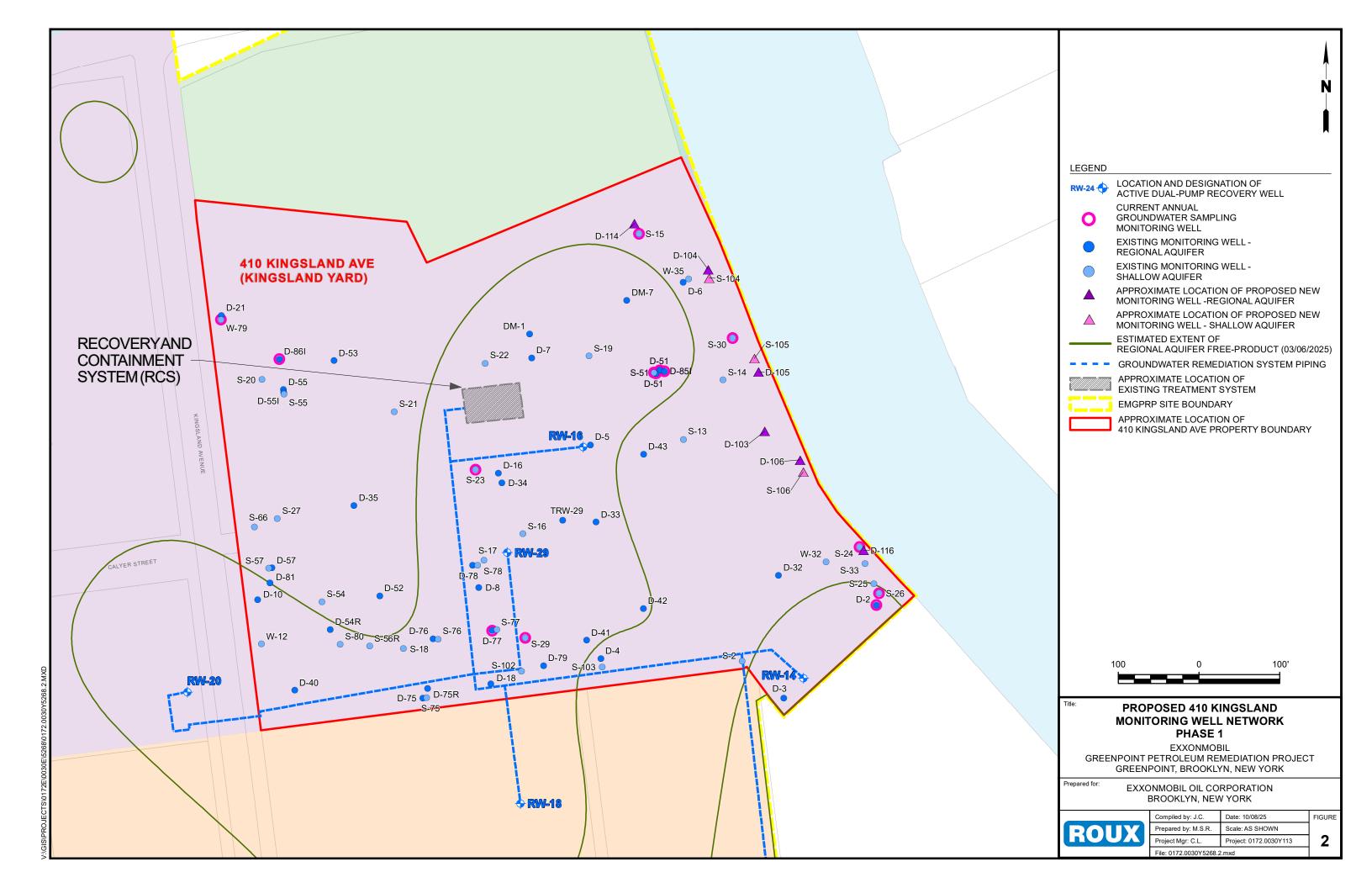
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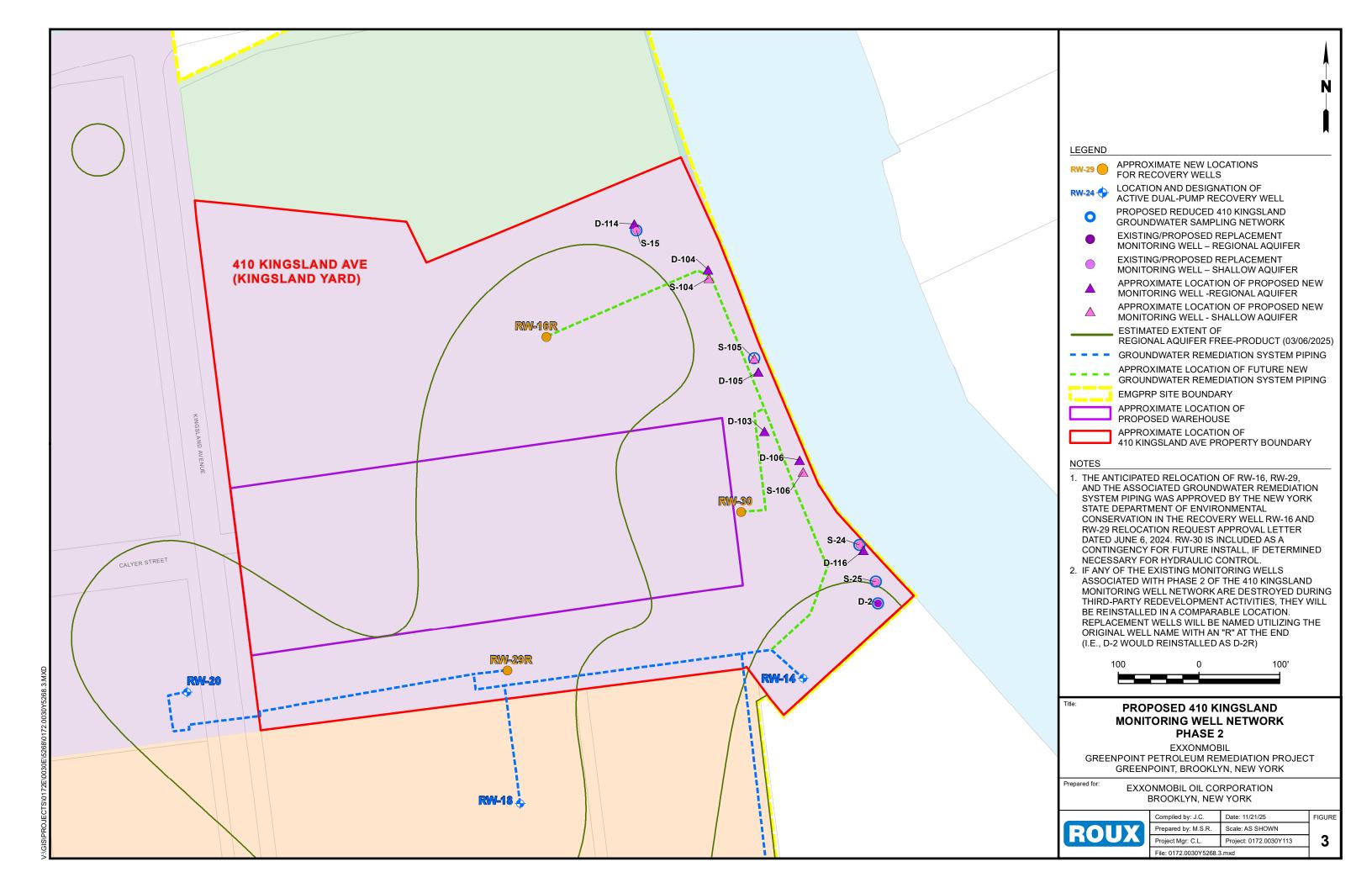
FIGURES

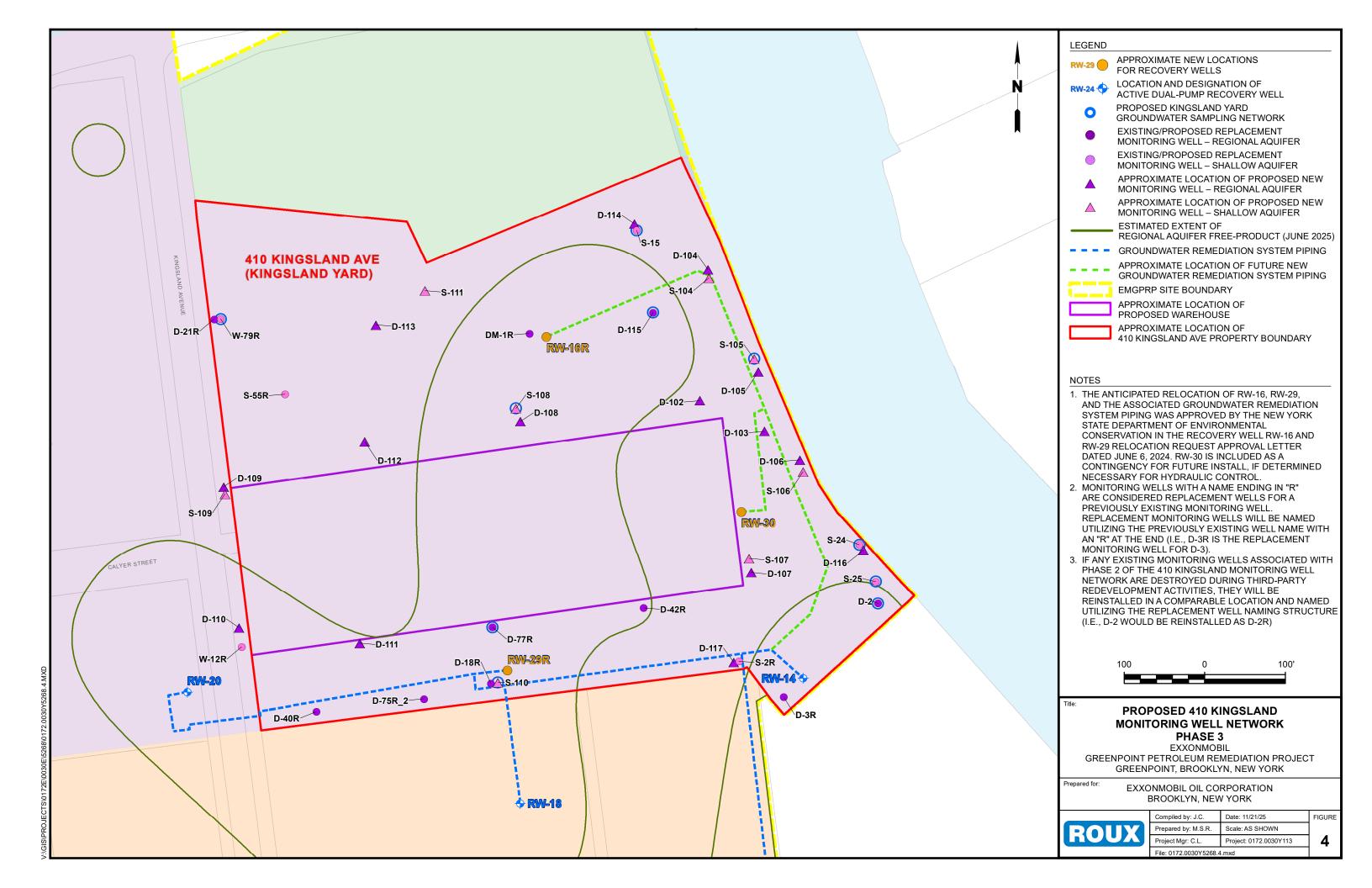
- 1. Existing 410 Kingsland Monitoring Well Network
- 2. Proposed 410 Kingsland Monitoring Well Network Phase 1
- 3. Proposed 410 Kingsland Monitoring Well Network Phase 2
- 4. Proposed 410 Kingsland Monitoring Well Network Phase 3

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Revised 410 Kingsland Avenue Monitoring Well Network Modification Request ExxonMobil Greenpoint Petroleum Remediation Project Greenpoint, Brooklyn, New York

ATTACHMENT 1

NYSDEC Approval of Alternative RW-16R Location

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Jacqueline Carames

From: Alam, Rafi S (DEC) <Rafi.Alam@dec.ny.gov>
Sent: Thursday, November 20, 2025 10:43 AM

To: Jacqueline Carames

Cc: Dudek, Heidi M (DEC); Cervi, Brian; Burghardt, Michael J; Lee, John J; Andrew Baris;

Christopher Proce; Justin Kennedy; Gorton, Lisa A (DEC); Dennis Shin

Subject: RE: RW Install Update - RE: NOTIFICATION OF FIELD WORK - RE: Approval Letter - RW

16 & RW 29 / ExxonMobil Greenpoint Petroleum Remediation Project / S224150

Attachments: Figure 1 - RW Locations.pdf

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Hi Jacqueline,

The Department has reviewed the request regarding the proposed relocation of RW-16R. Based on the information provided, the Department approves the secondary location for RW-16R as shown in Figure 1.

Additionally, as discussed during the early morning call today, the Revised Monitoring Well Network Modification Request (submitted 11/14) does not include the updated location for RW-16R. Please update the document and resubmit it to ensure the monitoring well network accurately reflects all current and proposed changes. This clarification is necessary for maintaining an accurate project record and ensuring consistency across all supporting documentation.

RAFI ALAM (he/him/his)

Project Manager, Division of Environmental Remediation

New York State Department of Environmental Conservation Division of Environmental Remediation | Bureau B, Section D

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From: Jacqueline Carames < jcarames@rouxinc.com>

Sent: Tuesday, November 18, 2025 2:54 PM **To:** Alam, Rafi S (DEC) <Rafi.Alam@dec.ny.gov>

Cc: Dudek, Heidi M (DEC) <heidi.dudek@dec.ny.gov>; Cervi, Brian <Brian.Cervi@wsp.com>; Burghardt, Michael J

<michael.j.burghardt@exxonmobil.com>; Lee, John J <john.j.lee@exxonmobil.com>; Andrew Baris <abaris@rouxinc.com>; cproce@rouxinc.com; Justin Kennedy <jkennedy@rouxinc.com>; Dennis Shin

<dshin@rouxinc.com>

Subject: RW Install Update - RE: NOTIFICATION OF FIELD WORK - RE: Approval Letter - RW 16 & RW 29 / ExxonMobil Greenpoint Petroleum Remediation Project / S224150

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As mentioned on our bi-monthly call last week, an obstruction (i.e., cobble/boulder layer) was encountered at approximately 43 ft bls while drilling at the original RW-16R location. Due to the obstruction and related drilling challenges at depth in this boring, it has been determined that continuing to advance a recovery well at the current RW-16R location is not feasible. As a result, we are planning to abandon the current boring and have evaluated a secondary location to install RW-16R.

After reviewing available existing data from the general area, the new location shown on Figure 1 was identified as a viable alternative option for RW-16R. The new location is within the current plume boundary, as shown on Figure 1. Additionally, groundwater flow modeling utilizing the Site's 2019 GW Flow Model indicates that this new location will continue to maintain hydraulic control, as show in Figure 2. An assumed groundwater pumping rate of 30 gallons per minute was utilized at the new RW-16R location for modeling purposes based on previous pumping rates achieved during free-product recovery activities via diaphragm pump in neighboring monitoring well DM-1, as described in the 2023 Annual Progress Report dated March 15, 2024. Additionally, multiple historic CPT borings in this area identify compatible hydrogeologic conditions. A test boring is anticipated to be installed nearby the new location to confirm that the geology in this area is compatible with the current well design, for which the well screen/casing material is currently on site already. Following the test boring and geology confirmation, drilling for RW-16R is anticipated to resume in the new location.

Please let us know if you have any questions or if additional information is needed, we just wanted to provide open communications on the RW-16R location modification.

Best Regards,

Jacqueline Carames | Project Geologist

209 Shafter Street, Islandia, New York 11749

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Email: jcarames@rouxinc.com Website: www.rouxinc.com



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From: Alam, Rafi S (DEC) < Rafi.Alam@dec.ny.gov > Sent: Wednesday, September 17, 2025 3:34 PM

To: Dennis Shin < dshin@rouxinc.com>

Cc: Dudek, Heidi M (DEC) < heidi.dudek@dec.ny.gov >; Burghardt, Michael J < michael.j.burghardt@exxonmobil.com >; Lee, John J < john.j.lee@exxonmobil.com >; Courtney Lind < clind@rouxinc.com >; Andrew Baris < abaris@rouxinc.com >; Cervi, Brian < Brian.Cervi@wsp.com >; Jacqueline Carames < jcarames@rouxinc.com >; Justin Kennedy < jkennedy@rouxinc.com >

Subject: RE: NOTIFICATION OF FIELD WORK - RE: Approval Letter - RW 16 & RW 29 / ExxonMobil Greenpoint Petroleum Remediation Project / S224150

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Dennis,

Thanks for the update. Exciting news!

RAFI ALAM (he/him/his)

Project Manager, Division of Environmental Remediation

New York State Department of Environmental Conservation

Division of Environmental Remediation | Bureau B, Section D

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From: Dennis Shin <dshin@rouxinc.com>

Sent: Wednesday, September 17, 2025 3:23 PM **To:** Alam, Rafi S (DEC) < Rafi. Alam@dec.ny.gov>

Cc: Dudek, Heidi M (DEC) < heidi.dudek@dec.ny.gov >; Burghardt, Michael J < michael.j.burghardt@exxonmobil.com >; Lee, John J < john.j.lee@exxonmobil.com >; Courtney Lind < clind@rouxinc.com >; Andrew Baris < abaris@rouxinc.com >;

Cervi, Brian < Brian.Cervi@wsp.com>; Jacqueline Carames < jcarames@rouxinc.com>; Justin Kennedy

<jkennedy@rouxinc.com>

Subject: NOTIFICATION OF FIELD WORK - RE: Approval Letter - RW 16 & RW 29 / ExxonMobil Greenpoint Petroleum

Remediation Project / S224150

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Rafi,

We are scheduled to commence the field work associated with the recovery well relocation work on September 25, 2025.

The work should take approximately 20 field days (including surface casing installation, recovery well installation, and development).

Please let us know if you have any questions or comments.

Thanks.

Dennis G. Shin, P.E. - NY | Senior Engineer II

209 Shafter Street, Islandia, New York 11749

Office: 631.232.2600 | Direct: 631.630.2441 | Mobile: 631.764.4280

Email: DShin@rouxinc.com | Website: www.rouxinc.com



From: Alam, Rafi S (DEC) < Rafi.Alam@dec.ny.gov>

Sent: Thursday, June 6, 2024 4:47 PM

To: Courtney Lind < clind@rouxinc.com >; Andrew Baris < abaris@rouxinc.com >

Cc: Dudek, Heidi M (DEC) < heidi.dudek@dec.ny.gov >; Burghardt, Michael J < michael.j.burghardt@exxonmobil.com >; Lee, John J < john.j.lee@exxonmobil.com >; Dennis Shin < dshin@rouxinc.com >; Cervi, Brian < Brian.Cervi@wsp.com > Subject: Approval Letter - RW 16 & RW 29 / ExxonMobil Greenpoint Petroleum Remediation Project / S224150

This message originated outside your organization. Please use caution!

Greetings,

Please find attached the Approval Letter of the Recovery Well RW-16 and RW-29 Relocation Request for the above referenced site.

Should you have any questions, please feel free to contact me.

Regards,

Rafi Alam

He/him/his
Project Manager
Section D, Remedial Bureau B
Division of Environmental Remediation

New York State Department of Environmental Conservation

625 Broadway, Albany, New York 12233

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