McCLELLAND CONSULTING ENGINEERS, INC.
DESIGNED TO SERVE

1580 E. Stearns Street
Fayetteville, Arkansas 72703
(479) 443.2377
mce.us.com

June 18, 2025

WDD ARCHITECTS

5050 Northshore Lane
North Little Rock, Arkansas 72118

ATTN: Mr. Wallie Sprick, AIA
Executive Vice President | Chief Operating Officer

RE: Phase I Environmental Site Assessment Proposal for
6310 Arkansas Highway 215 in
Charleston, Arkansas 72933
MCE Project No.: 25-9610

Dear Mr. Sprick:

McClelland Consulting Engineers, Inc. has completed the authorized Phase I Environmental Site Assessment and Limited Environmental Exploration for the subject property located at 6310 AR Highway 215 in Charleston, Arkansas. The subject property is understood to encompass approximately 828 acres.

This Phase I Environmental Site Assessment was conducted in general accordance with ASTM E2247-23 and ASTM E1903-19. The scope of work of this assessment was further defined by McClelland Consulting Engineer's proposal MCE27-045 dated February 28, 2025, and Change Order Request 25-9610-CO1A, dated April 17, 2025. Authorization of these service was provided by the execution of MCE27-045 on February 28, 2025 and the execution of 25-9610-CO1A on April 25, 2025; both signed by Mr. Wallie Sprick, Executive Vice President and Chief Operations Officer with WDD Architects. These documents were additionally signed and authorized by Ms. Lindsay Wallace, Secretary of the Arkansas Department of Corrections.

This report presents findings, opinions, and conclusions based on information that was reasonably ascertainable, readily apparent, and/or collected during the preparation of this Phase I Environmental Site Assessment and Limited Exploration. As a user of this report, MCE strongly encourages you to read the entire report for detailed descriptions of the observations and judgments made by the Environmental Professionals. The user is ultimately responsible for assessing whether the limitations of the ASTM practice and this project's scope of work are appropriate to the level of risk the user assumes concerning the subject property.

We appreciate the opportunity to work with you and contribute to this project. If there are any questions, comments, or concerns regarding the findings, opinions, and/or conclusions contained within this report please do not hesitate to reach out to us at your convenience.

Respectfully Submitted,

McClelland Consulting Engineers, Inc.

Andrew Miller, P.G., CFM©, CSA
Geologist | Project Designer

Cody L. Traywick, P.G.
Associate | Geotechnical Supervisor | Project Manager

Enclosure: 25-9610 – Phase I Environmental Site Assessment Report & Limited Exploration

McCLELLAND CONSULTING ENGINEERS, INC.
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Fayetteville, Arkansas 72703
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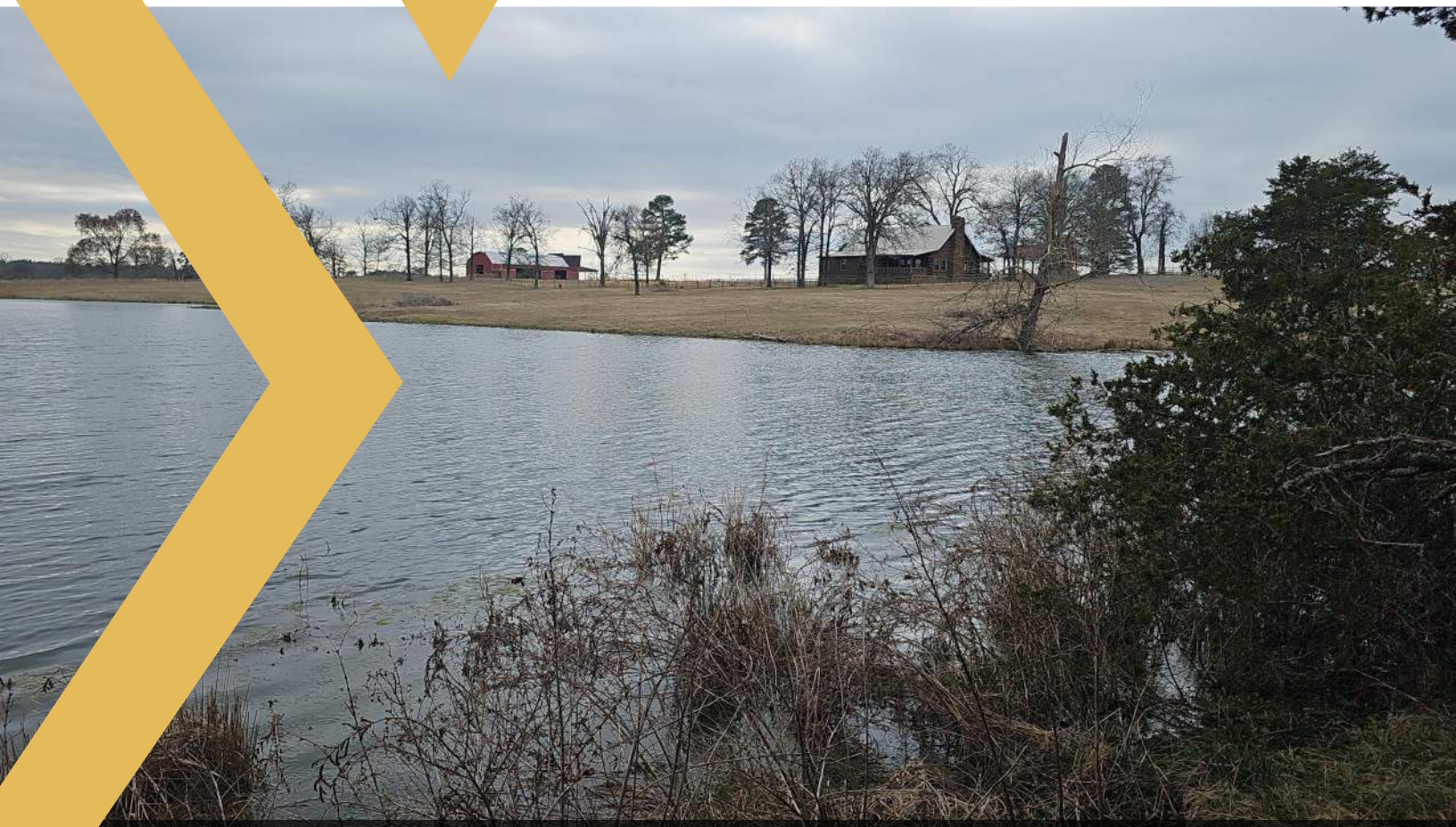

Phase I ESA Report
& Limited Exploration

6310 AR Hwy. 215
Charleston, AR

Project No. 25-9610
June, 2025

Prepared For:
WD&D Architects &
Arkansas Department of Corrections

Table of Contents

TABLES

APPENDICES

List of Commonly Utilized Acronyms

Acronyms	Definition
AAI	All Appropriate Inquiry
AC	Acre
ADEQ	Arkansas Department of Environmental Quality
ANHC	Arkansas Natural Heritage Commission
ANRC	Arkansas Natural Resources Commission
AST	Above Ground Storage Tank
ASTM	American Society for Testing and Materials
AUL	Activity Use Limitations
CEQ	Council on Environmental Quality
CERCLA	Comprehensive Environmental Response Compensation Liability Act
CFR	Code of Federal Regulations
COE	U.S. Army Corp of Engineers
CREC	Controlled Recognized Environmental Condition
dB	Decibels
ESA	Environmental Site Assessment
EDR	Environmental Data Resources, Inc.
EO	Executive Order
EP	Environmental Professional
EPA	Environmental Protection Agency
FEMA	Federal Emergency Management Agency
HREC	Historical Recognized Environmental Condition
LUST	Leaking Underground Storage Tank
MCE	McClelland Consulting Engineers, Inc.
NRHP	National Register of Historic Places
NEPA	National Environmental Policy Act
NGVD	National Geodetic Vertical Datum
NOI	Notice of Intent
NR	No Record
ppm	Parts per million
REC	Recognized Environmental Condition
RCRA	Resources Conservation and Recovery Act
SHPO	State Historic Preservation Officer
SF	Square Foot
SWID	Solid Waste Illegal Dump
TP	Target Property
USGS	United States Geological Service
UST	Underground Storage Tanks (gas/oil tank)
USFWS	U.S. Fish and Wildlife Service

1.0 Executive Summary

This Phase I Environmental Site Assessment (ESA) with Limited Environmental Exploration was conducted following the guidelines established by ASTM E 2247-23 and ASTM E 1903-19. Furthermore, McClelland Consulting Engineer's (MCE) proposal MCE27-045 dated February 28, 2025, and Change Order Request 25-9610-CO1A, dated April 17, 2025, defined the scope of work for this investigation.

Authorization of the defined scope of work was provided by the execution of MCE27-045 on February 28, 2025 and the execution of 25-9610-CO1A on April 25, 2025; both signed by Mr. Wallie Sprick, Executive Vice President and Chief Operations Officer with WDD Architects. These documents were additionally signed and authorized by Ms. Lindsay Wallace, Secretary of the Arkansas Department of Corrections.

The subject property is comprised of four (4) parcels with Franklin County Parcel IDs 002-01577-000, 002-01575-000, 002-00724-000, and 002-00720-000. The subject property is understood to encompass approximately 828 acres. The approximate address of the subject property is 6310 Highway 215 South, Charleston, Arkansas. All of the aforementioned parcels are currently owned by the Arkansas Development Finance Authority. The subject property is located on the east side of Arkansas Highway 215, approximately 1.7 miles north of the intersection of Arkansas Highway 215 and Arkansas Highway 217; near Charleston, Arkansas. The approximate center of the subject property may be referenced by the following latitude and longitude: 35.40206°N and -94.03142°W.

1.1 On-site Findings

- The subject property is currently and has been utilized for rural agricultural purposes since at least the 1940s.
  - The first developments on the subject property were identified by the Topographic Map from 1947
- Two (2) active natural gas wells and one (1) plugged and abandoned (P&A) natural gas well exist on the subject property
- Eleven (11) existing structures were identified on-site (not including the features associated with natural gas operations)
  - Livestock Shed (AEI-01)
  - Riding Arena (AEI-03)
  - Livestock Working Barn (AEI-03)
  - Storage Barn (AEI-05)
  - Machine Repair Barn (AEI-05)
  - Chemical Shack (AEI-05)
  - Main Residential Cabin (AEI-06)
  - Well House (AEI-06)
  - Storage & Electrical Shed (AEI-06)
  - Grilling Pattio (AEI-06)
  - Horse Barn & Entertainment Venue (AEI-07)
- Numerous farm ponds exist on the subject property
- Onion Creek and several tributaries exist on the subject property
- Eight (8) business environmental risks (BER) were identified onsite
  - Five (5) BERs were mitigated during the course of this investigation and determined to be of no concern
  - One (1) BER was determined to be a de minimis condition
  - Limited environmental exploration was conducted within the dimensions of one (1) BER and was subsequently mitigated during the course of this investigation.
  - Limited environmental exploration was conducted for within the dimensions of one (1) BER and found to be a de minimis condition
    - Delineation information has been provided to further mitigate this condition, should it be desired at a future date.

1.2 Off-site Conditions

There are no findings or mapped sites within the applicable ASTM search distances relative to the subject property. There were no observed conditions off-site that warranted concern.

1.4 Conclusions

No recognized environmental conditions (REC) were identified during the course of this investigation this Phase I ESA that could potentially cause negative environmental impact on the subject property.

Two (2) de minimis conditions were identified as existing on the subject property. These features are further identified in this report and should be considered business environmental risks (BER).

1.5 Deviations

The following deviations from the ASTM occurred throughout the preparation of this assessment.

- Contact with historical property owners was not accomplished
- Coordination of risk mitigation activity was included in this scope of work
- Limited environmental exploration was included as a change in scope and was performed during the course of this assessment

1.6 User Considerations & Additional Services

It should be noted that this Phase I ESA was conducted concurrently with additional services including Limited Utility Location Servies, a Preliminary Geotechnical Investigation, a Section 404 Wetland Delineation, a Cultural Resources Literature and Records Search, and a Threatened and Endangered Species Evaluation. Additional investigations, evaluations, testing, and/or assessments related to the aforementioned additional services are not discussed in this report.

MCE has provided limited delineation information with respect to an identified BER and de minimis condition on the subject property. If further assistance is desired to mitigate that condition, MCE would be happy to discuss that scope of work with the User of this report.

Based on the information collected and reviewed during this Phase I ESA, MCE does not recommend any additional investigation relevant to the conclusions of this Phase I ESA Report with respect to the subject property. However, observations should be made during site modifications (housekeeping or redevelopment) for areas of possible contamination, such as but not limited to, the presence of underground facilities, buried debris, stained soil, or odorous soil. Should such materials be encountered, further investigation and analysis may be necessary at that time.

The scope of additional services, if necessary, should be evaluated by the User to determine what approach, if any, is appropriate to evaluate the level of risk associated with the redevelopment of this property.

2.0 Introduction

2.1 Location and Legal Description

The subject property is comprised of four (4) parcels with Franklin County Parcel IDs 002-01577-000, 002-01575-000, 002-00724-000, and 002-00720-000, encompassing a total of approximately 828 acres. The address to the property is 6310 South Highway 215, Charleston, Arkansas. The parcels that comprise the understood subject property are currently owned by Arkansas Development Finance Authority. The subject property is located on the east side of Arkansas Highway 215, approximately 1.7 miles north of the intersection of Arkansas Highway 215 and Arkansas Highway 217; near Charleston, Arkansas. The approximate center of the subject property may be referenced by the following latitude and longitude: 35.40206°N and -94.03142°W. A street map and aerial image of the subject property may be referenced in Appendix 1, Figures 1 and 2; respectively.

A legal description of the subject property is as follows:

Lot 2 of the Northwest Quarter of Section 1, Township 8 North, Range 29 West, Franklin County, Arkansas, Except a Tract described as beginning at the Northwest Corner of Said Lot 2; thence South 645.5 feet; thence East 1351.2 feet; thence North 645.5 feet; thence West 1348 feet, to the Point of Beginning. Subject to Easements, Rights of Way and Covenants of record. Subject to Restrictions of record and Reservations and Conveyances of Oil, Gas and Other Minerals.

And

The Northeast Quarter of the Southwest Quarter; Lots One and Two of the Northeast Quarter; and Lot One of the Northwest Quarter of Section 1, Township 8 North, Range 29 West, Franklin County, Arkansas. Subject to Easements, Rights of Way and Covenants of record. Subject to Restrictions of record and Reservations and Conveyances of Oil, Gas and Other Minerals.

And

The Northeast Quarter of the Southwest Quarter and the Northwest Quarter of the Southeast Quarter of Section 1, Township 8 North, Range 29 West, Franklin County, Arkansas. Subject to Easements, Rights of Way and Covenants of record. Subject to Restrictions of record and Reservations and Conveyances of Oil, Gas and Other Minerals.

And

The Northwest Quarter of the Southwest Quarter; Lot Two of the Northwest Quarter; and the West Half of Lot One of the Northwest Quarter in Section 6, Township 8 North, Range 28 West, Franklin County, Arkansas. Subject to Easements, Rights of Way and Covenants of record. Subject to Restrictions of record and Reservations and Conveyances of Oil, Gas and Other Minerals.

And

The North Half of Lot 2 of the Northeast Quarter and the Southwest Quarter of Lot 2 of the Northeast Quarter of Section 6, Township 8 North, Range 28 West, Franklin County, Arkansas. Subject to Easements, Rights of Way and Covenants of record. Subject to Restrictions of record and Reservations and Conveyances of Oil, Gas and Other Minerals.

A copy of the property deed may be referenced in Appendix 9.

2.2 Purpose

The purpose of this Phase I ESA was to conduct an All-Appropriate Inquiry (AAI) to assist the User of this report in satisfying the requirements to qualify for the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) landowner liability protections, except for the User's Responsibilities, which are limited to the User-Provided Information found in ***Section 3.0***.

In addition, this Phase I ESA was conducted to identify recognized environmental conditions (REC) in connection with the subject property following the American Society for Testing and Materials (ASTM) Practice E2247-23 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process for Forestland or Rural Property. This Phase I ESA is not intended to meet CERCLA requirements other than AAI or to address any state or local laws or any federal requirements other than AAI.

We understand that the purpose of this Phase I ESA is in preparation for State project compliance.

2.3 Scope of Services

This Phase I Environmental Site Assessment (EDA) was conducted following the guidelines established by E2247-23 and ASTM E 1903-19. Furthermore, McClelland Consulting Engineer's (MCE) proposal MCE27-045 dated February 28, 2025 and Change Order Request 25-9610-CO1A dated April 17, 2025 defined the scope of work for this investigation.

Authorization of the defined scope of work was provided by the execution of MCE27-045 on February 28, 2025 and the execution of 25-9610-CO1A on April 25, 2025; both signed by Mr. Wallie Sprick, Executive Vice President and Chief Operations Officer with WDD Architects. These documents were additionally signed and authorized by Ms. Lindsay Wallace, Secretary of the Arkansas Department of Corrections.

2.4 Significant Assumptions

MCE assumes that information provided by others about the subject property, including governmental agencies, the User and their representatives, property contact, property owner, property owner representatives, computer databases, and personal interviews is accurate and correct. MCE did not know of it, nor was it obvious that the information provided by others was incorrect. We did not independently verify the information provided by others.

MCE will not be held accountable for any errors, omissions, or inaccuracies in reasonably ascertainable information or undisclosed environmental conditions; and is not responsible for any conclusions or opinions made by others based on this report.

Groundwater Flow directions are assumed to follow contours appearing on the United States Geological Survey (USGS) topographic maps. MCE assumes the property has been correctly and accurately identified by the client, the designated representative of the client, the property contact, the property owner, and the property owner's representatives.

2.5 Reliance

MCE has performed this scope of services for the exclusive use of, and the reports can be relied upon by WDD Architects, the State of Arkansas, Arkansas Department of Corrections, A/E Design Team, and Vanir Construction Management, Inc.; as well as their attorneys, lending institutions and subsidiaries. Any use by entities not listed is expressly prohibited without prior written permission from MCE.

2.6 Report Viability & Passage of Time

According to Section 4.6 of ASTM E2247-23, this report is viable for up to 180 days from the date that is the earliest of the following five tasks:

- The interview(s) of past and present owners, operators, and occupants.
- Searches for recorded environmental cleanup liens.
- Review of federal, tribal, state, and local government records.
- The visual inspection of the subject property and adjoining properties.
- Declaration by the environmental professional responsible for the assessment or update.

This Phase I ESA Report has a viability date of August 31, 2025, which is based on the initial Environmental Data Resources (EDR) database search conducted on March 4, 2025.

This report reflects observations made at the time of the Site Reconnaissance and judgments based on records available to MCE during the Phase I ESA process. The passage of time may result in changes in site conditions, available technologies, economic conditions, and political opinions that could alter the findings, conclusions, and/or opinions in this report. As the User of this report, you acknowledge and agree that deviations from observed conditions or available records due to the passage of time are not liable to the Environmental Professional (EP) or MCE.

2.7 Limitations and Exceptions

The accuracy of this assessment is limited to evidence detected through visual and olfactory senses on the specific day(s) the physical inspection(s) were conducted. MCE excludes possible evidence of environmental impacts that were obscured from detection by existing vegetation, structures, or water.

Accuracy is also limited to the availability and correctness of certain readily-available public information, which was obtained and utilized during the investigation. MCE does not warrant or guarantee the property is suitable for any particular purpose or certifies it as completely free of environmentally detrimental contamination. Additionally, MCE neither warrants nor guarantees information provided by vendors or subcontractors. Future regulatory modifications, agency interpretations, and/or attitude changes may affect the environmental status of the property described herein.

3.0 User-Provided Information

The User of this report is understood to be WDD Architects and the State of Arkansas. The following information has been summarized from the User Questionnaire completed by Mr. Chris Bell, Deputy Director with TSS – Division of Building Authority with the State. The completed User Questionnaire may be referenced in Appendix 7.

The following table summarizes the information provided by Mr. Bell.

Table 1: User -Provided Information Summary

Item		Comment
3.1	Environmental liens (40 CFR 312.25)	The User is not aware of any environmental cleanup liens against this property.
3.2	Activity and use limitations (40 CFR 312.26)	The User indicated that there is a transmission line easement with building set back requirements.
3.3	Specialized knowledge (40 CFR 312.28)	The User indicated they do not have any specialized knowledge related to the site.
3.4	Valuation reduction for environmental issues (40 CFR 312.29)	The User indicated that the purchase price reasonably reflected the fair market value at the time of purchase.
3.5	Commonly known or reasonably ascertainable information (40 CFR 312.30)	The User has no information related to environmental issues associated with this property. The User did indicate they had knowledge of the property's past use as a cattle farm.
3.6	Degree of obvious contamination (40 CFR 312.31)	The User has noted there are no obvious indicators that point to the presence or likely presence of contamination on the property.

4.0 Physical Setting

4.1 Topographic Conditions

The subject property is shown on the Mulberry, AR 2020 Quadrangle. This 7.5-minute Series map was produced by the USGS and has a scale of 1:24,000 (2000 feet) with a contour interval of 20 feet. The average site elevation, as shown on the 2020 Topographic Map, is estimated to be 650 feet above the mean sea level.

The topographic setting of the site may be described as being on the southern slope of a linear ridge with an overall slope from the north down to the south. The topographic features of the surrounding area are dominated by local drainage features. Regional surface drainage trends to the west/southwest following local tributary streams such as Onion Creek. Surface drainage within the subject property is anticipated to trend south/southwest trending with local tributaries feeding Onion Creek. An image compiled from the Mulberry 2020 topographic map may be referenced in Appendix 1, Figure 4. Historical topographic maps from 1890 to 2020 may be referenced in Appendix 4.

4.2 Geologic Conditions

The surface geology of the subject property area is mapped as the Hartshorne Sandstone Formation of the Pennsylvanian Age (346.7 to 323.2 million years old). A brief description from the Stratigraphic Summary of Arkansas – Information Circular 36 (IC36) of the local geologic formation is provided on the following page.

The Hartshorne Sandstone is normally a brown to light gray, massive, frequently cross-bedded, medium-grained sandstone. It is the first sandstone underlying the Lower Hartshorne Coal. The formation is a prominent ledge former under favorable structural conditions. A few fragmental plant fossils have been noted in the formation. The Hartshorne rests with a minor unconformity on the Atoka Formation. The Hartshorne thickness ranges from 10 to 300 feet.

An image clipped from the 1993 Geologic Map of Arkansas produced by the Arkansas Geological Survey and the United States Geological Survey, with the approximate property location may be referenced in Appendix 1, Figure 6.

4.3 Residual Soil Conditions

The following residual soil types exist in the subject property according to the National Cooperative Soil Survey produced and maintained by the United States Department of Agriculture (USDA), Natural Resources Conservation Services (NRCS). Table 2 below provides descriptions from the USDA on the residual soils:

Table 2: Summary NRCS-USDA Residual Soils

USDA Soil Type	USDA Symbol	USDA Descriptions
Allen gravelly fine sandy loam	**AgC**	The Allen series consists of well-drained, moderately permeable soils that developed in colluvium from acid sandstone and shale. These soils are on foot slopes and benches. This soil is medium acid to very strongly acid. Slopes range from three (3) to eight (8) percent across the subject property.
Enders gravelly silt loam	**EnC2** **EnD2**	The Enders series consists of well-drained soils that have a very slowly permeable, clayey subsoil. These soils developed in residuum derived from acid shale. They have a thin surface layer of loamy material, presumably colluvium from higher lying soils. They are on hillsides and mountains and primarily occur as short slopes. This soil is strongly acid to very strongly acid. Slopes range from three (3) to 20 percent across the subject property.
Linker fine sandy loam	**LnC**	The Linker series consists of well-drained, moderately permeable soils that developed in residuum from acid sandstone and siltstone. These soils are on ridges, mountaintops, hilltops, and benches throughout the county. This soil is strongly acid to very strongly acid. Slopes range from three (3) to eight (8) percent across the subject property.
Montevallo-Mountainburg complex	**MmD** **MmE**	The Montevallo series consists of somewhat excessively drained, moderately permeable, shallow soils that formed in residuum from acid shale. These soils are on ridges and side slopes throughout the county. This soil is strongly acid to very strongly acid. Slopes range from one (1) to 40 percent across the subject property.
Mountainburg gravelly fine sandy loam	**MtC**	The Mountainburg series consists of well-drained, rapidly permeable, shallow soils that formed in residuum from acid sandstone. These soils occur throughout the county, mainly on hilltops, mountaintops, and ridges. This soil is strongly acid to very strongly acid. Slopes range from one (1) to 12 percent across the subject property.
Mountainburg stony fine sandy loam	**MuD**	
Pickwick silt loam	**PsB2**	The Pickwick series consists of well-drained, moderately permeable soils that developed in alluvium washed from acid, loamy soils on uplands. These soils are on stream terraces. There are a few rills and shallow gullies. This soil is strongly acid to very strongly acid. Slopes range from one (1) to three (3) percent across the subject property.

An image of the NRCS Web Soil Survey Map may be referenced in Appendix 1, Figure 5.

4.4 Hydrologic Conditions

The subject property is considered part of Franklin County Unincorporated Areas (050432) and is shown on Panel 05047C0300D with an effective date of 08/21/2011. The entire property is shown as *Zone X – Area of Minimal Flood Hazard* as indicated in Appendix 1, Plate 6.

In general, unless disturbed, groundwater flow will follow the topography of the land surface. In this instance, the topography of the subject property would suggest that groundwater flow is to the south for the majority of the property, in the direction of Onion Creek. From Onion Creek, groundwater flow is anticipated to trend to the West. However, local conditions such as engineering controls and/or geologic features can alter flow directions from this generalization. An image of the FEMA Flood Map (Panel 05047C0300D) may be referenced in Appendix 1, Figure 3.

4.5 Water Well Operations Discussion

Two (2) water wells were physically identified within the extents of the subject property boundary. The on-site wells may be referenced by Photographs #24 through #26, #62, and #63. The observed on-site well locations may be referenced in Appendix 1, Figure 7. At the time of this assessment, the observed onsite wells were not operational. Further, geospatial data provided on the readily available completion reports in this area did not correspond to the on-site wells. Therefore, the completion depths and production rates for the on-site wells is not currently known.

MCE referenced readily available well completion reports on file with the Arkansas Water Well Construction Commission. Eleven (11) domestic water wells were identified in Township 8N, Range 28W, Section 6 and Township 8N, Range 29W, Section 1. Specifically, 10 wells were located in Section 1 and one (1) was located in Section 6. The following table summarizes data obtained from the well reports. The well reports may be referenced in Appendix 10.

Table 3: Water Well Data Summary

Well Owner	Completion Date	Total Depth (ft)	Production Zone (ft)	Production Amount (gallon per hour)	Location (STR)
McFerin	03/20/1974	160	127 & 160	300	T8N, R28W, S6
Danfurger	06/03/1974	97	37 & 69.5	800	T8N, R29W, S1
Little	10/25/1976	104	60 & 90	1,000	T8N, R29W, S1
Mays	08/03/1977	165	80 & 150	2,000	T8N, R29W, S1
Wilson	10/10/1977	200	86	3	T8N, R29W, S1
Leagans	09/08/1997	115	98	450	T8N, R29W, S1
Williams	09/09/1997	100	76	800	T8N, R29W, S1
Palmer	06/12/2000	220	38, 110, 152, & 178	200	T8N, R29W, S1
Lawson	05/22/2002	130	40 & 112	600	T8N, R29W, S1
Woods	04/21/2009	105	26, 38, & 90	300	T8N, R29W, S1
Crowdy	10/19/2009	175	--	30	T8N, R29W, S1

It should be noted that there were no records of commercial or irrigation wells being developed in Township 8N, Range 28W, Section 6 or Township 8N, Range 29W, Section 1. In the Arkansas River Valley, the primary consistent source of groundwater is the alluvium along the Arkansas River. Groundwater from this source is primarily utilized for crop irrigation.

Due to the predominance of shale in both the surface and subsurface rocks in the Arkansas River Valley region, as well as the low porosity of many of the interbedded sandstones, few rock units qualify as aquifers. Because most wells yield less than 600 gallons per hour, most communities rely on surface-water supplies.

4.6 Natural Gas Exploration & Operations Discussion

Natural gas wells in proximity to the subject property (west-central Arkansas) are located in what is referred to as the Arkoma Basin. The Arkoma Basin is an elongate sedimentary basin extending from east-central Oklahoma into Arkansas. It includes, but is not restricted to, the Arkansas River Valley physiographic region of western Arkansas. Due to the extremely high thermal maturation process over geological time, only “dry gas” is produced in the conventional sandstone reservoirs of this area. That is, the natural gas that is produced does not carry appreciable amounts of the heavier hydrocarbons as vapor.

The Atoka Formation of Pennsylvanian Age contains the principal gas-producing units in the Arkoma basin. The Atoka Formation is a succession of alternating beds of sandstone and shale with a maximum subsurface thickness ranging from approximately 15,000 - 20,000 feet in this region. Some dry gas has also been produced from the Morrowan Series (Bloyd and Hale formations), which underlies the Atoka Formation. Atokan and Morrowan beds have been folded into numerous east-west trending open folds which trap the gas within porous beds. Note the surface geology of the subject property is the Hartshorne Sandstone Formation which rests on top of the Atoka Formation.

Three (3) natural gas operation features were identified on the subject property. Two (2) of the features currently exist as active natural gas wells. The third feature is a plugged and abandoned (P&A) natural gas well. These features may be referenced in Appendix 1, Figure 12.

4.6.1 Hiatt, Clyde No. 1

This well has an AOGC permit number of 13279 and an API number of 03-047-00115-00-00. This well was completed on December 5, 1956 to a total depth of 5,810 feet. This well produces a “dry” natural gas and has produced 553,493 thousand cubic feet (Mcf), as of March 2025. The well is operated by MMGK Arkoma, LLC.

4.6.2 Triplett, Annie No 2

This well has an AOGC permit number of 24586 and an API number of 03-047-10089-00-00. This well was completed on September 30, 1977 to a total depth of 5,576 feet. This well produces a “dry” natural gas and has produced 1,967,239 Mcf, as of March 2025. The well is operated by MMGK Arkoma, LLC.

4.6.3 Skach, Lillyan C

This well has an AOGC permit number of 35081and an API number of 03-047-10803-00-00. Drilling operations for this well began on March 31, 1993, and the well was plugged and abandoned on April 10, 1993. This well was a “dry hole,” meaning that it did not produce commercially viable quantities. This well was completed to a total depth of 5,800 feet. The operator of this well was Ozark Oil & Gas, Inc.

5.0 Records Review

5.1 Standard Environmental Record Sources

MCE has conducted a review of reasonably ascertainable records from Federal, State, and Tribal regulatory agencies. The purpose of this review is to obtain and review records that may help identify recognized environmental conditions in connection with the subject property and/or adjoining properties. Information concerning these records was provided to MCE by EDR and is included in this report as Appendix 2. This record review is subject to certain limitations as outlined in the EDR summary in Appendix 2.

5.1.1 Federal, State, and Tribal Regulatory Listing Review

Due to the size of the subject property, two (2) separate record searches were conducted; one for the west and one for the east. The results of that review are compiled into the EDR Radius Map Report with GeoCheck©, dated February 28, 2025, and March 4, 2025, respectively.

The review of reasonably ascertainable records from Federal, State, and Tribal regulatory agencies revealed that there are no findings or mapped sites within the applicable ASTM search distances.

5.2 Historical Use Information on the Subject and Adjoining Properties

5.2.1 Historical Aerial Photographs

Aerial Photo Decade Package of the subject property and surrounding area were obtained through EDR. Again, due to the size of the property, the search for aerial imagery was separated into the western half and eastern half. Aerial photographs for the years 1962, 1971 (west only), 1977 (west only), 1983, 1994, 2001, 2006, 2010, 2015 and 2019 were reviewed. In addition, Aerial Imagery from Google Earth dated 2024 was reviewed.

A summary of the historical aerial photography is provided in Table 4 below. The complete EDR Aerial Photo Decade Package may be referenced in Appendix 3. The 2024 Aerial imagery from Google Earth may be referenced in Appendix 1, Figure 2.

Table 4: Summary of Historical Aerial Photographs

Year	Subject Property	Adjoining Properties / Surrounding Area
1960s	The subject property boundary is not discernable in the imagery from the 1960s and the imagery appears to be centered slightly north of the subject property. The imagery would suggest that the subject property is a mix of timberland and pasture land.	The imagery from 1962 shows the surrounding area as primarily rural land. Highway 215 and Anice Road can be identified as well as a few small homesteads along them. A poultry operation is present on Highway 215, just north of where the subject property is understood to be located. A large power line right-of-way is easily discernable trending northwest to southeast.
1970s	Imagery from the 1970s was only available for the western half of the subject property. The eastern portion of the subject property boundary has been approximated due to the imagery not being properly georeferenced. The subject property appears as a mix of pasture land and woodland. The large pond near the center of the property is easily discernable. No structures are easily discernable on the subject property.	In the 1970s, only minimal changes are discernable to the surrounding area. A second poultry operations structure is evident along Highway 215, north of the subject property. Additionally, a large pond has been constructed near the poultry operations.
1980s	The property boundaries have been approximated for both the eastern and western imagery from the 1980s due to not being properly georeferenced. In the 1980s there are no significant changes apparent to the western portions of the subject property from the 1970s. Imagery from the 1980s shows the development of a gas pad in the eastern portions of the subject since the 1960s. Across the subject property, small access roads are apparent.	Only minimal changes are discernable to the surrounding area.
1990s	By the 1990s there are two (2) barn structures that now appear in west-central portions of the property since the 1980s. There is a new well pad and access road constructed in the northwestern portion of the property. The access road enters the property from the west from Highway 215.	Minimal changes are apparent in the surrounding area since the 1980s. The poultry structures, located north of the subject property on Highway 215, have been demolished and a residential structure occupies that parcel. Minor amounts of small residential developments are apparent in the surrounding area.

Year	Subject Property	Adjoining Properties / Surrounding Area
2000s	Since the 1990s, several areas of the subject property have been cleared of trees and likely more utilized for grazing and/or hay production purposes. At least two (2) additional structures now appear on the subject property including the main house/cabin structure and the horse barn. Continued clearing of the subject property is evident. In the mid-2000s, one of the barn structures in the western portions of the property was demolished and construction of two (2) new barns is evident.	Since the 1990s, minor amounts of change are apparent in the surrounding area. Some notable changes include the development of a new poultry structure, due west of the subject property. A few new small residential structures are now apparent along Highway 215.
2010s	In the 2010s, no significant changes were apparent to the subject property from the 2000s.	In the 2010s, no significant changes were apparent to the surrounding area from the 2000s.

5.2.1.1 Opinions on Historical Aerial Photographs

Based on MCE's review of available aerial photography, no environmental concerns were noted for the subject property.

5.2.1.2 Historical Aerial Photographs – Data Gap

The provided historical aerial photography does not go back to when the property was first developed. As such, there is a data gap in the historical aerial photography for the subject property.

5.2.2 Historical Topographic Maps

Historical topographic maps that include the subject property and surrounding area were obtained through EDR. Topographic maps for the years 1890, 1906, 1943, 1947, 1948, 1949, 1951, 1971, 1975, 1987, 2014, 2017, and 2020 were reviewed. A summary of the topographic maps is provided in Table 5 below. The complete EDR Historical Topo Map Report may be referenced in Appendix 4.

Table 5: Summary of Historical Topographic Maps

Year Map Name	Subject Property	Adjoining Properties / Surrounding Area
1890s (1890 Fort Smith 30-minute)	In 1890, the subject property is shown on the east side of a rural road. No developments are indicated on the subject property. Tributaries of a larger stream are present across the property trending to the south.	In 1890, the majority of the surrounding area appeared to be rural undeveloped land with roads shown. Regional drainage features trend to the southwest.
1900s (1906 Lavaca 15-minute)	In 1906, no apparent changes were evident on the subject property since 1890.	In 1906, no apparent changes were evident to the surrounding area since 1890.

Year Map Name	Subject Property	Adjoining Properties / Surrounding Area
1940s (1943 Fort Smith 30-minute) (1947 Lavaca 15-minute) (1948 Mulberry 7.5-minute) (1949 Mulberry 7.5-minute)	In 1943, there was a power transmission line shown bisecting the subject property from the northwest to the southeast. By 1947, two (2) structures are now shown on the subject property in the western portions of the site. An unimproved road is now shown as spanning the southern portions of the property from Highway 215 and exiting the subject property to the south. In 1948, no apparent changes were evident on the subject property since 1947. In 1949, no apparent changes were evident on the subject property since 1948.	By 1943, there are a few more rural unimproved roads shown on the map since 1906; north, south, east, and west of the subject property. A few structures are shown south/southwest of the subject property identified as the community of Vesta. A single structure is also shown north of the subject property. By 1947 some of the unimproved roads were shown as improved. Additionally, several small structures are shown along the roads of the surrounding area likely related to a change in the map style. By 1948 the map style has changed again and as such, additional features are shown such as the strip mines located south/southwest from the subject property. In 1949, no apparent changes were evident to the surrounding area since 1948.
1950s 1951 Mulberry 7.5-minute)	In 1951, no apparent changes were evident on the subject property since 1949.	In 1951, no apparent changes were evident in the surrounding area since 1949.
1970's (1971 Mulberry 7.5-minute) (1975 Mulberry 7.5-minute)	By 1971, the large pond in the central portion of the subject property is now identifiable. No additional changes are evident since 1951. In 1975, no apparent changes were evident on the subject property since 1971.	Since 1951 there are a few new small developments on Highway 215. Additionally, there are now two (2) poultry structures and a large pond shown northwest of the subject property along Highway 215. A new pit is shown south of Onion Creek. The strip-mining operations further south on Highway 215 have also been expanded. In 1975, no apparent changes were evident on to the surrounding area since 1971.
1980's (1987 Mulberry 7.5-minute)	In 1987 the two (2) structures located near Highway 215 in the western portions of the site have been demolished. A new access road entering the property from the north is now shown as well as a small structure. Two (2) larger structures (likely barns) are shown in the central portions of the property. Additionally, two (2) gas wells are identified on the subject property; one is located north of the aforementioned barn structures and one is located in the extreme eastern portions of the property. The eastern gas well also has an access road identified entering the property from the south.	By 1987, several gas wells are identified in the surrounding area. There are also two gas pipelines identified; one is located northwest and one is located southeast of the subject property. A few new roads are shown in the surrounding area as well.

Year Map Name	Subject Property	Adjoining Properties / Surrounding Area
2010s (2014 Mulberry 7.5-minute) (2017 Mulberry 7.5-minute)	Since 1987, the map style has changed and only limited structures such as schools, churches, and fire stations are shown. No structures are shown on the subject property, including gas wells. No apparent changes were evident on the subject property. On the 2017 map, roads have been identified on the subject property compared to the 2014 map. Identified roads include one from Highway 215 to the large, centrally located pond and gas pad access roads entering the subject property from Highway 215 in the northern portions.	In 2014, no apparent changes were evident to the surrounding area since 1987. In 2017, no apparent changes were evident to the surrounding area since 2014.
2020s (2020 Mulberry 7.5-minute)	In 2020, no apparent changes were evident on the subject property since 2017.	In 2020, no apparent changes were evident to the surrounding area since 2017.

5.2.2.1 Opinions on Historical Topographic Maps

Based on MCE's review of available topographic maps, no environmental concerns were identified for the subject property.

5.2.2.2 Historical Topographic Maps – Data Gap

Topographic maps were not available or otherwise not provided for the complete decade series. The 1910s, 1920s, 1930s, 1960s, 1990s, and 2000s, maps were not provided by EDR. Based on the information provided, it is the opinion of MCE that these maps would not have provided any relevant information concerning the historical use of the subject property.

5.2.3 Sanborn Fire Insurance Maps

A Certified Sanborn Map Report was provided by EDR for both the eastern and western halves of the subject property. The complete holdings of the Sanborn Library, LLC collection were searched based on the User provided subject property information. No maps were available. A copy of the Certified Sanborn Map Reports may be referenced in Appendix 5.

5.2.4 City Directory Image Report

A City Directory Image Report, provided by EDR, was utilized to establish past uses of the subject property. An address of 6310 S. Hwy 215, Charleston, Arkansas was utilized for the subject property. EDR accesses a variety of business directory sources, including Haines, Info USA, Polk, Cole, Bresser, and Stewart. Records pertaining to the subject property address were reviewed from 1992 to 2020. Table 6 below, provides a summary of the City Directory listings for the subject property. A copy of the City Directory Image Report is provided in Appendix 6.

Table 6: Summary of City Directory Records

Year	6310 Hwy 215
1992	NO LISTING
1995	NO LISTING
2000	NO LISTING
2005	NO LISTING
2010	NO LISTING
2014	OCCUPANT UNKNOWN
2017	NO LISTING
2020	NO LISTING

5.3 Prior Environmental Assessments or Reports

No previous environmental site assessments or reports were made available at the time of preparing this report.

5.4 Environmental Lien and AUL Search

ASTM E2247-23 requires the User of this report to perform a search of title and judicial records for environmental liens and activity and use limitations (AULs). Any environmental liens and AULs known to the user should be reported to the environmental professional conducting the Phase I Environmental Site Assessment. Unless added by a change in the scope of work to be performed by the environmental professional, this practice does not impose on the environmental professional the responsibility to undertake a review of recorded land title records and judicial records for Environmental Liens and AULs. At the time of this report, deed information was provided to MCE that indicated the property is *Subject to Easements, Rights of Way, and Covenants of Record* and *Subject to Restrictions of record and Reservations and Conveyances of Oil, Gas, and Other Minerals*.

The User will be notified if Environmental Lien and/or Activity and Use Limitation information is provided at a later date that materially influences the findings of this report.

6.0 Site Reconnaissance

6.1 Current Uses of the Subject Property

At the time of preparing this report, the subject property exists as approximately 828 acres of rural farmland and isolated woodland. The subject property appears to be primarily utilized for agricultural purposes; including grazing and hay production. Grazing operations are interpreted to be related to cow and horse husbandry. Additionally, the subject property is being utilized for the production of natural gas. A single residential development is located in the approximate center of the subject property.

Access to the subject property is primarily provided via Highway 215 with a gravel access drive. Smaller unimproved trials exist across the subject property. The easternmost portions of the property are accessible via a lease road off of Gilsinger Road.

6.2 Current Uses of the Surrounding Area

At the time of preparing this report, the surrounding area is largely rural land, residential properties, agricultural lands, and woodlands. Some commercial poultry operations are evident in the surrounding area.

6.3 Methodology and Limiting Conditions

The site reconnaissance of this subject property was investigated following the E2247-23 guidelines for rural property or forestland. As such, an initial desktop reconnaissance of the subject property was conducted utilizing aerial imagery from Google Earth with an imagery date of October 23, 2024. Through the desktop review, MCE identified 12 areas within the subject property deemed as *Areas of Environmental Interest* (AEI). Those areas were identified based on activities outside the definition of *forestland* or *rural property;* or those areas were suspected to likely exhibit conditions indicative of environmental concern.

Site reconnaissance of the *Areas of Environmental Interest* was conducted in general accordance with ASTM E1527-21. The initial onsite reconnaissance of those areas was conducted by Cody Traywick, P.G. with MCE, on March 3, 2025. The weather at the time of the reconnaissance was mild and overcast. The *Areas of Environmental Interest* (AEI) were then visually and physically observed systematically on foot. Photographs taken during the site reconnaissance, are included in Appendix 8. The AEI locations may be referenced in Appendix 1, Figure 8.

The 12 areas identified as *Areas of Environmental Interest* are briefly described as follows:

6.3.1 AEI-01 – Livestock Shed

This area contained a small barn/shed with a dirt floor. The structure was timber framed with metal siding. The structure is estimated to encompass a footprint of approximately 300 square feet (SF). This structure is assumed to be utilized for livestock protection and/or covered feeding operations. No items of concern were noted in the AEI-01 location. This structure and the general area may be referenced in Photographs #1 through #4.

6.3.2 AEI-02 – Southwestern Farm Pond

This area contained a small farm pond with an earthen dam. Several drainage features converge in this area; two (2) streams converge to form the pond and another stream converges downstream from the pond spillway. The pond and streams exhibited notable clarity and the vegetation surrounding the pond and downstream did not appear stressed. No items of concern were noted in the AEI-02 location. This area may be referenced in Photographs #5 through #10.

6.3.3 AEI-03 – Riding Arena & Livestock Working Barn

This area contained two (2) large barn structures located south of the primary access drive from Highway 215. One (1) of the barn structures appeared to have historically been utilized as a riding arena area with the other barn being utilized for working livestock. Each structure may be identified in Appendix 1, Figure 9.

The riding arena has an estimated footprint on the order of 14,000 SF. The livestock arena was constructed with steel framing and has open-air sides with a dirt floor. The riding arena may be referenced in Photographs #79 through #83.

The livestock working barn has an estimated footprint on the order of 9,000 SF. This structure was constructed with a combination of timber and steel framing with open-air sides. The majority of the structure has a dirt floor with isolated areas being concrete. The livestock working barn may be referenced in Photographs #86 through #90.

No items of concern were noted in the AEI-03 location.

6.3.4 AEI-04 – Onion Creek

Onion Creek traverses the southern-most portions of the subject property. For approximately 1.15 miles, Onion Creek meanders through the subject property flowing from the east to the west, primarily. There is at least one area along its alignment with an earthen restriction feature that has a ponding effect. The drainage basin for Onion Creek includes the entire subject property area. As such, this area is of environmental interest due to the likelihood of contaminants, if present, would migrate in this direction.

At the time of this assessment, Onion Creek exhibited notable clarity and the vegetation surrounding the banks did not appear stressed. This area may be referenced in Photographs #13 through #23. No items of concern were noted in the EAI-04 location.

6.3.5 AEI-05 – Storage Barn, Machine Repair Barn, & Chemical Shack

This area contains two (2) large barn structures and one (1) small shed/shack located on the north side of the access drive from Highway 215 in the central portion of the property. Each of the structures is inferred to be related to historical farming operations. One (1) of the barn structures appears to have been utilized for storage; likely hay or equipment. The larger barn appears to have been utilized for machine repair and feed storage. The small shed is believed to have functioned as the farm's chemical shack/storage building. Each structure may be identified in Appendix 1, Figure 10. The storage barn may be referenced in Photographs #105 through #108. The machine repair barn may be referenced by Photographs #91 through #101, #109, and #111. The chemical shack may be referenced in Photographs #102 through #104.

Five (5) business environmental risks (denoted as BER-XX) were observed at the AEI-05 location. These items are discussed in detail Section 6.4.

6.3.6 AEI-06 – Main Residential Structure & Ancillary Structures

This area contains the main residential structure with three (3) ancillary structures. The ancillary structures include a grilling/patio structure that is open-air. This grilling/patio structure may be referenced in Photograph 71. Another of the ancillary structures is utilized for storage and electrical facility. This structure may be referenced in Photographs #58 and

#59. The third ancillary structure is utilized as the well house. This structure may be referenced in Photographs #62 and #63.

The main house is a multi-story (main level with loft) structure supported on a crawl space. The structure may be described as a log-cabin style structure. The main residential structure may be referenced in photographs #64 and #66 through #70.

Each structure may be identified in Appendix1, Figure 11. No items of concern were noted in the AEI-06 location.

6.3.7 AEI-07 – Horse Barn & Entertainment Venue

This area contains one (1) large barn structure, south of the residential structure. The structure appears to primarily serve as a horse barn with the interior utilized as an entertainment venue. This structure is constructed with a combination of metal and timber framing with a metal exterior around three (3) sides. The northern exterior has a timber façade. This structure may be referenced in Appendix 1, Figure 11 and by Photographs #72 through #78. No items of concern were noted in the AEI-07 location.

6.3.8 AEI-08 – Central Large Farm Pond

This area contains a large pond with an earthen dam and is centrally located near the main residential structure. The drainage basin for this pond includes the west-central portion of the subject property. The pond drains to the south in the direction of Onion Creek. The pond and streams exhibited notable clarity and the vegetation surrounding the pond and downstream did not appear stressed. This area may be referenced in Photographs #27 through #34. No items of concern were noted in the AEI-08 location.

6.3.9 AEI-09 – Clyde Hyatt No. 1 Gas Pad

This area contains an operational natural gas well and a small compressor station. This area is located in the west-central portion of the property on the north side of the access drive from Highway 215. This location contains the *Clyde Hyatt No. 1* gas well and the associated produced water tank, an open-air compressor station, and other associated equipment. This area may be referenced in Photographs #119 through #125. The presence of this facility and its associated features are inherently a business consideration. Additionally, two (2) BERs were identified and discussed in section 6.4.

6.3.10 EAI-10 – Skach, Lillyan C No. 1 Gas Pad

This area is a known location of a P&A natural gas well. This area is located in the northwest portion of the property. This is the location of the P&A well *Skach, Lillyan C No. 1*. There are no remnants of the well and/or production components that could be observed as remaining at this location. Two (2) decommissioned feed silos were observed in this area. This area may be referenced by Photographs #46 through #54. There was a BER identified in this area which is discussed in more detail in section 6.4.

6.3.11 AEI-11 – Triplett, Annie No. 2 Gas Pad

This area contains an operational natural gas well; the *Triplett, Annie No. 2*. This area is located in the east/northeast portion of the property. Access to this area is primarily limited to the well lease road off of Gilsinger Road. This location contained the wellhead and some well monitoring equipment. This area may be referenced by Photographs #35 through #38. No items of concern were noted in the AEI-11 location.

6.3.12 AEI-12 – Eastern Farm Pond

This area contains a medium to large pond with an earthen dam and is located in the eastern portion of the property. The drainage basin for this pond includes the eastern portions of the property and the pond drains to the south off the property. While not considered a BER, it is worth noting that the earthen dam for this pond is showing significant signs of erosion. This area may be referenced by Photographs #39 through #44. No items of concern were noted in the AEI-12 location.

6.4 On-Site Observations

Existing structures include a residential structure, ten (10) ancillary structures, two (2) active gas well pads, and one (1) plugged and abandoned (P&A) gas well.

During the site reconnaissance, numerous farm ponds, as well as several tributary streams feeding Onion Creek which also exists on the subject property were observed. In general, the site exhibits a general grade down to the south, in the direction of Onion Creek. Two (2) private water wells were observed onsite.

Eight (8) BERs were identified during the initial onsite site reconnaissance conducted on March 3, 2025. Upon identification of the BERs an Environmental Coordination Letter was prepared to facilitate understanding and mitigation, if desired, between MCE, WDD, and Arkansas Department of Corrections (DOC) for the identified risks. That letter, produced by MCE and dated April 4, 2025 may be referenced in Appendix 7. MCE received a response letter from DOC which may also be referenced in Appendix 7. The following section discusses those risks and the subsequent steps taken to mitigate those risks.

6.4.1 BER-01 Chemical Shack

BER-01 relates to potential chemicals, likely pesticides or herbicides, located in the referenced chemical shack at AEI-05. that could be hazardous. Ingress into the chemical shack was feasible as the shack door was ajar upon arrival (Photograph #102). Upon entering the shack, chemical odors were detected through olfactory senses. The odors may be described as an irritating chemical smell. Further observations from the interior of the chemical shack identified an application sprayer tank that is likely the point source of the odors (Photograph #103).

The EPs at MCE were of the opinion that the application sprayer tank presented a concern for a future release should the tank become compromised and that the fumes observed likely present a hazard to the health and safety of humans and animals in proximity to the chemical shack. To alleviate concern associated with the unknown chemical observed in the application sprayer tank, MCE recommended to have the chemical tested and properly disposed of in accordance with state and federal laws, if applicable. MCE also recommended to allow for proper ventilation of the chemical shack once the point source had been removed.

MCE was notified that State employees tested the contents of the identified sprayer tank and the contents had a pH of 7 (neutral). Further, the tank and its contents were disposed of in accordance with local and state laws. As such, the assumed point source had been removed. A follow up reconnaissance of this BER at AEI-05 was conducted on May 5, 2025. MCE confirmed that the application sprayer tank had been removed. This observation may be referenced in Photographs #128 and #129. Upon entry into the chemical shack, no chemical or irritating odors were observed.

The EPs at MCE feel that this BER has been mitigated and no longer poses a significant business environmental risk.

6.4.2 BER-02 Used Oil Drum

BER-02 relates to a used oil containment observed within the interior of the machine repair barn located at AEI-05 (Photograph #93) The drum was secured with a lid. The materials inside the drum were observed to be dark in color and smelled of hydrocarbons. The EP on-site assumed the material to be used motor oil. This observed condition did not appear to pose a material threat for a release. However, the used oil drum presents a concern for a future release should the drum become compromised. MCE recommended having the material inside the drum tested and if confirmed to be hydrocarbons, removed and recycled by a licensed oil collection service.

MCE was notified that the contents of the drum were transferred into collection tote for transport. The State contracted an authorized vendor for the recycling of used motor oil to remove the tote and property dispose/recycle the contents. Follow up observations confirmed that this BER has been mitigated and no longer poses a significant business environmental risk. The follow up observation may be referenced in Photographs #130 and #131.

6.4.3 BER-03 Large Protruding PVC Pipe

BER-03 is located east of the machine repair barn approximately 55 feet from the northeast corner in the area of AEI-05. The pipe was visually inspected and observed to have dirt and wood debris within the interior (Photograph #100 & #101). The pipe extends up from the existing ground surface approximately 12 inches. Bottom depths of pipe were not initially discernable. Protections were in place in the form of old tires and fence posts; assumed to mitigate risk of impact with vehicles, equipment, and/or livestock. This condition would suggest some type of underground infrastructure being present in this location.

MCE recommended limited exploration to evaluate the purpose of the protruding pipe. MCE was notified that the State conducted minimally invasive efforts to remove the debris and dirt from the protruding pipe. Their efforts revealed a water valve. This observation may be referenced in Photographs #132 through #134. The water valve was later determined to be part of the privately owned connection supplying public water as well as a connection to the onsite well near the residential structure. This condition was further investigated under a *Limited Utility Location* phase to map identified private utilities on the subject property conducted on MCE Project No. 25-9610 and dated May 27, 2025.

The EPs at MCE feel that this BER has been mitigated and no longer poses a significant business environmental risk.

6.4.4 BER-04 Pit & Burn Pile

BER-04 is an observed trash pit and burn pile northeast of the machine repair barn in area AEI-05. The pit and burn pile are located approximately 210 feet northeast of the northeast corner of the machine repair barn. This condition was observed to be a mound of trash, with dimensions estimated to be on the order of 20 feet by 10 feet. The pit and burn pile were observed to extend below the existing surface elevation of the surrounding ground. Historical dumping at this location is assumed, based on observed evidence of burned lower layer contents, and with unburned uppermost layers of trash.

Constituents of the pile include general household items such as furniture, appliances, and general household trash (cans, bottles, and cardboard boxes). Additionally, farming related items were observed such as empty five-gallon buckets (hydraulic oil), empty chemical containers, and used air filters. Additional items include general wood debris. (Photographs #112 through #116)

MCE recommended removal and proper disposal of the discarded materials within the pit and burn pile. MCE was notified that State employees were dispatched to the site to evaluate the debris. The contents of the pile were evaluated onsite, organized, and properly disposed of and/or recycled in accordance with local and state laws. The observed conditions may be referenced in Photographs #138 and #139.

To further evaluate the potential for concern, MCE recommended limited exploration, sampling, and testing of the subgrade materials and groundwater, if applicable. Under direction from the State, MCE prepared a *Change Order Request* to include a limited exploration and testing scope to reevaluate this BER for potential unseen environmental concerns. The results of this limited exploration and environmental testing are discussed in *Section 7.0 Limited Environmental Exploration & Testing*.

6.4.5 BER-05 Misc. Storage Containers (empty)

BER-05 encompasses a small number of containment items in and around the area of AEI-05. Such observed containers include 55-gallon drums, five-gallon buckets, gasoline storage tanks, and a machine oiler tank. The gasoline storage tanks are located within the interior of the machine repair barn and may be referenced Photograph #93. One (1) steel, 55-gallon drum was located on the west side of the chemical repair shack (Photograph #104). The majority of the remaining empty containers were located on the east side of the machine repair shop (Photographs #94 & #96 through #98).

MCE recommended basic housekeeping with regard to BER-05. The containers were observed to be in an empty state and as such do not pose a risk of release. Collection and proper disposal (reuse and/or recycling) would mitigate the any concerns associated with these discarded containers.

MCE was notified that State employees were dispatched to the site to conduct general housekeeping efforts. The State acknowledges that the identified miscellaneous containers had been collect and property disposed of in accordance with local and state laws. Follow up observations confirmed that this BER has been mitigated and no longer poses a business environmental risk. The follow up observations may be referenced in Photographs #135 through #137.

6.4.6 BER-06 Industrial Liquid Storage Tote

BER-06 relates to a liquid storage container was observed to be located east of and outside the dimensions of the established gas pad at area AEI-09. The container did contain a substance and appeared to hold approximately 1/4 of its total capacity. The contents of the tank were unknown and lack of containment around the tank posed a risk; although not a material risk of release. The storage tank and its contents were assumed to be related to the gas pad operations due to its proximity to the pad. The observed liquid storage tank, BER-06, may be referenced in Photograph #117.

MCE recommended coordination with the party managing the gas pad with respect to the ownership and long-term storage of this container. Additional action would be recommended to include testing and identification of the materials contained within the unlabeled industrial liquid storage container.

Through coordination with the project team, MCE was made aware that the tank was not part of the gas pad operations and was the responsibility of the previous tenant of the property. Furthermore, MCE was notified that State employees tested the contents of the identified industrial liquid storage container and the contents had a pH of 7 (neutral). Further, the tank and its contents were disposed of in accordance with local and state laws. Follow up observations confirmed that this BER has been mitigated and no longer poses a significant business environmental risk. The follow up observations may be referenced in Photograph #141.

6.4.7 BER-07 Compressor Station Staining

The compressor station at the AEI-09 location showed signs of a release of hydrocarbons onto the established pad. The compressor at this site does have a steel leak collection system in place. However, staining around the skid would suggest that an overflow or spill has occurred at the compressor. The staining does not appear to have left the pad, and as such, a limited quantity of loss (spill) is anticipated. The compressor station and stained gravel may be referenced in Photographs #119 and #122.

MCE recommended coordination with the party managing the gas pad with respect to the condition and maintenance of the compressor; specifically with the oil catchment system. Regarding historical leaks and current compliance, MCE recommended coordination with the Arkansas Oil and Gas Commission (AOGC) regarding historical and current inspections and compliance violations.

MCE received acknowledgement from the State that this facility could be considered a business environmental risk. Additionally, the state formally requests the EPs at MCE to coordinate with appropriate representatives at the AOGC in regard to this condition being in compliance with state laws and industry standard practice.

This gas pad including the compressor station were inspected AOGC personnel in November of 2024 and again in April of 2025. This site and the referenced condition were reported as “in compliance.” As such, this observed condition was not subject to enforcement action and does not pose a significant threat to human health or the environment. Therefore, this condition is considered a *de minimis condition.* The associated inspection reports (FIR 1 Documents with reference to Permit 13279) from the AOGC may be referenced in Appendix 7. Observations from the follow up reconnaissance may be referenced Photographs #140 and #141.

6.4.8 BER-08 Hydrocarbon-Stained Soils

In the area of AEI-10, the P&A Skach, Lillyan C No. 1, stained soils were observed at the surface. The staining was observed to be to be dark in color, semi-flexible, and smelled of hydrocarbons. The exact dimensions of this material were not easily discernable due to limited visibility of the soil surface caused by vegetation. The dimensions are estimated to encompass an area less than 100 square-feet. The staining may be referenced in Photographs #53 and #54.

Based on the unique physical properties and due to the unknown nature of this material, the EPs at MCE elected to sample and test this material; through coordination with and with verbal authorization from the property owner’s representative.

On March 17, 2025 EPs from MCE remobilized to this site and collected two samples from this material for laboratory analysis. The sample locations may be referenced by photographs #126 and #127. Two (2) samples of this material were collected in glass sample jars and transported in a chilled cooler to Eurofins Arkansas to be tested for total petroleum hydrocarbons (TPH). The testing method description is HEM and SGT-HEM which is an Arkansas Department of Pollution Control and Ecology protocol. The samples exhibited TPH concentrations ranging from 110,000 to 140,000 mg/kg. The results of this testing as well as the chain of custody forms may be referenced in Appendix 11.

With the presence of hydrocarbons confirmed within the surface crust of the stained soil in the area of AEI-10; the full extent of this material has not been delineated. MCE recommended coordination with the AOGC regarding any historical and/or current inspections and compliance violations as this condition is assumed to be related to historical gas operations with the aforementioned P&A well. AOGC records and inspections for this well ended in April of 1993 when the well was plugged and abandoned. No violations or compliance issues were noted in 1993.

As an alternative to coordination with AOGC on this matter, MCE recommended a limited exploration in the area of AEI-10 to delineate the affected area. MCE received acknowledgement from the State that this condition is likely a de minimis condition and could be considered a business environmental risk. Additionally, the state formally requests the EPs at MCE to coordinate with appropriate representatives at the AOGC in regard to this condition being in compliance with state laws and industry standard practice. Further, the State formally requested the EPs at MCE revisit and reevaluate this area with regard to potential unseen environmental concerns associated with this business environmental risk and/or delineate the extent. The results of this limited exploration and environmental testing are discussed in the following section, *Section 7.0 Limited Environmental Exploration & Testing*.

7.0 Limited Environmental Exploration & Analysis

Following the Environmental Coordination Letter submitted to WDD and DOC on April 4, 2025; a request for limited environmental exploration and analysis was requested. MCE prepared Change Order Request 25-9610-CO1A dated April 17, 2025. These services were authorized by the execution of 25-9610-CO1A by Mr. Wallie Sprick, Executive Vice President and Chief Operations Officer with WDD Architects. These documents were additionally approved and authorized by Ms. Lindsay Wallace, Secretary of the Arkansas Department of Corrections.

The scope of work of this change order, described in the following section, was focused on BER-04 and BER-08.

7.1 Proposed Scope of Work for Limited Environmental Exploration & Analysis

In the context of BER-04, the limited exploration, sampling, and laboratory analysis was intended to log encounters with hydrocarbons, volatile organic compounds (VOC), and/or Resource Conservation and Recovery Act (RCRA) metals that may be within the environmental media near the pit and burn pile. Rather, this scope of work is intended to provided data to be utilized in determining if contaminates associated with the burn pile are present within the environmental media in the location of BER-04.

In the context the limited exploration, sampling, and laboratory analysis are intended to log encounters with hydrocarbons and VOC that may be within the environmental media near BER-08. This scope of work will attempt to provide data that can be used to preliminarily delineate the staining/contamination to aid in planning and budgeting for remediation of this limited area.

7.2 Conducted Scope of Work for Limited Environmental Exploration & Analysis

On May 16, 2025 MCE mobilized a Diedrich D-50 rubber-track mounted drill rig, drill crew, environmental professionals, and decontamination equipment to conduct this scope of work. All tooling including exploration and sampling equipment was decontaminated between both sampling events and between boring locations utilizing an environmental detergent and a distilled water rinse.

Soil sampling was conducted with either a split-spoon sampler or by hand/grab sampling means. Neither groundwater nor perched groundwater was not encountered at the time of exploration. All recovered soil sampled from the May 16th exploration operations were screened in the field for VOC via photoionization detector (PID). An exploration map showing the conducted boring/sample locations may be referenced in Appendix 1, in Figures 13 and 14. Field logs, complete laboratory reports including the associated chain of custody, may be referenced in Appendix 11.

Samples collected in the field were placed in gas jars, labeled, and kept chilled for transport the laboratory.

7.2.1 BER-04 Pit & Burn Pile

Three (3) project borings were conducted in this location to completion depths ranging between nine (9.0) and 13.5 feet below the existing surface elevations. The project borings were terminated once in-situ, highly weathered to weathered sandstone materials were encountered. Soils samples were collected at select depths and screened for VOC. A sample from each boring was selected in the field to be further analyzed for TPH and RCRA Metals. The following tables provide an overview of the data collected at each boring location for BER-04.

Table 7: Log of Environmental Boring EB-01

Depth (ft)	Material	N Value	VOC (ppm)	Laboratory Analysis
0.5 – 2.0	Reddish Brown Clay	5	0.5	RCRA Metals, TPH Full
5.0 – 6.5	Reddish Brown Clay	5	0.5	--
10.0 – 11.5	Light Brown Clay with Weathered Sandstone	>50	6.5	--

Table 8: Log of Environmental Boring EB-02

Depth (ft)	Material	N Value	VOC (ppm)	Laboratory Analysis
0.5 – 2.0	Reddish Brown Clay	2	0.0	--
3.5 – 5.0	Reddish Brown Clay	0	0.5	--
5.0 – 6.5	Light Brown Clay with Weathered Sandstone Pieces	8	1.0	--
13.5 – 15.0	Weathered Sandstone	>50	0.0	RCRA Metals

Table 9: Log of Environmental Boring EB-03

Depth (ft)	Material		VOC (ppm)	Laboratory Analysis
0.5 – 2.0	Reddish Brown Clay	10	0.5	--
5.0 – 6.5	Reddish Brown Clay	17	0.5	RCRA Metals, TPH Full
10.0 – 11.5	Light Brown Clay with Weathered Sandstone Pieces	>50	6.5	--

7.2.2 BER-08 Hydrocarbon-Stained Soils

At this location, three (3) areas of staining were observed and investigated. Each location may be identified as EB-04, EB-05, and EB-06. Shallow weathered sandstone was present beneath the majority of this area investigated. The extent of the staining was observed to be very shallow, less than six (6) inches in all locations.

The investigation at that location consisted of split-spoon sampling and hand excavations. Neither groundwater nor perched groundwater was not encountered at the time of exploration. At each of the aforementioned locations, the depth of staining and radius from each EB location were determined. The sampling and depths were primarily measures/collected via split spoon sampling. The extents of the staining were further verified via hand excavations. All samples were screened for VOC in the field via the head space method. The VOC reading ranged from 0.0 to 5.2; with the average being much closer to 0.0.

Three (3) samples were collected for laboratory analysis; one (1) from each EB location on May 16, 2025. Additionally, hand/grab samples were collected for laboratory analysis on March 17, 2025. Photographs of the collected samples, and the associated operations from this location may be referenced in Appendix 8, Photographs #142 through #149.

7.3 Laboratory Testing Results

Samples collected with regard to BER-04 and BER-08 were submitted to Eurofins Arkansas in Little Rock, Arkansas for analysis. The contaminates of concern related to the BER-04 include RCRA Metals (arsenic, barium, cadmium, chromium, lead, selenium, silver, and mercury) and total petroleum hydrocarbons. The contaminates of concern related to the BER-08 were total petroleum hydrocarbons.

7.3.1 BER-04 Laboratory Results

The testing method utilized for total petroleum hydrocarbons is HEM and SGT-HEM which is an Arkansas Department of Pollution Control and Ecology protocol. The test method for metals arsenic, barium, cadmium, chromium, lead, selenium, and silver is SW846 6010D, Inductively Coupled Plasma-Optical Emission Spectrometry (ICP-OES) is a United States Environmental Protection Agency method. The results of the laboratory analysis for BER-04 are as follows:

Table 10: Laboratory Results - Boring EB-01, Sample Depth 0.5 feet

Analyte	Result	Report Limit	Unit
Arsenic	**9.1**	4.5	mg/kg
Barium	**61**	1.8	mg/kg
Cadmium	<0.36	0.36	mg/kg
Chromium	**12**	0.90	mg/kg
Lead	**11**	3.6	mg/kg
Selenium	<6.3	6.3	mg/kg
Silver	<0.63	0.63	mg/kg
Mercury	<0.047	0.047	mg/kg
TPH	<290	290	mg/kg

Table 11: Laboratory Results - Boring EB-02, Sample Depth 13.5 feet

Analyte	Result	Report Limit	Unit
Arsenic	**13**	5.0	mg/kg
Barium	**55**	2.0	mg/kg
Cadmium	<0.40	0.40	mg/kg
Chromium	**24**	1.0	mg/kg
Lead	**12**	4.0	mg/kg
Selenium	<7.0	7.0	mg/kg
Silver	<0.70	0.70	mg/kg
Mercury	<0.048	0.048	mg/kg

Table 12: Laboratory Results - Boring EB-03, Sample Depth 5.0 feet

Analyte	Result	Report Limit	Unit
Arsenic	**11**	4.9	mg/kg
Barium	**58**	2.0	mg/kg
Cadmium	<0.39	0.39	mg/kg
Chromium	**16**	0.98	mg/kg
Lead	**9.8**	3.6	mg/kg
Selenium	<6.9	6.9	mg/kg
Silver	<0.69	0.69	mg/kg
Mercury	<0.048	0.048	mg/kg
TPH	<290	290	mg/kg

7.3.2 BER-04 Laboratory Results Discussion

All of the samples exhibited levels of arsenic, barium, chromium, and lead detectable through the referenced test methods. Levels of cadmium, selenium, silver, mercury, and TPH were all found to be below reporting limits as shown in the above tables.

The reported levels of arsenic ranged between 9.1 and 13.0 mg/Kg for the soils at the BER-04 location. The range of arsenic exhibited by the soils at the BER-04 location is not significantly higher compared to background levels reported by the USGS for this region of Arkansas.

The reported levels of barium ranged between 55 and 61 mg/Kg for the soils at the BER-04 location. The range of barium exhibited by the soils at the BER-04 location is low, compared to background levels reported by the USGS for this region of Arkansas.

The reported levels of chromium ranged between 12 and 24 mg/Kg for the soils at the BER-04 location. The range of chromium exhibited by the soils at the BER-04 location is low, compared to background levels reported by the USGS for this region of Arkansas.

The reported levels of lead ranged between 9.8 and 12 mg/Kg for the soils at the BER-04 location. The range of lead exhibited by the soils at the BER-04 location is low-to-average, compared to background levels reported by the USGS for this region of Arkansas.

From the soils sampled at the BER-04 location, the target analytes of arsenic, barium, cadmium, chromium, lead, selenium, silver, mercury and total petroleum hydrocarbons were found to be below reporting limits or relatively in line with reported background levels for this region of Arkansas based on data published by the USGS.

Background levels for arsenic, barium, chromium, and lead may be referenced in Appendix 12.

7.3.4 BER-08 Laboratory Results

The testing method description for total petroleum hydrocarbons is HEM and SGT-HEM which is an Arkansas Department of Pollution Control and Ecology protocol. The results of the laboratory analysis for BER-08 are as follows:

Table 13: Laboratory Results - BER-08 Sample Locations and TPH Results

Sample Location	Result	Report Limit	Unit	Sample Date
EB-04	<350	350	mg/kg	5/16/2025
EB-05	17,000	260	mg/kg	5/16/2025
EB-06	19,000	250	mg/kg	5/16/2025
ENV-01A	110,000	2,300	mg/kg	3/17/2025
ENV-01B	140,000	2,500	mg/kg	3/17/2025

7.3.5 BER-08 Laboratory Results Discussion

All of the BER-08 samples were collected within six (6) inches of the surface at each of the sample locations. TPH concentrations ranged from below reporting limits to 19,000 mg/kg during the May 2025 exploration. TPH concentrations ranged from 110,000 to 140,000 for the samples collected in March of 2025. This trend shows a significant reduction in concentration from March to May and could be attributed to higher temperatures in May allowing for more volatilization during the warmer times of the year.

The EB-04 sample exhibited dark staining similar to the other samples collected for BER-08. However, the reported concentration for this sample was below reporting limits. The remaining samples exhibited TPH concentrations ranging from 17,000 to 140,000 mg/kg. These results were compared to Regional Screening Levels (RSL) for Residential Soil published by the Environmental Protection Agency (EPA) in May of 2022. The concentration of TPH exhibited by the samples collected at BER-08, with the exception of EB-04, were above the RSL for TPH for all levels of aromatic and low

to medium levels for Aliphatic. The samples were below the Aliphatic High RSL for residential soil. Sheet 10 of Regional Screening Level Table (May 2022, produced by the EPA) may be referenced in Appendix 12.

The materials that tested above the RSL for TPH have experienced a spill or some kind of release. However, the spill does appear to be limited in quantity and additionally limited to select areas in the BER-08 location. The EPs at MCE do not feel that this condition presents a threat to human health or the environment based on its current use. Vegetation, grass and weeds, do seem to flourish as well in the stained areas as those that do not exhibit the staining. However, to mitigate future risk of exposure, MCE has provided the following preliminary delineation for consideration should the User desire to remove stained soils from this area.

7.3.6 BER-08 Delineation Information

While onsite for the limited exploration and environmental sampling of the BER-08 location, MCE crews cleared grass and weeds to expose the observed staining. The staining was further investigated from a depth perspective by hand excavation. The staining depth did not exceed six (6) inches below the surface at any of the explored locations. The staining was observed to extend the deepest at the pin locations. At approximately five (5) feet from the pin location at each of the locations, the staining had tapered to a thin veneer or had disappeared. As a result of the limited exploration, MCE observed and would guide that materials within five (5) feet from each pin location at depths not greater than six (6) inches could exhibit some degree of staining. As a conservative estimate for the area to be remediated from this staining, MCE would recommend that a five (5) foot radius from each be excavated to a depth of six (6) inches and containerized.

Upon containment, MCE would recommend a toxicity characteristic leaching procedure (TCLP) to determine if the contained material is considered hazardous based on its potential to leach toxic substances into the environment. This will guide proper disposal based on the results.

It should be noted that the sample tested at the EB-04 location only exhibited staining and the results of the TPH-Full from this location came back below reporting limits. The BER-08 sampling locations may be referenced in Appendix 1, Figure 14.

8.0 Additional Interviews & Correspondence

In an effort to acquire more historical information related to the subject property, MCE attempted to reach out to local Government Officials and the previous owner. Each of the attempted correspondence is briefly explained in the following sections. The completed questionnaires from these correspondences may be referenced in Appendix 7.

8.1 Historical Owner

During the course of this assessment, MCE made several attempts to contact the Previous Owner(s), understood to be Aaron and Haley Geissinger. As of the time of this report, a return correspondence has not been returned from the Geissingers. Should additional information become available that material impacts this report, MCE will notify the User.

8.2 Local Government Official Questionnaire – Arkansas Department of Health

A Local Government questionnaire was sent to the Arkansas Department of Health (ADH), Russellville, Arkansas office. The questionnaire was completed by ADH Environmental Health Specialist, Mr. Matthew Woodward. Mr. Woodward indicated that ADH had no records or knowledge of the subject property.

8.3 Local Government Official Questionnaire – Arkansas Oil and Gas Commission

On April 9, 2025 MCE reached out to the AOGC via a letter addressed to Mr. Lawrence Bengal, AOGC Director. A written response was received from Mr. Jay Hansen, Assistant Director of the Fort Smith Regional Office. Mr. Hansen provided the most recent inspection reports for each of the gas wells that were on the property as well as available records.

Mr. Hansen agreed to dispatch AOGC Inspectors to confirm that the locations are in compliance at the time of this report. All provided AOGC records and documents may be referenced in Appendix ___. To summarize this correspondence, Mr. Hansen indicated the following regarding each well:

8.3.1 Hiatt, Clyde No. 1 (Pemit # 13279)

Last Inspection date: 11-21-2024 – Active, operating, single well pad, Signage compliance, No trash/debris, No Unusual equipment, No excessive erosion, Well Site Compressor, compliant, Gas meter on site-Digital/Analog Meter. No records of non-compliance or AOGC violations. This site was reinspected in April of 2025 and found to be in compliance.

8.3.2 Triplett, Annie No 2 (Permit #24586)

Last Inspection date: 01-16-2025 – Active, operating, single well pad, Signage compliance, No trash/debris, No Unusual equipment, No excessive erosion, Gas meter on site-Chart meter

6-3-2015 – Natural gas leak detected at the wellhead. The issue was resolved within 30 days as Notice of Non-Compliance was never issued per Rule B-26 i)2.

No records of non-compliance or AOGC violations. This site was reinspected in April of 2025 and found to be in compliance.

8.3.3 Skach, Lillyan C (Permit #35081)

Dry Hole, Plugged (4-10-93) with multiple cement plugs.

No records of non-compliance or AOGC violations.

9.0 Findings

9.1 On-site Findings

Based upon the review of applicable and reasonably ascertainable government and historical records, a site reconnaissance of the subject property, and interviews with persons knowledgeable about the subject property the following on-site findings have been identified:

- The subject property is currently and has been utilized for rural agricultural purposes since at least 1940s.
    - The first developments on the subject property were identified by the Topographic Map from 1947
- Two (2) active natural gas wells and one (1) P&A natural gas well exist on the subject property
- Eleven (11) existing structures were identified on-site (not including the features associated with natural gas operations)
    - Livestock Shed (AEI-01)
    - Riding Arena (AEI-03)
    - Livestock Working Barn (AEI-03)
    - Storage Barn (AEI-05)
    - Machine Repair Barn (AEI-05)
    - Chemical Shack (AEI-05)
    - Main Residential Cabin (AEI-06)
    - Well House (AEI-06)
    - Storage & Electrical Shed (AEI-06)
    - Grilling Pattio (AEI-06)
    - Horse Barn & Entertainment Venue (AEI-07)
- Numerous farm ponds exist on the subject property
- Onion Creek and several tributaries exist on the subject property
- Eight (8) business environmental risks (BER) were identified on-site
    - Five (5) BER were mitigated during the course of this investigation and determined to be of no concern
    - One (1) BER was determined to be a de minimis condition
    - Limited environmental exploration was conducted for one (1) BER and was subsequently mitigated during the course of this investigation
    - Limited environmental exploration was conducted for one (1) BER and found to be a de minimis condition
        - Delineation information has been provided to mitigate this condition should that be desired

9.2 Off-site Findings

There are no findings or mapped sites within the applicable ASTM search distances relative to the subject property. There were no observed conditions off-site that warranted concern.

10.0 Opinions

To evaluate which of the findings, if any, present an environmental risk to the subject property, the following criteria were considered:

- The type of database on which the finding is identified.
- The topographic position of the finding is relative to the subject property.
- The direction and distance of the identified finding from the subject property.
- Local soil conditions in the subject property area.
- The known or inferred groundwater flow direction in the subject property area.
- The status of the respective regulatory agency-required investigation(s) of the finding
- Surface and subsurface obstructions and diversions (e.g., buildings, roads, sewer systems, utility service lines, rivers, lakes, and ditches) are located adjacent to the subject property.

Only those findings that are determined to present a potential environmental risk to the subject property and/or warrant additional clarification are further evaluated. Using the above-referenced criteria, it is the opinion of the Environmental Professionals at MCE that there are potential environmental impacts within the subject property.

Onsite Conditions:
Based upon the review of applicable and reasonably ascertainable government and historical records, a site reconnaissance of the subject property, interviews with persons knowledgeable about the subject property, and limited environmental exploration; **there are no onsite findings identified that constitute a REC in connection to the subject property. Two (2) de minimis conditions exist on the subject property and are also considered business environmental risks.**

Offsite Conditions:
Based upon the review of applicable and reasonably ascertainable government and historical records **there are no offsite findings identified that would have an impact on the subject property.**

11.0 Conclusions

Searches of historical records, provided by EDR, included a review of aerial photographs, fire insurance maps, USGS, and topographic maps. Based upon the review of applicable and reasonably ascertainable government and historical records, a site reconnaissance of the subject property, and interviews with persons knowledgeable about the subject property there are **no REC were identified by this Phase I ESA that could potentially impact the subject property**.

Two (2) de minimis conditions exist on the subject property and are also considered business environmental risks.

12.0 Deviations

The following deviations were encountered during the completion of this assessment.

- Contact with historical property owners was not accomplished
- Coordination of risk mitigation activity was included in this scope of work
- Limited environmental exploration was included as a change in scope during the course of this investigation

13.0 Additional Services

It should be noted that this Phase I ESA was conducted concurrently with additional services including Limited Utility Location Servies, a Preliminary Geotechnical Investigation, a Section 404 Wetland Delineation, a Cultural Resources Literature and Records Search, and a Threatened and Endangered Species Evaluation. Additional investigations, evaluations, testing, and/or assessments related to the aforementioned additional services are not discussed in this report.

MCE has provided limited delineation information with respect to an identified BER / de minimis condition on the subject property. If further assistance is desired to mitigate that condition, MCE would be happy to discuss that scope of work with the User of this report.

Based on the information collected and reviewed during this Phase I ESA, MCE does not recommend any additional investigation relevant to the conclusions of this Phase I ESA Report with respect to the subject property. However, observations should be made during site modifications (housekeeping or redevelopment) for areas of possible contamination, such as but not limited to, the presence of underground facilities, buried debris, stained soil, or odorous soil. Should such materials be encountered, further investigation and analysis may be necessary at that time.

The level of additional services, if necessary, should be evaluated by the user to determine what approach, if any, is appropriate to evaluate the level of risk associated with redeveloping this property.

14.0 References

ASTM E1527-21 Standard Practice for Environmental Site Assessments - Phase I ESA Process; 11/17/2021
ASTM E2247-23 Standard Practice for Environmental Site Assessments - Phase I ESA Process for Forestland or Rural Property; 11/01/2023
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United States Environmental Protection Agency, Regional Screening Levels: https://semspub.epa.gov/work/HQ/405269.pdf
Arkansas Oil and Gas Commission, Lease & Well Data: https://www.aogc.state.ar.us/data/default.aspx
Arkansas Department of Agriculture, Water Well Completion Reports: https://agriculture.arkansas.gov/arkansas-water-well-construction/the-commission/
The EDR Summary Radius Report (Inquiry Number: 7912831.2); 2/28/2025
The EDR Summary Radius Report (Inquiry Number: 7915788.2); 3/4/2025
The EDR Aerial Photo Decade Package (Inquiry Number: 7912831.8); 3/3/2025
The EDR Aerial Photo Decade Package (Inquiry Number: 7915788.8); 3/5/2025
The EDR Historical Topographic Map Report (Inquiry Number: 7912831.4); 2/28/2025
The EDR Historical Topographic Map Report (Inquiry Number: 7915788.4); 3/4/2025
The EDR Certified Sanborn® Map Report (Inquiry Number: 7912831.3); 2/28/2025
The EDR Certified Sanborn® Map Report (Inquiry Number: 7915788.3); 3/4/2025
The EDR City Directory Image Report (Inquiry Number: 7912831.5); 3/4/2025
The EDR City Directory Image Report (Inquiry Number: 7915788.5); 3/7/2025

15.0 Signatures of Environmental Professionals

We declare that, to the best of our professional knowledge and belief, we meet the definition of Environmental Professional as defined in 40 CFR §321.10 ASTM E2247-23.

We have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. We have developed and performed the All-Appropriate Inquiries (AAI) in conformance with the standards and practices outlined in 40 CFR Part 312 and ASTM E2247-23.

Andrew L. Miller, P.G., CFM©, CSA
Geologist | Designer

Cody L. Traywick, P.G.
Associate | Geotechnical Supervisor | Project Manager

16.0 Qualifications of Environmental Professionals

16.1 Andrew L. Miller, P.G., CFM, CSA

Mr. Miller has over 38 years of geology, hydrology, hydraulics, and engineering experience working with consulting engineering and geotechnical companies on a wide variety of projects. He has worked as a project geologist and designer on a broad range of projects including modeling, geotechnical investigations, environmental site assessments, and site cleanup and permitting. He has completed over 300 Phase I Environmental Site Assessments and conducted numerous Phase II/Phase III site assessments and cleanups. He was responsible for QA/QC, sample collection, and reporting during the Phase II and Phase III projects.

16.2 Cody L. Traywick, P.G.

Mr. Traywick has over 16 years of geology, engineering, and exploration experience working with exploration, engineering, and environmental companies as well as regulatory and state agencies. He has worked as a geologist, project manager, inspector, and consultant on a range of projects including geotechnical investigations, geophysical surveys, exploration, geological mapping, and environmental site assessments. Mr. Traywick has conducted and managed numerous site assessments as an environmental professional.