

**2024 Environmental Cost Account (ECA) Budget Forecast for the Kerr-McGee Chemical Corp Refinery Site in Cleveland, Oklahoma**

**Date Submitted: 11/24/2023**

Greenfield Environmental Multistate Trust LLC,

**Date Approved: 12/11/2023** Trustee of the Multistate Environmental Response Trust (collectively, the Multistate Trust)

**Exhibit I**

**Submission to: Oklahoma Department of Environmental Quality on November 24, 2023**

**Summary of Site Work Completed in 2023 and Planned for 2024:**

**Work Completed in 2023:** Performed WP-6 compliance monitoring and maintenance, Site mowing, and maintenance, including perimeter fence and Site building and equipment; Continued implementing the Groundwater Feasibility Study (FS) under the DEQ-approved Groundwater FS Work Plan. Performed routine surface water inspections and responded to sheen observations in accordance with sheen response plan (attached to Groundwater FS Work Plan). Prepared draft work plan for evaluation of surface soil at the City lot. Engaged with City leaders on access for offsite well sampling and initiated a meeting to introduce the Site and path forward as a basis for discussions on reuse/redevelopment ideas. Prepared Chapter 3.U (specific to the Site) of the Multistate Trust 2022 Annual Progress Report.

**Work Planned for 2024:** Perform WP-6 compliance monitoring and maintenance, Site mowing and maintenance, including perimeter fence and Site building and equipment. Continue implementing the Groundwater FS under the DEQ-approved Groundwater FS Work Plan (with transition from fieldwork, mostly complete in 2023, to data evaluation, hydrogeologic modeling, reporting, development of remedial action objectives (RAOs), and alternatives analysis). Support DEQ with the proposed plan and decision document. Perform routine surface water inspections and respond to sheen observations in accordance with sheen response plan. Perform community outreach, including with City leaders regarding future reuse ideas and opportunities. Prepare the Multistate Trust's 2023 Annual Progress Report (portion specific to the Site). Also, in light of ongoing sheen observations in the West Tributary, evaluate approaches for restarting LNAPL recovery as an interim action and prepare a work plan for DEQ review and approval.

**Site Name: Kerr-McGee Chemical Corp Refinery Site in Cleveland, Oklahoma (the Site)**

**Site Location: Cleveland, Oklahoma**

**Multistate Trust Site Code: XXV**

Cost Center	Cost Center Description	Total 2023 Approved Budget	Project Costs incurred in 2023 (as of 9/30/2023)	2024 Budget	2024 Scope of Work
XXV.A	Regulatory Compliance and Site Operations/Maintenance	\$296,646	\$116,834	\$326,000	Budget includes: (i) WP-6 groundwater compliance monitoring and reporting, (ii) surface-water inspections and sampling as needed (sheen response), and (iii) routine/non-routine caretaking, including mowing, and road maintenance. Two (vs. one in previous years) Site-wide mowing events are included in the budget to manage overgrowth and provide continued access to sampling locations, address erosion of Site roads from heavy rains, and provide limited repairs to onsite building as needed.
XXV.C	New Environmental Actions	\$2,082,000	\$1,112,588	\$1,110,400	Budget includes: (i) Multistate Trust third-party contractor(s) project management; (ii) continued implementation of the Groundwater FS investigation activities, data evaluation, hydrogeologic modeling, and reporting; (iii) preparation of an update to the CSM based on findings from the Groundwater FS investigation activities; (iv) RAO development; (v) FS Report preparation; (vi) Proposed Plan and Decision Document support; (vii) community outreach support, including fact sheets, meeting materials and meeting participation; (viii) finalization of the Surface Soil Sampling Work Plan for the "City Lot" and implementation upon DEQ approval, and preparation and submittal of the associated report; and (ix) in light of ongoing sheen observations in the West Tributary, evaluate an approach for restarting LNAPL recovery as an interim action and prepare a work plan for DEQ review and approval.
XXV.D	Technical Team/Project Management	\$128,000	\$56,113	\$128,000	Budget includes fees and expenses for providing project direction and oversight of technical elements of on-going and new Environmental Actions including Site strategy, technical oversight of environmental contractors, project controls, project communications, financial management, beneficiary communications, community involvement/engagement on reuse, quality assurance/quality control, and contract management. No formal community outreach (i.e. fact sheets / meetings) is anticipated. Budget also includes fees for preparing the Multistate Trust 2023 Annual Progress Report.
XXV.E	Project Fees & Expenses	\$10,000	\$1,103	\$10,000	Budget includes Managing Principal time and expenses for: oversight and approval of technical strategy and Environmental Actions; beneficiary communications; support for beneficiary community involvement; key stakeholder communications; Settlement Agreement matters; budget submittals; redevelopment planning activities; and preparing the Multistate Trust 2023 Annual Progress Report.
XXV.F	Regulator Oversight Costs	\$40,000	\$8,448	\$40,000	Placeholder estimates for DEQ oversight costs.
XXV.G	Legal Fees and Accounting Fees	\$34,000	\$17,135	\$37,000	Budget includes fees and expenses for in-house legal services required to support Environmental Actions, including the preparation and execution of contracts, SOWs, access agreements, work associated with deed restrictions and Site closure and other legal affairs. Budget includes costs for financial services, including accounting, bookkeeping, financial reporting, invoice processing, budget preparation, and budget tracking. Budget also includes costs for legal and financial affairs support in preparation of the Multistate Trust 2023 Annual Progress Report.
XXV.I	Lease & Property Use (Income & Expenses)	\$0	\$0	\$0	Budget assumes no lease revenues in 2024.
XXV	Total Site 2024 Budget	\$2,590,646	\$1,312,220	\$1,651,400	
<b>Total Kerr-McGee Chemical Corp Refinery Site in Cleveland, Oklahoma Estimated Funding at Beginning of 2024 Budget Year*</b>				<b>\$49,023,000</b>	Total funds allocated to the Site per Consent Decree and Environmental Settlement Agreement; less 2011 - 2022 actual and 2023 estimated costs; plus 2011 - 2022 actual and 2023 estimated investment activity and other receipts.
<b>Estimated Remaining Funds (Post-2024)</b>				<b>\$47,371,600</b>	<b>Initial Funding (2/14/11): \$8,036,586</b> <b>Anadarko Settlement Funds (2015 and 2016): \$45,314,301</b> <b>Waterfall Distribution from Sale of Property: \$245,339</b> <b>Other Property Sales: \$325</b>

\*This is a projection based on estimates and is subject to change once final costs have been received. Actual balances are presented in the quarterly distributed financial statements.