

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

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

Greenfield Environmental Multistate Trust LLC,

[Exhibit I](#)

**Date Approved: 12/05/2023** Trustee of Multistate Environmental Response Trust (collectively, the Multistate Trust)

**Submittal 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 routine O&M and compliance activities, including discharge of treated groundwater and discharge monitoring. Continued implementing the groundwater remedial design investigation (Groundwater RDI). Completed the warranty period for the Waste Pits and Contaminated Soil RA. Prepared Chapter 3.V (specific to the Site) of the Multistate Trust 2022 Annual Progress Report.

**Work Planned for 2024:** Perform routine O&M and compliance activities, including discharge of treated groundwater and discharge monitoring. Complete Skull Creek riparian restoration and additional erosion-related repairs as needed for the SDC. Evaluate the property East of Skull Creek for potential undocumented contamination. Complete the Groundwater RDI. Based on the Groundwater RDI results, prepare the groundwater remedy remedial design scope and cost estimate. The budget does not include preparing the actual remedial design. A budget amendment, if needed, will be submitted based on the overall Groundwater RDI completion schedule. Budget also includes a placeholder allowance (\$70,000) to perform, if needed, next-level priority repairs (i.e., lower priority level) and upgrades for the groundwater IRMs recommended as part of the 2015 mechanical vulnerability assessment. Prepare the Multistate Trust's 2023 Annual Progress Report (portion specific to the Site).

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

Site Location: Cushing, Oklahoma

Multistate Trust Site Code: XXVI

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
XXVI.A	Regulatory Compliance and Site Operations/Maintenance	\$1,005,000	\$662,683	\$1,061,000	Perform routine (i) O&M of the IRMs and WTS, (ii) operation of the Cushing Water Lab for pH testing, and (iii) Site maintenance, including mowing and routine removal of flood debris. Perform compliance activities including (i) preparing and submitting monthly DMRs pursuant to OPDES discharge permits, (ii) preparing and submitting to DEQ the Post-Closure Monitoring Report for the South Disposal Cell, (iii) Tier 2 reporting for the Site as required by Section 312 of the Emergency Planning and Community Right-to-Know Act., (iv) preparing monthly status reports and the Annual Site Operations Report for submittal to DEQ, and (v) tracking of surface and groundwater water rights for reporting to OWRB. Budget includes Oklahoma DEQ permit and utility fees. A \$45,000 placeholder allowance is included for non-routine repairs, as needed.
XXVI.C	New Environmental Actions	\$3,219,000	\$333,549	\$1,738,000	Complete Skull Creek riparian restoration and additional erosion-related repairs as needed for the SDC. Evaluate the property East of Skull Creek for potential undocumented contamination. Continue implementing the Groundwater RDI. Based on the Groundwater RDI results, prepare the groundwater remedy remedial design scope and cost estimate. The budget does not include preparing the actual remedial design. A budget amendment, if needed, will be submitted based on the overall Groundwater RDI completion schedule. Budget also includes a placeholder allowance (\$70,000) to perform, if needed, next-level priority repairs (i.e., lower priority level) and upgrades for the groundwater IRMs recommended as part of the 2015 mechanical vulnerability assessment.
XXVI.D	Technical Team/Project Management	\$247,000	\$62,235	\$230,000	Provide direction and oversight of technical elements of new environmental actions, QA/QC, and contract/subcontract management. Provide key stakeholder communications, participate in community meetings and evaluate local job training opportunities and other communications. Perform technical reviews of various submittals. Budget also includes fees to prepare the Multistate Trust 2023 Annual Progress Report.
XXVI.E	Project Fees & Expenses	\$11,000	\$315	\$11,000	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.
XXVI.F	Regulator Oversight Costs	\$45,000	\$16,140	\$45,000	Placeholder for ODEQ oversight costs.
XXVI.G	Legal Fees and Accounting Fees	\$78,000	\$21,291	\$81,000	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. The budget also 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 Multistate Trust 2023 Annual Progress Report.
XXVI.I	Lease & Property Use (Income & Costs)	\$0	\$0	\$0	Budget assumes no lease revenues in 2024.
XXVI	Total Site 2024 Budget	\$4,605,000	\$1,096,213	\$3,166,000	
<b>Total Kerr-McGee Chemical Corp Refinery Site in Cushing, Oklahoma Estimated Funding at Beginning of 2024 Budget Year*</b>				<b>\$52,979,000</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>\$49,813,000</b>	<b>Initial Funding (2/14/11): \$8,719,555</b> <b>Anadarko Settlement Funds (2015 and 2016): \$90,628,603</b> <b>Waterfall Distribution from Sale of Property: \$490,678</b> <b>Other Property Sales: \$60,338</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