

**2023 Environmental Cost Account (ECA) Budget Forecast for the Kerr-McGee Chemical Corp Refinery Site in Cushing, Oklahoma**

**Exhibit I**

**Date Submitted: 11/23/22**

**Greenfield Environmental Multistate Trust LLC,  
Trustee of Multistate Environmental Response Trust (Multistate Trust)**

**Date Approved: 12/02/22**

**Submission to: Oklahoma Department of Environmental Quality on November 23, 2022**

**Summary of Site Work Completed in 2022 and Planned for 2023:**

**Work Completed in 2022:** Performed (i) routine operations and maintenance (O&M) of the interim remedial measures (IRMs) and water treatment system (WTS), (ii) operation of the Cushing Water Lab for pH testing, and (iii) routine Site maintenance, including mowing and routine removal of flood debris. Performed compliance activities including (i) preparation and submittal of monthly discharge monitoring reports (DMRs) pursuant to Oklahoma Pollution Discharge Elimination System (OPDES) discharge permits, (ii) preparation of annual Post-Closure Monitoring Report for the North 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) preparation of the Annual Site Operations Report, and (v) surface and groundwater water rights tracking and reporting to Oklahoma Waster Resources Board (OWRB). Completed implementation of Waste Pits and Contaminated Soil Remedial Action (Waste-Soil Remedial Action), including removal of the asbestos disposal cells (ADCs) and Site restoration. Performed Site inspections to evaluate status of vegetation and stormwater best management practices (BMPs). Reseeded and maintained additional stormwater BMPs, as necessary. Prepared the Construction Completion Report for the Waste-Soil Remedial Action for submittal to DEQ. Initiated pre-design investigations required to support the groundwater remedy remedial design (Groundwater RD), including (i) updating the quality assurance project plan (QAPP), (ii) preparation for a geophysical survey to locate subsurface piping and other potential infrastructure and down-hole camera survey of the IRMs to assess the extent of fouling, and (iii) preparation for the WTS equipment audit. Initiated monthly surface water sampling at Skull Creek and nearby tributaries to support Groundwater RD. Supported preparation of Chapter 3.V (specific to the Site) of the Multistate Trust 2021 Annual Progress Report.

**Work Planned for 2023:** Perform (i) routine O&M of the IRMs and WTS, (ii) operation of the Cushing Water Lab for pH testing, and (ii) routine Site maintenance, including mowing and routine removal of flood debris. Perform compliance activities including (i) preparation and submittal of monthly DMRs pursuant to OPDES discharge permits, (ii) preparation of the annual Post-Closure Monitoring Report for the North 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) preparation of the Annual Site Operations Report, and (v) surface and groundwater water rights tracking and reporting to OWRB. Perform, if needed, next-level priority repairs (i.e., lower priority level) and upgrades for the Groundwater IRMs recommended as a result of the 2015 mechanical vulnerability assessment. Complete warranty period for the Waste-Soil Remedial Action. Complete post-closure monitoring plan and reporting for the South Disposal Cell, if not completed in Q4 2022. Continue implementation of the groundwater remedial design investigation (Groundwater RD) and based on the results of the investigation, prepare scope and cost estimate for the Groundwater RD. A budget amendment will be submitted to prepare the Groundwater RD depending on the schedule for completion of the Groundwater RDI. Support preparation of the Multistate Trust 2022 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 2022 Approved Budget	Project Costs incurred in 2022 (as of 9/30/2022)	2023 Budget	2023 Scope of Work
XXVI.A	Regulatory Compliance and Site Operations/Maintenance	\$975,000	\$601,548	\$1,005,000	Perform routine (i) O&M of the IRMs and WTS, (ii) operation of the Cushing Water Lab for pH testing, and (ii) Site maintenance, including mowing and routine removal of flood debris. Perform compliance activities including (i) preparation and submittal of monthly DMRs pursuant to OPDES discharge permits, (ii) preparation of the Post-Closure Monitoring Report for the North 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) preparation and submittal of the Annual Site Operations Report to DEQ, and (v) surface and groundwater water rights tracking and reporting to OWRB. Budget includes Oklahoma DEQ permit and utility fees. A placeholder allowance of \$45,000 is included for non-routine repairs, as needed.
XXVI.C	New Environmental Actions	\$17,363,500	\$8,960,300	\$3,219,000	Complete warranty period for Waste-Soil Remedial Action. Complete the post-closure monitoring plan and reporting for the South Disposal Cell, if not completed in Q4 2022. Perform, if needed, next-level priority repairs (i.e., lower priority level) and upgrades for the Groundwater IRMs recommended as a result of the 2015 mechanical vulnerability assessment. Continue implementation of the groundwater remedial design investigation (Groundwater RDI) and based on the results of the investigation, prepare scope and cost estimate for the Groundwater RD. A budget amendment will be submitted to prepare the Groundwater RD depending on the schedule for completion of the Groundwater RDI.
XXVI.D	Technical Team/Project Management	\$238,000	\$123,647	\$247,000	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 for preparation of Multistate Trust 2022 Annual Progress Report.
XXVI.E	Project Fees & Expenses	\$10,000	\$2,441	\$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 preparation of Multistate Trust 2022 Annual Progress Report.
XXVI.F	Regulator Oversight Costs	\$45,000	\$35,831	\$45,000	Placeholder for ODEQ oversight costs.
XXVI.G	Legal Fees and Accounting Fees	\$75,000	\$29,973	\$78,000	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 2022 Annual Progress Report.
XXVI.I	Lease & Property Use (Income & Costs)	\$0	\$0	\$0	Budget assumes no lease revenues in 2023.
XXVI	Total Site 2023 Budget	\$18,706,500	\$9,753,740	\$4,605,000	
<b>Total Kerr-McGee Chemical Corp Refinery Site in Cushing, Oklahoma Estimated Funding at Beginning of 2023 Budget Year*</b>				<b>\$51,359,000</b>	Total funds allocated to the Site per Consent Decree and Environmental Settlement Agreement; less 2011 - 2021 actual and 2022 estimated costs; plus 2011 - 2021 actual and 2022 estimated investment activity and other receipts.
<b>Estimated Remaining Funds (Post-2023)</b>				<b>\$46,754,000</b>	<b>Initial Funding (2/14/11): \$8,719,555 Anadarko Settlement Funds (2015 and 2016): \$90,628,603 Waterfall Distribution from Sale of Property: \$490,678 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.