

Cimarron Decommissioning Project Status  
Meeting Minutes  
May 20, 2026 – 2:30 Eastern, 1:30 Central

Attendees:

NRC

Linda Gersey  
James Smith  
Stephanie Anderson

DEQ

Jon Reid  
Joshua Deen  
David Cates  
Penn Mouluh  
Ellen Isbell

EPM

Matt Crawford  
Gretchen McDonnell

## **Administrative Issues**

### Remaining 2025 Budget & 2026 Budget Request

EPM submitted the 2026 budget request on March 31<sup>st</sup>. DEQ has provided their approval and NRC continues their review. Currently, EPM continues operating under the remaining funding from the 2025 budget, as allowed by Articles 3.2.1 and 3.2.5 of the Trust Agreement. EPM continues to project that sufficient 2025 funding remains to bridge the gap while the 2026 budget is under review. Mr. Crawford offered to prepare a document bridging the gap between the construction budget and the original 2024 Decommissioning Cost Estimate (DCE), since the DCE has not been directly updated every year with the construction budget. Mr. Smith indicated he would determine whether such a document was required to support NRC review.

## **Licensing Issues**

### 2026 Inspection Schedule

Ms. Linda Gersey confirmed the NRC team will be at the Cimarron Site for inspection on June 10<sup>th</sup> and potentially the morning of June 11<sup>th</sup> if additional time is required. In preparation for the inspection, Ms. Gersey met with the CERT team on May 7<sup>th</sup> to discuss the NRC SharePoint site where EPM would have uploaded documentation for NRC review prior to the on-site inspection; however, there have been technical issues with utilization of that system. Instead, EPM will have the requested documents ready for NRC review upon arrival. NRC will arrive at approximately 6:30AM on the inspection date to be able to attend the 7:00AM morning tailgate meeting with the construction contractor and their subcontractors.

EPM requested a meeting with Mr. Lifeng Guo to discuss what his focus will be during the inspection so we can be the best prepared to support his areas of interest. Ms. Gersey recommended Ms. McDonnell send an email requesting a call with Mr. Guo upon his return to the office.

### License Amendment Request – RSO Change

Ms. McDonnell briefed that EPM would be withdrawing the amendment request as discussions with NRC indicated there is no license requirement for an amendment to acknowledge a change in personnel at the RSO position. EPM will submit a letter formally retracting the license amendment request, as noted by Mr. Smith would be required.

## Status of Work/Submittals

### Community Engagement

No community engagement interactions since the last meeting.

### Construction Progress Update & Lookahead

#### ***Groundwater Extraction, Treated Water Injection, and Discharge Components***

- Since the last meeting, installation of metering valve vaults and contents required to connect extraction wells in both the Western Alluvial Area (WAA) and Burial Area 1 (BA1) was completed.
- GWI-BA1-04 is the first of three trenches to be excavated in unconsolidated materials where slurry is utilized prevent sidewall collapse during construction. That trench has been excavated, gravel backfill placed and the injection point installed. We're currently wrapping up slurry removal with the next step being trench development, similar to developing an extraction well to ensure optimal communication between the native subsurface, the gravel pack backfill and the injection point.
- When the full volume of water that will be generated during development activities for that trench has been produced and conveyed to frac tanks for storage, we'll then execute our sampling plan to analyze the liquids in those tanks for contaminants of concern with those results dictating how the water will be managed. Consistent with historical practice, that would include discharge to ground surface for liquids not exceeding Maximum Contaminant Limits (MCLs) and, potentially, treatment at the WATF for liquids that might exceed MCLs.
- GETR-BA1-02 will be the last trench to be constructed in the BA1 area, with that work schedule to begin in mid-June. After that is complete, the final trench planned for construction is GETR-WU-01 located north of the north end of the 1206 drainage feature.

#### ***Western Area Treatment Facility (WATF) and Burial Area 1 Remediation Facility (BARF)***

- WATF pre-engineered metal building is now completely "dried in" with roof and exterior wall insulation and metal sheeting completed earlier in May.
- WATF building interior framing and utilities installation has begun and will continue over the next several weeks.
- Additional concrete work at the WATF exterior has been completed since the last meeting, consisting of primarily pipe support columns. Remaining concrete work to be completed here includes construction of the concrete ramps at WATF building overhead and personnel door entrances and the concrete slab providing the parking area.
- No significant additional construction work has been performed at the BARF recently, with the concrete pads required for the equipment there having been completed prior to the last meeting.

#### ***Utility Trenching/Utilities***

- Utility Trenching
  - Additional segments of utility trenches (communication/power/water) have been installed since the last meeting, including the small trench segments crossing the roadway to connect the WATF with utility trenches approaching from the southwest, west and northeast.
  - The only communication/power/water trench segments remaining to be constructed are the trench spurs leading to individual extraction wells or trenches.
  - The Outfall 001 trench and outfall structure remain to be constructed and are scheduled for June after Bald Eagle breeding season ends.

- Electrical Service Extension
  - Project design for extension of electrical service from the OG&E pole to the WATF has been completed and is with the contractor for pricing.
  - Design of the BARF internal power distribution network continues with field information currently being gathered to support selection of the alignment between the Cimarron Electric Cooperative pole and the BARF.
  - See more information within the “Issues Encountered” section below.

### ***Injection Skids and Water Treatment System Equipment Fabrication***

- Fabrication of the injection skids is ongoing with Factory Acceptance Testing to be conducted and surveilled by Burns & McDonnell design engineers within the next few weeks. Skids are planned for delivery to the site in mid-June.
- Fabrication of water treatment system equipment (ion exchange vessels, ion exchange skid, resin handling system and vertical blender) continues with those vendors and is anticipated to be delivered by the end of October in accordance with the existing project schedule.

### ***Permitting***

- OPDES (Oklahoma Pollutant Discharge Elimination System) – DEQ’s April 15<sup>th</sup> letter indicated our OPDES permit application was deemed administratively complete. We await any questions from DEQ as they continue their review of the permit application submittal.
- UIC (Underground Injection Control) - For the injection trenches which are considered Class V Underground Injection Wells, EPM is preparing well inventory documentation for submittal to the DEQ UIC Program.
- USFWS General Permit for Bald Eagle Disruption Take - Work within a 660-foot radius of the identified Bald Eagle nest will be performed in accordance with the conditions of the permit issued on May 19<sup>th</sup>.

### **Construction Schedule Outlook**

- No changes to the overall schedule construction schedule to report.
- The final construction completion date is still projected for October with system commissioning and start-up in November.
- There may be slight adjustments to the final construction completion date as delivery dates are finalized for the groundwater treatment system components (filter skids, IX vessels, vertical blender, resin handling system).

### **Issues Encountered**

#### ***Septic System Selection and Placement***

- DEQ will approve either a mound or evapotranspiration /absorption bed septic system given our site conditions. EPM is awaiting cost estimates to determine which type system will be most cost-effective for construction, with long-term maintenance costs being similar.

#### ***Electrical Service***

- As briefed previously, OG&E declined to construct the extension of electrical service at the site, determining that their crews could not perform work on a site requiring radiological controls. Instead, they'll provide a meter on the existing terminal pole within the site, with the Trust responsible for installing the electrical transmission infrastructure from there to WATF.
- The WATF internal power distribution system design has been released to the contractor for pricing.

- To reduce construction cost for the distribution network, power for the BARF will be obtained from Cimarron Electric Cooperative who has a power line along the much nearer east property line.
- The BARF internal power distribution system design is underway with additional field data currently being collected to support that alignment (wetlands and habitat evaluation, depth to bedrock). As soon as that design is finalized, it will also be released to the contractor for pricing.

### ***OK State Fire Marshal Permit Requirement***

While Logan County had instructed the contractor there were no permitting requirements that applied to the WATF building construction being that we are in an unzoned location, the contractor discovered there is a requirement for the Oklahoma State Fire Marshal to issue a building permit. Under that permit, the Fire Marshall would perform 50% and 100% inspections to allow issuance of a Certificate of Occupancy. Upon reviewing Logan County's letter providing the misdirection on permitting requirements, the Fire Marshall advised building construction could continue while the permit application was made and permit obtained. At this time, the permit application is nearly complete with the final submittal item being generated being an attestation letter from the building architect/engineers stating the building design complies with International Building Code requirements. Upon securing the permit, contractor will schedule Oklahoma State Fire Marshal to conduct the 50% inspection event and we'll proceed from there.

### ***NOD 2026-05 – Equipment Demobilized Without Unrestricted Release Survey***

On May 8<sup>th</sup>, a Sunbelt rental equipment technician demobilized a telehandler from the site without it first undergoing an unrestricted release survey. While this equipment was red-tagged and the OKC Sunbelt yard where it was obtained had been specifically instructed that no equipment deployed to the Cimarron Site could be demobilized without specific permission being granted by the renter (the pre-engineered manufactured building assembly subcontractor), a technician from a different Sunbelt yard was in the vicinity of the site and noted his GPS-enabled equipment tracking system indicated this equipment as idle. Assuming the equipment should be picked up, he entered the site and removed the telehandler. The technician failed to sign in with the contractor office as required, avoiding the opportunity to stop him from removing the equipment. Root cause analysis of this incident indicated physical site access control at the gate was not sufficient to prevent the technician from entering and removing the equipment without checking in with the contractor office. Upon discovery of the issue, the equipment was recalled to the site (returned same day) and a padlocked chain was applied to the facility gate to prohibit entry and it has been maintained in that condition since. Visitors arriving at the locked gate must now contact the contractor by radio, at which time contractor staff physically walk down to the gate to verify the identify of the visitor and their purpose for visiting and obtaining any required information (and providing radiological orientation for first-time staff) before permitting their entry.

For the prior situations where equipment was removed from the site before unrestricted release survey was performed, EPM had developed corrective actions for implementation by the contractor. In this case, while EPM assisted the contractor in identifying immediate corrective actions, the contractor has been required to investigate and develop corrective actions of their own in accordance with their quality plan. With the contractor being one level closer to the issue, this approach provides a greater opportunity for the contractor to take an active role in developing corrective actions that may be most effective. When complete, the contractor's non-conformance report will be supplied as a reference document to the NOD documentation generated by EPM.

Ms. Gersey asked for clarification on the equipment removed. Mr. Crawford explained that the item was a “telehandler” which is a wheeled forklift-type device where the forks are on the end of an extendable boom that allows it to reach farther and higher than traditional forklifts.

Ms. Gersey indicated the details of the incident will be discussed and reviewed during the upcoming inspection. While her concern is not that there’s potential for gross contamination of the equipment, but simply that the site cannot be releasing equipment that could be potentially contaminated. Mr. Crawford noted although EPM has committed to screening soils and surveying equipment coming in contact with soils during these construction activities, the soils at the site have already been released indicating a low potential for contamination to occur in this situation. He elaborated that the use of the telehandler was to carry other pieces of equipment and materials across the WATF earthen pad area into the WATF building to avoid contact with soil that would trigger a requirement for radiological survey. He concluded that, while there is a procedural issue here that must be addressed to avoid demobilization of equipment prior to unrestricted release survey, the soils within the WATF pad area that the telehandler came in contact with had been surveyed and sampled multiple times with no remarkable results, presenting no expected risk of contamination.

#### Summary of Results of Radiological Surveys

- Numerous surveys have been conducted over the past month with no remarkable results.
- Surveys include NORM screening for incoming materials and equipment, frisking of personnel and equipment out of areas subject to radiation controls, restricted release surveys of equipment moving between on-site work locations and unrestricted release surveys of equipment leaving the site. Gamma walk-over surveys have been conducted in work areas adjacent to trenches and along haul routes, before and after disturbance or use.
- Soil samples submitted for laboratory analysis and presenting unremarkable data include:
  - Seven samples of extraction well soil boring cuttings
  - 68 utility trench excavated soil samples
  - Four soil samples from septic system percolation test borings
  - Two samples from the final exposed soil surface at a test pit excavated during 1206 drainage feature construction

#### Construction Progress Report

- Second construction progress report will be submitted by the end of this week, detailing work performed during February and March.

#### Construction Budget Update

Updated budget information will be presented in the upcoming construction progress report. Since the last meeting, EPM reports two additional change orders:

- Pump control units and motor starters. Drawings were ambiguous as to whether those items were being procured by the general contractor or by EPM, so were not included in the general contractor’s pricing. This ~\$30,000 change order has been vetted and approved.
- CAT6 Ethernet cabling. Drawings indicate the presence of ethernet receptacles on a general architectural layout drawing but did not explicitly define the actual cable or cable installation as being within the general contractor’s scope. This is an estimated \$30,000 change order, pending general contractor’s proposal and cost information.

Remaining significant additional cost being tracked is that associated with the internal electrical

utility distribution network the Trust must construct due to OG&E's declining to construct. EPM is developing design information to allow definition of costs for the internal distribution network but expects this to be a change order greater than \$500,000 in value. When those costs are developed, a memo will be prepared explaining the need for this change and summarizing those costs and validation of those costs. These costs will be allocated against the contingency funding per the construction budget approval.

**Date and Time of Next Meeting**

June 17, 2026, 2:30 Eastern, 1:30 Central

Attachment – CERT Groundwater Remediation System Construction Schedule – 2026-05-13

Activity ID	Activity Name	OD	Start	Finish	TF	2026												2027				
						May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May				
<b>CIMARRON PUMP AND TREAT SYSTEM PROJECT (PROGRESS UPDATE 07)</b>																						
<b>PROJECT MILESTONES</b>																						
PM100	PROJECT NTP (01SEP2025)	0	01-Sep-25																			
PM110	CONTRACTOR MOBILIZATION	0		10-Oct-25 A																		
PM190	WATF BUILDING FOUNDATIONS READY	0		17-Feb-26 A																		
PM180	WATF ROOF DRIED IN	0		30-Apr-26	110																	
PM200	WATF UTILITY AVAILABILITY - OG&E	0		30-Apr-26	72																	
PM260	INJECTION WELLFIELD COMPLETION	0		29-May-26	104																	
PM250	EXTRACTION WELLFIELD COMPLETION	0		18-Jun-26	90																	
PM210	BA1 UTILITY AVAILABILITY - OG&E	0		02-Jul-26	70																	
PM220	ELECTRICAL POWER AVAILABLE	0		02-Sep-26	40																	
PM230	LIFE SAFETY SIGN-OFF	0		10-Sep-26	58																	
PM120	MECHANICAL COMPLETION (MC)	0		26-Oct-26	0																	
PM240	ADVERSE WEATHER RISK CONTINGENCY	16	10-Nov-26	03-Dec-26	0																	
PM130	SUBSTANTIAL COMPLETION	0		03-Dec-26	0																	
PM140	FINAL COMPLETION (04 DEC 2026)	0		04-Dec-26*	0																	
<b>PRE-CONSTRUCTION</b>																						
<b>SUBMITTALS</b>																						
TRENCH DEVELOPMENT PLAN																						
EXCAVATION PLAN																						
<b>PROCUREMENT</b>																						
<b>PROCUREMENT BY VNSFS</b>																						
ION EXCHANGE (IX) SKID																						
ION EXCHANGE (IX) VESSEL																						
VERTICAL BLENDER																						
FILTER SKID																						
RESIN HANDLING AND TREATMENT SYSTEM																						
RESIN HANDLING MEZZANINE																						
PUMP P-121																						
PUMP P-130																						
<b>PROCUREMENT BY OWNER</b>																						
PACKAGED INJECTION SYSTEM SKID BA1																						
PACKAGED INJECTION SYSTEM SKID WATF																						
<b>PROCUREMENT BY CONTRACTOR</b>																						
PRE-ENGINEERED METAL BUILDING (PEMB)																						
ELECTRICAL PANELBOARDS																						
SWITCHBOARD																						
PUMPS																						
400 KW GENERATOR																						
ELECTRICAL CABLE																						
CONCRETE REINFORCEMENT																						
METAL WALL PANELS																						
EXTERIOR DOORS																						
INTERIOR DOORS																						
MECHANICAL DUCTS																						
HVAC EQUIPMENT																						
FIRE ALARM DEVICES																						





