

## Kyle Walker, CPA

Rates Analyst

Tel: 503.226.4211 ext. 5858

Fax: 503.721.2516

Email: kyle.walker@nwnatural.com



March 15, 2016

## **VIA ELECTRONIC FILING AND US MAIL**

Public Utility Commission of Oregon Attn: Filing Center 201 High Street SE, Suite 100 Post Office Box 1088 Salem, Oregon 97308-1088

# RE: UM 1732 - Application for Prudence Review of Environmental Remediation Costs Schedule 183 - 2015 Annual Report

Northwest Natural Gas Company, dba NW Natural ("NW Natural" or "Company"), files herewith its report of Environmental Remediation Costs for the period January 1, 2015 through December 31, 2015, and requests Commission review and a determination of prudence of these costs.

In accordance with Rate Schedule 183 "Site Remediation Recovery Mechanism (SRRM)" and the Commission's Order No. 12-137 in Docket UG 221 approving Schedule 183, the Company is required to submit an annual report of environmental site remediation costs recorded in the deferral account through March 31 of the report year. The Company proposed to change the reporting cycle to a calendar year cycle in the compliance phase of Docket UM 1635. In the Company's last annual report filed in UM 1732, the Company transitioned to the calendar year reporting cycle by seeking review of environmental remediation costs from April 1, 2014 through December 31, 2014. Those costs were found prudent in Order No. 16-069. The 2015 annual report will implement the full calendar year report year from January 1, 2015 through December 31, 2015.

Please feel free to call me at 503.226.4211 ext. 5858 if you have any questions.

Sincerely,

/s/ Kyle Walker, CPA

Kyle Walker, CPA Rates Analyst

Attachments: Report Narrative

Exhibit A Exhibit B

Exhibit C (CD by U.S. mail)

#### **NW NATURAL**

## SCHEDULE 183 - 2015 ANNUAL REPORT ENVIRONMENTAL SITE REMEDIATION AND RECOVERY MECHANISM (SRRM)

## **JANUARY 1, 2015 – DECEMBER 31, 2015**

In accordance with Rate Schedule 183 and the Oregon Public Utility Commission ("Commission") Order No. 12-137 in Docket UG 221, implementing Northwest Natural Gas Company's ("NW Natural" or "Company") Site Remediation and Recovery Mechanism (SRRM), NW Natural provides the following information to allow the Commission, Staff, and any parties to review for prudency NW Natural's environmental remediation expenses incurred between January 1 of 2015 and December 31 of 2015. NW Natural submits this information so that review of the expenses can be conducted before they are included in the SRRM for rates effective November 1, 2016.

#### A. 2015 Remediation Activities

NW Natural has eight sites at which the Oregon Department of Environmental Quality (DEQ) or the Environmental Protection Agency (EPA) has required clean-up. These include: Portland Harbor, Portland Gas Manufacturing (PGM), Gasco, Siltronic, Central, Eugene Water Electric Board, French American International School, and Oregon Steel. NW Natural also incurred litigation costs related to recovery of insurance proceeds and minor litigation costs related to collections under the settlement agreements.

Total expenditures by site (or activity) for the period of January 1, 2015 through December 31, of 2015, are as follows:

<u>SITE</u>	<u>AMOUNT</u>
Gasco (1)	\$7,921,365
Siltronic	263,409
Harbor	1,820,552
PGM	459,376
Central	120,641
	\$10,585,343

(1) Includes Gasco Uplands, Sediments, and operation of Source Control.

These expenditures are further detailed in Exhibit A and B of this Report. Descriptions of the significant activities at these sites for this period are described below.

<sup>&</sup>lt;sup>1</sup> The remediation at the Eugene Water and Electric Board and French American International School sites is now complete.

#### B. Portland Harbor

The Portland Harbor site is a stretch of approximately ten miles along the Willamette River that is listed as a Superfund site by the Environmental Protection Agency (EPA). Investigation of the site is being managed by a consortium of potentially responsible entities known as the Lower Willamette Group (LWG), under EPA's oversight. NW Natural is a member of the LWG and is cofunding the work performed with other members of the LWG. As of March 1, 2016, the Portland Harbor site is still in the feasibility study phase of remediation.

NW Natural also participates in the Portland Harbor Natural Resource Damage (NRD) cooperative assessment process. During the period of January through December 2015, the Company worked with the Natural Resource Trustees in the NRD cooperative process on pathways to reach settlement.

#### C. PGM

The PGM site covers approximately 3.7 upland acres and is located on the Willamette River near the Steel Bridge. The location of the former PGM is now a fully developed part of downtown Portland. NW Natural is managing this site as the PGM Project under DEQ's oversight. During the period of January through December 2015, NW prepared and submitted the Feasibility Study to the DEQ.

#### D. Gasco

The Gasco site covers approximately 45 acres and is located on the Willamette River between the St. Johns Bridge and the Railroad Bridge. The manufacturing facility is gone, and the site is currently occupied by the Company's Portland liquefied natural gas storage facility and two tenant facilities. Work at this site consists of various projects: the Uplands Project, the Sediments Project, and the Source Control Project. These projects are subject to EPA and DEQ oversight.

The Gasco Upland site is now in the feasibility study phase. The primary work activities conducted in 2015 were finalizing the risk assessment and performing upland groundwater monitoring activities, and the initial scoping of the feasibility study. Offshore boom maintenance and work on the temporary treatment unit for LNG containment basin storm water and groundwater were also performed.

The Sediments site is still in the Engineering Evaluation/Cost Analysis (EE/CA) phase. In 2015, NW Natural continued to work with EPA on its regulatory requirements for the site. Although revision of the EE/CA has been delayed due to a delay in the release of the EPA Portland Harbor Superfund Site Feasibility Study, NW Natural continued to work with EPA to incorporate the results of the EE/CA into EPA's proposed plan for Portland Harbor. The Company also conducted monthly visual monitoring of the shoreline area in the direct vicinity of the pilot cap area.

Construction of the Source Control wells was completed in October 2013. DEQ-required testing of the source control system is ongoing. The Company will continue to incur costs associated with operating the wells and environmental regulatory oversight.

#### E. Siltronic

The Siltronic site is adjacent to the Gasco site. The land is now owned by Siltronic Corporation ("Siltronic"), but approximately 38.5 acres of it was previously owned by NW Natural's predecessor company, Portland Gas & Coke (PG&C). Some of the contamination at the site resulted from PG&C's use of approximately 400 feet of the property adjacent to the Gasco site for storage and management of MGP residuals. Subsequent owners of the Siltronic site placed a significant amount of fill on the property and redistributed MGP material across the property. Other contaminants from different sources, including Siltronic's own operations, also exist at the site. The Siltronic site is managed by Siltronic and NW Natural under DEQ's oversight. The Siltronic Project consists of all of NW Natural's work on the site that is not covered by the other two Gasco site projects.

Siltronic is still in the investigation phase. The primary work performed during the period of January through December 2015 was quarterly routine groundwater monitoring activities, and access negotiations to complete sampling on the adjacent railroad right of way.

## F. Central

The Central Service Center is the former site for company operations including as a gas holder site and other activities. At the end of 2006, the Central Service Center site was identified by DEQ for cleanup and ranked as a high priority site.

During the period of January 2015 through January 2016, the company completed the following tasks:

- Finalized and submitted to Oregon DEQ a Remedial Investigation and Risk
  Assessment (RI/RA) report which characterized the legacy environmental impacts
  associated with the site's historical operations, assessed the environmental and
  human health risks associated with those impacts, and provided recommendations
  for moving the site forward.
- 2. Decommissioned all remaining Underground Injection Control (UIC) wells (6) so that Oregon DEQ can consider removing NW Natural from the UIC program.
- 3. Completed cleanup activities related to the former holder pad #7, including soil/sediment removal of contaminated media on and around the holder pad and the decommissioning of a defunct historical oil-water separator associated the former operation of the holder pad.

## G. Major Reports and Communications with Environmental Regulators

To assist the Commission, Staff, and any parties in reviewing NW Natural's costs for the January 1 2015 to December 31 2015 period, the Company is providing the major reports and communications with environmental regulators related to the activities described above, which can be found in Exhibit C.

Deferred Environmental Remediation Costs and Insurance Proceeds For the period of January 1, 2015 through December 31, 2015 UM 1732 - Exhibit A

**NW Natural** 

tasks
work
ut by
ken o
bro
th site
for eacl
osts fo
leferred o
r the d
B for
o Exhibit
Refer to

Month/Year         GASCO (1)         HARBOR         SILTRONIC         FRONT (PGM)         CENTRAL           Jan-15         1,022,807         379,668         12,650         52,863         -           Feb-15         726,768         (357)         32,217         941         164           Mar-15         602,978         384,295         24,815         75,570         -           Apr-15         502,466         58,516         22,624         16,133         4,657           May-15         1,007,674         91,448         3,908         3,511         9,004           Jun-16         444,247         56,795         15,270         108,256         3,593           Jul-17         658,709         147,603         12,583         38,680         1,161           Sep-16         485,152         58,358         17,459         25,062         476           Oct-15         464,992         15,289         31,540         28,616         97,096           Nov-15         908,746         235,799         41,173         38,427         3,197           Dec-15         908,746         263,409         459,376         120,641									
(a)         (b)         (c)         (d)         (e)         (f)           Jan-15         1,022,807         379,668         12,650         52,863         -           Feb-15         726,768         (357)         32,217         941         164           Mar-15         602,978         384,295         24,815         75,570         -           Apr-15         502,466         58,516         22,624         16,133         4,657           May-15         1,007,674         91,448         3,908         3,511         9,004           Jun-15         444,247         56,795         15,270         108,256         3,593           Jun-15         678,709         147,603         12,583         38,680         1,161           Sep-15         485,152         58,358         17,459         25,062         476           Sep-15         464,992         157,891         31,540         28,616         97,096           Nov-15         908,746         235,799         41,173         38,427         3,197           Dec-15         908,746         235,799         41,173         38,427         3,197		TOO Y STRONG	(1)	a C a a v ii	OINOGE IIS	CDOMT (MOM)	- V	IOIAL REMEDIATION SPEND	INSURANCE & 3RD
(a)         (b)         (c)         (d)         (e)         (f)           Jan-15         1,022,807         379,668         12,650         52,863         -           Feb-15         726,768         (357)         32,217         941         164           Mar-15         602,978         384,295         24,815         75,570         -           Apr-15         502,466         58,516         22,624         16,133         4,657           May-15         1,007,674         91,448         3,908         3,511         9,004           Jun-15         444,247         56,795         15,270         108,256         3,593           Jul-15         658,795         147,603         12,583         38,680         1,161           Aug-15         658,795         147,603         12,583         38,680         1,161           Sep-15         485,152         58,358         17,459         25,062         476           Oct-16         464,992         157,891         31,540         28,616         97,096           Nov-15         908,746         235,799         41,173         38,427         3,197           T,921,365         1,820,552         263,409         459,376	0	MOI III / Teal	(I) cocyo	NOGNALI	SILINOMIC	LACIAT (PGIAI)	CENTRAL	SI END	I ANTI NECOVEN
Jan-15       1,022,807       379,668       12,650       52,863         Feb-15       726,768       (357)       32,217       941         Mar-15       602,978       384,295       24,815       75,570         Apr-15       502,466       58,516       22,624       16,133         May-15       1,007,674       91,448       3,908       3,511         Jun-15       444,247       56,795       15,270       108,256         Jul-15       674,243       174,250       54,649       66,009         Aug-15       658,709       147,603       12,583       38,680         Sep-16       485,152       58,358       17,459       25,062         Oct-15       464,992       157,891       31,540       28,616         Nov-15       908,746       235,799       41,173       38,427         7,921,365       1,820,552       263,409       459,376       12	9	(a)	(q)	(2)	(p)	(e)	(£)	(g) = sum (b)-(f)	(H)
Jan-15       1,022,807       379,668       12,650       52,863         Feb-15       726,768       (357)       32,217       941         Mar-15       602,978       384,295       24,815       75,570         Apr-15       502,466       58,516       22,624       16,133         May-15       1,007,674       91,448       3,908       3,511         Jun-15       444,247       56,795       15,270       108,256         Jul-15       658,709       147,603       12,583       38,680         Sep-15       485,152       58,358       17,459       25,062         Oct-15       464,992       157,891       31,540       28,616         Nov-15       422,582       76,285       (5,478)       5,308         Dec-15       908,746       235,799       41,173       38,427         A,921,365       1,820,552       263,409       459,376       12	7								
Feb-15       726,768       (357)       32,217       941         Mar-15       602,978       384,295       24,815       75,570         Apr-15       502,466       58,516       22,624       16,133         May-15       1,007,674       91,448       3,908       3,511         Jun-15       444,247       56,795       15,270       108,256         Jul-15       674,243       174,250       54,649       66,009         Aug-15       658,709       147,603       12,583       38,680         Sep-15       485,152       58,358       17,459       25,062         Oct-15       464,992       157,891       31,540       28,616         Nov-15       422,582       76,285       41,173       38,427         Dec-15       908,746       235,799       41,173       38,427         7,921,365       1,820,552       263,409       459,376       12	œ	Jan-15	1,022,807	379,668	12,650	52,863	•	1,467,989	(9,281)
Mar-15         602,978         384,295         24,815         75,570           Apr-15         502,466         58,516         22,624         16,133           May-15         1,007,674         91,448         3,908         3,511           Jun-15         444,247         56,795         15,270         108,256           Jul-15         674,243         174,250         54,649         66,009           Aug-15         658,709         147,603         12,583         38,680           Sep-15         485,152         58,358         17,459         25,062           Oct-15         464,992         157,891         31,540         28,616           Nov-15         422,582         76,285         (5,478)         5,308           Dec-15         908,746         235,799         41,173         38,427           7,921,365         1,820,552         263,409         459,376         12	6	Feb-15	726,768	(357)	32,217	941	164	759,733	•
Apr-15       502,466       58,516       22,624       16,133         May-15       1,007,674       91,448       3,908       3,511         Jun-15       444,247       56,795       15,270       108,256         Jul-15       674,243       174,250       54,649       66,009         Aug-15       658,709       147,603       12,583       38,680         Sep-15       485,152       58,358       17,459       25,062         Oct-15       464,992       157,891       31,540       28,616         Nov-15       422,582       76,285       (5,478)       5,308         Dec-15       908,746       235,799       41,173       38,427         7,921,365       1,820,552       263,409       459,376       12	01	Mar-15	602,978	384,295	24,815	75,570	•	1,087,659	(18,707)
May-15       1,007,674       91,448       3,908       3,511         Jun-15       444,247       56,795       15,270       108,256         Jun-15       674,243       174,250       54,649       66,009         Aug-15       658,709       147,603       12,583       38,680         Sep-15       485,152       58,358       17,459       25,062         Oct-15       464,992       157,891       31,540       28,616         Nov-15       422,582       76,285       5,308       5,308         Dec-15       908,746       235,799       41,173       38,427         7,921,365       1,820,552       263,409       459,376       12	Ξ	Apr-15	502,466	58,516	22,624	16,133	4,657	604,396	(4,489)
Jun-15       444,247       56,795       15,270       108,256         Jul-15       674,243       174,250       54,649       66,009         Aug-15       658,709       147,603       12,583       38,680         Sep-15       485,152       58,358       17,459       25,062         Oct-15       464,992       157,891       31,540       28,616         Nov-15       422,582       76,285       (5,478)       5,308         Dec-15       908,746       235,799       41,173       38,427         7,921,365       1,820,552       263,409       459,376       12	12	May-15	1,007,674	91,448	3,908	3,511	9,004	1,115,546	•
Jul-15       674,243       174,250       54,649       66,009         Aug-15       658,709       147,603       12,583       38,680         Sep-15       485,152       58,358       17,459       25,062         Oct-15       464,992       157,891       31,540       28,616         Nov-15       422,582       76,285       (5,478)       5,308         Dec-15       908,746       235,799       41,173       38,427         7,921,365       1,820,552       263,409       459,376       12	13	Jun-15	444,247	26'192	15,270	108,256	3,593	628,160	(10,301)
Aug-15       658,709       147,603       12,583       38,680         Sep-15       485,152       58,358       17,459       25,062         Oct-15       464,992       157,891       31,540       28,616         Nov-15       422,582       76,285       (5,478)       5,308         Dec-15       908,746       235,799       41,173       38,427         7,921,365       1,820,552       263,409       459,376       12	14	Jul-15	674,243	174,250	54,649	600'99	1,294	970,445	•
Sep-15       485,152       58,358       17,459       25,062         Oct-15       464,992       157,891       31,540       28,616         Nov-15       422,582       76,285       (5,478)       5,308         Dec-15       908,746       235,799       41,173       38,427         7,921,365       1,820,552       263,409       459,376       12	2	Aug-15	628,709	147,603	12,583	38,680	1,161	858,736	•
Oct-15       464,992       157,891       31,540       28,616         Nov-15       422,582       76,285       (5,478)       5,308         Dec-15       908,746       235,799       41,173       38,427         7,921,365       1,820,552       263,409       459,376       12	9	Sep-15	485,152	58,358	17,459	25,062	476	586,508	(6,725)
Nov-15       422,582       76,285       (5,478)       5,308         Dec-15       908,746       235,799       41,173       38,427         7,921,365       1,820,552       263,409       459,376       120		Oct-15	464,992	157,891	31,540	28,616	960'26	780,135	•
Dec-15 908,746 235,799 41,173 38,427 7921,365 1,820,552 263,409 459,376 120	<u>8</u>	Nov-15	422,582	76,285	(5,478)	5,308	•	498,696	
7,921,365 1,820,552 263,409 459,376	6	Dec-15	908,746	235,799	41,173	38,427	3,197	1,227,342	(17,331)
	0		7,921,365	1,820,552	263,409	459,376	120,641	10,585,343	(66,833)
	Σ.								
22 <u>Notes:</u>	7	Notes:							
(4) Leading and the contraction of the contraction	9	(4)	200 Jo 04000 muitonous						

(1) Includes the operating costs of Gasco Source Control.

NW Natural
UM 1732 - Exhibit B
Task Detail - Deferred Environmental Remediation Costs and Insurance Proceeds
For the period of January 1, 2015 through December 31, 2015

Note: Monthly totals by site agree to the amounts presented in the Exhibit A Summary

Part	Sum of Amount Col	Column Labels												
164   April   April   1,571   1,581   1,592   1,284   1,161   476   4,657   9,004   3,533   1,294   1,161   476   4,667   9,004   3,533   1,294   1,161   476   4,667   9,004   3,533   1,294   1,161   476   4,667   9,004   3,533   1,294   1,161   4,66   4,668   4,927   1,157   3,81   4,927   2,312   4,91   1,733   4,937   1,157   1,150   2,131   4,927   1,157   3,148   4,927   3,148   4		2015												<b>Grand Total</b>
1164   4657   9,004   3,583   1,294   1,161   476	Row Labels	Jan-15	Feb-15	Mar-15	Apr-15	May-15	Jun-15	Jul-15	Aug-15	Sep-15	Oct-15	Nov-15	Dec-15	
164   4,657   9,004   3,593   1,294   1,161   476	Central													
164   4657   9,004   3,593   1,294   1,161   406   4,667   9,004   3,593   1,294   1,161   4,067   4,674   4,674   4	Study		164		4,657	9,004	3,593	1,294	1,161	476	134,913	(37,817)	3,197	120,641
11,461   1,571   2,811   464   52,755   15,367   30,772   17,207     1514   1,571   2,811   360   4,927   1,444   2,627   1,972   1,937     152   206,201   46,650   5,842   39,819   13,418   4,821   4,01   1,753   6,371     152   206,201   46,650   23,242   33,242   33,243   18,395   34,496   15,781     153   24   25   24   25   24   24   24   24	Central Total		164		4,657	9,004	3,593	1,294	1,161	476	134,913	(37,817)	3,197	120,641
Hardel	Gasco Sediments													
11461   1571   2811   464   52,755   15,357   30,772   17,207   17,007   1,0	DEQ			(0)							424			424
Free Controls	EE/CA and Data Report	11,461		2,811		464	52,755	15,367	30,772	17,207	28,372		12,177	171,384
Edule 161 542 862 803 2,321 401 1,753 637 637 8 13418	Legal - PLG - Gasco Sediments Remedy	1,814	1,571	360	4,927	1,157	144	2,627	1,972	1,937	3,600	14,886	12,999	47,994
1564	Meetings, Budget, Schedule	161		542		803	2,321	401	1,753	637	731		1,109	8,457
206,201 (89)  13,600 13,644 1,1200 14,602 14	Preliminary Design	164		46,650		50,819	13,418							111,051
13,600   213,614   51,473   4,927   53,242   83,239   18,395   34,496   19,781   31,400   3	EPA		206,201	(88)									141,513	347,626
13,600 213,614 51,473 4,927 53,242 83,239 18,395 34,496 19,781    13,600 213,614 51,473 4,927 53,242 24 24 24 23 23 23 24 24 24 24 24 24 24 24 24 24 24 24 24	Trustees		5,842	1,200			14,602							21,644
Treatment Plant 756,648 455,357 305,315 452,19 707,206 140,016 461,216 474,363 289,989   Treatment Plant 756,648 455,357 305,315 452,19 707,206 140,016 461,216 474,363 289,989   Treatment Plant 756,648 455,357 305,315 452,19 707,206 140,016 461,216 474,363 289,989   Treatment Plant 756,648 455,357 305,315 452,19 707,206 140,016 461,216 474,363 289,989   Treatment Plant 786,570 455,357 305,315 459,001 772,384 151,002 474,167 497,484 303,403   Treatment Plant 786,570 485,223 236,449 469,001 772,384 151,002 474,167 497,484 303,403   Treatment Plant 786,570 485,237 1,900 772,384 151,002 474,167 497,484 303,403   Treatment Plant 786,570 1,900 19,297 44,027 15,854 14,157 15,864 14,041   Treatment Plant 786,570 1,900 19,297 44,027 15,854 14,157 15,864 14,041   Treatment Plant 857 1,900 1,446 6,997 44,027 15,854 14,157 15,804 14,157 15,804 14,041   Treatment Plant 857 1,900 1,446 6,997 44,027 15,854 14,157 14,157 15,804 14,127 14,157	Gasco Sediments Total	13,600	213,614	51,473	4,927	53,242	83,239	18,395	34,496	19,781	33,127	14,886	167,798	708,579
1y 24 24 25 24 26 27 24 24 24 24 24 24 24 23 23 23 24 24 24 23 23 23 24 24 23 23 23 23 24 24 23 23 23 23 24 24 25 23 23 23 24 24 24 24 24 24 24 24 24 24 24 24 24	Gasco Source Control													
Treatment Plant 756,648 45,323 19,850 (68,187) 7,621 40,438 1,646 7,947 8,973 10,919 1,296 9,314 1,296 9,315 24,716 46,1216 474,363 28,472 10,919 1,296 9,137 24,716 46,1216 474,363 28,473 10,919 1,205 15,690 15,006 30,825 21,103 44,842 151,002 474,167 497,484 303,403 10,000 15,000 15,000 15,000 11,113 3,300 827 (13,000) 197 15,834 (11,579) (15,894 40,412 10,000 11,113 3,300 827 (13,000) 197 147 5,994 6,312 1,497 5,004 1,333 2,004 1,333 2,004 6,312 1,497 1,599 1,30	Groundwater Pilot Study	24	25	24	24	24	24	23	23	24	25	25	26	291
Treatment Plant 756,648 455,357 303,315 42,129 707,206 49,316 4,916 461,216 444,363 289,989	NWN Direct Costs	23,897	19,850	(68,187)	7,621	40,438	1,646	7,947	8,973	10,919	14,578	10,068	14,568	92,317
Treatment Plant 756,648 455,357 303,315 452,219 707,206 140,016 461,216 474,363 289,989 Treatment Plant 756,648 455,357 303,315 459,211 772,384 151,002 474,167 497,484 303,403 11 16,690 15,006 30,825 24,187 6,999 4,027 15,854 (11,579) (15,864) 40,412 10,000 1,011 857 1,900 146 6,997 4,027 15,854 (11,579) (2,703) 11,000 1,011 3,300 827 (13,000) 197 147 5,094 6,312 1,415 2,630 1,000 15,006 15,006 1,373 2,074 5,094 6,312 1,415 2,630 1,373 2,074 5,094 6,312 1,415 2,630 1,373 2,074 5,094 6,312 1,415 2,630 1,373 2,074 5,094 6,312 1,415 2,630 1,373 2,074 1,103 2,599 2,360 1,853 5,019 1,455 8,995 13,390 1	Legal - PLG - Gasco Source Controls		9,991	1,296	9,137	24,716	9,316	4,982	14,124	2,472	7,869	25,498	21,676	131,077
16,690	Optimization of Water Treatment Plant	756,648	455,357	303,315	452,219	707,206	140,016	461,216	474,363	289,989	213,635	354,907	520,322	5,129,194
essment being bein	Gasco Source Control Total	780,570	485,223	236,449	469,001	772,384	151,002	474,167	497,484	303,403	236,106	390,498	556,592	5,352,878
Figure 15,006 30,825 21,103 44,842 48,352 29,347 (15,864) 40,412 (15,864) 41,364 (15,864) 41,3	Gasco Uplands													
sesment 6,61,10 8,283 24,187 6,909 61,197 (15,864) 40,412 (10,000 10,000 1,113 3,300 827 (13,000) 197 147 5,094 6,312 1,415 2,600 1,415 2,000 1,415 8,800 1,415 8,	DEQ	16,690	15,006	30,825		21,103	44,842		48,352	29,347	58,023	43,859		308,046
essment 60,171 857 1,900 146 6,997 4,027 15,854 (11,579) (2,703) 10,000 10,000 827 (13,000) 197 147 5,094 6,312 1,415 2,600 1,373 2,074 5,094 6,312 1,415 2,600 1,373 2,074 5,094 6,312 1,415 2,600 1,314 6,890 9,180 7,215 8,497 6,413 2,600 1,415 6,890 9,180 7,215 8,497 6,413 2,600 1,415 6,890 9,180 7,215 24,307 2,501 2,339 13,390 2,805 36,407 39,119 1,418	Final RI	9,610	8,283		24,187		606′9	61,197	(15,864)	40,412	13,722	(54,645)	16,771	110,581
10,000	Finalize Risk Assessment	60,171	857	1,900	146	266'9	4,027	15,854	(11,579)	(2,703)	9/	(20)		75,669
rery 1,113 3,300 827 (13,000) 197 147  Admittenance 1,872 731 2,619 1,373 2,074 5,094 6,312 1,415 2,630  sco Site Remedy 27,902 (2,920) 7,714 6,890 9,180 7,215 8,497 6,413 2,600  Luation 5,005 5,005 2,578 96,609 1,853 50,197 14,553 8,085 36,407 39,119  Ination 1	Gasco Other	10,000							5,000				10,000	25,000
Admittenance 1,872 731 2,619 1,373 2,074 5,094 6,312 1,415 2,630 2,00 Site Remedy 27,902 (2,920) 7,714 6,890 9,180 7,215 8,497 6,413 2,600 1,415 2,600 1,415 2,600 1,415 2,600 1,415 2,4307 2,501 2,339 13,390 13,390 1,415 2,600 1,853 50,145 2,4307 2,501 2,339 13,390 13,300 1,415 2,400 1,415 2,4307 2,501 2,339 13,390 1,415 2,400 1,	Insurance Recovery	1,113	3,300	827	(13,000)	197	147							(7,416)
sco Site Remedy 27,902 (2,920) 7,714 6,890 9,180 7,215 8,497 6,413 2,600 luation 155 23,676 1,103 559 276 42 42 42 42 42 42 42 42 42 42 42 42 42	Interim Action Maintenance	1,872	731	2,619	1,373	2,074	5,094	6,312	1,415	2,630	1,524	158	2,473	28,273
Luation     155     23,676     1,103     559     276     42       G Related     5,005     51,086     29,155     24,307     2,501     2,339     13,390       58,051     98     96,609     1,853     50,197     14,553     8,085     36,407     39,119       ination     38,252     2,578     99,619     7,088     62,043     10,353     78,961     54,203     37,174       tion     228,819     27,932     314,874     28,538     182,048     210,006     181,681     126,729     161,968       te Group     341,382     144,828     24,000     24,000     2,897     8,233     52,215     171,353     82,230     56,354       tion Process     6,066     8,273     13,324     (12,947)     4,580     2,897     8,205	Legal - PLG - Gasco Site Remedy	27,902	(2,920)	7,714	6,890	9,180	7,215	8,497	6,413	2,600	18,912	19,664	19,029	131,096
G Related 5,005 5,005 1,086 29,155 24,307 2,501 2,339 13,390 13,390 58,051 98 96,609 1,853 50,197 14,553 8,085 36,407 39,119 10 10 10 10 10 10 10 10 10 10 10 10 10	Restoration Evaluation	155		23,676		1,103	559	276	42		47		47	25,905
S8,051   98   96,609   1,853   50,197   14,553   8,085   36,407   39,119     S8,252   2,578   99,619   7,088   62,043   102,353   78,961   54,203   37,174     Ition   228,819   27,932   314,874   28,538   182,048   210,006   181,681   126,729   161,968     S8,285   27,932   314,874   28,538   182,048   210,006   181,681   126,729   161,968     S8,285   26,285   12,048   21,036   13,681   126,729   161,968     S8,285   34,382   144,828   13,324   12,947   4,580   2,897   8 2,005     S8,286   6,066   8,273   13,324   (12,947)   4,580   2,897   8 2,005     S8,286   6,066   8,273   13,324   (12,947)   4,580   2,897   8 2,005     S8,286   6,066   8,273   26,166   2,440   2,440   2,440     S8,286   6,066   8,273   24,406   2,440   2,440   2,440     S8,286   6,066   8,273   24,406   2,440   2,440   2,440     S8,286   6,066   8,273   24,406   2,440   2,440     S8,286   6,066   8,273   2,440   2,440   2,440     S8,286   6,066   8,273   24,406   2,440   2,440     S8,286   6,066   8,273   24,406   24,406   2,440     S8,286   6,066   8,273   24,406   24,406   24,406     S8,286   6,066   8,273   24,406   24,406   24,406   24,406   24,406     S8,286   6,066   8,273   24,406   24,406   24,406   24,406   24,406     S8,286   6,066   8,273   24,406   24,406   24,406   24,406   24,406   24,406     S8,286   24,406   24,406   24,406   24,406   24,406   24,406     S8,2	Sediments - LWG Related	200'5		51,086		29,155	24,307	2,501	2,339	13,390	5,101		2,787	135,669
ination 38,252 2,578 99,619 7,088 62,043 102,353 78,961 54,203 37,174 tion  Lion  228,819 27,932 314,874 28,538 182,048 210,006 181,681 126,729 161,968 210,006 181,681 126,729 161,968 210,006 181,681 126,729 161,968 210,006 2,821 207,194 45,192 104,395 52,215 171,353 82,230 56,354 144,828 24,000	Site Wide FS	58,051	86	609'96	1,853	50,197	14,553	8,085	36,407	39,119	48,676	4,193	78,130	435,968
tion Process 1228,819 27,932 314,874 28,538 182,048 210,006 181,681 126,729 161,968 181,681 226,729 161,968 181,681 226,729 161,968 182,230 56,354 181,382 184,828 184,382 184,828 184,382 184,000 184,580 184,828 184,384 184	Technical Coordination	38,252	2,578	99,619	2,088	62,043	102,353	78,961	54,203	37,174	49,677	4,046	55,120	591,116
128,819 27,932 314,874 28,538 182,048 210,006 181,681 126,729 161,968   161,968   182,048   182,048   182,048   182,048   182,048   182,048   182,048   182,230   182,230   182,230   182,230   182,230   182,230   182,230   182,230   182,230   182,230   182,230   182,230   182,230   182,230   182,230   182,230   182,230   182,324   18	Insurance Litigation		,		1	,	1							1
LG  IIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIII	Gasco Uplands Total	228,819	27,932	314,874	28,538	182,048	210,006	181,681	126,729	161,968	195,759	17,198	184,357	1,859,907
LG NRD	Harbor													
//Illamette Group 341,382 144,828 41,364 41,364 41,364 11,	Legal - PLG	38,286	(6,423)	207,194	45,192	104,395	52,215	171,353	82,230	56,354	106,701	76,065	164,189	1,097,750
Idellocation Process 24,000 24	Lower Willamette Group	341,382		144,828					41,364		52,760			580,334
LG NRD 6,066 8,273 13,324 (12,947) 4,580 2,897 8	Remedial Allocation Process			24,000					24,000					48,000
LG NRD 6,066 8,273 13,324 (12,947) 4,580 2,897 8	Trustees												71,127	71,127
270 GS (2ET) 284 30E E8 E1G 01 A48 EG 70E 174 3EA 147 GA3	Legal - PLG NRD		990'9	8,273	13,324	(12,947)	4,580	2,897	∞	2,005	(1,569)	220	484	23,341
3/3/00 14/,003 01/4/00 01/4/00 01/4/00 01/4/00 14/,003	Harbor Total	379,668	(357)	384,295	58,516	91,448	56,795	174,250	147,603	58,358	157,891	76,285	235,799	1,820,552

	2015												<b>Grand Total</b>
Row Labels	Jan-15	Feb-15	Mar-15	Apr-15	May-15	Jun-15	Jul-15	Aug-15	Sep-15	Oct-15	Nov-15	Dec-15	
PGM													
DEQ	2,770	698	5,036	2,317		5,071		2,219	4,730	8,168	844		32,023
Legal - PLG	324	72	12,829	13,816	3,511	1,006	9,175	1,400	2,484	(324)	4,464	4,123	52,880
Sediment Investigation 2nd Ph Work Plan	376												376
Upland Investigation 2nd Ph Implement	5,517												5,517
Upland Investigation 2nd Ph Work Plan	43,876		3,795			15,060	6,018	6,359	1,781	4,529		7,873	89,290
Feasibility Study			53,910			87,119	50,816	28,702	16,068	16,243		26,431	279,289
PGM Total	52,863	941	75,570	16,133	3,511	108,256	600'99	38,680	25,062	28,616	5,308	38,427	459,376
Siltronic													
DEQ	291	1,851	1,359		2,462	949	3,172	6,398	1,383	1,965	3,167		22,997
Meetings, Budget, Schedule	944	1,170	812	1,276	47	2,319	1,616	1,153	910	786	104	2,245	13,381
RI Investigations/Reporting	11,415	11,884	18,287	20,214	355	11,570	46,710	2,299	6,158	13,598	930	37,908	181,329
Risk Assessment									774			395	1,169
Legal - PLG - Gasco Siltronic MGP RI/FS		17,313	4,358	1,134	1,044	432	3,150	2,733	8,233	15,191	(6,679)	625	44,534
Siltronic Total	12,650	32,217	24,815	22,624	3,908	15,270	54,649	12,583	17,459	31,540	(5,478)	41,173	263,409
Grand Total	1,468,171	759,733	1,087,476	604,396	1,115,546	628,160	970,445	858,736	586,508	817,952	460,879	1,227,342	10,585,343