



REPORT TO THE
LEGISLATURE

FEBRUARY 2023

3M Settlement biannual report

Report to the Legislature on
Natural Resource Damages settlement
in the east metropolitan area

m MINNESOTA

Pollution Control Agency
Department of Natural Resources

Legislative charge

The commissioner of the Pollution Control Agency and the commissioner of the Department of Natural Resources must jointly submit by February 1 and August 1 each year, a biannual report to the chairs and ranking minority members of the legislative policy and finance committees with jurisdiction over environment and natural resources on expenditures from the water quality and sustainability account during the previous six months. Minn. Stat. § 115B.52

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This report is available in alternative formats upon request, and online at <https://3msettlement.state.mn.us/>

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Foreword

On February 20, 2018, the State of Minnesota settled its Natural Resource Damage lawsuit against the 3M Company in return for a settlement of \$850 million (3M Settlement). Minnesota’s Attorney General sued 3M in 2010 alleging that the company disposed of chemicals known as per- and polyfluoroalkyl substances (PFAS) and had damaged and continues to damage drinking water and natural resources in the Twin Cities East Metropolitan Area. After legal and other expenses, about \$720 million remains to finance drinking water and natural resource projects in the East Metropolitan Area.

The Minnesota Pollution Control Agency (MPCA) and the Minnesota Department of Natural Resources (DNR) are Co-Trustees of these funds.

Multiple reports are produced annually for the 3M Settlement. Table 1 below lists current reports produced for the settlement, the purpose of each report, and the respective reporting period.

Table 1. List of reports produced for the 3M Settlement, their purpose, and reporting period of Settlement activities for any given year. Most recent reports can be found on the 3M Settlement webpage, [Minnesota 3M PFAS Settlement | The State of Minnesota's 3M PFAS Settlement Portal](#)

Report	Purpose	Reporting period	Submittal deadline
3M Settlement biannual report	Legislative report to provide a summary of Settlement activities from the previous 6 months	July 1-December 31	February 1 (statutory deadline)
3M Settlement biannual report and annual spending plan	Legislative report to provide a summary of Settlement activities from the previous 6 months as well as an estimated spending plan for the following year	January 1-June 30 (summary of past activities); July 1-June 30 (estimated spending plan)	August 1 (statutory deadline)
Conceptual Drinking Water Supply Plan Annual Review	Annually evaluate progress implementing the Conceptual Plan including comparing project cost estimates to actual costs	August 2021-June 30, 2022 (first report); July 1-June 30 (thereafter)	January 2023 and every September thereafter (Co-Trustee determined deadline)

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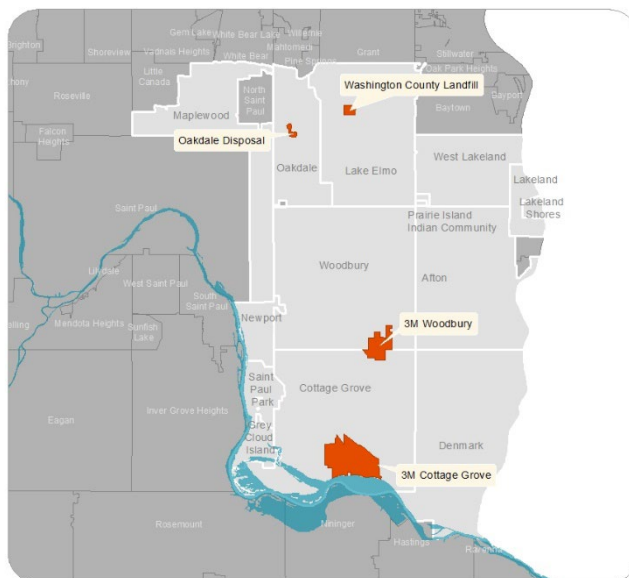
Summary

The State of Minnesota and the 3M Company announced an agreement to settle the state’s Natural Resource Damages lawsuit for PFAS contamination on February 20, 2018. Under the terms of the agreement, 3M made an \$850 million grant to the state to be used for safe drinking water and natural resource projects, and the state’s lawsuit expenses. After legal and other expenses were paid, about \$720 million was available to finance drinking water and natural resource projects in the Twin Cities East Metropolitan Area. The Minnesota Pollution Control Agency (MPCA) and Minnesota Department of Natural Resources (DNR) are Co-Trustees for the grant.

Priority 1 — Ensure safe and sustainable drinking water

The top priority for the grant money is to enhance the quality, quantity, and sustainability of drinking water in the East Metropolitan Area. This area includes, but is not limited to, the cities of Afton, Cottage Grove, Lake Elmo, Lakeland, Lakeland Shores, Maplewood, Newport, Oakdale, St. Paul Park, Woodbury and the townships of Denmark, Grey Cloud Island and West Lakeland, and the Prairie Island Indian Community. The goal of this highest priority work is to ensure safe drinking water in sufficient supply to residents and businesses in the East Metropolitan Area to meet their current and future water needs.

Figure 1: PFAS contamination traced to four disposal sites



Priority 2 — Enhance natural resources

The second priority for grant money is to restore and enhance water resources, wildlife, habitat, fish and other aquatic resources, resource improvement, and outdoor recreational opportunities in the East Metropolitan Area and in downstream areas of the Mississippi and St. Croix Rivers. The terms of the 3M Settlement specify that \$20 million is available for Priority 2 projects. After the safe drinking water goals of Priority 1 are reasonably achieved, all remaining grant money is then available for natural resource restoration and enhancement projects. No additional funds are identified for Priority 2 projects beyond \$20 million at this time.

Remaining grant funds

If there are funds remaining after the first two priority goals have been met, the grant can be used for statewide environmental improvement projects. Only projects in categories such as statewide water resources, habitat restoration, open space preservation, outdoor recreation improvements, or other sustainability projects would be eligible.

3M Settlement Work Groups – Priority 1

The MPCA and DNR are responsible for implementing the 3M Settlement. Under the terms of the agreement, the two agencies are responsible for establishing at least one working group to identify and recommend projects and are also responsible for determining what projects and other activities will be funded with Settlement money.

To engage with communities, stakeholders, and technical experts, the MPCA and DNR created two main work groups — the Government and 3M Working Group and the Citizen–Business Group. To assist these two main groups, a Drinking Water Supply Technical Subgroup 1 (Subgroup 1) was formed to analyze options and deliver assessments and advice on alternatives and options for the Conceptual Drinking Water Supply Plan (Conceptual Plan). The Conceptual Plan was released August 18, 2021.

The MPCA and DNR co-chair these groups and make all final decisions.

Government and 3M Working Group

The Government and 3M Working Group is composed of one representative each from the MPCA, DNR, 3M, Washington County and one representative from each of the following communities: the cities of Afton, Cottage Grove, Lake Elmo, Lakeland, Lakeland Shores, Maplewood, Newport, Oakdale, St. Paul Park, Woodbury, the townships of Denmark, Grey Cloud Island and West Lakeland, and the Prairie Island Indian Community. One representative from the Citizen – Business Group is also a liaison to this group.

The group’s charter, meeting dates, and presentation materials are available on the 3M Settlement website — <https://3msettlement.state.mn.us/government-and-3m-working-group>.

Citizen–Business Work Group

The Citizen–Business Group is composed of MPCA, DNR, and 15 at-large community, business, and nongovernmental representatives who live or work in the East Metropolitan Area. One representative from the Government and 3M Working Group is also a liaison to this group.

The group’s charter, meeting dates, and presentation materials are available on the 3M Settlement website — <https://3msettlement.state.mn.us/citizen-and-business-group>.

Drinking Water Supply Technical Subgroup 1

This technical subgroup analyzed options and provided assessments and advice to the MPCA, DNR, Government and 3M Working Group and the Citizen–Business Group for long-term options for drinking water supply and for treatment of existing water supplies to help ensure safe drinking water in sufficient supply to residents and businesses in the East Metropolitan Area to meet their current and future needs. The subgroup does not intend to meet anymore now that the Conceptual Plan is released, and the communities are implementing the long-term drinking water projects. Subgroup 1 members will be notified of any technical updates (e.g., Project 1007, treatment technologies) planned for presentation at Priority 1 work group meetings, or of any special technical presentations that may be of interest.

Planning and assistance

MPCA and DNR retained Abt Associates (Abt) as consultants to coordinate and facilitate implementation activities for the 3M Settlement. Abt Associates is an existing State contractor for Natural Resource

Damage Assessment (NRDA) work and has considerable expertise with natural resource damage assessments and settlement implementation. In addition, Abt is providing an essential supplement to existing agency staff capacity.

WSP Global Inc. (WSP, formerly Wood Environment & Infrastructure Solutions Inc.) was retained to develop a comprehensive groundwater model and drinking water model for the East Metropolitan Area, as well as cost estimates associated with long-term drinking water supply options. These models enabled the Co-Trustees to evaluate long-term drinking water supply options for the 14 communities. In addition, WSP is assisting with technical engineering review of community grant forms to implement the projects in the Conceptual Plan.

AECOM Technical Services Inc. (AECOM) provided an independent peer review of the groundwater model. They are also the primary contractor in the assessment and evaluation of Project 1007.

WSP and AECOM are existing State environmental consultants for Superfund projects, have extensive experience in providing technical assistance with hazardous substance release site evaluations and municipal infrastructure projects, and bring national expertise on PFAS contamination issues.

Conceptual Drinking Water Supply Plan

The Conceptual Drinking Water Supply Plan is a key component of the 3M Settlement that ensures drinking water needs for the East Metropolitan Area are appropriately and thoroughly considered. The purpose of the Conceptual Plan is to identify drinking water projects that will meet the needs of the communities in the area — now and into the future.

Conceptual Plan

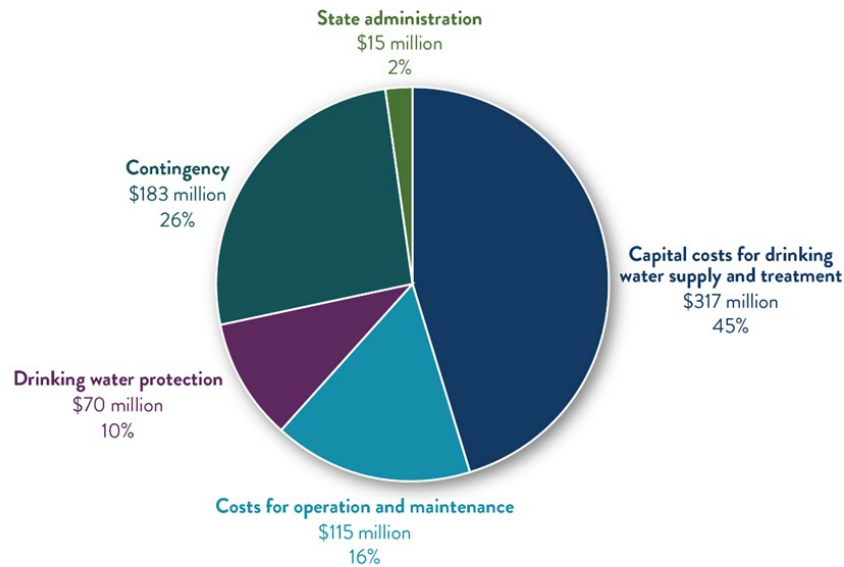
The Conceptual Plan was released August 18, 2021, and can be found at this website: [Full plan documents: Conceptual Drinking Water Supply Plan | Minnesota 3M PFAS Settlement \(state.mn.us\)](#).

The Conceptual Plan meets the Priority 1 goals developed by the Co-Trustees and work groups to provide safe drinking water, protect and improve groundwater quality, protect and maintain groundwater quantity, and minimize long-term cost burdens for communities. The four pillars of the Conceptual Plan are:

1. **Comprehensive** – Addresses both tap water and groundwater (the source itself)
2. **Safe and Sustainable** – Protects drinking water immediately and long-term
3. **Resilient** – Adaptable to new information and data on PFAS
4. **Flexible** – Allows for flexible funding in communities

The major funding categories include capital infrastructure, operation and maintenance (O&M), and drinking water protection. The Conceptual Plan treats drinking water wells with a health index (HI) of at least 0.5 (using the HI calculation at the time the Conceptual Plan was finalized) and includes capital and O&M funding for an estimated 20 years for municipal systems and an estimated 30 years for private wells. If needed, the Conceptual Plan also includes contingency funds for cost overruns, future treatment, and new drinking water sources. Finally, the funding reallocation strategy helps manage potential future shortfalls and surpluses as costs are refined during implementation.

Figure 2 Priority 1 funding categories



The Conceptual Plan’s community projects include building new or expanded water treatment plants, installing whole-home water filter systems, connecting homes to public water supplies, and building or enhancing connections between existing community water treatment systems.

It is important to note that everyone in the area currently has access to safe drinking water. If Settlement funds are depleted in the future, the 2007 Consent Order (a separate legal agreement with 3M) provides funding for treatment for any drinking water wells that receive a well advisory (HI of at least 1). A summary of the Consent Order can be found here:

<https://3msettlement.state.mn.us/file/368>.

Implementing the Conceptual Plan

Communities were able to access grant funding for municipal capital drinking water infrastructure planning and design, construction, and O&M through an implementation process immediately upon release of the Conceptual Plan. The implementation phase is driven by communities over multiple years as communities choose to access grant funding and move through the grant process. For individuals on private wells, the MPCA continues to use contractors to manage the installation and maintenance of whole home treatment systems.

As of December 31, 2022, the State has spent \$67,698,131 million in Settlement funding across the five funding priorities and from interest earned. This includes expedited and Request for Funding projects that were approved for implementation before the Conceptual Plan was final, as they were time sensitive and were consistent with the Conceptual Plan. Of the Settlement funding spent as of December 31, 2022, \$17,590,500 was spent July 1 through December 31, 2022.

Spending during this period includes:

- **Capital funding (\$5,915,933)** spent on land purchases and planning and design for water treatment plants in the cities of Cottage Grove and Woodbury; connecting homes in various neighborhoods to municipal water in the cities of Cottage Grove, Lake Elmo, Lakeland/Lakeland

Shores, and Woodbury; installing whole-home water filter systems also called point of entry treatment systems (POETS) for private wells over treatment threshold¹ in communities across the East Metropolitan Area.

- **O&M funding (\$588,511)** spent on maintenance of granular activated carbon (GAC) filters in POETS and O&M for St. Paul Park’s water treatment plant.
- **Drinking water protection funding (\$2,876,107)** spent on Project 1007, including contractor support for the feasibility study, and drinking water monitoring.
- **Contingency (\$6,527,943)** spent on extending water mains and connecting homes to the municipal drinking water supply system in Lake Elmo. These projects were similar to expedited projects in that they were consistent with the Conceptual Plan, were time-sensitive, and were reviewed and approved with input from the work groups. However, these projects were funded with Contingency funds to maintain the capital allocation and because interest earned was not sufficient to cover these projects. These specific contingency-funded projects are referred to as the Request for Funding projects, listed here: <https://3msettlement.state.mn.us/expedited-and-request-funding-projects>.
- **State Administration (\$827,201)** spent on administering and implementing the Conceptual Plan, including state and contractor review and development of grant agreements, tracking project implementation progress, annual review and reallocation, reporting, and preparing for and holding work group and public meetings.

Using interest earned on Settlement funds, a total of \$854,805 was spent on expedited projects and community capacity grants to support community participation in the technical subgroup from July 1 through December 31, 2022.

In addition to the spending described above, \$7,808,800 has also been awarded to communities since the last legislative report (August 2022) to assist local government units in implementing capital projects.

Table 2. Community projects funded July 1 through December 31, 2022

Community	Project	Amount funded
Cottage Grove	City administration and communication support to implement drinking water projects	\$214,000
Cottage Grove	Install the Grange trunk water main as part of the City’s water treatment plant	\$371,800
St. Paul Park	Connect Well #2 to the City’s water treatment plant	\$7,000,000
Woodbury	City administration support to implement drinking water projects	\$223,000
Total funded		\$7,808,800

Changing PFAS Health Values for Drinking Water

On June 15, 2022, the U.S. Environmental Protection Agency (EPA) issued updated interim health advisories for PFOA and PFOS, and final health advisories for PFBS and GenX. The interim health advisories for PFOA and PFOS were updated as a result of new scientific information on their health effects, and are non-regulatory values designed to provide context and guidance for policy makers.

¹ As stated in the Conceptual Plan, private wells throughout the affected communities that are not to be connected to municipal systems will be supplied with a POETS if they meet or exceed a Health Index (HI) value of at least 0.5 when the Conceptual Plan was released.

More information is available at <https://www.epa.gov/sdwa/drinking-water-health-advisories-pfoa-and-pfos>.

In light of the new scientific information, EPA plans to release draft maximum contaminant levels (MCLs) for PFOA and PFOS in the first part of 2023, and final MCLs by January 2024. MDH is also reviewing the new information and plans to release updated HBVs for PFOA and PFOS in 2023. It is anticipated that the new HBVs and MCLs will be more stringent than current HBVs and health risk limits (HRLs).

MPCA and MDH are going through various scenarios to better understand how anticipated future, lower values might impact wells in the East Metropolitan Area. MDH is working with communities to increase sampling at public wells, and MPCA continues to sample private wells based on plume location. More information on changing PFAS health values is available in the Conceptual Drinking Water Supply Plan Annual Review here: [Minnesota 3M PFAS Settlement | The State of Minnesota's 3M PFAS Settlement Portal](#)

Project 1007 PFAS Conveyance Feasibility Study

Investigations continue into an area known as Project 1007 in the north-central portion of Washington County, as part of Priority 1 of the Settlement.

Project 1007 is a system of pipes, open channels, catch basins, and two dams that direct the flow of water from the Tri-Lakes (DeMontreville, Olson, and Jane) area to the St. Croix River. It also uses a number of lakes and creeks to connect to the St. Croix River. One of those creeks, Raleigh Creek, flows through the former 3M Oakdale disposal site. Additionally, between the late 1980's to the early 1990's, untreated water from the Washington County Landfill was discharged to Project 1007.

The purpose of the investigation noted in the Settlement agreement is to understand how Project 1007 is contributing to PFAS contamination in drinking water resources in the East Metropolitan Area. The results of the investigation will be used to evaluate long-term drinking water protection options in the area. The progress reports and supporting documents are available at:

<https://3msettlement.state.mn.us/project-1007>. Investigation results will be provided in a Feasibility Study that will be substantially complete at the end of 2023.

Investigation process

The Project 1007 PFAS Conveyance Feasibility Study investigation has led to a better understanding of PFAS movement from surface water into sediment and further into groundwater and drinking water resources. Large sets of data have been collected across the Project 1007 corridor and data analysis has confirmed PFAS impacts to surface water, sediment, surface water foam, and groundwater. PFAS contamination continues to move via surface water and groundwater pathways from the Oakdale Disposal Site. PFAS concentrations emanating from the Oakdale Disposal Site have not shown notable decreases from the beginning of the investigation in 2019 and no evidence is present that groundwater concentrations are decreasing across the system at this time. The MPCA is working to address the ongoing impacts from the Oakdale Disposal Site under the 2007 Consent Order with 3M. The Washington County Landfill PFAS contamination is now contained onsite; however, historic impacts from the Washington County Landfill to groundwater and surface water remain outside of the landfill footprint.

The following Project 1007 PFAS Conveyance Feasibility Study activities were conducted since the August 2022 legislative report:

- Deep and shallow monitoring wells installed throughout the project corridor to gain a better understanding of the contaminant movement into the multiple drinking water aquifers that serve much of the East Metropolitan Area, including Oakdale, Lake Elmo, and West Lakeland.
- Research into physical and chemical properties related to the fate and transport components of the surface water and groundwater model.
- Updated the combined surface water and groundwater model to evaluate the long-term impacts across the region. Groundwater aquifer pumping tests and detailed aquifer properties analysis helped inform the model and long-term feasibility study.
- Surface activated foam fractionation (SAFF) pilot system has been initiated to evaluate removal of PFAS in groundwater and is planned to be piloted on surface water.
- Additional ecological risk assessments

The SAFF system was deployed to Tablyn Park in Lake Elmo in November 2022 to evaluate removal of PFAS in groundwater and then surface water. Tablyn Park is one of a few locations that was chosen based on proximity to Raleigh Creek and the PFAS concentrations in the surface water and groundwater; the intent is to test the system with different PFAS concentrations and PFAS mixtures in various areas of the Project 1007 corridor. This technology exploits the foaming behavior of PFAS chemicals, by aerating the surface water causing the PFAS to foam, allowing for easy physical removal of PFAS from water. The foam is then concentrated into a small volume of liquid for either disposal or destruction. Another innovative technology, that is intended to break down PFAS, called electrochemical oxidation, will be one of several types of technologies considered/tested during this pilot study. If these technologies demonstrate effective removal/effective rates to break down PFAS during this pilot project phase, the Co-Trustees will consider using these and other technologies on a larger scale across the East Metropolitan Area.

The MPCA is targeting the end of calendar year 2023 for substantial completion of a feasibility study. The overall intent of the feasibility study is to conduct a detailed analysis of remedial technologies to reduce the spread of PFAS as a result of the Project 1007 conveyance which will result in the long-term drinking water resource protection in the East Metropolitan Area. Recommended actions to reduce or limit the spread of PFAS will be based on the ability to implement short- or long-term actions; ability to reduce toxicity, mobility, or volume of contamination; cost effectiveness; and/or other reasonable and appropriate actions necessary in the overall protection of human health and the environment. This feasibility study will be consistent with EPA guidance for conducting feasibility studies under CERCLA (Comprehensive Environmental Response, Compensation, and Liability Act, or Federal Superfund Law).

Temporary drinking water treatment systems

Under terms of the Settlement, 3M is to provide up to \$40 million for a period of up to five years (February 20, 2018-February 20, 2023), whichever comes first, to fund temporary drinking water treatment system until the long-term plan is put in place. The \$40 million is in addition to the \$850 million Settlement grant amount. From July 1, 2022, through December 31, 2022, \$2,374,565 has been spent on temporary treatment systems.

These temporary treatment systems meet 3M's obligation to provide safe, alternative, drinking water where public or private drinking water wells receive a health advisory from MDH for PFAS contamination, as outlined in the 2007 Consent Order between 3M and the MPCA. Such temporary municipal GAC treatment systems are currently operating in Cottage Grove, Oakdale, and Woodbury. The temporary treatment system in Oakdale is in addition to the permanent GAC treatment system already in place. The St. Paul Park water treatment facility was initially built as a temporary treatment system but is now operating as the long-term treatment facility as identified in the Conceptual Plan.

Under the terms outlined in the 2007 Consent Order, the MPCA seeks cost recovery of State expenses related to these temporary treatment systems. Through September 30, 2022, the MPCA has recovered just over \$27 million from 3M in costs related to temporary systems, along with expenses to provide bottled water until individual home GAC treatment systems are installed. The MPCA intends to submit one final invoice of temporary expenses for reimbursement to 3M for costs incurred from October 1, 2022, through February 20, 2023; these costs will be included in the next legislative report. Once this provision expires on February 20, 2023, Settlement funds will fund the O&M costs of these temporary systems until the long-term water treatment systems are in place.

Investment planning

The State Board of Investments (SBI) approved the Co-Trustee's investment strategy for Priority 1 funds at the May 2022 SBI Board Meeting. The Settlement funds are currently being held in a non-retirement, cash account accruing approximately 4.5% interest. Once the Co-Trustees have a better understanding on potential financial impacts to the Conceptual Plan based on EPA's new expected MCLs for PFOA and PFOS, final funding allocations will be determined, and funds will be transferred to their respective allocations, which are outlined in the funding strategy linked below. The Co-Trustees intend to inform the work group members and the Legislature of any adjustments in the investment strategy that may occur.

A detailed outline of the overall investment strategy was presented to the work groups in May 2022, and can be found here:

<https://3msettlement.state.mn.us/sites/default/files/May%202022%20Investment%20Plan%20Handout.pdf>

Priority 2 planning

The terms of the 2018 3M Agreement specify that \$20 million is immediately available for Priority 2 project funding. The DNR and MPCA have begun planning for Priority 2, which provides funding to restore and enhance water resources, wildlife, habitat, fish and other aquatic resources, resource improvement, and outdoor recreational opportunities in the East Metropolitan Area and in downstream areas of the Mississippi and St. Croix Rivers.

In the second half of 2022, the DNR and MPCA finalized an approach to Priority 2 that will develop goals and project evaluation criteria, identify appropriate types of natural resource enhancements and recreational opportunities, and provide funding via a competitive solicitation process. Priority 2 will be informed by new advisory work groups, including a Government and 3M Work Group, a Resident Work Group, and a technical Ecosystem Services and Recreation subgroup. In addition to the communities with impacts to drinking water that participated in Priority 1, Hastings, Inver Grove Heights, Lake St. Croix Beach, Landfall, Nininger Township, Rosemount, St. Mary's Point, Saint Paul, South Saint Paul, Dakota County, and Ramsey County will be invited to participate in the Priority 2 Government and 3M Work Group because: (1) they also have experienced natural resource injuries or recreational service losses from PFAS released by 3M, and (2) are located in the East Metropolitan Area and downstream locations of the Mississippi and St. Croix Rivers. Communities may opt out of participating in the work groups and still be eligible to apply for a project grant. Resident Work Group members are being selected via an application process, and Priority 1 Citizen-Business work group members may join if they desire. Work group meetings are planned to begin spring 2023, additional information can be found on the Settlement webpage [Government and 3M Working Group | Minnesota 3M PFAS Settlement \(state.mn.us\)](https://3msettlement.state.mn.us)

Expenditures for Priority 1

Expenses related to implementation of the 3M Agreement: Original grant: \$700,000,000

This report covers the period July 1, 2022 – December 31, 2022. Previous legislative reports combined Priority 1 and 2 revenue and expenditures. This report includes the total revenue and expenditures for each priority, respectively.

Balance: June 30, 2022	\$691,048,643
Revenue: Interest earned July 1, 2022 – December 31, 2022	\$1,627,258
Total Revenue	\$692,675,901

Expenditures: July 1, 2022 – December 31, 2022

Category	Amount
Capital	
Community grant funded projects	\$5,591,972
Private well treatment	\$323,961
Total Capital expenditures subtotal	\$5,915,933
O&M	
Community grant funded O&M	\$140,184
Private well O&M	\$448,327
Total O&M expenditures subtotal	\$588,511
Drinking Water Protection	
Project 1007	\$2,671,012
Private well sampling	\$205,095
Total Drinking Water Protection expenditures subtotal	\$2,876,107
Contingency	
Request for funding	\$6,527,943
Total Contingency expenditures subtotal	\$6,527,943
State Administration (staff and operational costs)	
State agencies	\$590,234
Consultants (Abt & WSP)	\$236,967
Total State Administration subtotal	\$827,201
Interest Spending	
Capacity Grants	\$29,801
Expedited Projects	\$825,004
Total Interest spending subtotal	\$854,805
Total Expenditures (as of December 31, 2022)	\$17,590,500
Balance (as of December 31, 2022)	\$675,085,401

Expenditures for Priority 2

Expenses related to implementation of the 3M Agreement: Original grant: \$20,000,000

This report covers the period July 1, 2022 – December 31, 2022. Previous legislative reports combined Priority 1 and 2 revenue and expenditures. This report includes the total revenue and expenditures for each priority, respectively.

Balance: July 1, 2022	\$20,736,820
Revenue: Interest earned July 1, 2022 – December 31, 2022	\$180,380
Total Revenue	\$20,917,200

Expenditures: July 1, 2022 – December 31, 2022

Category	Amount
<i>MPCA/DNR staff and operational costs</i>	
MPCA/DNR staff/technical support	\$94,427
<i>Total Expenditures (as of December 31, 2022)</i>	<i>(\$94,427)</i>
Balance (as of December 31, 2022)	\$20,822,733