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July 9, 2026

VIA ELECTRONIC MAIL

Oklahoma Department of Environmental Quality
Attn: Travis Couch
Office of General Counsel
707 N. Robinson
P.O. Box 1677
Oklahoma City, OK 73101-1677

RE: Initial Response to Notice of Violation No. 26-AQN-002

Dear Travis:

Included herewith is Continental Carbon Company's ("Continental Carbon") initial response to the Oklahoma Department of Environmental Quality's ("ODEQ") June 19, 2026 Notice of Violation No. 26-AQN-0002 ("NOV"). Going forward, any communications relating to the NOV should be directed to the undersigned as legal counsel for Continental Carbon.

Set forth in the included Excel spreadsheet, Continental Carbon has provided its initial response to each issue set forth in the NOV and FCE No. 10917 conducted at Continental Carbon's Ponca City facility on April 16, 2026. Supporting documentation for these responses is being provided via regular United States mail on a jump drive as it is too large to send via email.

Unless specifically admitted, Continental Carbon denies the allegations regarding alleged violations as set forth in the Notices of Violation. Moreover, our investigation into the NOV and the circumstances leading to its issuance is continuing, so Continental Carbon reserves the right to supplement and/or amend this initial response to the NOV.

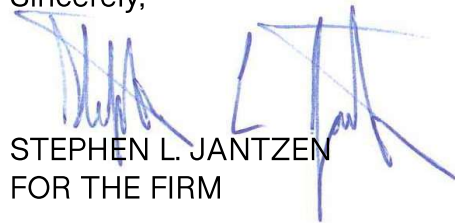
Additionally, Continental Carbon received the NOV on June 24, 2026 and due to the number of issues identified, the volume of information requested, and the intervening Federal Holiday, Continental Carbon requested a brief extension of time to respond but the same was not granted by ODEQ. We respectfully disagree with ODEQ's position on our requested extension as such extensions are routinely and reasonably granted by

ODEQ in relation to NOV's and FCEs. Notwithstanding, we have undertaken every effort to provide a timely initial response. Due to the number of issues, the volume of information, and the quick turnaround required, Continental Carbon reserves the right to supplement and respond to questions or concerns. If ODEQ finds that it requires more information or further explanation, Continental Carbon is happy to provide the same.

Finally, Continental Carbon would like to point out that it believes several issues were erroneously cited as violations and has provided information and documentation to support this position. For convenience, they include FCE Issue Nos. 2, 49, 55, 56, 65, and 74. This should not be considered Continental Carbon's refusal to work with ODEQ on resolving these issues, but rather a good faith attempt to correct the record.

Continental Carbon looks forward to working with ODEQ to resolve all of these issues and would like to schedule an early meeting in this process to review issues and responses.

Sincerely,



STEPHEN L. JANTZEN
FOR THE FIRM

Enclosure

cc: Cara Ahrens (Continental Carbon)