

## ATTACHMENT H: FINANCIAL ASSURANCE DEMONSTRATION

Facility name: Archer Daniels Midland, CCS#1 Well  
IL-115-6A-0002

Facility contact: Mr. Mark Burau, Plant Manager  
4666 Faries Parkway, Decatur, IL  
(217) 424-5750, [mark.burau@adm.com](mailto:mark.burau@adm.com)

Well location: Decatur, Macon County, IL;  
39° 52' 37.06469" N, 88° 53' 36.25685" W

ADM is providing financial responsibility pursuant to 40 CFR 146.85. ADM is using a corporate guarantee to cover the costs of: corrective action, emergency and remedial response, injection well plugging, and post-injection site care and site closure.

The estimated costs of each of these activities, as provided in "Cost Estimate to Demonstrate Financial Responsibility for Class VI UIC Permit" (September 5, 2014) are presented in Table 1:

**Table 1. Cost Estimates for Activities to be Covered by Financial Responsibility**

Activity	Total Cost (\$)
Performing Corrective Action on Wells in AoR	231,800
Plugging Injection Wells	594,120
Post-Injection Site Care	6,434,500
Site Closure	535,300
Emergency and Remedial Response	30,792,000



September 26, 2014

**Archer Daniels Midland Company**  
4666 Faries Parkway  
Decatur, IL 62525  
T 217.424.5200

Mr. Steve Jann  
Acting Branch Chief  
UIC Branch (WU-16J)  
U.S. Environmental Protection Agency Region 5  
77 W. Jackson Blvd.  
Chicago, IL 60604-3590

Dear Mr. Jann,

I am the chief financial officer of Archer Daniels Midland Company, headquartered at 4666 Faries Parkway, Decatur, IL 62525. This letter is in support of this firm's use of the financial test to demonstrate financial assurance.

This firm is the owner or operator of the following injection well for which financial assurance for the current corrective action, injection well plugging, post injection site care, site closure, and emergency & remedial response is demonstrated through the financial test. This firm will maintain active coverage from the effective date of the Class VI permit for the injection well until site closure is authorized by the United States Environmental Protection Agency. The current corrective action, injection well plugging, post injection site care, site closure, and emergency & remedial response cost estimate covered by the financial test is shown for the following injection well:

EPA ID:	IL-115-6A-0002
Well Name:	CCS#1
Address:	4666 Faries Parkway, Decatur, IL 62525
Location:	39° 52' 37.06469" N, 88° 53' 36.25685" W
Cost Estimate:	\$38,587,720

This firm is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year. The fiscal year of this firm ends on December 31. In Table 1, the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year ended December 31, 2013. Table 2 shows the firm's bond rating test.

**Table 1: Financial Coverage Criteria**

1. (a) Cost in current dollars for corrective action, injection well plugging, post injection site care and site closure, and/or emergency and remedial response (i.e., all obligations secured by the owner or operator using the financial test)	\$ 39 MM
(b) Sum of the company's financial responsibilities currently met using the financial test or corporate <u>guarantee</u> , including CERCLA and RCRA	\$ 42 MM
(c) Total of lines a and b	\$ 81 MM
2. Tangible net worth *	\$19,435 MM
3. Current assets *	\$28,530 MM
4. Current liabilities *	\$15,658 MM
5. Net working capital [line 3 minus line 4]	\$12,872 MM
6. Total assets *	\$43,752 MM
7. Total assets in U.S. *	\$30,674 MM
	Yes      No
8. Is line 2 at least \$100 million?	X
9. Is line 2 at least 6 times line 1(c)?	X
10. Is line 5 at least 6 times line 1(c)?	X
11. Is line 7 at least 90% of Line 6? If not, complete line 12.	X
12. Is line 7 at least 6 times line 1(c)?	X

**Table 2: Bond Rating Test**

1. Current bond rating of most recent issuance of this firm and name of rating service (rating service must be either Standard & Poor's or Moody's)	A (S&P)
2. Date of issuance of bond	10/16/2012
3. Date of maturity of bond	04/16/2043
4. Committee on Uniform Securities Identification Procedures (CUSIP) number	039483BH4

I hereby certify that the wording of this letter is identical to the wording specified in the Underground Injection Control VI Program Financial Responsibility Guidance as such regulations were constituted on the date shown immediately below.



Ray G. Young  
Chief Financial Officer  
Archer Daniels Midland Company  
September 26, 2014