

EMERGENCY AND REMEDIAL RESPONSE PLAN

Facility Name: Archer Daniels Midland, CCS#1, 2, & 3
IL-115-6A-0002, IL-115-6A-0001 for CCS#1 and CCS#2

Facility Contacts: A site-specific list of facility contacts will be developed and maintained during the life of the project.

Injection Well Location: CCS#1
39°52'37.06469 N, 88°53'36.25685" W
NW Quarter of Section 5
Township 16N, Range 3E (Whitmore Township)
Decatur, Macon County, Illinois

CCS#2:
39°53'09.32835" N, -88°53'16.68306" W
Near the center of Section 32
Township 17N, Range 3E (Whitmore Township)
Decatur, Macon County, Illinois

CCS#3:
CCS#3 (proposed):
39° 52' 12.936" N, -88° 52' 49.188" W
South center of Section 33
Township 17N, Range 3E (Whitmore Township)
Decatur, Macon County Illinois

This ERRP describes actions that the owner/operator (ADM) will take to address movement of the injection fluid or formation fluid, due to ADM CCS operations, in a manner that may endanger an underground source of drinking water (USDW) during the operation or post-injection site care periods. The ERRP addresses existing wells CCS#1 and CCS#2, as well as proposed well CCS#3.

If ADM obtains evidence that the injected CO₂ stream and/or associated pressure front may cause an endangerment to a USDW, ADM will perform the following actions as required at § 146.94(b):

1. Initiate shutdown plan for the impacted injection well(s).
2. Take steps reasonably necessary to identify and characterize any release.
3. Notify the permitting agency (UIC Program Director) of the emergency event within 24 hours.
4. Implement applicable portions of the approved ERRP.

Where the phrase “initiate shutdown plan” is used, the following protocol will be employed: ADM will immediately cease injection. However, in some circumstances, ADM will, in consultation with the UIC Program Director, determine whether gradual cessation of injection (using the

parameters set forth in Attachment A of the Class VI permit) is appropriate. Gradual cessation activities are discussed later in more detail and may include ramp-down of CCS operations and/or the injection of brine or other fluids to control the wells.

Emergency response activities as a result of backflow or other well workover or stimulation activities is addressed in a separate plan.

Part 1: Local Resources and Infrastructure

Resources in the vicinity of the ADM CCS project that could hypothetically be impacted as a result of an emergency event at the project site include: Sensitive, Confidential, or Privileged Information

Infrastructure in the vicinity of the ADM CCS project that could hypothetically be impacted as a result of an emergency at the CCS project site include: the wellhead; Richland Community College structures; the Decatur Airport; Caterpillar and other manufacturing facilities, Interstate 72 and State Routes 48, 121, 105, and 36; and ADM plant facilities. The AOR also includes the City of Decatur as well as the Mount Zion, Cerro Gordo, Argenta, Oreana, and Forsyth communities. The AOR for the project is primarily contained within Macon County, with some overlap into Piatt County. Where applicable, Macon and Piatt county emergency services are listed as emergency contacts. A map of the local area is provided as Figure F-1 at the end of this plan.

Part 2: Potential Risk Scenarios

The following events related to the ADM CCS project could potentially result in an emergency response:

- Injection or monitoring (verification) well integrity failure;
- Injection well monitoring equipment failure (e.g., shut-off valve or pressure gauge, etc.);
- A natural disaster (e.g., earthquake, tornado, lightning strike);
- Fluid (e.g. brine) leakage to a USDW;
- CO₂ leakage to USDW or land surface; or
- Induced seismic event above a threshold magnitude specified in this plan.

Response actions will depend on the severity of the event(s) triggering an emergency response. “Emergency events” are categorized as follows:

TABLE F-1. DEGREES OF RISK FOR EMERGENCY EVENTS	
Emergency Condition	Definition
Major Emergency	Event poses immediate substantial risk to human health, resources, or infrastructure. Emergency actions involving local authorities (evacuation or isolation of areas) should be initiated.
Serious Emergency	Event poses potential serious (or significant) near term risk to human health, resources, or infrastructure if conditions worsen or no response actions taken.
Minor Emergency	Event poses no immediate risk to human health, resources, or infrastructure.

In the event of an emergency requiring cessation of injection, CO₂ slated for injection may be released to the atmosphere.

Part 3: Emergency Identification and Response Actions

Steps to identify and characterize the emergency event will be dependent on the specific issue identified, and the severity of the event. The potential risk scenarios identified in Part 2 are detailed below.

In the event of an emergency requiring outside assistance, the lead project contact shall call the ADM Security Dispatch at (217) 424-4444 and ADM Corporate Communications at (217) 424-5413.

Possible Well Integrity Failure Indicators

A loss of integrity experienced in the injection well and/or a verification well could have the potential to endanger USDWs. Integrity loss may have occurred if the following events occur:

- a. Automatic shutdown devices are activated.
 - Wellhead pressure exceeds the specified shutdown pressure specified in the permit;
 - Annulus pressure indicates a loss of external or internal well containment;

ADM is required to notify the UIC Program Director within 24 hours if a well integrity issue prompts shut off system activation in accordance with 40 CFR 146.91(c)(3) (i.e., down-hole or at the surface).

- b. Mechanical integrity test results identify a loss of mechanical integrity.

It is likely that such events, if they occur, would not involve any risk to a USDW, but events would be evaluated to ascertain potential severity. Response to potential well integrity failure indicators will be treated as serious issues, and responses will be managed as follows:

Response Actions:

- Immediately notify the ADM plant superintendent or designee.
- Notify the UIC Program Director within 24 hours of the emergency event if required, per 40 CFR 146.91(c).
- The plant superintendent will make an initial assessment of the situation and determine which other project personnel to notify.
- Project contacts will determine the severity of the event, based on the information available, within 24 hours of notification.
- For a Major or Serious Emergency:
 - Initiate shutdown plan including cessation of pumping.
 - Shut in well (close flow valve).
 - Vent CO₂ from surface facilities.
 - Limit access to wellhead to authorized personnel only.
 - Communicate with ADM personnel and local authorities to initiate evacuation plans, as necessary.
 - Monitor well pressure, temperature, and annulus pressure to verify or refute integrity loss and determine the cause and extent of failure; identify and implement appropriate remedial actions to repair damage to the well (in consultation with the UIC Program Director).
 - If contamination is detected, identify and implement appropriate remedial actions (in consultation with the UIC Program Director).
- For a Minor Emergency:
 - Conduct assessment to determine whether there has been a loss of mechanical integrity.
 - If there has been a loss of mechanical integrity, initiate shutdown plan.
 - Shut in well (close flow valve).
 - Vent CO₂ from surface facilities.
 - Reset automatic shutdown devices.
 - Monitor well pressure, temperature, and annulus pressure to verify or refute integrity loss and determine the cause and extent of failure; identify and, if necessary, implement appropriate remedial actions (in consultation with the UIC Program Director).

Injection Well Monitoring Equipment Failure

The failure of monitoring equipment for wellhead pressure, temperature, and/or annulus pressure may indicate a problem with the injection well that could endanger USDWs.

Response Actions:

- Immediately notify the ADM plant superintendent or designee.
- Notify the UIC Program Director within 24 hours of the emergency event if required, per 40 CFR 146.91(c).
- The plant superintendent will make an initial assessment of the situation and determine which other project personnel to notify.
- Project contacts will determine the severity of the event, based on the information available, within 24 hours of notification.
- For a Major or Serious Emergency:
 - Initiate shutdown plan including cessation of pumping.
 - Shut in well (close flow valve).
 - Vent CO₂ from surface facilities.
 - Limit access to wellhead to authorized personnel only.
 - Communicate with ADM personnel and local authorities to initiate evacuation plans, as necessary.
 - Monitor well pressure, temperature, and annulus pressure (manually if necessary) to determine the cause and extent of failure.
 - Identify and, if necessary, implement appropriate remedial actions (in consultation with the UIC Program Director).
- For a Minor Emergency:
 - Conduct assessment to determine whether there has been a loss of mechanical integrity.
 - If there has been a loss of mechanical integrity, initiate shutdown plan including cessation of pumping.
 - Shut in well (close flow valve).
 - Vent CO₂ from surface facilities.
 - Reset or repair automatic shutdown devices.
 - Monitor well pressure, temperature, and annulus pressure (manually if necessary) to determine the cause and extent of failure.

- Identify and, if necessary, implement appropriate remedial actions (in consultation with the UIC Program Director).

Potential Brine or CO₂ Leakage to USDW. Elevated concentrations of indicator parameter(s) in groundwater sample(s) or other evidence of fluid (brine) or CO₂ leakage into a USDW.

Response Actions:

- Immediately notify the ADM plant superintendent or designee.
- Notify the UIC Program Director within 24 hours of the emergency event, per 40 CFR 146.91(c).
- The plant superintendent will make an initial assessment of the situation and determine which other project personnel to notify.
- Project contacts will determine the severity of the event, based on the information available, within 24 hours of notification.
- For all Emergencies (Major, Serious, or Minor):
 - Initiate shutdown plan including cessation of pumping.
 - Shut in well (close flow valve).
 - Vent CO₂ from surface facilities.
 - Collect a confirmation sample(s) of groundwater and analyze for indicator parameters. (Potential indicators are listed in Tables presented in the Testing and Monitoring Plan provided in Section G4.)
 - If the presence of indicator parameters is confirmed, develop (in consultation with the UIC Program Director) a case-specific work plan to:
 - Potentially take additional samples and/or install additional groundwater monitoring points near the impacted groundwater well(s) to delineate the extent of impact; and
 - Remediate unacceptable impacts to the impacted USDW.
 - Arrange for an alternate potable water supply, if the USDW was being utilized as a drinking water supply and has been caused to exceed drinking water standards.
 - Proceed with efforts to remediate USDW to mitigate any unsafe conditions (e.g., install system to intercept/extract brine or CO₂ or “pump and treat” to aerate CO₂-laden water).
 - Continue groundwater remediation and monitoring on a frequent basis (frequency to be determined by ADM and the UIC Program Director) until unacceptable adverse USDW impact has been mitigated or sufficiently addressed.

Natural Disaster. Well problems (integrity loss, leakage, or malfunction) may arise as a result of a natural disaster impacting the normal operation of the injection well. An earthquake may disturb surface and/or subsurface facilities, and weather-related disasters (e.g., tornado or lightning strike) may impact surface facilities.

If a natural disaster occurs that affects normal operation of the injection well, perform the following:

Response Actions:

- Immediately notify the ADM plant superintendent or designee.
- Notify the UIC Program Director within 24 hours of the emergency event, per 40 CFR 146.91(c). The plant superintendent will make an initial assessment of the situation and determine which other project personnel to notify.
- Project contacts will determine the severity of the event, based on the information available, within 24 hours of notification.
- For a Major or Serious Emergency:
 - Initiate shutdown plan including cessation of pumping.
 - Shut in well (close flow valve).
 - Vent CO₂ from surface facilities.
 - Limit access to wellhead to authorized personnel only.
 - Communicate with ADM personnel and local authorities to initiate evacuation plans, as necessary.
 - Monitor well pressure, temperature, and annulus pressure to verify well status and determine the cause and extent of any failure.
 - Determine if any leaks to ground water or surface water occurred.
 - If contamination or endangerment is detected, identify and implement appropriate remedial actions (in consultation with the UIC Program Director).
- For a Minor Emergency:
 - Conduct assessment to determine whether there has been a loss of mechanical integrity.
 - If there has been a loss of mechanical integrity, initiate shutdown plan including cessation of pumping.
 - Shut in well (close flow valve).
 - Vent CO₂ from surface facilities.
 - Limit access to wellhead to authorized personnel only.
 - Monitor well pressure, temperature, and annulus pressure to verify integrity loss

and determine the cause and extent of any failure.

- Identify and, if necessary, implement appropriate remedial actions (in consultation with the UIC Program Director).

Induced Seismic Event. Induced seismic events typically refer to minor seismic events that are caused by human activity which alters the stresses and fluid pressures within subsurface geological formations. Induced seismicity could potentially result from the injection of fluids into subsurface formations that change the stress state of strata proximal to bedding planes, heterogeneities, pre-existing fractures, pre-existing faults, or other relatively weaker rock volumes which causes movement and energy release. Most induced seismic events are extremely small (microseismic) but in some instances are great enough to be felt by humans. Based on the results of ongoing seismic monitoring and projected ADM CCS project operating conditions, it is unlikely that injection operations would induce a seismic event outside an eight (8) mile radius from the wellhead. Therefore, this portion of the response plan is developed for any seismic event with an epicenter within an eight (8) mile radius of the injection well, noting expansion of the monitoring network may be implemented depending on monitoring results. This 8-mile radius is based on the area of review associated with the cone-of-influence projected using reservoir simulation for maximum injection rates at the end of the modeled operational period.

To monitor the area for seismicity, the permittee has deployed passive seismic monitoring system that is capable of detecting events over M1.0 within the AoR. The monitoring equipment consists of two (2) permanently installed borehole monitoring stations. GM1 is equipped with an array of 31 sensors that extend along the wellbore to a depth of 3,400 ft. CCS1 is equipped with a three level and four component sensors located at: 4,925', 5,743', and 6,137'. These sensors operate continuously and are triggered to record data when specific seismic thresholds are met. Also, the USGS has deployed a network of ten (10) surface seismic monitoring stations and four (4) borehole monitoring stations. The existing site monitoring system is sufficient to detect and locate microseismic level events within the AOR.

Based on the periodic analysis of the monitoring data, observed level of seismic activity, and local reporting of felt events, the site will be assigned an operating state. The operating state is determined using threshold criteria which correspond to the potential risk and level of seismic activity associated with the entire site and the AOR. The operating state provides operating personnel information about the potential risk of further seismic activity and guides them through a series of response actions. In the following table, the ADM Decatur Seismic Monitoring System is presented. The table corresponds each level of operating state with the threshold conditions and operational response actions.

Table F-2a. ADM Decatur Seismic Monitoring System (1)

Operating State	Threshold Condition	Response Action
Green	Seismic events less than or equal to M1.5 (2)	1. Continue normal operation within permitted levels.
Yellow	Five (5) or more seismic events within a 30-day period having a magnitude greater than M1.5 (2) but less than or equal to M2.0(2).	1. Continue normal operation within permitted levels. 2. Within 24 hours of the incident, notify the UIC Program Director and ISGS of the operating status of the well.
Orange	Seismic event greater than M1.5 (2); and Local observation or felt report (3) confirmed by seismic monitoring to exceed threshold.	1. Continue normal operation within permitted levels. 2. Within 24 hours of the incident, notify the UIC Program Director, ISGS, and ADM Communications of the operating status of the well.
	Seismic event greater than M2.0 (2) and no felt report	3. Review seismic and operational data. 4. Report findings to the UIC Program Director and issue corrective actions (5).(6)

1. Seismic events < M1.0 with an epicenter within an 8-mile radius of the injection well.
2. Determined by the local ADM or USGS seismic monitoring stations or reported by the USGS National Earthquake Information Center using the national seismic network.
3. Confirmed by local reports of felt ground motion or reported on the USGS “Did You Feel It?” reporting system.
4. Onset of damage is defined as cosmetic damage to structures – such as bricks dislodged from chimneys and parapet walls, broken windows, and fallen objects from walls, shelves, and cabinets.
5. Within 25 business days (five weeks) of change in operating state.
6. In coordination with the UIC program director, establish the need for an expanded monitoring program within the AOR as necessary to detect seismic events within this area.

Table F-2b. ADM Decatur Seismic Monitoring System (1)

Operating State	Threshold Condition	Response Action
<p style="color: magenta; text-align: center;">Magenta</p>	<p>Seismic event greater than M2.0 (2); and Local observation or report (3) confirmed by seismic monitoring to exceed threshold.</p>	<ol style="list-style-type: none"> 1. Initiate injection rate reduction plan. 2. Vent CO2 from surface facilities if necessary. 3. Within 24 hours of the incident, notify the UIC Program Director, ISGS, and ADM Communications of the operating status of the well. 4. Limit access to wellhead to authorized personnel only. 5. Determine if seismic history and locations support the potential for injection induced seismicity based on trends and proximity. If so, proceed with subsequent steps. 6. Communicate with ADM personnel and local authorities to initiate evacuation plans, if/as necessary. 7. Monitor well pressure, temperature, and annulus pressure to verify well status and determine the cause and extent of any failure; identify and implement appropriate remedial actions (in consultation with the UIC Program Director). 8. Determine if leaks to ground water or surface water occurred based on review of data from ongoing monitoring. 9. If USDW contamination is detected, <ol style="list-style-type: none"> a. Notify the UIC Program Director within 24 hours of the determination. b. Initiate shutdown plan and cease pumping. c. Shut in well (close flow valve). d. Vent CO2 from surface facilities. e. Identify and implement appropriate remedial actions (in consultation with the UIC Program Director). 10. Review seismic and operational data. 11. Report findings to the UIC Program Director and issue corrective actions (5).

1. Seismic events < M1.0 with an epicenter within an 8-mile radius of the injection well grouping centroid, noting establishment of an expanded monitoring radii per implementation of the Orange operating state.
2. Determined by the local ADM or USGS seismic monitoring stations or reported by the USGS National Earthquake Information Center using the national seismic network.
3. Confirmed by local reports of felt ground motion or reported on the USGS “Did You Feel It?” reporting system.

4. Onset of damage is defined as cosmetic damage to structures – such as bricks dislodged from chimneys and parapet walls, broken windows, and fallen objects from walls, shelves, and cabinets.
5. Within 25 business days (five weeks) of change in operating state.

Table F-2c. ADM Decatur Seismic Monitoring System (1)

Operating State	Threshold Condition	Response Action
Red	Seismic event >M3.5 (2)	<ol style="list-style-type: none"> 1. Initiate injection shutdown plan and cease pumping. 2. Shut in well (close flow valve). Vent CO₂ from surface facilities. 3. Within 24 hours of the incident, notify the UIC Program Director, ISGS, and ADM Communications of the operating status of the well. 4. Limit access to wellhead to authorized personnel only. <ol style="list-style-type: none"> 1. Determine if seismic history and locations support the potential for injection induced seismicity based on trends and proximity. If so, proceed with subsequent steps. 2. 3. Communicate with ADM personnel and local authorities to initiate evacuation plans, if/as necessary. 4. Monitor well pressure, temperature, and annulus pressure to verify well status and determine the cause and extent of any failure; identify and implement appropriate remedial actions (in consultation with the UIC Program Director). 5. Determine if leaks to ground water or surface water occurred based on review of data from ongoing monitoring. 6. If USDW contamination is detected, <ol style="list-style-type: none"> a. Notify the UIC Program Director within 24 hours of the determination. b. Identify and implement appropriate remedial actions (in consultation with the UIC Program Director). 7. Review seismic and operational data. 10. Report findings to the UIC Program Director and issue corrective actions (5).

1. Seismic events < M1.0 with an epicenter within an 8-mile radius of the injection well grouping centroid, noting establishment of an expanded monitoring radii per implementation of the Orange operating state.
2. Determined by the local ADM or USGS seismic monitoring stations or reported by the USGS National Earthquake Information Center using the national seismic network.

3. Confirmed by local reports of felt ground motion or reported on the USGS “Did You Feel It?” reporting system.
4. Onset of damage is defined as cosmetic damage to structures – such as bricks dislodged from chimneys and parapet walls, broken windows, and fallen objects from walls, shelves, and cabinets.
5. Within 25 business days (five weeks) of change in operating state.

Data Acquisition System Description

The seismic data acquisition system for the CCS site is as follows:

1. Seismic data is recorded in real time from monitoring stations.
2. Data from specific borehole and surface stations is transferred to a central data acquisition system where it is processed to determine the magnitude of the seismic event.
3. A notification is made for events with magnitudes greater than M1.0.
4. If the seismic activity results in the operational state of the site escalating above yellow, additional data from remote seismic stations will be retrieved.
5. The seismic data will undergo additional processing to refine the magnitude and determine location of the event(s).
6. The data will be evaluated by subject matter experts and a report of findings and recommendations will be issued within 25 business days.

Part 4: Response Personnel and Equipment

Site personnel, project personnel, and local authorities will be relied upon to implement this ERRP. The injection well(s) and areas to the west and southwest are located within the limits of the City of Decatur; however, adjacent areas to the southeast, east, and north are outside of city limits. Therefore, both city and county emergency responders (as well as state agencies) may need to be notified in the event of an emergency.

Site personnel to be notified (not listed in order of notification):

1. ADM CCS Program Manager(s)
2. ADM Plant Safety Manager(s)
3. ADM Environmental Manager(s)
4. ADM Plant Manager
5. ADM Plant Superintendent
6. ADM Corporate Communications

A site-specific emergency contact list is developed and maintained at the facility under the SOP titled *180.80.SAFE.129 Emergency Contact List.xlsx*.

Local Authorities (including but not limited to):

Agency:	Phone No.
Emergency	911
City of Decatur Police Department (Non-Emergency)	217-424-2711
City of Decatur Fire Department (Non-Emergency)	217-424-2811
Macon County Sheriff (Command)	217-424-1311
Piatt County Sheriff (Command)	217-762-9482
Illinois State Police (Springfield)	217-786-7107
Illinois Emergency Management Agency (Macon County)	800-782-7860
Macon County Emergency Management Agency	217-424-1327
Piatt County Emergency Management Agency	217-762-9482
Bodine Environmental Services (24 hr line)	800-637-2379
UIC Program Director (US EPA Region V)	312-353-7648
US EPA National Response Center (24 hr)	800-424-8802
Illinois State Geological Survey	217-333-4747

Equipment needed in the event of an emergency and remedial response will vary, depending on the triggering emergency event. Response actions (cessation of injection, well shut-in, and evacuation) will generally not require specialized equipment to implement. Where specialized equipment (such as a drilling rig or logging equipment) is required, the designated Subcontractor Project Manager shall be responsible for its procurement.

Part 5: Emergency Communications Plan

ADM will communicate to the public about any event that requires an emergency response, in consultation with the UIC Program Director.

In the event of an emergency requiring outside assistance, the project contact lead shall call the ADM Security Dispatch at (217) 424-4444 and ADM Corporate Communications at 312-634-8484

- Emergency communications with the public will be handled by ADM Corporate Communications.
- ADM Corporate Communications, in consultation with the UIC Program Director, will determine the method, frequency, and extent of public communication based upon the emergency event's severity and impact to the public.
- ADM will describe what happened, any impacts to the environment or other local resources, how the event was investigated, what responses were taken, and the status of the response (including any updates, as necessary).
- ADM Corporate Communications will manage all ADM media communications with the public (through either interview, press release, Web posting, or other) in the event of an emergency situation related to the injection project.
- The individual to be designated by ADM will be the first contact during an emergency event.
- This individual will contact the crisis communication team as appropriate. Emergency responses to the media from ADM will be dealt with ONLY by the personnel so designated by ADM.
- Those individuals should try to be reachable 24 hours a day for contact in the event of an emergency.

In the event that anyone else at ADM is contacted to comment on any situation deemed an "emergency event," the media contact should be directed to ADM's 24/7 media line at 312-634-8484 or Media@adm.com.

Part 6: Plan Review

This ERRP shall be reviewed:

- at least once every five (5) years following its approval by the permitting agency,
- within one (1) year of an area of review (AOR) re-evaluation or update,
- within a prescribed period (to be determined by the permitting agency) following any significant changes to the injection process, the injection facility or an emergency event,

or

- as required by the permitting agency.

If the review indicates that no amendments to the ERRP are necessary, the permitting agency will be provided with the documentation supporting the “no amendment necessary” determination.

If the review indicates that amendments to the ERRP are necessary, amendments shall be made and submitted to the permitting agency within six (6) months following an event that initiates the ERRP review procedure.

Part 7: Staff Training and Exercise Procedures

ADM will integrate the ERRP into the plant specific standard operating procedures and training program as described in the SOP entitled 180.60.ENV.130 “*Environmental Training, Awareness and Competence.*” Periodic training will be provided annually, to well operators, plant safety and environmental personnel, the plant manager, plant superintendent, and corporate communications. The training plan will document that the above listed personnel have been trained and possess the required skills to perform their relevant emergency response activities described in the ERRP.

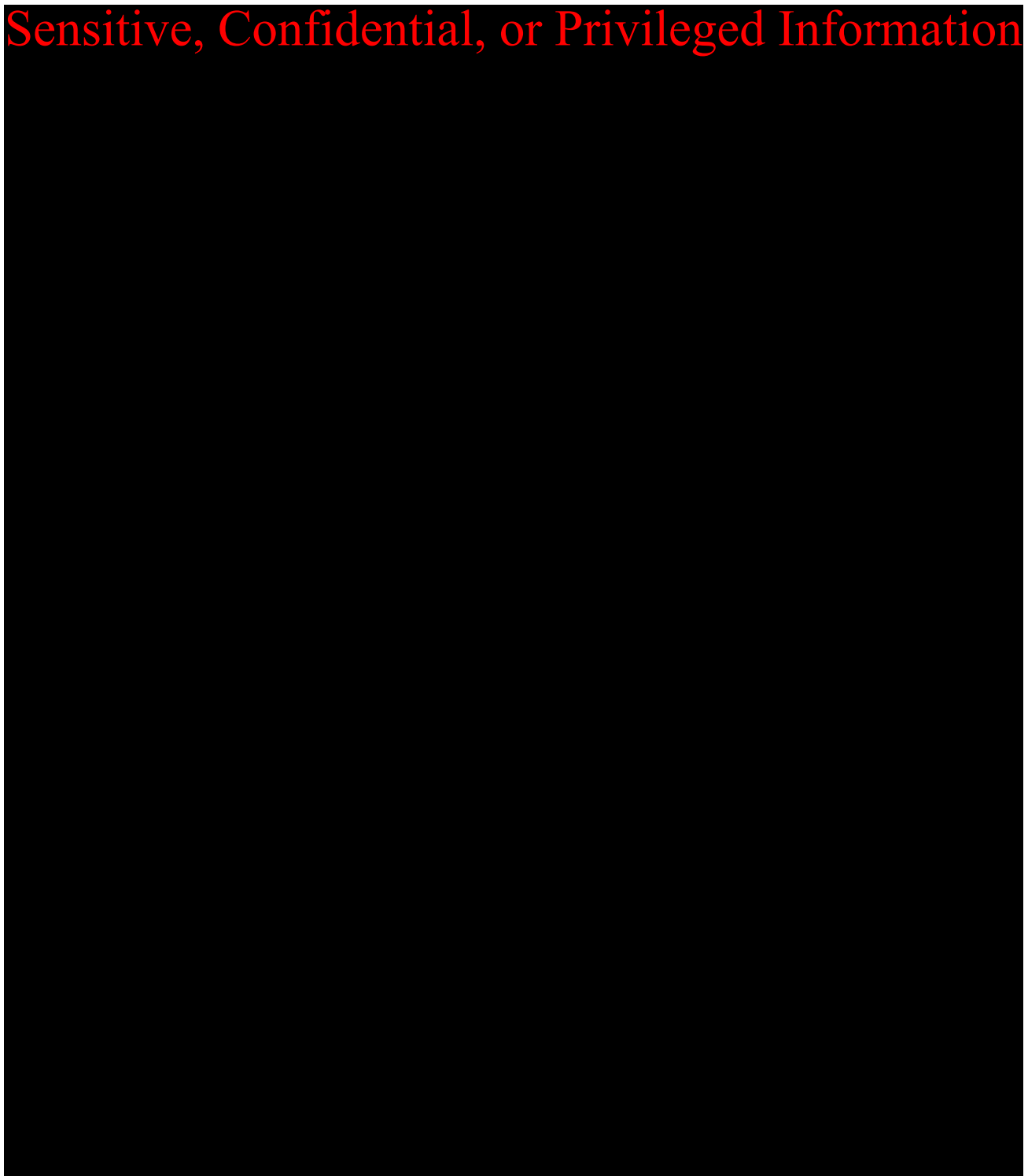


Figure F-1. Local area map for the ADM project. Emergency & remedial response activities will most likely be within the “area of review” highlighted on the map. Source: ISGS and ISWS well databases, current as of 2022.