ATTACHMENT E: POST-INJECTION SITE CARE AND SITE CLOSURE PLAN

Facility Information

Facility name: One Carbon Partnership, LP
CCS1

Facility address: 1554 N. 600 E. Union City, IN 47390

Well location: Section 17, Township 20 N, Range 15 E
Latitude 40.1874°
Longitude -84.8646°

The Post-Injection Site Care (PISC) and Site Closure period of this permit is 50 years after cessation of injection and system operation. The PISC and Site Closure plan describes the activities that One Carbon Partnership, LP (OCP) will perform to meet the requirements of 40 C.F.R. § 146.93 and Section P of this permit. OCP will monitor groundwater quality and track the position of the carbon dioxide plume and pressure front for the duration of the 50-year PISC period. OCP may not cease post-injection monitoring until a demonstration of non-endangerment of USDWs has been approved by the Director pursuant to 40 C.F.R. § 146.93(b)(3). Following approval for site closure, OCP will plug all project wells, restore the site to its original condition, and submit a site closure report and associated documentation.

Post-Injection Monitoring Plan and Schedule for OCP required Reporting Submissions

OCP must perform groundwater monitoring, USDW monitoring, injection formation pressure and temperature monitoring, and 2D/3D seismic monitoring as described in the following sections during the post-injection phase. OCP will convert CCS1 into a monitoring well once the injection operations have ceased. No flowlines or pipeline will remain connected to the well, and CO2 will no longer be injected into the well. The converted monitoring well will be used to monitor in-zone for downhole pressure measurements and PNL for in-zone & above zone monitoring.

For the PISC plan the following definitions apply for the frequencies of monitoring/sampling given for the different testing protocols described.

1. Continuous: Data is continuously sampled and recorded per the frequencies presented in Table 3 of this attachment.
2. Quarterly: Sampling will take place within 5 days before the following dates each year: March 31st, June 30th, September 30th, December 31st.

3. Semi-annual: Sampling will take place within 5 days before June 30th and December 31st.
4. Annual: Sampling will take place within 45 days before January 1st of each year.
5. 5 Year: Sampling will take place every 5 years within 45 days before January 1st during injection and the PISC period.

With the exception for anomalous results noted below, OCP must submit all post-injection site care monitoring data and monitoring results described below to the Director in annual reports. OCP must submit these reports each year by January 31st.

OCP must submit any anomalous post-injection testing and data results within 30 days of the conclusion of the activities or receipt of processed data, whichever is later, but in no case longer than 90 days from the conclusion of testing or data collection activities.

Post Injection Monitoring Plan

Table 1 presents the monitoring methods, locations, and frequencies OCP must use for monitoring above the confining zone. Table 2 identifies the parameters to be monitored, and the analytical methods OCP will employ for monitoring above the confining zone.

Table 1: Monitoring of groundwater quality and geochemical changes above the confining zone.

Target Formation	Monitoring Activity	Monitoring Location(s)	Spatial Coverage	Frequency
Glacial Drift	Aqueous Geochemistry	12 privately owned groundwater wells	Distributed throughout AoR at depths of less than 300 ft BGL.	Biannual[1]: Years 1-5 Annual[2] thereafter (Q2 of each year)
Maquoketa Shale	Aqueous Geochemistry	USDW1	600 ft	Biannual1: Years 1-5 Annual [2] thereafter (Q2 of each year)
Knox Formation	Aqueous Geochemistry	ACZ1	1,666 ft	Annual [2] (Q2/yr): Years 1-5, Every 5 years thereafter (Q2 of each year)

[1] Every 6 Months

[2] Every 12 Months

Table 2: Summary of analytical and field parameters for groundwater samples.

Parameters	Analytical Methods
Formation: Glacial Drift, Maquoketa Shale, Knox Formation	
Cations: Al, Ba, Mn, As, Cd, Cr, Cu, Pb, Sb, Se, Zn, and Tl	ICP [2]-MS [3], EPA Method 6020
Cations: Ca, Fe, K, Mg, Na, and Si	ICP-OES [4], EPA Method 6010B
Anions: Br, Cl, F, NO_3, and SO_4	Ion Chromatography EPA Method 300.0
Dissolved CO_2	Coulometric Titration ASTM D513-11
Isotopes: δ13C Dissolved Inorganic Carbon (DIC)	Isotope ratio mass spectrometry [5]
Total Dissolved Solids	Gravimetry APHA 2540C
Water Density (field)	Oscillating body method
Alkalinity	APHA 2320B
pH (field)	EPA 150.1
Conductivity/Resistivity (field)	APHA 2510
Temperature (field)	Thermocouple
[1]An equivalent method may be employed with the prior approval of the UIC Program Director. [2]Inductivity Coupled Plasma [3]Mass Spectrometry [4]Optical Emission Spectrometry [5]Gas evolution technique by (Atekwana and Krishnamurthy, 1998); modifications made by (Hackley et al., 2007)	

Tables 3 through 5 apply to all other monitoring types (in-zone and above-zone).

Table 3: Sampling and recording frequencies for continuous monitoring.

Time Period	Parameter	Device(s)	Location	Min. Sampling Frequency	Min. Recording Frequency
Years 1-5	Wellhead Pressure	Digital Surface Pressure Gauge	CCS1	Every 10 sec.	Every 10 sec.
	Annulus Pressure	Digital Surface pressure Gauge	CCS1	Every 10 sec.	Every 10 sec.

	Bottomhole Pressure	Digital Downhole Pressure Gauge	CCS1	Every 10 sec.	Every 10 sec.
	Wellhead Pressure	Digital Surface pressure Gauge	OBS1	Every 10 sec.	Every 10 sec.
	Annulus Pressure	Digital Surface pressure Gauge	OBS1	Every 10 sec.	Every 10 sec.
	Downhole Pressure	Digital Downhole Pressure Gauge	OBS1	Every 10 sec.	Every 10 sec.
	Wellhead Pressure	Digital Surface pressure Gauge	ACZ1	Every 60 min.	Every 24 hours
Years 6-50	Wellhead Pressure	Analog Surface Pressure Gauge	ACZ1	Continuous Analog readout	Every 24 hours
	Wellhead Pressure	Analog Surface Pressure Gauge	CCS1	Continuous Analog readout	Every 24 hours
	Annulus Pressure	Analog Surface Pressure Gauge	CCS1	Continuous Analog readout	Every 24 hours
	Wellhead Pressure	Analog Surface Pressure Gauge	OBS1	Continuous Analog Readout	Every 24 hours
	Annulus Pressure	Analog Surface Pressure Gauge	OBS1	Continuous Analog readout	Every 24 hours
	Notes: • Sampling frequency refers to how often the monitoring device obtains data from the well for a particular parameter. • Recording frequency refers to how often the sampled information gets recorded to digital format (such as a computer hard drive).				

Table 4: Post-injection phase plume monitoring.

Target Formation	Monitoring Activity	Monitoring Location(s)	Spatial Coverage	Frequency
Direct Plume Monitoring				
Mt Simon Formation	Pressure Monitoring	CCS1 OBS1	3,142 ft 3,145 ft	Continuous for 5 years or until the BHP in CCS1 is below the critical pressure (227 psi) whichever occurs later
Indirect Plume Monitoring				
Knox Formation, Eau Claire Shale,	Pulsed Neutron Logging (PNL)	OBS1 CCS1	Approximately 1,600-3,600 ft	Year 1, Year 3, Year 6,

Mt Simon Formation				then five-year intervals to Year 50
Overburden, Eau Claire Shale, Mt Simon Formation	Time-lapse 3D Surface Seismic Data	Over project AoR	Area sufficient to image an 8.97 mi2 plume	Q2 Year 1 Q2 Year 8 Q2 Year 48

Table 5: Post-injection phase pressure-front monitoring.

Target Formation	Monitoring Activity	Monitoring Location(s)	Spatial Coverage	Frequency
Direct Pressure-Front Monitoring				
Mt Simon Formation, Eau Claire Shale	Pressure monitoring	CCS1 OBS1	3,142 ft 3,145 ft	Continuous for 5 years or until the BHP in CCS1 is below the critical pressure (227 psi) whichever occurs later
Mt Simon Formation	Annual Static Survey	CCS1 OBS1	Above Packer (~3,142 ft) Above Packer (~3,145 ft)	Annually[1], years 6-50
Mt Simon Formation, Eau Claire Shale	Microseismic monitoring	Minimum 5 surface stations	Injection Zone Confining Zone	Continuous for first 2 years

[1] Every 12 Months

Site Closure Plan

OCP must conduct site closure activities to meet the requirements of 40 C.F.R. § 146.93(e) as described below. OCP must submit a final Site Closure Plan and notify the Director at least 120 days prior of its intent to close the site, per 40 C.F.R. § 146.93(d). Once the Director has approved closure of the site, OCP will plug the injection and monitoring wells and submit a site closure report according to the schedule submitted and approved in the Site Closure Plan. The activities, as described below, represent the planned activities based on information provided to EPA. The actual site closure plan may employ different methods and procedures as approved by the Director. A final Site Closure Plan will be submitted to the Director for approval with the notification of the intent to close the site.

Plugging Monitoring Wells

OCP must flush all wells with a kill weight brine fluid. A minimum of three tubing volumes will be injected without exceeding fracture pressure. A final external MIT will be conducted to ensure mechanical integrity. Detailed plugging procedures are provided below. All well casings will be cemented to surface and will not be retrievable at abandonment. After injection ceases and after the appropriate post-injection monitoring period is finished, the completion equipment will be removed from the wells.

Type and Quantity of Plugging Materials, Depth Intervals

OCP will use the materials and methods noted in Table 6, Table 7, and Table 8 to plug the project wells. The volume and depth of the plug or plugs will depend on the final geology and downhole conditions of the wells as assessed during construction. The cements formulated for plugging will be compatible with the carbon dioxide (CO2) stream where appropriate as per 40 C.F.R. § 146.86(b)(1)(v) and 146.86(b)(1)(viii) (Attachment H). OCP will submit the cement formulation and required certification documents to the Director with the well plugging plan. The wet density will be recorded and provided in the well plugging report. Duplicate samples of the cement used for each plug will be collected and stored.

The general plugging methodology is as follows:

- Approximately 500-foot plugs to be used throughout the wells,
- CO2-resistant cement (i.e., EverCRETE) to be used from Total Depth (TD) to approximately 500 ft above the Eau Claire Formation (Attachment H).
- Class A cement to be used 500 ft above the Eau Claire Formation to surface.

Table 6. Plugging Information for CCS1

Plug Information	Plug #1	Plug #2	Plug #3	Plug #4	Plug #5	Plug #6	Plug #7
Diameter of boring in which plug will be placed (in.)	6.184	6.184	6.184	6.184	6.184	6.184	6.184
Depth to bottom of tubing or drill pipe (ft)	3,549	3,080	2,580	2,080	1,580	1,080	580
Sacks of cement to be used (each plug)	90	96	96	89	89	89	107
Slurry volume to be pumped (ft^3)	97.8	104.3	104.3	104.3	104.3	104.3	125.2
Slurry weight (lb/gal)	16.0	16.0	16.0	15.5	15.5	15.5	15.5
Calculated top of plug (ft)	3,100	2,600	2,100	1,600	1,100	600	0
Bottom of plug (ft)	3,569	3,100	2,600	2,100	1,600	1,100	600
Type of cement or other material	EverCRETE			Class A			

Method of emplacement (e.g., balance method, retainer method, or two-plug method)	Balance	Balance

Table 7. Plugging Details for OBS1

Plug Information	**Plug #1**	**Plug #2**	**Plug #3**	**Plug #4**	**Plug #5**	**Plug #6**	**Plug #7**
Diameter of boring in which plug will be placed (in.)	6.184	6.184	6.184	6.184	6.184	6.184	6.184
Depth to bottom of tubing or drill pipe (ft)	3,599	3,080	2,580	2,080	1,580	1,080	580
Sacks of cement to be used (each plug)	100	96	96	89	89	89	107
Slurry volume to be pumped (ft^3)	108.3	104.3	104.3	104.3	104.3	104.3	125.2
Slurry weight (lb/gal)	16.0	16.0	16.0	15.5	15.5	15.5	15.5
Calculated top of plug (ft)	3,100	2,600	2,100	1,600	1,100	600	0
Bottom of plug (ft)	3,619	3,100	2,600	2,100	1,600	1,100	600
Type of cement or other material	EverCRETE			Class A			
Method of emplacement (e.g., balance method, retainer method, or two-plug method)	Balance			Balance			

Table 8. Plugging Details for ACZ1

Plug Information	**Plug #1**	**Plug #2**	**Plug #3**	**Plug #4**
Diameter of boring in which plug will be placed (in.)	4.000	4.000	4.000	4.000
Depth to bottom of tubing or drill pipe (ft)	1,687	1,180	680	180
Sacks of cement to be used (each plug)	38	37	37	15
Slurry volume to be pumped (ft^3)	44.2	43.6	43.6	17.5
Slurry weight (lb/gal)	15.5	15.5	15.5	15.5
Calculated top of plug (ft)	1,200	700	200	0
Bottom of plug (ft)	1,707	1,200	700	200
Type of cement or other material		Class A		
Method of emplacement (e.g., balance method, retainer method, or two-plug method)		Balance		

Figure 1. Injection Well Plugging Schematic

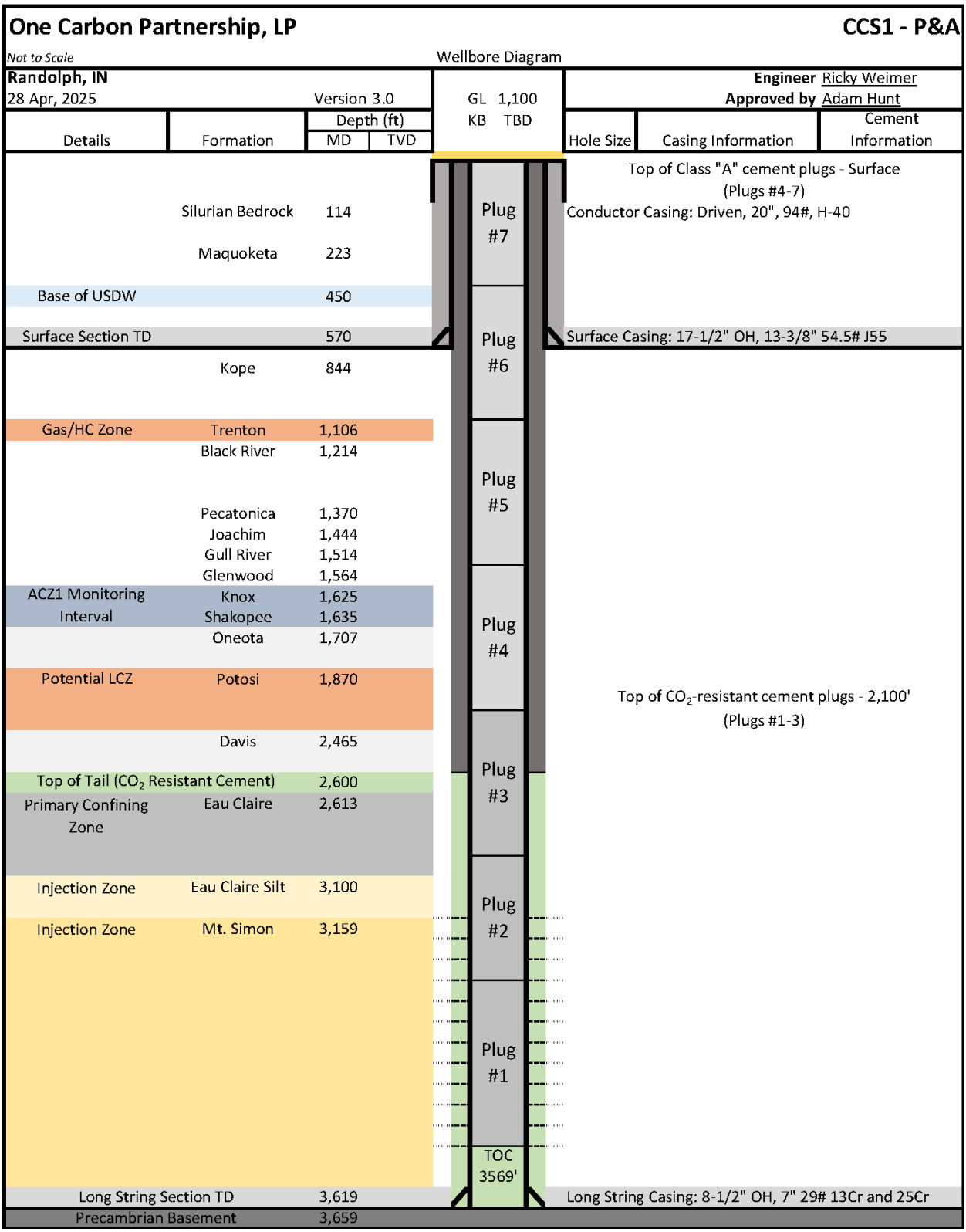


Figure 2. OBS1 Plugging Schematic

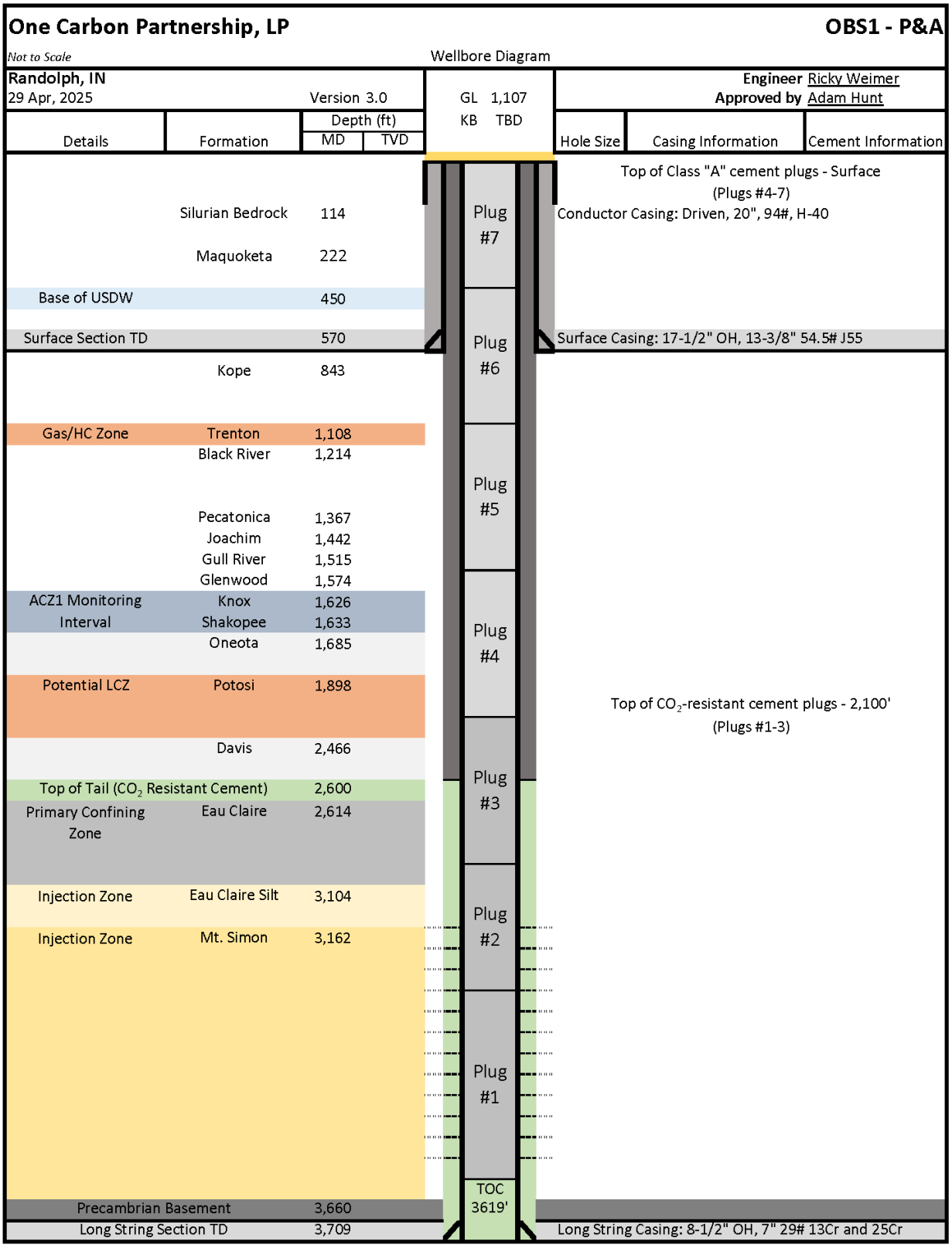
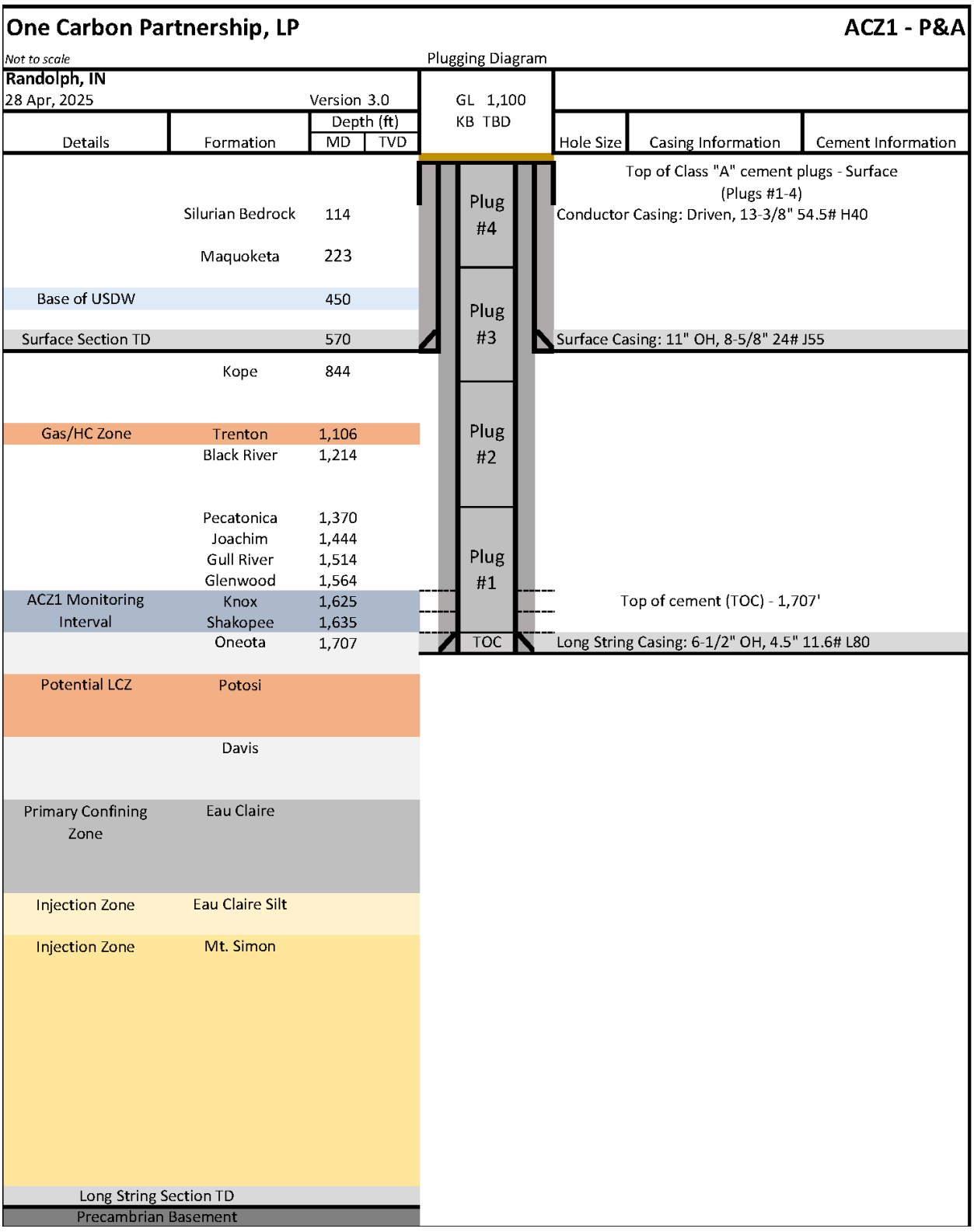


Figure 3. ACZ1 Plugging Schematic



Volume Calculations

OCP will calculate volumes for specific abandonment wellbore environments based on desired plug diameter and length required. Volume calculations are the same for plug and abandonment during construction and post-injection. OCP is required to:

1. Choose the following:
    a. Length of the cement plug desired.
    b. Desired setting depth of base of plug.
    c. Amount of spacer to be pumped ahead of the slurry.
2. Determine the following:
    a. Number of sacks of cement required.
    b. Volume of spacer to be pumped behind the slurry to balance the plug.
    c. Plug length before the pipe is withdrawn.
    d. Length of mud freefall in drill pipe.
    e. Displacement volume required to spot the plug.
3. Field cementing and wellsite supervisor will both review calculations prior to spotting any plug.

Plugging and Abandonment Procedure

OCP must at a minimum:

1. Notify the Director 48 hours prior to commencing operations.
2. Ensure in advance that a pre-site inspection has been performed, and the rig company has visited the site and is capable of transporting rig, tanks, and ancillary equipment to perform P&A operations.
3. Check to see if conditions of approval have been met.
4. Make sure all necessary safety forms are on the rig, e.g., NPDES, safety meetings, trip sheets, etc.

Plugging Procedures for the Injection Well (CCS1) that OCP must employ

1. OCP will notify the Director at least 60 days before any field activity begins with an updated plugging plan.

2. Move in the workover rig and rig up (RU) on CCS1.

3. CO2 flowlines will be marked and noted with the rig supervisor and facility manager.

4. Hold safety meeting with all available rig crew, contractors, and facility personnel.

5. Based on the calculated kill fluid weight needed from the bottom hole pressure survey, kill the well. It is anticipated that approximately 9.5 pounds per gallon will be appropriate. This weight is subject to change based on the result of the bottomhole pressure survey. It is noted that regardless of the results of the pressure survey, 9.5 pounds per gallon will be the minimum fluid weight.

6. Ensure that rig pump or other suitable pump is rigged up to the well. Pressure test all lines to minimum 2,500 psi. Perform annulus pressure test.

7. Fill tubing and cased hole volume with kill brine. Monitor tubing pressure to ensure the well is dead.

8. Once the casing and tubing are dead, nipple down (ND) the well head.

9. Nipple up (NU) and test blow out preventers (BOPs).

10. Latch onto and remove tubing hanger from wellhead.

11. Lay down (LD) tubing hanger.

12. Latch onto injection string.

13. Unlatch from packer. Note that, at this time, the well is likely to u-tube. Ensure rig pump is connected to the top side, close the BOPs, and slowly circulate out the annulus fluid while maintaining a full column of fluid (as feasible).

14. Pull out of hole (POOH) with tubing and LD same. Fill hole as necessary.

15. Pick up (PU) work string with packer pulling tool and run in hole (RIH).

16. Latch onto Packer and remove same.

17. POOH with work string and packer. LD same.

18. RIH with open end work string.

19. Tag bottom. Note tag depth

20. Pump plug one. Pump 20 ft off bottom. Target height of plug should be 500 ft. Plug volume should be as detailed in Table 2. Slowly pull out of hole as necessary while pumping plug.

21. Target top of hole should be approximately 3,100 ft. Trip work string out to approximately 3,000 ft (at least 100 feet above the anticipated top of cement). Wait at 3,000 ft for

approximately two hours. Wait time is dependent on hardening time for cement. Wet samples of cement should be taken.

22. RIH and tag top of cement. Note top of cement. Ensure cement top has not moved.

23. Repeat steps 20 through 22 for plugs two and three. Note that cement used in plugs one through three will be CO2 resistant. Target top of plug three to be 2,100 ft. This depth is approximately 500 ft above the top of the Eau Claire Formation.

24. Flush wellbore with brine.

25. RIH with work string and tag top of cement. Note top of cement.

26. Pump plug four 20 ft off bottom. Target height of plugs should be 500 ft. Plug volume should be as detailed in Table 2. Plug to be pumped as balance plug. Slowly pull out of hole as necessary while pumping plug.

27. Trip out work string to 100 ft above projected top with cement. Wait approximately two hours. Wait time is dependent on hardening time for cement. Wet samples of cement should be taken.

28. RIH and tag top with cement. Note top of cement.

29. Pump remaining 500-foot plugs by repeating steps 24 through 26.

30. Ensure cement is to surface. Fill from surface if necessary.

31. ND BOPs

32. Rig down rig. All casing should be cut to minimum three ft below ground level and have plate with well information welded on top.

33. Fill and level ground as necessary

Plugging Procedures for the In-Zone Monitoring Well (OBS1) that OCP must employ

1. The Director will be notified at least 60 days before any field activity begins with an updated plugging plan.

2. Move in the workover rig and RU on OBS1.

3. Hold safety meeting with all available rig crew, contractors, and facility personnel.

4. Based on the calculated kill fluid weight needed from the bottom hole pressure survey, kill the well. It is anticipated that approximately 9.5 pounds per gallon will be appropriate. This weight is subject to change based on the result of the bottomhole pressure survey. It is noted

that regardless of the results of the pressure survey, 9.5 pounds per gallon will be the minimum fluid weight.

5. Ensure that rig pump or other suitable pump is rigged up to the well. Pressure test all lines to minimum 2,500 psi. Perform annulus pressure test.

6. Fill tubing and cased hole volume with kill brine. Monitor tubing pressure to ensure the well is dead.

7. Once the casing and tubing are dead, ND the well head.

8. NU and test BOPs.

9. Latch onto and remove tubing hanger from wellhead.

10. LD tubing hanger.

11. Latch onto injection string.

12. Unlatch from packer. Note that, at this time, the well is likely to u-tube. Ensure rig pump is connected to the top side, close the BOPs, and slowly circulate out the annulus fluid while maintaining a full column of fluid (as feasible).

13. POOH with tubing and LD same. Fill hole as necessary.

14. PU work string with packer pulling tool and RIH.

15. Latch onto Packer and remove same.

16. POOH with work string and packer. LD same.

17. RIH with open end work string.

18. Tag bottom. Note tag depth

19. Pump plug one 20 ft off bottom. Target height of plug should be 500 ft. Plug volume should be as detailed in Table 3. Slowly pull out of hole as necessary while pumping plug.

20. Target top of hole should be approximately 3,100 ft. Trip work string out to approximately 3,000 ft. (at least 100 feet above the anticipated top of cement). Wait at 3,000 ft for approximately two hours. Wait time is dependent on hardening time for cement. Wet samples of cement should be taken.

21. RIH and tag top of cement. Note top of cement. Ensure cement top has not moved.

22. Repeat steps 18 through 21 for plugs two and three. Note that cement used in plugs one through three will be CO2 resistant. Target top of plug three to be 2,100 ft. This depth is approximately 500 ft above the top of the Eau Claire Formation.

23. Flush wellbore with brine.

24. RIH with work string and tag top of cement. Note top of cement.

25. Pump plug four 20 ft off bottom. Target height of plugs should be 500 ft. Plug volume should be as detailed in Table 2. Plug to be pumped as balance plug. Slowly pull out of hole as necessary while pumping plug.

26. Trip out work string to 100 ft above projected top with cement. Wait approximately two hours. Wait time is dependent on hardening time for cement. Wet samples of cement should be taken.

27. RIH and tag top with cement. Note top of cement

28. Pump remaining 500-foot plugs by repeating steps 24 through 26.

29. Ensure cement is to surface. Fill from surface if necessary.

30. ND BOPs

31. Rig down rig. All casing should be cut to minimum three ft below ground level and have plate with well information welded on top.

32. Fill and level ground as necessary.

Plugging Procedures for the Above Confining Zone Well (ACZ1) that OCP must employ

1. The Director will be notified at least 60 days before any field activity begins with an updated plugging plan.

2. Move in the workover rig and RU on ACZ1.

3. Hold safety meeting with all available rig crew, contractors and facility personnel.

4. Should kill fluid be needed to kill the well, pump it as necessary. It is not anticipated that this well will need to be killed as it should remain at the original formation pressure throughout the life of the project.

5. Ensure that rig pump or other suitable pump is rigged up to the well. Pressure test all lines to minimum 2,500 psi.

6. ND the well head.

7. NU and BOPs.

8. Latch onto and remove tubing hanger from wellhead. The tubing should remain in the slips with the annular BOP engaged to ensure the tubing does not fall after removed the tubing hanger.

9. LD tubing hanger.

10. POOH with tubing and LD same. Fill hole as necessary.

11. PU open end work string and RIH.

12. Tag bottom. Note tag depth.

13. Pump plug one 20 ft off bottom. Target height of plug should be 500 ft. Plug volume should be as detailed in Table 4. Slowly pull out of hole as necessary while pumping plug.

14. Target top of hole should be approximately 1,207 ft. Trip work string out to approximately 1,100 ft (at least 100 feet above the anticipated top of cement). Wait at 1,100 ft for approximately two hours. Wait time is dependent on hardening time for cement. Wet samples of cement should be taken.

15. RIH and tag top of cement. Note top of cement. Ensure cement top has not moved.

16. Repeat steps 13 through 15 plugs two through four.

17. Ensure cement is to surface. Fill from surface if necessary.

18. ND BOPs

19. Rig down rig. All casing should be cut to minimum three ft below ground level and have plate with well information welded on top.

20. Fill and level ground as necessary.

Plugging Procedures for the Lowermost USDW Monitoring Well (USDW1) that OCP must employ

The shallow groundwater monitoring well (USDW1) will be plugged by pulling the well pump (if present) and filling the well with bentonite or equivalent fill material. OCP does not plan to plug the 12 pre-existing privately owned groundwater wells used for shallow groundwater sampling in the AoR.

Planned Remedial/Site Restoration Activities

1. The following steps or similar will be taken:

2. The free liquid fraction of the plugging fluid waste, which may consist of produced water and/or crude oil, shall be removed from the pit and disposed of in accordance with state and federal regulations (e.g., injection or in above ground tanks or containers pending disposal) prior to restoration. The remaining plugging fluid wastes shall be disposed of by on-site burial.
3. All plugging pits shall be filled and leveled in a manner that allows the site to be returned to original use with no subsidence or leakage of fluids, and where applicable, with sufficient compaction to support farm machinery.
4. All drilling and production equipment, machinery, and equipment debris shall be removed from the site.
5. Casing shall be cut off at least three (3) feet below the surface of the ground, and a steel plate welded on the casing.
6. Any drilling rat holes shall be filled with cement to no lower than four (4) feet and no higher than three (3) feet below ground level.
7. The well site and all excavations, holes, and pits shall be filled, and the surface leveled.

Site Closure Report

OCP will prepare and submit a site closure report within 90 days following site closure per 40 C.F.R. § 146.93(f) and Section P(6) of this permit. The report will document the following:

1. Plugging of the verification and geophysical wells (and the injection well if it has not previously been plugged),
2. Location of sealed injection well on a plat of survey that has been submitted to the local zoning authority,
3. Notifications to state and local authorities as required at 40 C.F.R. § 146.93(f)(2),
4. Records regarding the nature, composition, and volume of the injected carbon dioxide, and
5. Post-injection monitoring records.
6. Any other information required by the Director.

OCP will record a notation to applicable property deeds per 40 C.F.R. § 146.93(g) documenting the following:

1. That the property was used for carbon dioxide sequestration,
2. The name of the local agency to which a plat of survey with injection well location was submitted,

3. The volume of fluid injected,
4. The formation into which the fluid was injected, and
5. The period over which the injection occurred.

OCP will submit the site closure report to the Director and maintain a copy for a period of 10 years following site closure per 40 C.F.R. § 146.93(h). Additionally, OCP will maintain the records collected during the post-injection period for a period of 10 years after the date on which these records are delivered to the Director.