

## ATTACHMENT H: FINANCIAL ASSURANCE DEMONSTRATION

Facility name: Archer Daniels Midland, CCS#2 Well  
IL-115-6A-0001

Facility contact: Mr. Steve Merritt, Plant Manager  
4666 Faries Parkway, Decatur, IL  
(217) 424-5750, steve.merritt@adm.com

Well location: Decatur, Macon County, IL;  
39°53'09.32835", -88°53'16.68306"

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 updated costs of each of these activities, submitted pursuant to 40 CFR 146.82(c) on October 25, 2016, are presented in Table 1:

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

Activity	Total Cost (in Millions of \$)
Performing Corrective Action on Wells in AoR	\$0.25
Plugging Injection Wells	\$0.65
Post-Injection Site Care	\$7.80
Site Closure	\$0.59
Emergency and Remedial Response	\$33.81

Attachment 1: CFO Letter



Archer Daniels Midland Company  
 Global Headquarters  
 77 W. Wacker Drive, Suite 4600  
 Chicago, Illinois 60601  
 t (312) 634.8100 / f (312) 634.8105

ADM.COM

March 11, 2016

Via Electronic Submittal

Tinka Hyde, Director, Water Division  
 US Environmental Protection Agency  
 Region 5  
 77 West Jackson Boulevard  
 Chicago, IL 60604-3590

Dear Director Hyde:

I am the chief financial officer of Archer Daniels Midland Company, headquartered at 77 W. Wacker Drive, Suite 4600, Chicago, IL 60601. 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 wells 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 corrective action, injection well plugging, post injection site care, site closure, and emergency & remedial response baseline cost estimate covered by this financial test is established in Appendix H for each of EPA UIC Permits indicated below. The baseline cost is escalated on annual basis.

EPA UIC Permit #:	IL-115-6A-0001	IL-115-6A-0002
Well Name:	CCS#2	CCS#1
Location:	39°53'08.3502"N, 88°53'13.4118"W	39°52'37.06469"N, 88°53'36.25685"W
2016 Escalated Total Cost:	\$92,523,088	

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, 2015. 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)		\$ 92,500,000
(b) Sum of the company's financial responsibilities currently met using the financial test or corporate guarantee, including CERCLA and RCRA		\$ 2,000,000
(c) Total of lines a and b		\$ 94,500,000
2. Tangible net worth*		\$14,227,000,000
3. Current assets*		\$21,829,000,000
4. Current liabilities*		\$13,505,000,000
5. Net working capital [line3 minus line 4]		\$8,324,000,000
6. Total assets*		\$40,157,000,000
7. Total assets in U.S.*		\$28,186,000,000
	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, completed 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 consistent with the wording specified in the Underground Injection Control VI Program Financial Responsibility Guidance (July 2011).



Ray G. Young  
 Executive Vice President and  
 Chief Financial Officer  
 Archer Daniels Midland Company