PROJECT MINERVA

CBI SUBMISSION OF GSDT INPUTS

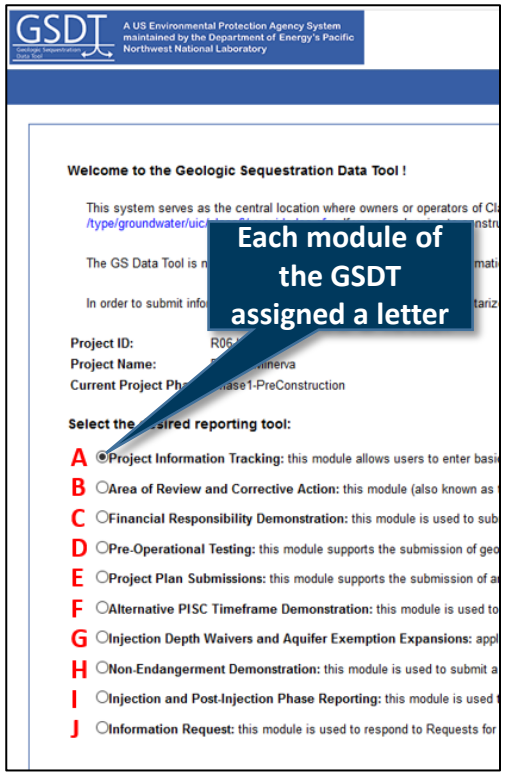
Confidential Business Information

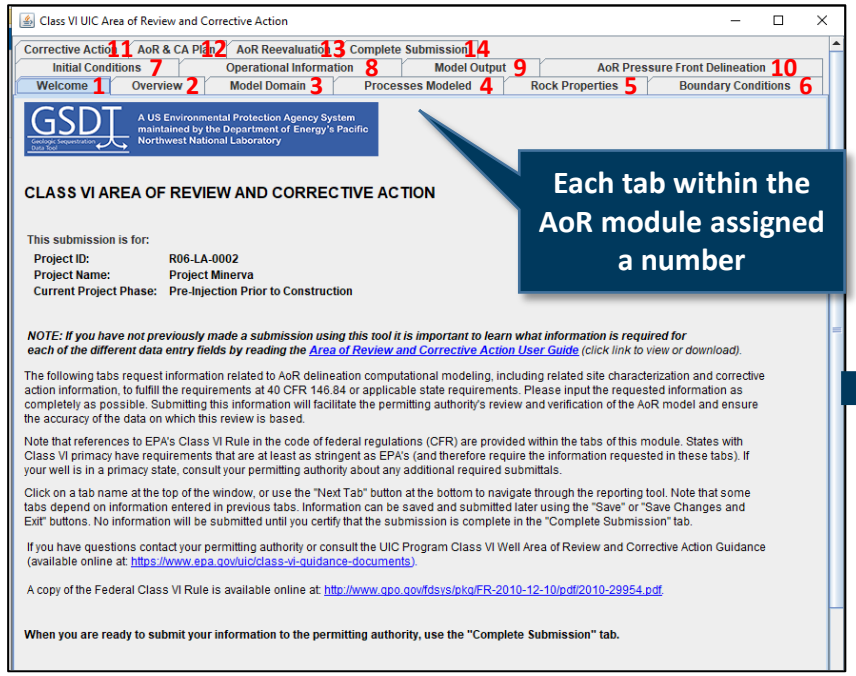
GULF COAST SEQUESTRATION

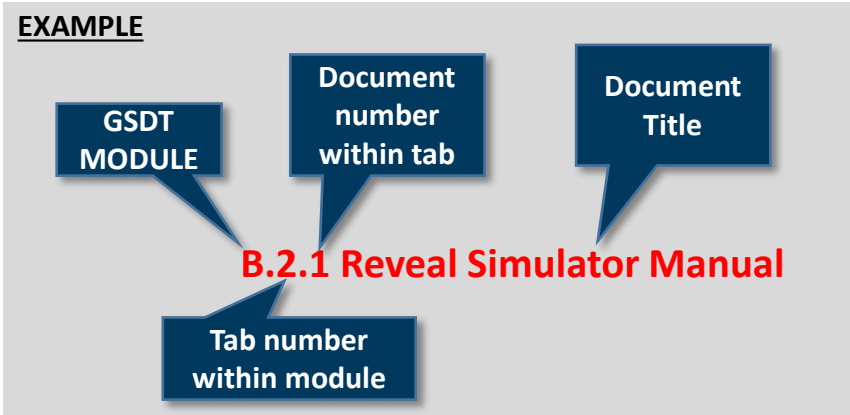
GSDT 'CBI' SUBMISSION: RAW INPUTS AND DOCUMENT MAP

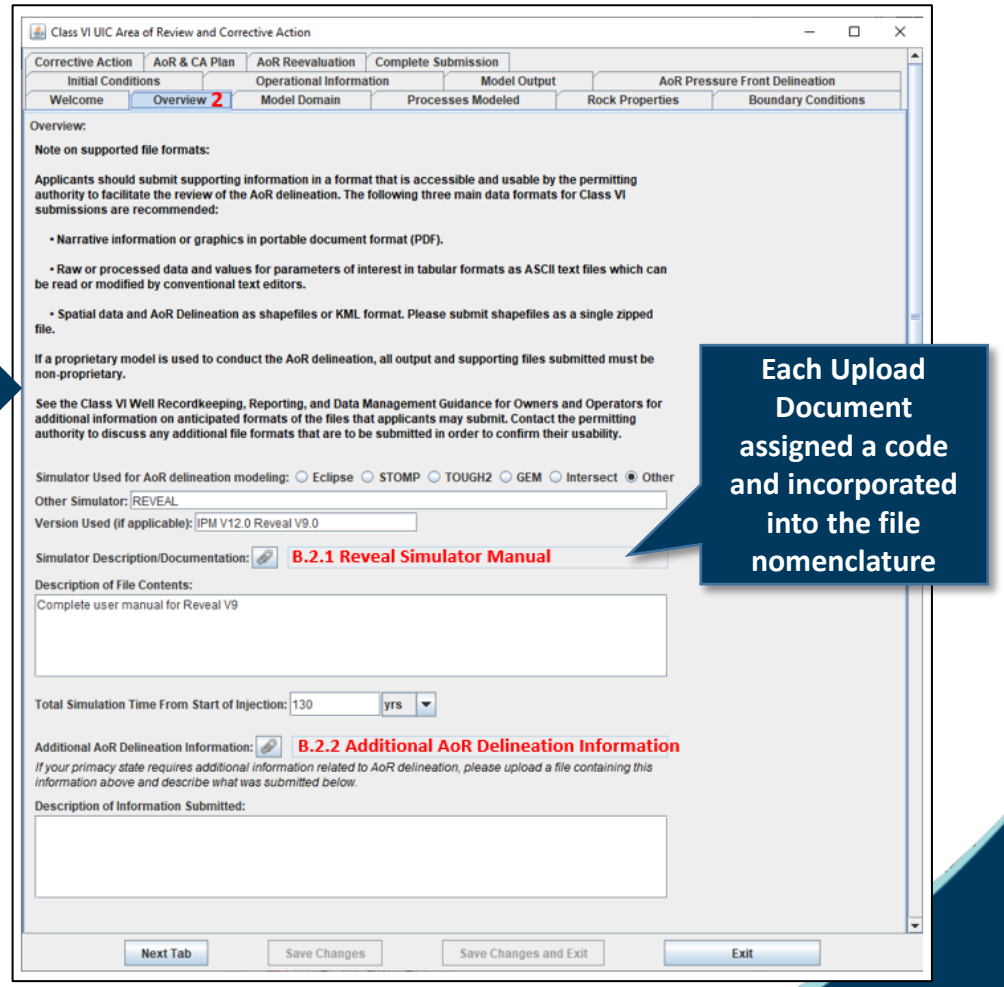
In order to submit Confidential Business Information (CBI), GCS have taken a screengrab of each tab of the fully completed AoR Module and added a document naming system to files that would have otherwise been uploaded via the GSDT.

The files have been named using the following convention to aid review of the relevant information per tab as follows:









TAB 1: Welcome

Class VI UIC Financial Responsibility Demonstration

Welcome 1 | Cost Estimates | Trust Fund | Surety Bond | Letter of Credit | Third Party Insurance | Escrow Account | Self Insurance | Other Instrument | Notifications | Complete Submission

GSDT Geologic Sequestration Data Tool — A US Environmental Protection Agency System maintained by the Department of Energy's Pacific Northwest National Laboratory

CLASS VI FINANCIAL RESPONSIBILITY DEMONSTRATION

This submission is for:

Project ID:	**R06-LA-0002**
Project Name:	**Project Minerva**
Current Project Phase:	**Pre-Injection Prior to Construction**

NOTE: If you have not previously made a submission using this tool it is important to learn what information is required for each of the different data entry fields by reading the Financial Responsibility Demonstration User Guide *(click link to view or download).*

The following tabs request information related to cost estimates and financial instruments for Class VI projects to fulfill the requirements at 40 CFR 146.85 or applicable state requirements. Please complete all of the data fields in this form.

It is your responsibility to ensure that the values reported on the financial instrument tabs are consistent with the totals reported in the cost estimate tab.

Note that references to EPA's Class VI Rule in the code of federal regulations (CFR) are provided within the tabs of this module. States with Class VI primacy have requirements that are at least as stringent as EPA's (and therefore require the information requested in these tabs). If your well is in a primacy state, consult your permitting authority about any additional required submittals.

Click on a tab name at the top of the window, or use the "Next Tab" button at the bottom to navigate through the reporting tool. Information can be saved and submitted later using the "Save" or "Save Changes and Exit" buttons. No new information will be submitted until you certify that the submission is complete in the "Complete Submission" tab.

If you have questions, contact your permitting authority or consult the UIC Program Class VI Financial Responsibility Guidance (available online at: https://www.epa.gov/uic/class-vi-guidance-documents)

A copy of the Federal Class VI Rule is available online at: https://www.gpo.gov/fdsys/pkg/FR-2010-12-10/pdf/2010-29954.pdf

When you are ready to submit your information to the permitting authority, use the "Complete Submission" tab.

TAB 2: Cost Estimate

Class VI UIC Financial Responsibility Demonstration

Welcome | Cost Estimates 2 | Trust Fund | Surety Bond | Letter of Credit | Third Party Insurance | Escrow Account | Self Insurance | Other Instrument | Notifications | Complete Submission

Independent Cost Estimates

Required under 40 CFR 146.85(c) or Applicable State Requirement

Company providing estimates: RPS

The cost estimate must be performed for each phase separately and must be based on the costs to the regulatory agency of hiring a third party to perform the required phases. A third party is a party who is not within the corporate structure of the owner or operator.

Cost of each phase:		**Date of Third-Party Estimate:**
Corrective Action on Deficient Wells:	NA	
Plugging Injection Well:	$2,200,195	Nov 2021
Post-Injection Site Care and Site Closure:	$5,900,717	Nov 2021
Emergency and Remedial Response:	$15,519,055	Nov 2021

Total Cost Estimate (calculated):

Year of Dollars: 2021

Cost Estimate File: C.2.1 Cost Estimate File

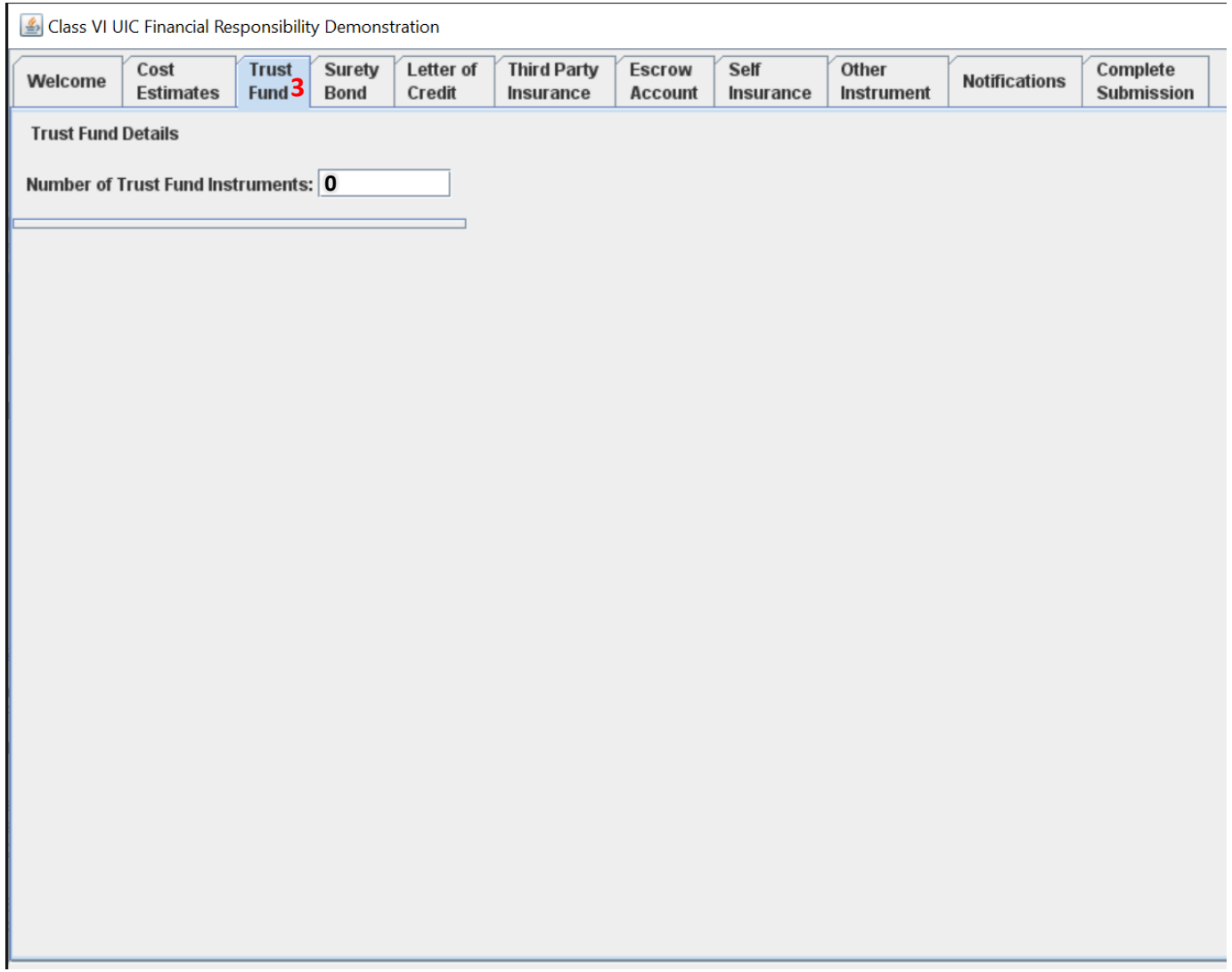
Upload cost estimate and all supporting documentation, either in a single file or in a compressed format such as .zip

Additional Cost Information: Attachment A - PISC, Attachment B – ERR, Attachment D - Financial Assurance Tables 2 - 5

If your primacy state requires additional cost information, please upload a file containing this information above and describe what was submitted below.

Description of Information Submitted:

TAB 3: Trust Fund



TAB 4: Surety Bond

Class VI UIC Financial Responsibility Demonstration

Welcome | Cost Estimates | Trust Fund | Surety Bond 4 | Letter of Credit | Third Party Insurance | Escrow Account | Self Insurance | Other Instrument | Notifications | Complete Submission

Surety Bond Details

Number of Surety Bond Instruments: 1

Surety Bond #1

Proof of Third Party Financial Strength

Proof of financial strength is required under 40 CFR 146.85(a)(6)(ii), or applicable state requirements. If not using credit ratings to prove financial strength, provide proof that the company can demonstrate ability to meet a minimum rating, meet minimum capitalization requirements, and pass the bond rating test.

Using credit ratings to prove financial strength: (●) Yes ( ) No

Name of Issuing Institution: Endurance Assurance Corporation

Credit Rating: A+

Rating Date: 9/2/2021

Company Issuing Rating: A.M. Best

To obtain the most recent financial strength and credit ratings, search for the relevant surety company on A.M. Best.
- *A.M. Best: http://www.ambest.com/)*

Describe Proof of Financial Strength:

Provide a brief description for the proof of financial strength and upload all supporting documentation.

The Department of Treasury Circular 570 provides a list of approved sureties and their underwriting limits.
- *Circular 570: http://www.fiscal.treasury.gov/fsreports/ref/suretyBnd/c570.htm)*

Surety Bond Number: -999

Date Instrument Issued or Amended: 9/9/1999

Date Instrument Expires: 9/9/1999

Type of Bond: ( ) Performance Bond (●) Financial Guarantee

Phases Covered by Instrument:

- [x] Corrective Action on Deficient Wells
- [x] Plugging Injection Well
- [x] Post-Injection Site Care and Site Closure
- [ ] Emergency and Remedial Response

Total Cost of Selected Phases (calculated): $2,997.00

Using more than one instrument to cover a single phase: ( ) Yes (●) No

If yes, a performance bond may not be used in combination with one or more other instruments for a single phase. Combined instruments must be limited to instruments that are not based on financial strength or performance. Examples of acceptable instruments are trust funds, surety bonds guaranteeing payment into a trust fund, letters of credit, escrow account, and insurance.

Value of Instrument: ($999.00)

The instrument must be sufficient to cover the costs associated with the phases being covered. If the value of an existing instrument is revised, the "Date Instrument Issued or Amended" field should reflect the date of the revision.

Instrument Language

Download a template with recommended instrument language for a Performance Surety Bond or a Financial Guarantee Surety Bond.

Instrument using recommended language: (●) Yes ( ) No

Instrument includes required conditions of coverage: (●) Yes ( ) No

Required conditions of coverage include: cancellation; renewal; continuation; specifications on when provider becomes liable if failure to renew; and requirements for provider to meet minimum financial strength requirements.

Standby Trust

A standby trust is required for a surety bond in EPA-administered programs under 40 CFR 146.85(a)(6)(iii).

Has a standby trust been established: ( ) Yes (●) No

Issuing Institution:

Value of Standby Trust:

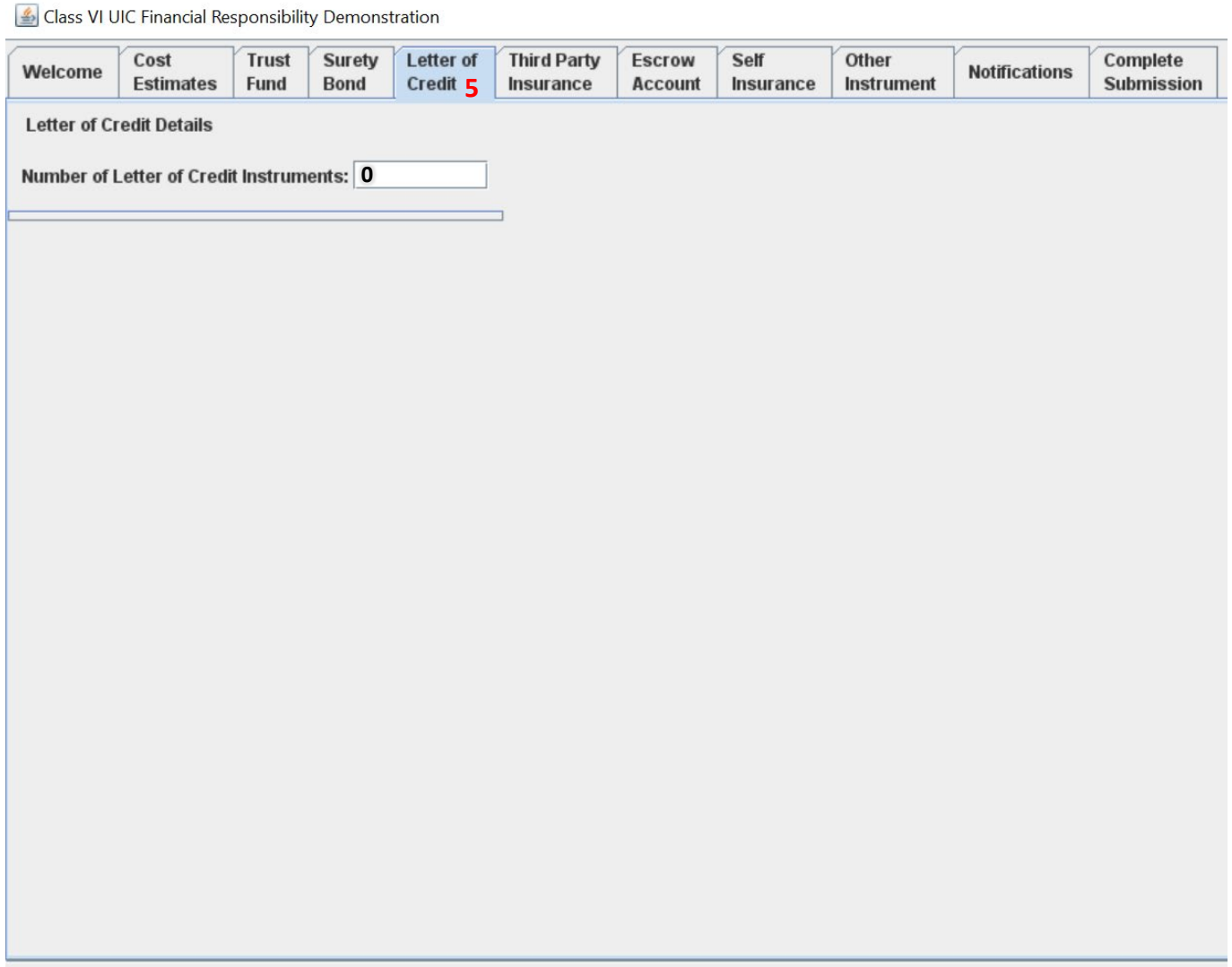
Date Standby Trust Issued or Amended:

Date Standby Trust Expires:

Instrument File: **Attachment C – Surety Bond**

Upload instrument and all supporting documentation, either in a single file or in a compressed format such as .zip

TAB 5: Letter of Credit



TAB 6: Third Part Insurance

Class VI UIC Financial Responsibility Demonstration

Welcome | Cost Estimates | Trust Fund | Surety Bond | Letter of Credit | Third Party Insurance 6 | Escrow Account | Self Insurance | Other Instrument | Notifications | C S

Third Party Insurance Details

Number of Third Party Insurance Instruments: 1

Third Party Insurance #1

Proof of Third Party Financial Strength

Proof of financial strength is required under 40 CFR 146.85(a)(6)(ii) or applicable state requirements. If not using credit ratings to prove financial strength, provide proof that the company can demonstrate ability to meet a minimum rating, meet minimum capitalization requirements, and pass the bond rating test.

Using credit ratings to prove financial strength: (•) Yes ( ) No

Name of Issuing Institution: Ascot Specialty Insurance Company

Credit Rating: A

Rating Date: 9/17/2021

Company Issuing Rating: A.M. Best

To obtain the most recent credit ratings, create an account free of charge at the following credit rating companies. Once signed in, search for the relevant financial institution to see its ratings.

- *Standard and Poor's (S&P) Credit Ratings (http://www.standardandpoors.com/)*
- *Moody's Credit Ratings (http://www.moodys.com/)*

Describe Proof of Financial Strength:

Provide a brief description for the proof of financial strength and upload all supporting documentation.

Also verify that the issuing institution is regulated by a state or federality. Regulated institutions include, but are not limited to, Federal Deposit Insurance Corporation (FDIC) insured banks and institutions regulated by the Office of the Comptroller of the Currency (OCC).

- *FDIC (http://www.fdic.gov/)*
- *OCC (http://www.occ.gov/)*

Date Policy is Active: 9/9/1999 **Describe:** CBI

Date Policy Expires: 9/9/1999 **Describe:** CBI

If the activation and expiration dates of the policy are based on events, or if exact dates have not yet been identified, please explain when the policy will become active and when it will expire in the corresponding "Describe" fields.

Phases Covered by Instrument:

- [ ] Corrective Action on Deficient Wells
- [ ] Plugging Injection Well
- [ ] Post-Injection Site Care and Site Closure
- [x] Emergency and Remedial Response

Total Cost of Selected Phases (calculated): $999.00

Using more than one instrument to cover a single phase: ( ) Yes (•) No

If yes, the combined instruments must be limited to instruments that are not based on financial strength or performance. Examples of acceptable instruments are trust funds, surety bonds guaranteeing payment into a trust fund, letters of credit, escrow account, and insurance.

Value of Instrument: ($999.00)

The instrument must be sufficient to cover the costs associated with the phases being covered. If the value of an existing instrument is revised, the "Date Policy is Active" field should reflect the date of the revision.

Instrument Language

Download a template with recommended instrument language for a Certificate of Insurance.

Certificate of Insurance is using recommended language and is consistent with provisions and exclusions in the actual insurance policy (•) Yes ( ) No

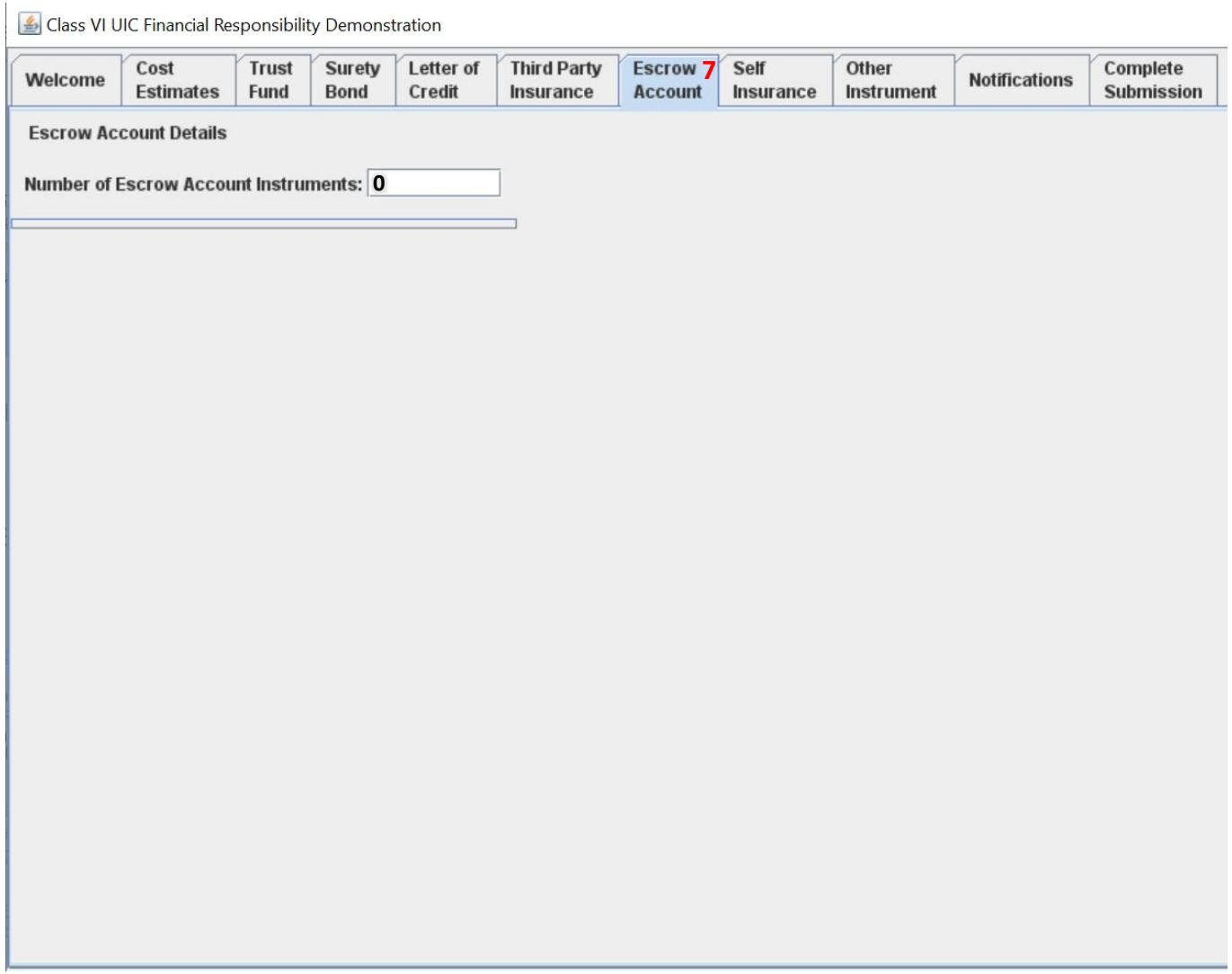
Insurance policy includes required conditions of coverage: ( ) Yes ( ) No

Required conditions of coverage include: cancellation; renewal; continuation; specifications on when provider becomes liable if failure to renew; and requirements for provider to meet minimum financial strength requirements.

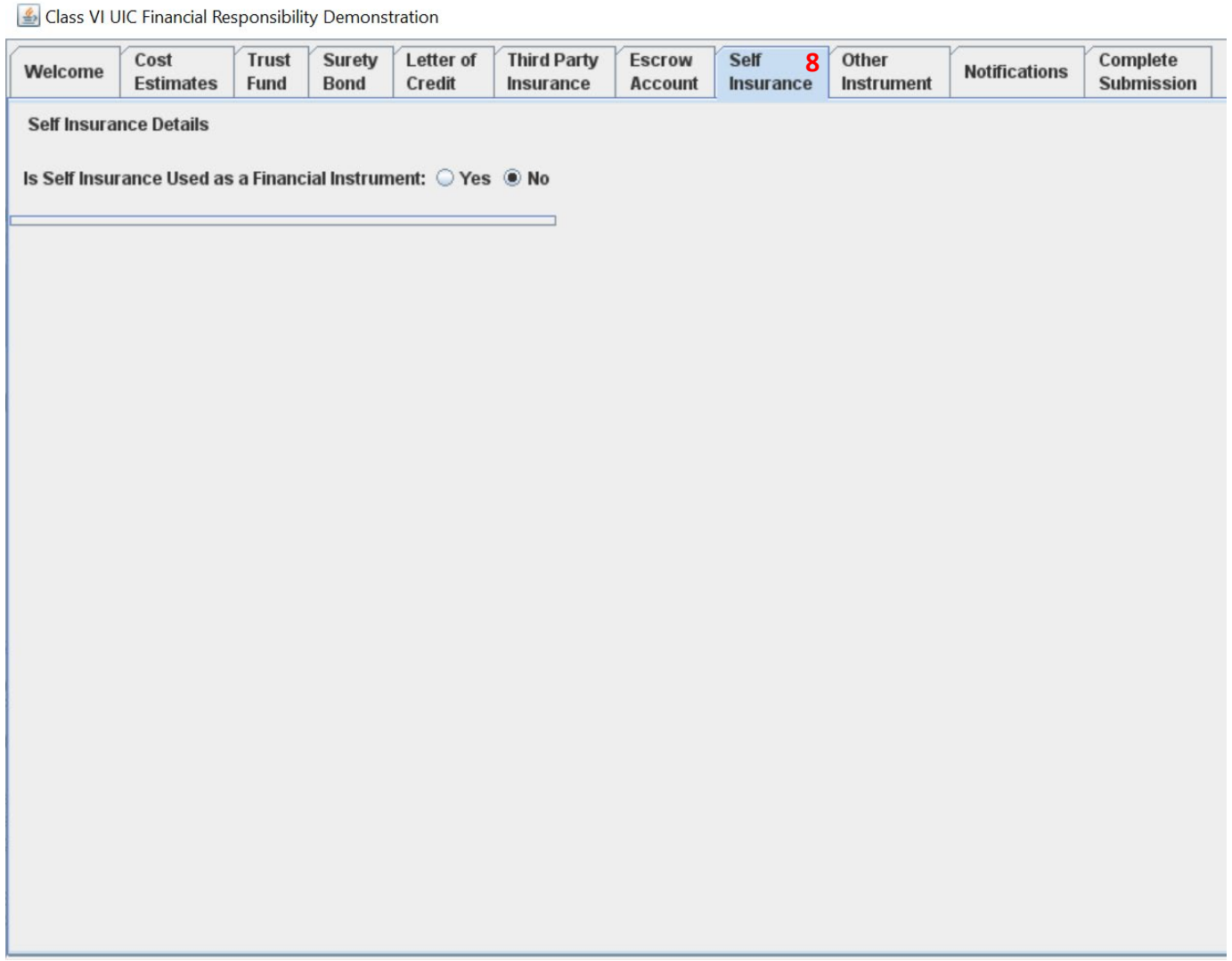
Instrument File: **Attachment D – Insurance**

Upload instrument and all supporting documentation, either in a single file or in a compressed format such as .zip

TAB 7: Escrow Account



TAB 8: Self Assurance



TAB 9: Other Instrument

Class VI UIC Financial Responsibility Demonstration

Welcome | Cost Estimates | Trust Fund | Surety Bond | Letter of Credit | Third Party Insurance | Escrow Account | Self Insurance | Other Instrument 9 | Notifications | Complete Submission

Other Instrument Details

Use this tab if you plan to use a financial instrument that is not addressed on the other tabs in this module.

Number of Other Instruments: 0

TAB 10: Notifications

Class VI UIC Financial Responsibility Demonstration

Welcome | Cost Estimates | Trust Fund | Surety Bond | Letter of Credit | Third Party Insurance | Escrow Account | Self Insurance | Other Instrument | Notifications 10 | Complete Submission

Notification of Adverse Financial Conditions

Required by 40 CFR 146.85(d) or Applicable State Requirements

The Class VI Rule states that the owners or operators must notify the UIC Program Director of adverse financial conditions (e.g. bankruptcy) affecting the owner or operator, or a financial instrument's trustee or issuing institution, that may affect the ability to carry out well plugging, post-injection site care (PISC), or site closure. A notification must be submitted within 10 days of the commencement of a bankruptcy proceeding.

In the event that adverse financial conditions affect an instrument's trustee or issuing institution, the owner or operator must establish other financial assurance within 60 days after such event.

To submit a notification or adverse financial conditions:

1. Check the box below.
2. Use the "Notification File(s)" field to upload your notification, then use the other two fields to add any supplemental materials or comments.
3. Use the Complete Submission tab to send your notification.

Note that you must also send a notification by certified mail.

☐ **I am submitting a notification of adverse financial conditions (or making a related submission)**

Notification File(s):

Supplemental Material File(s) (optional):

Comments (optional):

TAB 11: Complete Submission

Class VI UIC Financial Responsibility Demonstration

Welcome | Cost Estimates | Trust Fund | Surety Bond | Letter of Credit | Third Party Insurance | Escrow Account | Self Insurance | Other Instrument | Notifications | Complete Submission 11

Use this tab to complete your submission and send the information to the permitting authority.

You will need to complete all of the other tabs before the submission is accepted. Click "Validate Required Fields" to check if any fields have been left blank.

Validate Required Fields

Please select your name below to authorize the submission.

To make a submission, you must have completed an EPA Electronic Signature Agreement (ESA). If you have not done this, you are not authorized to make submissi
not appear below.

Authorized submission made by:

☑ **Benjamin Heard**

Comments regarding this submission (optional):

By clicking on the "Submit Information" button, you indicate that you agree with the following statement:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assur
manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, ac
imprisonment for knowing violations.

For confirmation a read-only copy of your submission will be emailed to: randrews@gcscarbon.com

If you have any questions, please contact your permitting authority.

Submit Information