CLASS VI PERMIT FINANCIAL ASSURANCE DEMONSTRATION

40 CFR 146.85

STRATEGIC BIOFUELS
LOUISIANA GREEN FUELS, PORT OF COLUMBIA FACILITY

Prepared By:
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TABLE OF CONTENTS

1.0 Facility Information 2

1.0 FACILITY INFORMATION

Facility Name: Louisiana Green Fuels, Port of Columbia Facility
Three Class VI Injection Wells

Facility Contact: Bob Meredith, COO
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Well Locations: Port of Columbia,
Caldwell Parish, Louisiana
Name: Latitude / Longitude
Well 1 (W-N1): 32.18812141510 / -92.10986101060
Well 2 (W-N2): 32.18686691570 / -92.05915551900
Well 3 (W-S2): 32.1639375970 / -92.08754320370

Strategic Biofuels will provide financial responsibility pursuant to 40 CFR 146.85. Strategic Biofuels will secure a Security Bond to cover the costs of corrective action, injection well plugging, post-injection site care and site closure, and emergency and remedial response.

The estimated costs of each of these activities, as provided by a third party by knowledge of industry standards, are presented in Table 1.

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

Activity	Total Cost ($)
Corrective Action	$0.00
Plugging Injection Wells	$1,481,400
Post-Injection Site Care and Site Closure	$42,000,000
Emergency and Remedial Response	$10,000,000

Strategic Biofuels has reviewed 40 CFR 146.85 and understands a demonstration of financial responsibility will be made by the UIC Program Director during the phases of the application and the project itself. As such, cost estimates have been provided to address the following:

1. Corrective action on wells in the AoR, described at 40 CFR 146.84
2. Injection well plugging, described at 40 CFR 146.92
3. Post-injection site care and site closure, described at 40 CFR 146.93
4. Emergency and remedial response activities, described at 40 CFR 146.94

Further, management has referenced the Underground Injection Control (UIC) Class VI Program Financial Responsibility Guidance document.

The surety bond will comply with Louisiana Administrative Code 43:XVII Chapter 6, Statewide Order No. 29-N-6 ("SWO 29-N-6") §609.C and 40 C.F.R. §146.85(a). The instrument will be issued by and drawn on a bank or other financial institution authorized under state or federal law to operate in the State of Louisiana. The instrument will contain the protective conditions of coverage required by SWO 29-N-6 §609.C.4.c and 40 C.F.R. §146.85(a)(4), including a provision that it may not be terminated except due to failure to make payment and such termination may not be final until 120 days after receipt of a cancellation notice. A standby trust fund will be used along with the surety bond so the funds can be deposited in the standby trust if needed.