Module C – Financial Assurance – Surety Bond Placeholder

Per an email from Ian Ussery, EPA Region 6 dated November 4, 2022:

"*"Under 40 CFR 146.85, the owner or operator must demonstrate that they have met the stated financial responsibility requirements before the UIC Program Director can approve a permit for a Class VI well."*

"The Rule requires, at 40 CFR 146.85(c), that the owner or operator have a detailed written estimate, in current dollars, of the cost of performing corrective action on wells in the area of review, plugging the injection well(s), post-injection site care and site closure, and emergency and remedial response."

Since the technical review phase of the application is an iterative and lengthy endeavor, an applicant can initiate financial instrument(s) in a timely manner. As we approach the end stages of preparing to go to public comment, the applicant could begin their instrument(s). Once we receive confirmation that all financial responsibility has been demonstrated, we can proceed. The overhead cost would be reduced to the time required for public comment, responding to all comments, and then issuing the permit to construct."

Shell U.S. Power and Gas, LLC, will be begin the Surety Bond process as their Class VI Permit Application is preparing to go to public notice, as advised by EPA Region 6.

****<u>Please note that dates and values uploaded on the GSDT are also "placeholders" and will be updated accordingly.</u> ****