ATTACHMENT C

FINANCIAL ASSURANCE DEMONSTRATION [40 CFR 146.85]

1 FACILITY INFORMATION

Facility name: River Parish Sequestration – RPN 1

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Well location:

Well	Parish/State	Latitude (NAD27)	Longitude (NAD27)
RPN-1-INJ	Ascension, LA	[redacted]	[redacted]

2 INTRODUCTION

This financial assurance demonstration describes how River Parish Sequestration, LLC (RPS), will meet the requirements for 40 Code of Federal Regulations (CFR) 146.85 and Louisiana Administrative Code (LAC) 43.XVII.3609. The financial assurance for Class VI projects consists of these four components:

1. Corrective Action
2. Injection Well Plugging and Abandonment (P&A)
3. Post-Injection Site Care (PISC) and Site Closure
4. Emergency and Remedial Response Plan (ERRP)

This document discusses the methodology of determining the costs for each of the four components, the financial responsibility instrument to be used, and the frequency with which the financial assurance will be reassessed.

3 FINANCIAL INSTRUMENTS [40 CFR 146.85(A) AND LAC 43.XVII.3609.C]

[redacted]

- [redacted]
- [redacted]

Each method of financial assurance will contain applicable protective conditions of coverage as required pursuant to 40 CFR 146.85(a)(4). [redacted] The financial assurance will be maintained for the period required in 40 CFR 146.85(b).

4 COST ESTIMATES [40 CFR 146.85(C)]

Cost estimates for the required activities associated with RPN-1-INJ were prepared by several different service providers (**Table 1**). [redacted]

Table 1: Cost Estimate for Project Activities to be Covered

Activity	Estimated Cost (2023 USD)
Corrective Action on Wells in the AoR	[redacted]
Plugging of Injection Well	
Plugging of Monitor Wells	
Post-Injection Site Care	
Site Closure	
Emergency and Remedial Response (including endangerment to USDW)	
Total:	

AoR: Area of Review
USDW: underground source of drinking water

4.1 Performing Corrective Action on Wells in the Area of Review

[redacted]

4.2 Plugging of Injection Well

The Injection Well Plugging Plan discusses the plugging plan in detail, which will occur following cessation of injection operations and commencement of the PISC period (P&A procedures provided in **Attachment G**).

[redacted]

[redacted]

4.3 PISC and Site Closure

The PISC and Site Closure Plan details the plume, pressure front, and groundwater monitoring activities that will be performed during the post injection period, as well as their frequencies (PISC and Site Closure Plan provided in **Attachment H**). This plan also describes the process for decommissioning monitoring wells and closing the site. [redacted]

PISC cost estimates are presented in **Table 2** and are based on quotes provided by the following:

- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]
- [redacted]

Table 2: PISC Cost Estimate

Activity	Cost per Event per Well (2023 USD)	# of Wells per Event	# Events Over [redacted]	Total Estimated Cost (2023 USD)
Logging	[redacted]			
Vertical Seismic Profiling Survey				
Groundwater Quality – Direct Sampling				
Mechanical Integrity Test				
Seismicity Monitoring				
Soil Gas Monitoring				

[redacted]

Table 3: Site Closure Cost Estimate

Activity	Total Estimated Cost (2023 USD)
Plug Monitoring Wells [redacted]	[redacted]
Site Restoration	
Site Closure Subtotal:	

4.4 Emergency and Remedial Response Costs

This section provides an estimate for ERR costs for injection well RPN-1-INJ. [redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

5 UPDATES TO FINANCIAL ASSURANCE [40 CFR 146.85(C)(2)(3)(4)

[redacted]

During the evaluation of the qualifying financial responsibility instruments, if the UIC Program Director and LDNR Commissioner determines the qualifying financial instrument(s) is no longer adequate to cover the cost of corrective action, injection well plugging, PISC and site closure, and ERR, RPS will provide an adjustment of the cost estimate to the UIC Program Director and LDNR Commissioner within 60 days of notification.

[redacted]

Table 4: Financial Assurance Required Before and Upon Commencement of CO_2 Injection

[redacted]