

IEA CCS Liability Workshop: Recent US Actions

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2010 Taskforce Report:

The following four approaches should be considered:

- (1): reliance on existing framework for long term liability and stewardship
- (2): adoption of substantive or procedural limitations on claims
- (3) creation of an industry-financed trust fund
- (4) Transfer of liability to Federal Government

Open-ended Federal indemnification should not be used to address long-term liabilities



FR Mechanisms [40 CFR 146.85] Archer Daniels Midland: Corporate Guarantee 10 Year PISC

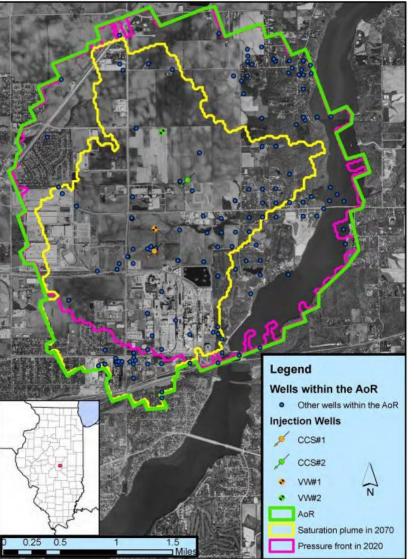
Table 1. Cost Estimates for Activities to be Covered by Financial Responsibility

Activity	Total Cost (\$)
Performing Corrective Action on Wells in AoR	231,800
Plugging Injection Wells	594,120
Post-Injection Site Care	6,434,500
Site Closure	535,300
Emergency and Remedial Response	30,792,000

http://www.epa.gov/region5/water/uic/adm/



ADM: Area of Review (AoR)





FR Mechanisms [40 CFR 146.85] FutureGen: Forward funded Trust Fund 50 Year PISC

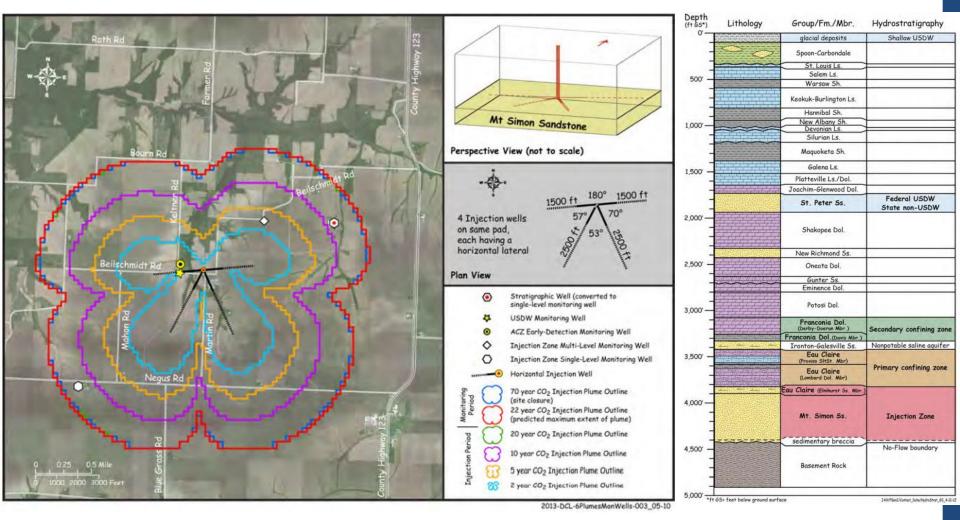
Table 1. Cost Estimates for Activities to be Covered by Financial Responsibility

Activity	Estimated Cost (Millions, 2012\$)
Performing Corrective Action on Deficient Wells in AoR	\$0.62
Plugging Injection Wells	\$2.7
Post-Injection Site Care	\$18.3
Site Closure	\$3.4
Emergency and Remedial Response	\$26.7
Note: Values in this table are rounded. For exact costs used to determine the value of the Trust Fund, refer to Table 2.	

http://www.epa.gov/r5water/uic/futuregen/



FutureGen: Area of Review





Class VI Update

- "5" Permits Granted
- ADM: Drilling Injection well
- FutureGen Project Cancelled (4 wells)
 - Continuing through permit appeals process
 - May use injection site in the future
- EPA Developing Guidance: II-VI Transition
 - Focus: Protection of Underground Sources of Drinking Water (USDWs)
 - Summer 2015 Publication

