



Decatur Corn Processing
4666 E. Faries Parkway
Decatur, IL 62526

217-424-5200

September 27, 2024

Submitted via email (jann.stephen@epa.gov) and GSDT

Stephen M. Jann
Branch Chief
USEPA Region 5
Mail Code WP-16J
77 W. Jackson Blvd.
Chicago, IL 60604-3590

Re: USEPA Permit Number IL-115-6A-0001
Follow-up Report regarding Preliminary Data

Dear Mr. Jann:

We are sending this report as a follow-up to ADM's discussions with USEPA this week (Wednesday).

As part of our ongoing well diagnostic efforts at ADM's CCS operations in Decatur, including early action with the terms of the proposed Administrative Order on Consent (i.e., paragraphs 59(b)(iii) and (iv)) and development of responses to agency information requests, we recently conducted a noise survey at deep monitoring well VW#1. Preliminary data received this week (Tuesday) indicated potential brine (salty water) movement between different formations at a depth of approximately 5,000 feet. The data suggests a flow across or near the Zone 3 lower packer, creating the potential ability to allow flow between zones. Prior to receiving this preliminary data, there had been no indication of this potential condition. Given the extreme depth of this anomaly and the multiple layers of shale and other confining rock up to the surface, there is no risk or impact to the surface or groundwater sources or any threat to public health.

Although the data is preliminary, we reported it right away and continue to take prompt action. In addition to our discussions with your staff, we assembled internal and external experts to help interpret the preliminary data and provide guidance on immediate next steps. That robust effort resulted in the following plan of action to be taken.

Over the next two weeks, we will conduct further diagnostic testing to validate the preliminary data and provide greater visibility into the well conditions. The forthcoming test results will help us develop viable response options, which will be closely reviewed with USEPA. While performing these diagnostic tests, there will be no interruption to ongoing monitoring functionality at deep monitoring well VW#1. Nevertheless, we have temporarily paused injection of CO₂ at injection well CCS#2 as a proactive measure while we conduct the actions described above. We will continue to work closely with your staff to help guide future action and provide regular updates.



Please note during our latest well diagnostic efforts, we also conducted noise surveys on inactive injection well CCS#1, currently used only for monitoring, and deep monitoring well VW#2. Preliminary data for the CCS#1 survey did not indicate any issues. Similarly, preliminary data for the VW#2 survey confirmed the dual plugs installed last October continue to prevent fluid migration. Finally, there have not been any issues identified in injection well CCS#2 based on annual pulse neutron logging and mechanical integrity tests from earlier this year.

I certify under penalty of law that this response and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the persons who 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, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions regarding this letter, please contact Jeff Neisslie at Jeff.Neisslie@adm.com or 217-451-2720.

Sincerely,

Todd Davis
Plant Manager – Decatur Corn Processing

cc:
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