



**Status Report Pursuant to Administrative Order on Consent,
Docket No. SDWA-05-2025-0001, Paragraph 68
November 15, 2025**

This Status Report describes the actions taken by ADM in accordance with Paragraph 68 of the Administrative Order on Consent (AOC), and includes the following information:

- a) A description of the actions that have been taken towards achieving compliance with this AOC during the previous two months, including an assessment of milestones due, whether they were met, and, if not, what actions will be taken or planned to meet the milestones, the timeline for meeting milestones, and any impact on future milestones;
- b) An assessment of the effectiveness of such actions;
- c) A summary of all Permit violations that occurred in the previous two months; and,
- d) An analysis of the cause of each such Permit violation.

Paragraph 68 (a): Actions taken towards achieving compliance with the AOC

From the effective date of the AOC, September 12, 2025, until the date of this first Status Report, November 15, 2025, (First Status Report Period) ADM has taken multiple actions towards achieving compliance with the AOC. These actions include:

- Timely completing and submitting all written deliverables required under Paragraphs 67(a),¹ 67(b),² 67(c-f),³ and 67(g)(i)⁴ by September 12, 2025;
- Timely establishing and maintaining a publicly accessible webpage with compliance summaries for each submission required by Paragraphs 67(a) through 67(e) and 67(g)(i) by September 12, 2025;
- Timely completing and submitting IRS Tax Form W-9 under Paragraph 92 on October 9, 2025; and

¹ This document described response actions that were identified and completed for VW#2 and VW#1, and their current monitoring capabilities.

² This document described the actions taken by ADM to determine the cause and extent of failure of VW#2 and VW#1, and ADM's subsequent repairs to prevent fluid migration through VW#2 and VW#1. This document further explained why no other conduits exist through which injected fluid could migrate.

³ This document described how ADM assessed and determined the area of review and extent of fluid migration from the Mount Simon formation into the Ironton-Galesville formation outside the authorized injection zone from and through VW#2.

⁴ This document described how ADM evaluated two remedial action alternatives to address the fluids that migrated from the Mount Simon formation into the Ironton-Galesville formation outside of the authorized injection zone from and through VW#2.



- Continuing to prepare permit modifications for wells CCS#1 and CCS#2, which are currently due December 11, 2025, in accordance with Paragraph 67(i).

All actions required under the AOC during the First Status Report Period were timely completed. ADM continues to diligently prepare its permit modifications in advance of the due date of December 11, 2025, in accordance with Paragraph 67(i). As all requirements of the AOC during the First Status Report Period were timely satisfied, a discussion of actions to be taken to complete the unmet requirements is inapplicable.

In addition to the items required by the AOC, ADM also submitted the VW#1 Logging Report on August 27, 2025, and the VW#1 Recompletion Report on October 22, 2025. Together, these two reports describe ADM's VW#1 well assessment and actions implemented to ensure the long-term mechanical integrity of the well.

Paragraph 68(b): Assessment of Effectiveness of Actions

As referenced in section (a) above, ADM's actions were effective in meeting all applicable requirements during the First Status Report Period. ADM is finalizing its permit modifications in accordance with Paragraph 67(i), and does not currently anticipate needing additional time to meet that obligation. Thus, these actions also effectively meet the requirements of the AOC.

Paragraph 68(c-d): Permit Violation Analysis

No permit violations have occurred since EPA signed the AOC on August 13, 2025. Therefore, a permit violation analysis is inapplicable for the First Status Report Period.