**Status Report Pursuant to Administrative Order on Consent,**
**Docket No. SDWA-05-2025-0001, Paragraph 68**
**September 17, 2026**

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

ADM has taken the following actions towards achieving compliance with the AOC in the two-month period since the submission of its Sixth Status Report, dated September 18, 2026, (Sixth Status Report Period):

- Completed and submitted the Sixth Status Report as required under Paragraph 68 of the AOC.
- Continued to implement monitoring in accordance with the Alternative Monitoring Plan, including in-zone monitoring using the recompleted VW#1 and above confining zone monitoring using the recompleted VW#2, as required under Paragraph 67(a)(ii) of the AOC.
- Completed VW#3A. Installation of the downhole pressure gauge occurred on October 20, 2026, marking the completion of the well. This work was performed as required under Paragraph 67(a)(ii) of the AOC and the Alternative Monitoring Plan, and timely completed pursuant to the construction deadline extension issued by USEPA on May 7, 2026.
- Completed VW#3B. Installation of the downhole pressure gauge occurred on October 21, 2026, marking the completion of the well. This work was performed as required under Paragraph 67(a)(ii) of the AOC and the Alternative Monitoring Plan, and timely completed pursuant to the construction deadline extension issued by USEPA on May 7, 2026.

- Continued to maintain the publicly accessible webpage[1] where ADM posts compliance summaries, status reports, and other relevant documentation, as required under Paragraph 67(h) of the AOC.
- Submitted the signed Financial Instrument documentation and responses to the Agency's questions regarding additional corrosion monitoring as part of ADM's permit applications.
- Received Application and Technical Completeness Correspondence from USEPA on October 26, 2026, signifying completeness of ADM's applications for modifications of two existing Class VI permits and for two new Class VI permits, as well as conclusion of USEPA's technical review. ADM continues to cooperate and coordinate with the Agency to facilitate timely finalization of the draft permits.

As identified above, all actions taken toward achieving compliance with the AOC during the Seventh Status Report Period were timely completed. ADM does not anticipate the submission of additional permit applications or modifications to comply with the requirements of the AOC and will continue to consult and coordinate with the Agency's permit-writing staff to ensure timely issuance of the draft permits. As all requirements of the AOC during the Seventh Status Report Period were timely satisfied, a discussion of actions to be taken to complete the unmet requirements is inapplicable.

Paragraph 68(b): Assessment of Effectiveness of Actions

ADM's actions were effective in meeting all applicable requirements of the AOC during the Seventh Status Report Period, as described below:

- ADM's response actions to date have effectively addressed the violations alleged in the AOC because, (1) ADM has resolved the alleged failure to construct, operate, maintain, plug, or conduct any other injection activity in a manner that does not allow movement of injection and formation fluids into an unauthorized zone by recompleting monitoring wells VW#1 and VW#2, and (2) ADM has resolved the alleged failure to conduct testing and monitoring at VW#2 as required by its Testing and Monitoring Plan by implementing the Alternative Monitoring Plan in consultation with the Agency.
- Recompleted monitoring wells VW#1 and VW#2 monitored the $CO_2$ plume in accordance with the Alternative Monitoring Plan and all data collected to date continues to confirm the conclusions provided in the Migration Assessment Report, Corrective Action Plan, and the Remedial Action Plan required under Paragraphs 67(c), (d), (e), and (g) of the AOC, including:
    - The "Migrated Fluids," as defined in the AOC, continue to be sequestered in the intended location, confirming the long-term effectiveness of this remedial alternative.

[1] Available at: https://www.adm.com/en-us/standalone-pages/adm-and-carbon-capture-and-storage/

- No new conduits through which fluid migrates or has migrated from the injection zone into the Ironton-Galesville formation have been detected.
- The sequestered Migrated Fluids do not pose a risk of further migration.
- The sequestered Migrated Fluids do not pose a risk to underground sources of drinking water.
- Production of the sequestered Migrated Fluids would pose significantly more risk to human health and the environment than their continued long-term sequestration.
- Recompleted monitoring wells VW#1 and VW#2 have mechanical integrity and are not conduits through which injection fluid is anticipated to migrate.
- CCS#1 and CCS#2 continue to have mechanical integrity and are not conduits through which injection fluid is anticipated to migrate.

- ADM finalized the drilling operations, sampling, completion installation, and downhole gauge installation for VW#3-A and VW#3-B on October 20 and 21, 2026, respectively, allowing ADM to proceed towards fully implementing the Alternative Monitoring Plan as required by the AOC, which provides for additional in-zone and above-zone monitoring wells.
- ADM's continued consultation and coordination with the Agency is intended to ensure the permit modification applications are timely processed, thereby incorporating the AOC's obligations into the new permits. Specifically, the new permits would incorporate the obligations outlined in the Alternative Monitoring Plan, the Remedial Action Plan submitted under Paragraph 67(g) of the AOC to monitor the Migrated Fluids and provide for updated operation and construction parameters to ensure the movement of injection and formation fluids into an unauthorized zone, through monitoring wells or otherwise, does not occur.

Paragraph 68(c-d): Permit Violation Analysis

No permit violations occurred during the Seventh Status Report Period. Therefore, a permit violation analysis is inapplicable for the Seventh Status Report Period. ADM Continues to implement the Alternative Monitoring Plan, dated April 22, 2025.