The Current Regulatory Framework for CCS

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Underground Injection Control (UIC)

- Oil/gas fields: Class II
  - Early 1980s, bare bones
  - Implementation problems (DOGGR/EPA)
- Class VI
  - Late 2010, much more comprehensive
  - Does not apply to most oil/gas field projects that claim to sequester concurrently
- Neither deals with quantifying air emissions
EPA Greenhouse Gas Reporting

- **Subpart UU**
  - Applies to entities that inject CO2
  - Very basic mass/volume flow reporting

- **Subpart RR**
  - Applies to entities that sequester CO2
  - Requires Monitoring, Reporting & Verification (MRV) Plan
  - Voluntary for enhanced oil/gas recovery operations
  - Open to interpretation, no prevention or remediation provisions
Needs

• Holistic regulatory approach that focuses on prevention from the start…

  • Site selection
  • Operation

• … through project decommissioning

• Monitoring to detect and estimate/measure air emissions

• Applicable to saline formations and oil/gas fields

• Meaningful, protective and commercially workable regulations