

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