

**Jensen, Tracy@ARB**

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**From:** Balcazar, Trinidad@ARB  
**Sent:** Tuesday, February 17, 2015 9:26 AM  
**To:** Jensen, Tracy@ARB  
**Cc:** Whiting, Amy@ARB  
**Subject:** FW: Deadline for Comments on LCFS?  
**Attachments:** DOE Storing CO2 with EOR 2009.pdf

Tracy,

See email below. Written submittal that needs to be added to the LCFS rulemaking comment log.

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**From:** Vergara, Floyd@ARB  
**Sent:** Tuesday, February 17, 2015 8:20 AM  
**To:** Whiting, Amy@ARB; Balcazar, Trinidad@ARB  
**Cc:** Kitowski, Jack@ARB; Wade, Samuel@ARB; Scheehle, Elizabeth@ARB  
**Subject:** FW: Deadline for Comments on LCFS?

Amy and Trini,

Can you include the email thread below into the comments log for the LCFS readoption rulemaking record? Mr. Johnson has asked that it be submitted as a formal written comment. Thanks.

Floyd

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Floyd V. Vergara, Esq., P.E.  
Chief, Industrial Strategies Division  
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**From:** Johnson, Timothy V. [<mailto:JohnsonTV@Corning.com>]  
**Sent:** Monday, February 16, 2015 3:01 PM  
**To:** Vergara, Floyd@ARB  
**Cc:** Ayala, Alberto@ARB  
**Subject:** RE: Deadline for Comments on LCFS?

Thanks much Floyd.

We will not be able to submit formal public comments, unless you can include this email. We are developing CO2 capture technology that will take CO2 directly out of air. This is in a research phase now, but there is already commercial interest in scaling up and evaluating it. The first market is CO2-based enhanced oil recovery wherein the equipment would be installed at the oil field site. The CO2 captured from air and used for this purpose is mostly sequestered, rendering the oil 70-100% carbon free, according to the attached journal paper from the DOE.

It is important the LCFS is flexible enough to allow oil produced in this method to be considered as a LC fuel upon proper review and certification.

Regards,

Tim Johnson

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**From:** Vergara, Floyd@ARB [<mailto:fvergara@arb.ca.gov>]  
**Sent:** Monday, February 16, 2015 4:39 PM  
**To:** Johnson, Timothy V  
**Cc:** Ayala, Alberto@ARB  
**Subject:** Re: Deadline for Comments on LCFS?

Tim,

Thanks for your note and interest in the LCFS. Unless you will be testifying at our February 19th hearing, all comments must be submitted in writing and must be received by 5 pm Pacific Time, February 17th. Comments can be submitted in writing by regular or electronic mail. Please see the hearing notice, <http://www.arb.ca.gov/regact/2015/lcfs2015/lcfs15notice.pdf>, for additional details on comment submittals.

Feel free to contact me directly if you have further questions.

Floyd Vergara, Chief  
Industrial Strategies Division  
(916) 324-0356

Sent from my iPhone

On Feb 16, 2015, at 12:42 PM, Johnson, Timothy V <[JohnsonTV@Corning.com](mailto:JohnsonTV@Corning.com)> wrote:

Thanks Alberto.

Mr. Vergara, When is the deadline for submitting comments on the LCFS? See below for our interests.

Regards,  
Tim



GHGT-9

## Storing CO<sub>2</sub> with Enhanced Oil Recovery

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and Vello A. Kuuskraa<sup>(1)</sup>

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### Abstract

CO<sub>2</sub> enhanced oil recovery (CO<sub>2</sub>-EOR) offers the potential for storing significant volumes of carbon dioxide emissions while increasing domestic oil production. This presentation, based on a recently completed study for DOE/NETL, examines the domestic oil resource amenable to CO<sub>2</sub>-EOR, the size of the related market for CO<sub>2</sub>, and the benefits to the power sector from CO<sub>2</sub> sales to the EOR industry. The study finds that, depending on future oil prices and the costs for purchasing CO<sub>2</sub> from power plants and other industrial sources, from 39 to 48 billion barrels of oil could be economically recoverable with CO<sub>2</sub>-EOR. In addition, the size of the market for CO<sub>2</sub> offered by the EOR industry is on the order of 7,500 million metric tons between now and 2030. With advances in CO<sub>2</sub>-EOR and storage technology, the economically recoverable oil resource would increase to 54 to 70 billion barrels.

The market for CO<sub>2</sub> from the EOR industry is examined in depth from the coal-fueled power plant industry's standpoint. The sale of CO<sub>2</sub> emissions captured from new coal-fueled power plants could provide significant revenue offsets to the cost of installing carbon capture technology. It is estimated these revenue offsets along with a value for carbon abatement could enable 40% (48 out of 121 GW) of the new coal-fueled power capacity expected to be built between now and 2030 to install CCS. With advances in CO<sub>2</sub>-EOR and storage technology the number of power plants with CCS could increase to 50 to 70 GWs. This would provide significant assistance toward addressing CO<sub>2</sub> emissions from this sector, helping drive down the costs of installing CCS technology. © 2009 Elsevier Ltd. All rights reserved.

Keywords: CO<sub>2</sub>-EOR; carbon capture and storage; enhanced oil recovery; coal power plants; CO<sub>2</sub> emissions

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## 1. Introduction

CO<sub>2</sub> enhanced oil recovery (CO<sub>2</sub>-EOR) offers the potential for storing significant volumes of carbon dioxide emissions while increasing domestic oil production. Four notable benefits would accrue from integrating CO<sub>2</sub> storage and enhanced oil recovery:

- First, CO<sub>2</sub>-EOR provides a large, “value added” market for sale of CO<sub>2</sub> emissions captured from new coal-fueled power plants. The size of this market is on the order of 7,500 million metric tons between now and 2030. Sales of captured CO<sub>2</sub> emissions would help defray some of the costs of installing and operating carbon capture and storage (CCS) technology. These CO<sub>2</sub> sales would support “early market entry” of up to 49 (one GW size) installations of CCS technology in the coal-fueled power sector. With advances in CO<sub>2</sub>-EOR and storage technology the market could increase to 10,850 million metric tons which would support up to 70 GW of CCS;
- Second, storing CO<sub>2</sub> with EOR helps bypass two of today’s most serious barriers to using geological storage of CO<sub>2</sub> - - establishing mineral (pore space) rights and assigning long-term liability for the injected CO<sub>2</sub>;
- Third, the oil produced with injection of captured CO<sub>2</sub> emissions is 70% “carbon-free”, after accounting for the difference between the carbon content in the incremental oil produced by EOR and the volume of CO<sub>2</sub> stored in the reservoir. With “next generation” CO<sub>2</sub> storage technology and a value for storing CO<sub>2</sub>, the oil produced by EOR could be 100+% “carbon free”;
- Fourth, the 39 to 48 billion barrels of economically recoverable domestic oil economically recoverable from storing CO<sub>2</sub> with EOR would help displace imports, supporting a path toward energy independence. It could also help build pipeline infrastructure subsequently usable for storing CO<sub>2</sub> in saline formations.

Various analysts and studies have discussed the potential for storing CO<sub>2</sub> with enhanced oil recovery but have noted (incorrectly) that this option is quite small or is counter productive to reducing CO<sub>2</sub> emissions. For example, the “IPCC Special Report on Carbon Dioxide Capture and Storage”, while recognizing that depleted oil fields could provide an attractive, early option for storing CO<sub>2</sub> (particularly with CO<sub>2</sub>-EOR), concluded that oil fields would provide only a relatively small volume of CO<sub>2</sub> storage capacity.

The report finds that the opportunity for selling captured CO<sub>2</sub> emissions to the EOR industry and storing these emissions in oil reservoirs using CO<sub>2</sub>-EOR is largely providing a market for productive use of CO<sub>2</sub> emissions from the nation’s large and growing fleet of coal-fueled power plants.

## 2. Evaluating the Market for Captured CO<sub>2</sub> Emissions Offered by EOR

The size and value of the market for captured CO<sub>2</sub> emissions offered by enhanced oil recovery rests on three pillars: (1) the size and nature of the domestic crude oil resource base, particularly the large portion of this resource base unrecoverable with existing primary and secondary oil recovery methods; (2) the ability of CO<sub>2</sub>-EOR to recover a portion of this currently unrecoverable (“stranded”) domestic oil, while efficiently storing CO<sub>2</sub>; and (3) the impact of alternative oil prices and CO<sub>2</sub> costs on the volume of oil that could be economically produced.

### 2.1. The Domestic Oil Resource Base

The U.S. has a large, established oil resource base, on the order of 596 billion barrels originally in-place. About one-third of this resource base, nearly 196 billion barrels, has been recovered or placed into proved reserves with existing primary and secondary oil recovery technologies. This leaves behind a massive target of 400 billion barrels of “technically stranded” oil, Table 1.

Table 1. National In-Place, Conventionally Recoverable and “Stranded” Crude Oil Resources

Basin/Area	OOIP* (Billion Barrels)	Conventionally Recoverable (Billion Barrels)	ROIP** “Stranded” (Billion Barrels)
1. Alaska	67.3	22.3	45.0
2. California	83.3	26.0	57.3
3. Gulf Coast (AL, FL, MS, LA)	44.4	16.9	27.5
4. Mid-Continent (OK, AR, KS, NE)	89.6	24.0	65.6
5. Illinois/Michigan	17.8	6.3	11.5
6. Permian (W TX, NM)	95.4	33.7	61.7
7. Rockies (CO, UT, WY)	33.6	11.0	22.6
8. Texas, East/Central	109.0	35.4	73.6
9. Williston (MT, ND, SD)	13.2	3.8	9.4
10. Louisiana Offshore	28.1	12.4	15.7
11. Appalachia (WV, OH, KY, PA)	14.0	3.9	10.1
Total	595.7	195.7	400.0

\*Original Oil in Place, in all reservoirs in basin/area; Calculated through internal ARI analysis and EIA production data.

\*\* Remaining Oil in Place, in all reservoirs in basin/area. Source: Advanced Resources Int'l, 2008.

## 2.2. Technically Recoverable Oil Resources Using CO<sub>2</sub>-EOR

Numerous scientific as well as practical reasons account for the large volume of “stranded” oil, unrecoverable with primary and secondary methods. These include: oil that is bypassed due to poor waterflood sweep efficiency; oil that is physically unconnected to a wellbore; and, most importantly, oil that is trapped by viscous, capillary and interfacial tension forces as residual oil in the pore space.

Injection of CO<sub>2</sub> helps lower the oil viscosity and trapping forces in the reservoir. Additional well drilling and pattern realignment for the EOR project helps contact bypassed and occluded oil. These actions enable a portion of this “stranded oil” to become mobile, connected to a wellbore and thus recoverable.

### 2.2.1. Current CO<sub>2</sub>-EOR Activity and Production

According to the latest tabulation of CO<sub>2</sub>-EOR activity in the U.S., in the 2008 EOR Survey published by the Oil and Gas Journal, approximately 250,000 barrels per day of incremental domestic oil is being produced by 101 CO<sub>2</sub>-EOR projects, distributed broadly across the U.S.

### 2.2.2. Evolution in CO<sub>2</sub> Flooding Practices

Considerable evolution has occurred in the design and implementation of CO<sub>2</sub>-EOR technology since it was developed in the 1970's. Notable changes include: (1) use of much larger (up to 1 HCPV\*) volumes of CO<sub>2</sub>; (2) incorporation of tapered WAG (water alternating with gas) and other methods for mobility control; and (3) application of advanced well drilling and completion strategies to better contact previously bypassed oil. As a result of the changes mentioned above, the oil recovery efficiencies of today's better designed “state-of-the-art” CO<sub>2</sub>-EOR projects have steadily improved.

### 2.2.3. Technically Recoverable Resources

The reservoir-by-reservoir assessment of the 1,111 large oil reservoirs contained in the ARI database amenable to CO<sub>2</sub>-EOR shows that a significant volume, 64 billion barrels, of domestic oil may be recoverable with state-of-the-art application of CO<sub>2</sub>-EOR. Extrapolating the data base to national-level results indicates that 87.1 billion barrels

(84.8 after subtracting the 2.3 that has already been produced and proven) of domestic oil may become recoverable by applying “state-of-the-art” CO<sub>2</sub>-EOR, Table 2.

Table 2. Technically Recoverable Resources from Applying “State-of-the-Art” CO<sub>2</sub>-EOR: National Totals

	Technically Recoverable (Billion Barrels)	Existing CO <sub>2</sub> -EOR Production/Reserves	Incremental Technically Recoverable (Billion Barrels)
1. Alaska	12.4	-	12.4
2. California	6.3	-	6.3
3. Gulf Coast (AL, FL, MS, LA)	7	-	7
4. Mid-Continent (OK, AR, KS, NE)	10.7	-0.1	10.6
5. Illinois/Michigan	1.2	-	1.2
6. Permian (W TX, NM)	17.8	-1.9	15.9
7. Rockies (CO, UT, WY)	4.2	-0.3	3.9
8. Texas, East/Central	17.6	-	17.6
9. Williston (MT, ND, SD)	2.5	-	2.5
10. Louisiana Offshore	5.8	-	5.8
11. Appalachia (WV, OH, KY, PA)	1.6	-	1.6
Total	87.1	-2.3	84.8

### 3. Economically Recoverable Resources

#### 3.1. Economically Recoverable Resources: Base Case Scenario

Out of 85 billion barrels technically recoverable using CO<sub>2</sub>-EOR technology, 45 billion barrels of incremental oil are economically recoverable in our base case scenario, Table 3. The Base Case evaluates the CO<sub>2</sub>-EOR potential using an oil price of \$70 per barrel (constant, real) and a CO<sub>2</sub> cost of \$45 per metric ton (\$2.38 per Mcf) (delivered at pressures around 2,200 psi to the field, constant and real), Table 4. The 40 billion barrels that are not economic to recover in this scenario are contained in reservoirs that cannot provide a sufficient rate of return, 15%, in this scenario, on a CO<sub>2</sub>-EOR project's capital costs.

Table 3. Economically Recoverable Resources from Applying “State-of-the-Art” CO<sub>2</sub>-EOR: National Totals at Base Case Economics\*

Basin/Area	Incremental Technically Recoverable (Billion Barrels)	Incremental Economically Recoverable* (Billion Barrels)
1. Alaska	12.4	9.5
2. California	6.3	5.4
3. Gulf Coast (AL, FL, MS, LA)	7.0	2.2
4. Mid-Continent (OK, AR, KS, NE)	10.6	5.6
5. Illinois/Michigan	1.2	0.5
6. Permian (W TX, NM)	15.9	7.1
7. Rockies (CO, UT, WY)	3.9	1.9
8. Texas, East/Central	17.6	8.3
9. Williston (MT, ND, SD)	2.5	0.5
10. Louisiana Offshore	5.8	3.9
11. Appalachia (WV, OH, KY, PA)	1.6	0.1
Total	84.8	45.0

\*Base Case Economics use an oil price of \$70 per barrel (constant, real) and a CO<sub>2</sub> cost of \$45 per metric ton (\$2.38/Mcf), delivered at pressure to the field.

Table 4. Economically Recoverable Resources from Applying “State-of-the-Art” CO<sub>2</sub>-EOR: National Totals at Base Case and Alternative Oil Prices/CO<sub>2</sub> Costs

Oil Prices (\$ per Bbl)	CO <sub>2</sub> Costs (\$ per metric ton)			
	\$35	\$45*	\$55	\$60
Lower Prices				
\$50	39.1 BBbls			
Base Case				
\$70	45.0 BBbls			
Higher Prices				
\$90	47.9 BBbls			
\$100	48.3 BBbls			

\*A CO<sub>2</sub> cost of \$45 per metric ton (mt) is equal to \$2.38 per Mcf. 15% IRR project hurdle rate

#### 4. The Market for Storing CO<sub>2</sub> with EOR

Our analysis shows that significant volumes of CO<sub>2</sub> (ranging from 10 to 13 billion metric tons depending on oil price) can be stored with enhanced oil recovery. In general, about 5 to 6 Mcf (0.26 to 0.32 metric tons (mt)) of purchased CO<sub>2</sub> per barrel of oil is injected and stored as part of CO<sub>2</sub>-EOR. This is augmented with 5 to 10 Mcf (0.26 mt to 0.52 mt) of recycled CO<sub>2</sub> during the latter stages of a CO<sub>2</sub>-EOR process. With incentives for storing CO<sub>2</sub> emissions and “next generation” CO<sub>2</sub> storage technology, considerably larger volumes of CO<sub>2</sub> could be stored.

##### 4.1. Producing “Carbon Free” Domestic Oil

A typical barrel of crude oil contains 0.42 metric tons (mt) of releasable CO<sub>2</sub> (assuming that 3% of the produced and refined oil barrel remains as asphalt or coke). As such, netting the injection and storage of 0.26 to 0.32 mt of CO<sub>2</sub> emissions against the 0.42 mt of CO<sub>2</sub> in the produced oil, makes the domestic oil produced by CO<sub>2</sub>-EOR about 70% (62% to 76%) “carbon free”.

##### 4.2. Market Demand for CO<sub>2</sub>: Power Plant Perspective

The overall demand for CO<sub>2</sub> by the CO<sub>2</sub>-EOR industry can be met by three potential sources of CO<sub>2</sub> supply, namely:

- Natural CO<sub>2</sub> supplies already found and defined in geological structures;
- Industrial, high concentration sources of CO<sub>2</sub> (e.g. refineries and fertilizer plants) that are currently being captured and used by the CO<sub>2</sub>-EOR industry; and
- The large volumes of low concentration power plant and industrial emissions of CO<sub>2</sub> that needs to be captured and stored to mitigate CO<sub>2</sub> emissions.

Excluding Alaska, which is not projected to build new coal-fueled power plants to any great extent, the demand for CO<sub>2</sub> in the lower-48 states offered by the EOR industry is 9,694 million metric tons (183.4 Tcf)

Table 5 sets forth the net remaining demand for CO<sub>2</sub> by the EOR industry of 7,470 million metric tons for the lower-48 states, after subtracting the 2,224 million metric tons (42.2 Tcf) of CO<sub>2</sub> available, in the next 30 years, from natural CO<sub>2</sub> deposits and high concentration industrial CO<sub>2</sub> sources (e.g., natural gas processing plants, fertilizer plants) already being captured and used for enhanced oil recovery.

The overall conclusion from the analysis is that CO<sub>2</sub>-EOR may provide a 7,500 million metric ton market for captured CO<sub>2</sub> emissions by the coal-fueled power generation industry, Table 5. While the actual revenues afforded by this market will be established, in the main, by one-on-one negotiations between individual power companies and oil field operators, the potential size of this market could be large.

Using an oil price of \$70 per barrel (Base Case), assuming a delivered CO<sub>2</sub> cost of \$45 per metric ton, and subtracting \$10 per metric ton for transportation and handling, the revenue potential offered by the CO<sub>2</sub>-EOR market could reach \$260 billion.



Table 5. Economically Feasible Market Demand for CO<sub>2</sub> by EOR: NEMS/EMM Power Generation Regions\*

NEMS EMM Region	Purchased CO <sub>2</sub> Requirements	Natural CO <sub>2</sub> **	Industrial CO <sub>2</sub> **	Unmet (Net) Demand for CO <sub>2</sub>		
	(Tcf)	(Tcf)	(MMcfd)	(Tcf)	(Tcf)	(Million mt)
Region 1 – ECAR	1.1	-	15	***	1.1	58
Region 2 – ERCOT	72.2	25	110	1.2	46.0	2,436
Region 3 – PJM (MAAC)	0.1	-	-	-	0.1	4
Region 4 – MAIN	1.9	-	-	-	1.9	100
Region 5 – MAPP	2.1	-	-	-	2.1	109
Region 6 – NY ISO	-	-	-	-	-	-
Region 7 – NW ISO	-	-	-	-	-	-
Region 8 – Florida	0.2	-	-	-	0.2	9
Region 9 – SERC	40.0	8	-	-	32.0	1,695
Region 10 – SWPP	29.7	5	35	0.4	24.3	1,286
Region 11 – WECC/NWPP	7.8	-	175	1.9	5.9	311
Region 12 – WECC/RMPP	2.3	-	65	0.7	1.6	83
Region 13 – WECC/CA	26.0	-	-	-	26.0	1,377
Region 14 – Alaska	39.6	5	-	-	34.6	1,831
TOTAL U.S.	223.0	43	400	4.2	175.8	9,301
TOTAL Lower-48	183.4	38	400	4.2	141.2	7,470

\*Base Case: \$70/Bbl oil and \$45/mt CO<sub>2</sub>

\*\*Assumed available to be produced and productively used by the CO<sub>2</sub>-EOR industry in the next 30 years.

\*\*\*Less than 0.01 Tcf and thus not included in totals.

## 5. Using Sale of Captured CO<sub>2</sub> Emission for “Early Market Entry” of CCS Technology

A common feature of EIA carbon management studies is that, in general, CCS is not considered, as of yet, a key part of the solution. The reason, according to EIA’s EMM cost model, is that using CCS with coal- or gas-fired power is not economically competitive with other options for generating power with low CO<sub>2</sub> emissions.

However, revenues from selling captured CO<sub>2</sub> emissions into the CO<sub>2</sub>-EOR market can change the competitive outlook. For example, as shown in Table 6 and Figure 1, the sale of captured CO<sub>2</sub> emissions at \$25 to \$35 per metric ton can reduce the costs of power generation with CCS by \$17 to \$24 per MWh, significantly offsetting the costs of installing CCS with new coal-fueled power plants.

Table 6. Relationship of CO<sub>2</sub> Sales Price to Cost Offsets in the Coal-Fueled Power Sector (Year 2020)

Sale of CO <sub>2</sub>	Sale of CO <sub>2</sub>
@ \$25/mt CO <sub>2</sub>	@ \$35/mt CO <sub>2</sub>
*7,920 btu/kWh x	7,920 btu/kWh x
94 MMmt CO <sub>2</sub> /QBtu x	94 MMmt CO <sub>2</sub> /QBtu x
90% Capture	90% Capture
Cost Offset: \$16.80/MWh	Cost Offset: \$23.50/MWh

\*Advanced Integrated Gasification Combined Cycle (IGCC) plant.

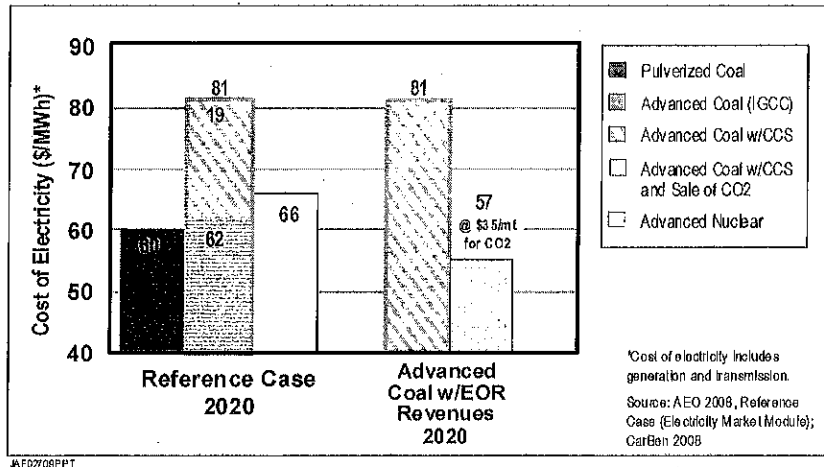


Figure 1. Sale of Captured CO<sub>2</sub> Emissions Can Help Make Coal Plants w/CCS Competitive

The CarBen and EIA EMM models project that 29 new coal-fueled power plants would be placed into operation between 2013 and 2020 in the lower-48. Assuming that half of these power plants are favorably located with respect to oil fields attractive for CO<sub>2</sub>-EOR and are able to sell CO<sub>2</sub> at \$35/mt at the plant gate, the integration of CO<sub>2</sub> storage and EOR plus a value for abating CO<sub>2</sub> emissions would support the construction of 15 new advanced coal w/CCS power plants, each with 1 GW of capacity. (A 1 GW advanced coal-fueled power plant built by 2020 is estimated to be able to sell about 5.1 million metric tons of captured CO<sub>2</sub> emissions per year; 15 plants would be able to provide 2,300 million metric tons in 30 years). Sales of captured CO<sub>2</sub> emissions by power plants built after 2020 would support the 33 additional installations of CCS by 2030 for a total of 48 GWs of capacity with CCS.