

George Peridas

18-7-4

Submitted in person

Sep 27th, 2018

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Resolution to Revisit Provisions for Post-Injection Monitoring under the CCS Protocol

Dear Clerk of the Board,

The undersigned hereby submit the following language for the Board's consideration in relation to revising provisions for post-injection monitoring under the CCS Protocol:

WHEREAS the CCS Protocol contains extensive requirements for minimizing risk and assuring permanent subsurface storage of carbon dioxide.

WHEREAS by the time CCS projects regulated under the Protocol reach the post-injection phase, experience with, and data on, such projects will have increased significantly, and monitoring and scientific methods to estimate any residual risk of leakage, will very likely have evolved considerably and beyond what can be envisioned today, necessitating a risk-based approach to post-injection monitoring.

NOW, THEREFORE, BE IT RESOLVED that the Board directs the Executive Officer to work with stakeholders, including scientists and researchers, project developers and environmental groups, to evaluate the optimal risk-based requirements for the methods, frequency and duration for post-injection monitoring of CCS projects after carbon dioxide plume stabilization has been established, how these requirements can accommodate both today's and future needs and technologies, and to propose scientifically supported and environmentally protective amendments to the relevant provisions of the CCS Protocol by October of 2019, including authorizing the termination of monitoring in the event that it can be demonstrated with a high degree of confidence that 100-year permanence will be achieved by a particular CCS project.

Respectfully,

Jeffrey Bobeck, Director of Energy Policy Engagement, **Center for Climate and Energy Solutions**

Deepika Nagabhushan, Energy Policy Associate, **Clean Air Task Force**

Timothy O'Connor, Senior Director, Energy Program, **Environmental Defense Fund**

George Peridas, Senior Scientist, **Natural Resources Defense Council**