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**To:** CARB Staff  
**From:** George Peridas, NRDC (gperidas@nrdc.org)  
**Re:** Comments on Industry in Draft Scoping Plan  
**Date:** August 20, 2008  
**Via:** Electronic submission at  
<http://www.arb.ca.gov/cc/scopingplan/spcomment.htm>

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In addition to our Comments on Industry submitted on August 11, 2008, please accept this addendum regarding Enhanced Oil Recovery.

### **I. Enhanced Oil Recovery**

Appendix C (C-112) briefly mentions enhanced oil recovery using CO<sub>2</sub> (CO<sub>2</sub>-EOR) as a means of reducing emissions from oil and gas extraction. As part of the EOR process, CO<sub>2</sub> is sequestered underground. Some of the CO<sub>2</sub> is extracted with the oil, recycled and re-injected, but ultimately all of it remains in the subsurface – with the exception of any venting from surface facilities. Business-as-usual CO<sub>2</sub>-EOR should not be considered the same as sequestration. Simple additional regulatory requirements, such as careful field characterization combined with appropriate monitoring, operational, and reporting procedures, are needed to assure permanent sequestration and account for the CO<sub>2</sub> in the oil fields. We therefore recommend that CO<sub>2</sub>-EOR be recognized as a CO<sub>2</sub> reduction, but with those added requirements. However, we strongly recommend that, for accounting purposes, the reduction be attributed to the anthropogenic source of the CO<sub>2</sub> (i.e. the capture facility). It should not be used to offset compliance obligations under the Low-Carbon Fuel Standard.