#### Preliminary Evaluation of Offshore Transport and Storage of CO<sub>2</sub>\*

#### Steven M. Carpenter<sup>1</sup>

Search and Discovery Article #80201 (2011) Posted November 28, 2011

\*Adapted from oral presentation at AAPG Eastern Section meeting, Washington, DC, September, 25-27, 2011

<sup>1</sup>Advanced Resources International, 1282 Secretariat Court, Batavia, OH 45103 (<u>scarpenter@adv-res.com</u>)

#### Abstract

The DOE-NETL has funded the Southern States Energy Board (SSEB) who have teamed with IOGCC (and others) to prepare a report that will have as its primary objective to conduct studies to evaluate the potential for geological storage of  $CO_2$  utilizing existing offshore oil and natural gas fields in the Gulf of Mexico nearing the end of productive life, and in areas that have not been subject to oil and natural gas production (other than GOM). These offshore geologic settings, along with wells and infrastructure (where it exists), may be suitable for  $CO_2$  sequestration with the adaptation of technical, regulatory, and business modifications. Inherent within this objective is the consideration of:

- (1) resource mapping of CO<sub>2</sub> storage potential and infrastructure in SECARB's offshore areas under Federal jurisdiction in the Gulf of Mexico;
- (2) resource mapping of CO<sub>2</sub> storage potential and infrastructure in the SECARB region offshore areas under state jurisdiction, and
- (3) the current legal and regulatory structures and opportunities in applicable jurisdictions.

Research will be performed as part of a collaborative partnership between the Southern States Energy Board and the Interstate Oil and Gas Compact Commission (IOGCC), with technical assistance from the University of Texas at Austin, Bureau of Economic Geology (BEG) and from the Geological Survey of Alabama (GSA). The SSEB will manage the project, under its existing SECARB Phase III agreement.

The IOGCC Carbon Capture and Geologic Storage Task Force will conduct legal and regulatory research by means of specific subgroups created for each project. These subgroups will: 1) conduct research and analyses; and 2) draft findings and recommendations and/or guidance documents, potentially including suggested amendments to IOGCC's  $CO_2$  model legislation and rules. The IOGCC will work closely with the SECARB partnership to evaluate the legal and regulatory structures of the states involved. Research topics include an evaluation of current legal and regulatory structures, identification of challenges stakeholders may face, and identification of legal and regulatory opportunities.



#### Preliminary Evaluation of Offshore Transport and Storage of Carbon Dioxide



Presented By: Steven M. Carpenter, Vice, President ADVANCED RESOURCES INTERNATIONAL, INC. Arlington, VA

#### National CO<sub>2</sub> Pipeline Infrastructure for CCS

**September 27, 2011** 

2

#### Southeast Regional Carbon Sequestration Partnership

- 2
- **USDOE-NETL**
- SECARB/Southern States Energy Board (SSEB)
- Interstate Oil and Gas Compact Commission (IOGCC)
- SSEB CO<sub>2</sub> Pipeline Transportation Task Force (PTTF)











#### Disclaimer

"This report was prepared as an account of work sponsored by an agency of the United States Government. Neither the United States Government nor any agency thereof, nor any of their employees, makes any warranty, express or implied, or assumes any legal liability or responsibility for the accuracy, completeness, or usefulness of any information, apparatus, product, or process disclosed, or represents that its use would not infringe privately owned rights. Reference herein to any specific commercial product, process, or service by trade name, trademark, manufacturer, or otherwise does not necessarily constitute or imply its endorsement, recommendation, or favoring by the United States Government or any agency thereof. The views and opinions of authors expressed herein do not necessarily state or reflect those of the United States Government or any agency thereof."



# Pipeline Task Force Composition

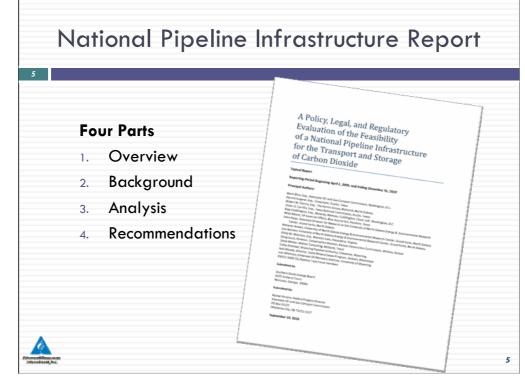
#### 15 Authors & 34 Task Force Members

- Interstate Organizations
  - IOGCC
  - SSEB
- Federal Government
  - FERC
  - U.S. DOE & NETL
  - U.S. EPA
  - U.S. DOI

- Industry Representatives
- Environmental Representatives
- Scientists
- Legal Experts







Presenter's notes: The Pipeline Study was released on January 31, 2011, and consists of four parts:

1. The OVERVIEW section outlines SSEB and IOGCC's experience in the topic area, acknowledges those who funded and supported the project, and summarizes the objectives of the project.

2. The report provides BACKGROUND information on the basics of carbon dioxide capture technologies and geologic storage options.

3. The ANALYSIS section discusses the existing CO2 PL infrastructure in the U.S., the current regulations governing them, and future PL build-out scenarios.

4.Based on the finding from the analysis section, the Task Force provides a list of state and federal RECOMMENDATIONS.

# Next Step to evaluate OCS

- 6
- Advanced Resources International
- Armbrecht Jackson, LLP
- Bureau of Economic Geology, The University of Texas at Austin
- Geological Survey of Alabama
- IOGCC
- Mississippi State Mineral Lease Program
- SECARB
- State Oil and Gas Board of Alabama
- Southern Company
- Southern States Energy Board
- WESTCARB



# **OCS Task Force Objectives**

- Some basic information and recommendations
- A guide to regulators, policy makers, legal professionals
- Evaluation of the potential for CO<sub>2</sub> storage, in sub-seabed geologic structures
- Analysis and consideration of legal and regulatory framework to facilitate offshore CO<sub>2</sub>



## **Preliminary Draft Report**



#### Preliminary Evaluation of Offshore Transport and Storage of Carbon Dioxide

SSEB/IOGCC Offshore Task Force

#### **Topical Report**

Reporting Period Beginning October 1, 2009, and Ending September 30, 2011

Principal Authors:

Principal Authors:
Principal Authors:
Principal Authors:
Principal Authors:
Principal Authors:
Principal Authors:
Principal Authors:
Principal Principal Authors:
Principal Pri

SSEB and IOGCC Task Force

Submitted to: Southern States Energy Board 6325 Amherst Court Norcross, Georgia 30092

Submitted by: Cynthia McCollum, Federal Projects Manager Interstate Oll and Gas Compact Commission PO Box 53127 Oklahoma City, OK 73152-3127

Draft September 19, 2011



## The Good

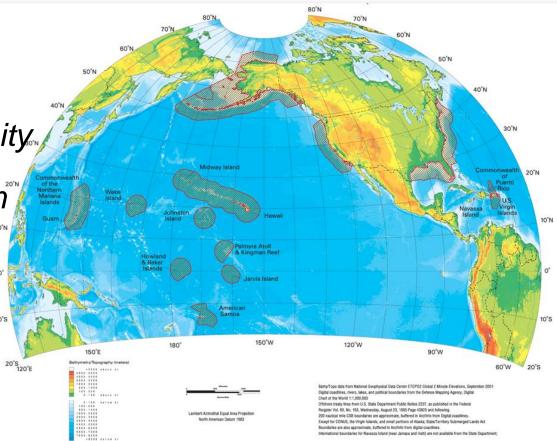
- Sediment thicknesses from 15,000' to 50,000' thick
- Depth of storage will assure super-critical
- >1 trillion tons capacity
- Additional assessment to follow





## The Best – One landowner

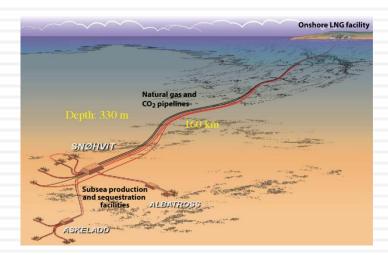
- Single owner
- Sovereign Immunity
- Plume remains on controlled lands
- Benefits to
   government





# The Bad – Offshore EOR

- Very applicable; however,
- Design & existence of infrastructure is lacking
- Economics and politics are a moving target
- More evaluation required







### The Bad

- Marine environment is dynamic
- MVA must be risk based (v. prescriptive)



25 to -20	BLACK	NON-OPERABLE: INTOLERABLE: UNDESIRABLE: ACCEPTABLE:		Evacuate the zone and or area/country Do not take this risk Demonstrate ALARP before proceeding Proceed carefully, with continuous improvement				
16 to -10	RED							
-9 to -5	YELLOW							
-4 to -2	GREEN							
-1	BLUE	NEGLIGIBLE: Safe to proceed						
MITIGATION Control Measures PREVENTION			Improbable	Unlikely	Possible	Likely	Probable	
			1	2	3	4	5	
Light	2	1	-1 11	- <b>2</b> 	-3 3.		<b>-5</b> 51	
Serious	-		- <b>2</b> 15	- <b>4</b> 15	<b>-6</b> 35	<b>-8</b> 45		
Major	-3	SEVERITY	-3 1M	-6 2M	-9 3M	-12 4M		
Catastro	ohic -		-4 10	<b>-8</b> 20	-12 3C		<b>-20</b> 5C	
Multi-Ca	tastrophic -	5	-5 1MC	-10 2MC	-15 3MC	-20 4MC	-25 5MC	



## The Bad – Regulatory Morass

#### At the State level (5 x 12)

- O&G wells
- UIC
- CO<sub>2</sub> Storage
- State Sea beds
- Off-shore O&G

AL	NC
CA	OR
FL	SC
GA	ΤX
LA	VA
MS	WA



# The Bad – Regulatory Morass

#### DOI – BOEM

- ☑ EPA- SDWA, UIC, CWA, CAA, MRR, NEPA
- DOT Pipeline and Hazardous Materials Safety Administration (PHMSA)
- ✓ USACE & USCG
- NOAA Magnuson-Stevens Fishery Conservation and Management Act (MSA), the Marine Mammal Protection Act (MMPA) and the Endangered Species Act (ESA)



# The Bad – Regulatory Morass

Advanced Resource

<u>Subsea CCS includes jurisdiction >30 Federal Laws, including :</u>

- Outer Continental Shelf Lands Act
- Submerged Lands Act
- National Environmental Policy Act
- Endangered Species Act
- Coastal Zone Management Act
- Marine Mammal Protection Act
- Clean Air Act
- National Historic Preservation Act

# The Bad – The Obscure

- The London Convention ocean dumping
- RCRA & CERCLA
- American Indian Religious Freedom Act
- Executive Order 12777 Implementation of Section 311 of the Federal Water Pollution Control Act of October 18, 1972, as Amended, and the Oil Pollution Act of 1990
- Rivers and Harbors Appropriation Act of 1899
- Archeological and Historical Preservation Act and the National Historic Preservation Act



# The Ugly

- Time, and
- Money....
- Great Lakes

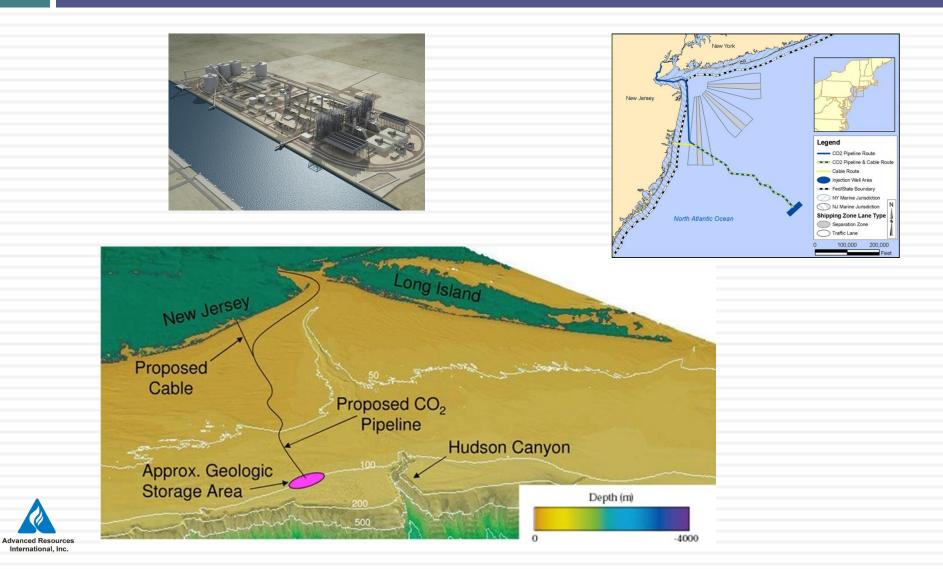




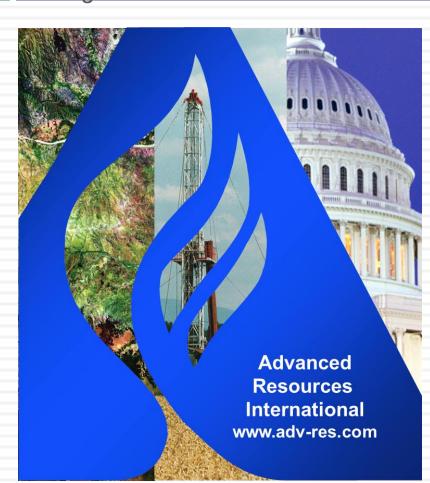




## The PurGen Project and others...



### Questions, Comments, Concerns...



#### Steven M. Carpenter, VP

Others

513-460-0360

#### scarpenter@adv-res.com

#### Offices:

Washington DC, Houston, TX Knoxville, TN, Cincinnati, OH



19