Preliminary Evaluation of Offshore Transport and Storage of CO₂*

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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 CO₂ storage potential and infrastructure in SECARB's offshore areas under Federal jurisdiction in the Gulf of Mexico;
- (2) resource mapping of CO₂ 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



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National CO₂ 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 CO₂ Pipeline Transportation Task Force (PTTF)











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Pipeline Task Force Composition

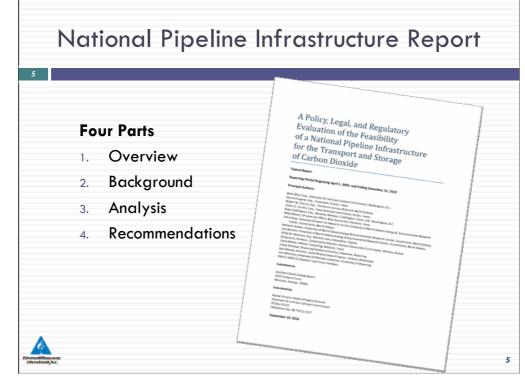
15 Authors & 34 Task Force Members

- 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 CO₂ storage, in sub-seabed geologic structures
- Analysis and consideration of legal and regulatory framework to facilitate offshore CO₂



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:

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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

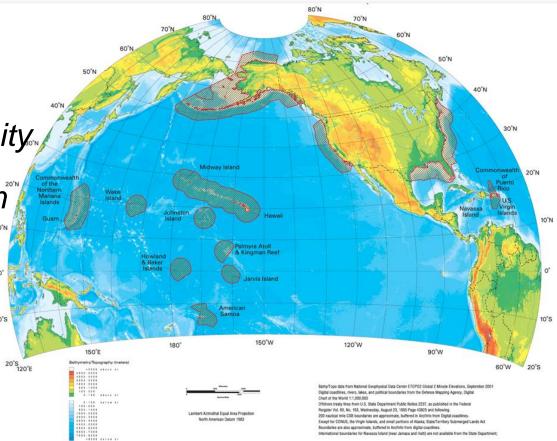
- Sediment thicknesses from 15,000' to 50,000' thick
- Depth of storage will assure super-critical
- >1 trillion tons capacity
- Additional assessment to follow





The Best – One landowner

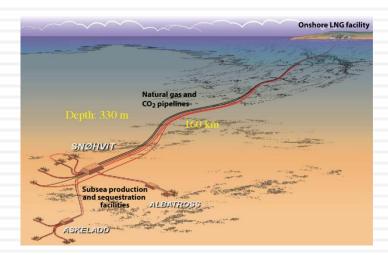
- Single owner
- Sovereign Immunity
- Plume remains on controlled lands
- Benefits to
 government





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	- 2 	-3 3.		-5 51	
Serious	-		- 2 15	- 4 15	-6 35	-8 45		
Major	-3	SEVERITY	-3 1M	-6 2M	-9 3M	-12 4M		
Catastro	ohic -		-4 10	-8 20	-12 3C		-20 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
- CO₂ 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

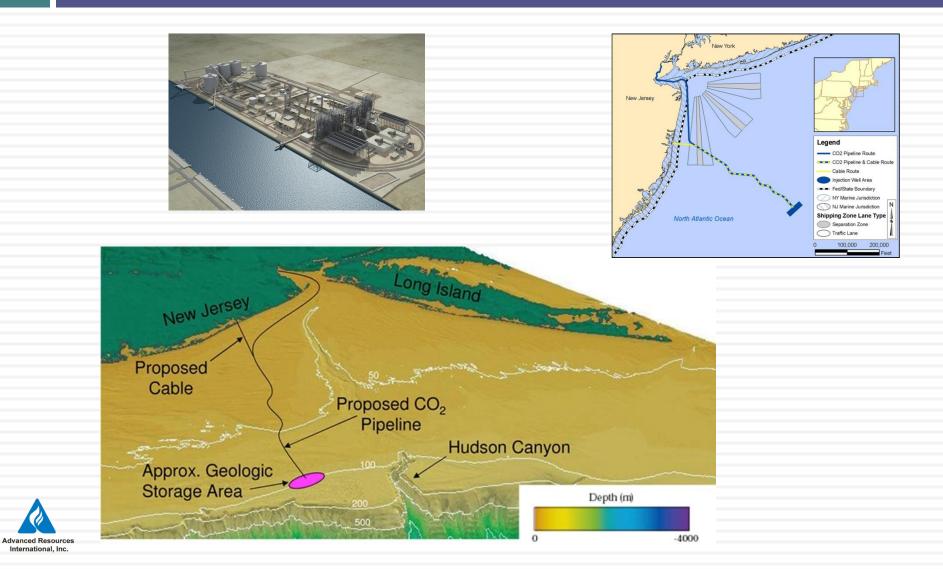




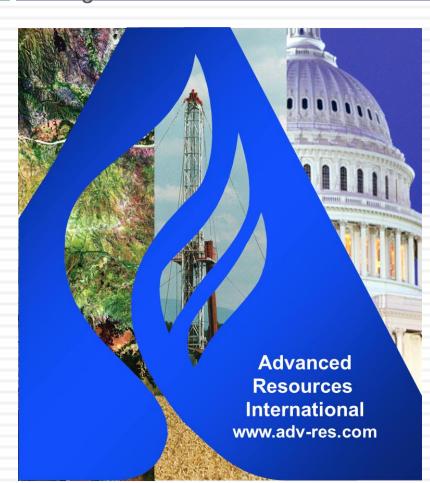




The PurGen Project and others...



Questions, Comments, Concerns...



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Others

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19