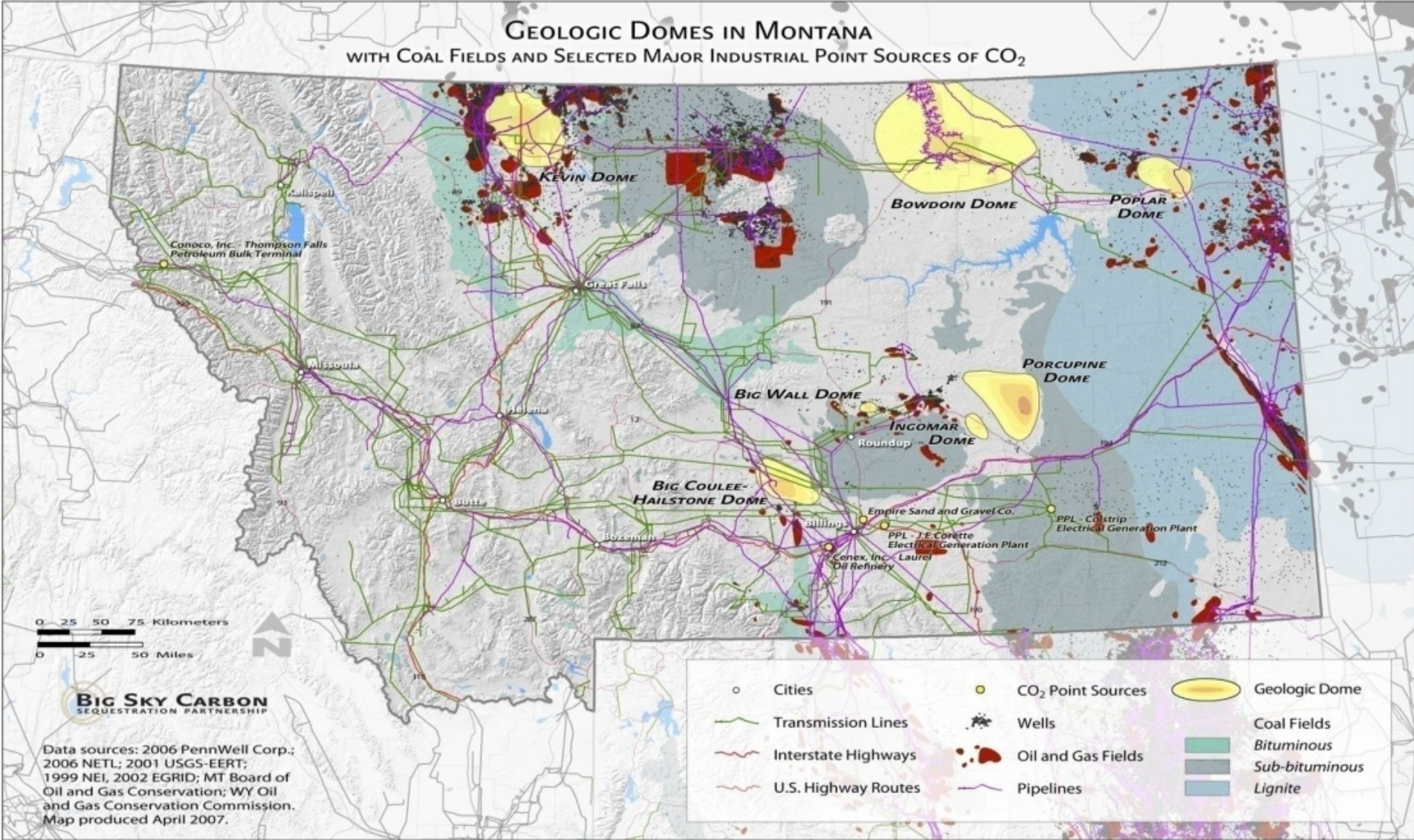


Kevin Dome

GEOLOGIC DOMES IN MONTANA
WITH COAL FIELDS AND SELECTED MAJOR INDUSTRIAL POINT SOURCES OF CO₂

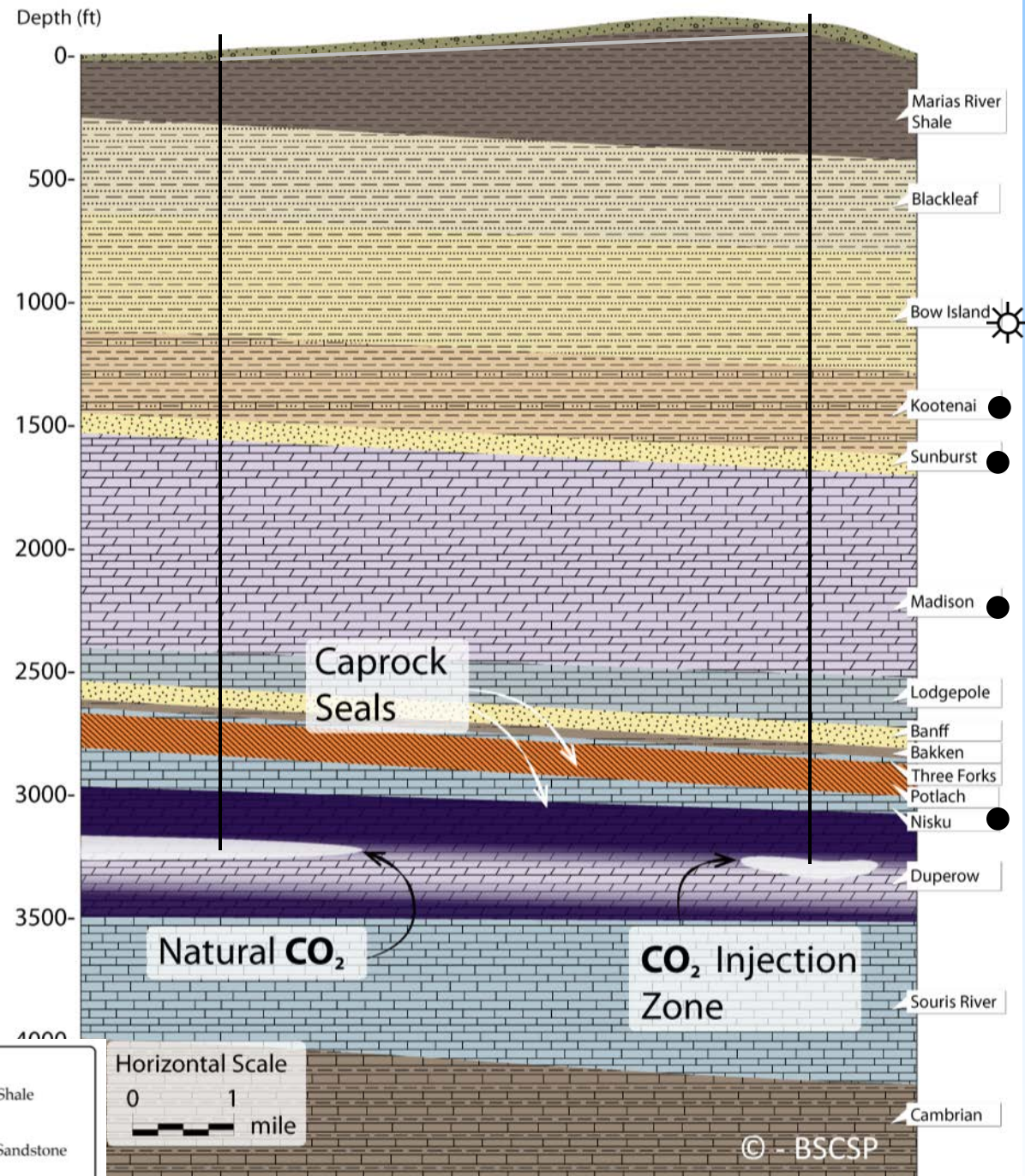


BIG SKY CARBON
SEQUESTRATION PARTNERSHIP

Data sources: 2006 PennWell Corp.;
2006 NETL; 2001 USGS-EERT;
1999 NEI, 2002 EGRID; MT Board of
Oil and Gas Conservation; WY Oil
and Gas Conservation Commission.
Map produced April 2007.

Kevin Dome

- CO₂ in middle Duperow
- Two “gold standard” seals
 - Upper Duperow ~200’ tight carbonates and anhydrites
 - Caprock ~ 175’ Anhydrite Caprock
- Multiple secondary, tertiary Seals

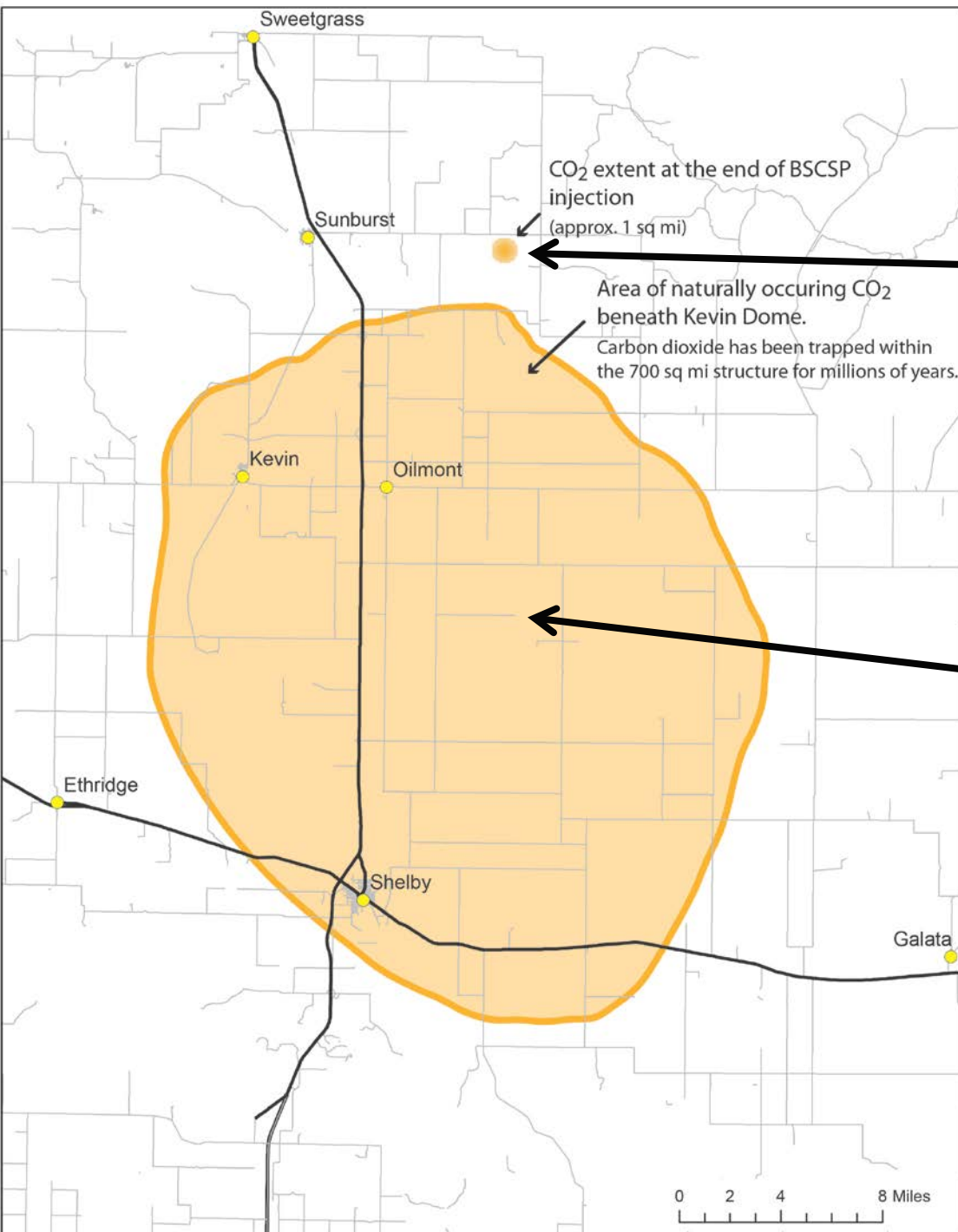


claimer: This graphic is a generalized representation of the subsurface at Kevin Dome. The horizontal and vertical scale are independent of one another to fit view on a single page. Surface infrastructure not to scale.

Kevin Dome CO₂

**Estimated Area of Big Sky Storage Test
(Approx. 1 sq. mi.)**

**Estimated Area of Natural CO₂ Already in Kevin Dome
(Approx. 500 sq. mi.)**



Site Characteristics – Scientific Opportunities

Since nature has stored CO₂ at this site for 50 million years, we viewed this is a very safe place to develop a CO₂ storage field lab that could yield unique and valuable information to science, federal agencies and industry.

- Test monitoring technologies
- Test mitigation methods
- Test stacked storage
- Test detection limits

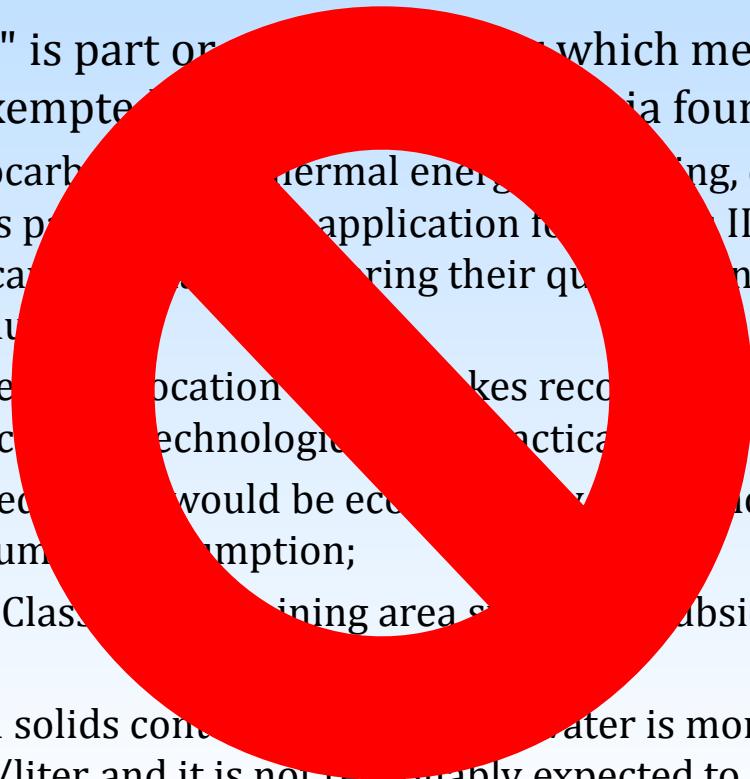
Site Characteristics – Scientific Opportunities

- Natural accumulation vs. new injection
 - Allows investigation of geophysical detection of CO₂ spatially as well as temporally
 - May help understand seismic response changes – function of fluid fill vs. function of geochemically alteration of rock (9C)
- Great opportunity to study mitigation
 - Use injector (and perhaps monitoring wells) to withdraw injected CO₂ and place back in the gas cap



Underground Source of Drinking Water (USDW) - Definition

- (40 CFR) Section 144.3 is an aquifer or part of an aquifer which:
 - a. supplies any public water system, or contains a sufficient quantity of ground water to supply a public water system and currently supplies drinking water for human consumption or contains fewer than **10,000 milligrams/liter of Total Dissolved Solids (TDS)**; and
 - b. is not an exempted aquifer.
- An "exempted aquifer" is part of an aquifer which meets the definition of a USDW but which has been exempted from the definition of a USDW via found in 40 CFR Section 146.4:
 1. It is mineral, hydrocarbon, geothermal energy, or can be demonstrated by a permit applicant as producing a mineral or hydrocarbon or geothermal energy in a permit application for Class II or III operation to contain minerals or hydrocarbons or geothermal energy and their quantities and location are expected to be commercially produced;
 2. It is situated at a depth or location that makes recovery of water for drinking water purposes economically infeasible using current technology or practical methods;
 3. It is so contaminated that it would be economically or technologically impractical to render that water fit for human consumption;
 4. It is located over a Class I mining area or an area of subsidence or catastrophic collapse; or
 5. The total dissolved solids concentration of the water is more than 3,000 and less than 10,000 milligrams/liter and it is not reasonably expected to supply a public water system.

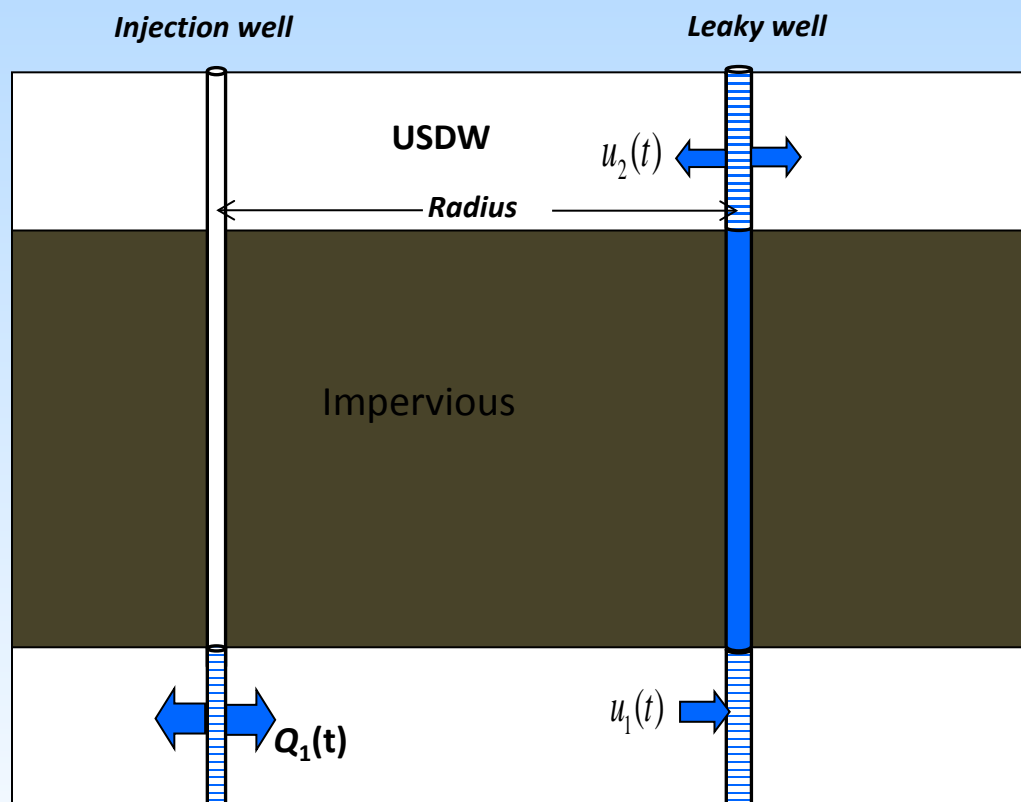


Original Area of Review Definition

Area where pressure can lift brine from storage reservoir to lowermost USDW through an open conduit

Madison is under-pressurized in our region – leads to infinite area of review

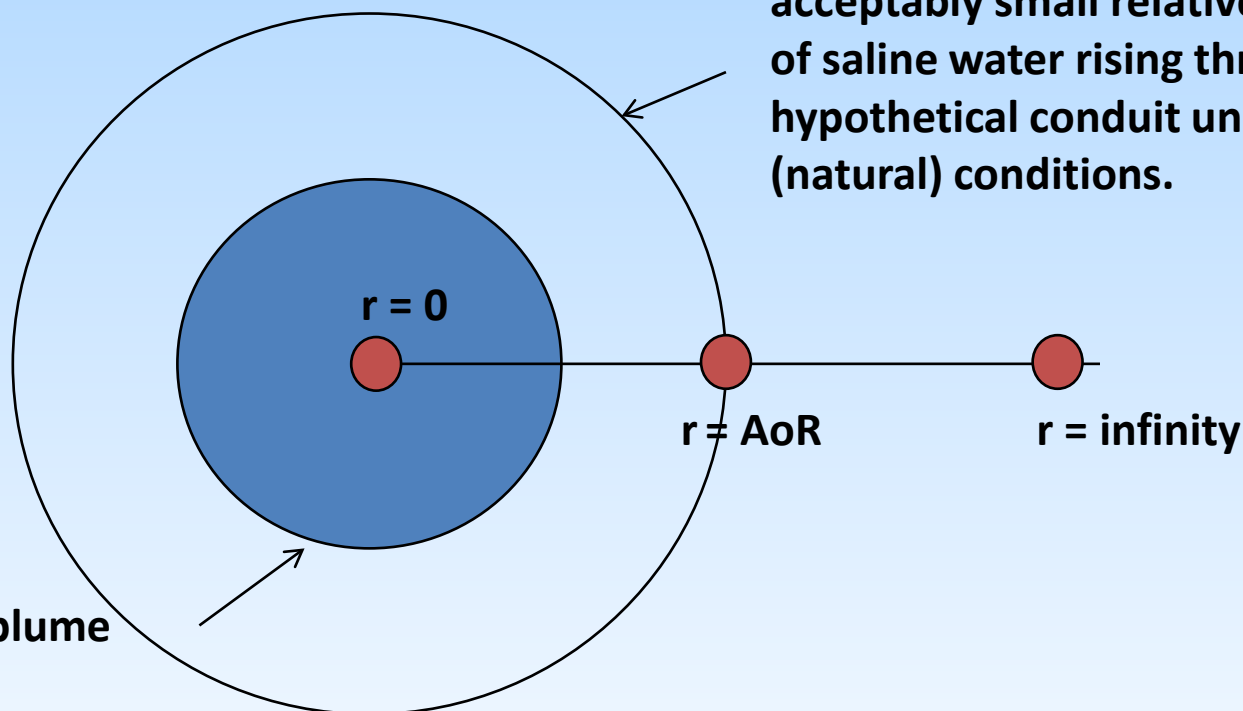
	Storage Reser	USDW
Thickness	50 m	50 m
Average Initial Head	1036.4 (m)	817.35 (m)
Density*	1090.55 (kg/m ³)	1002.77(kg/m ³)
Viscosity*	9.30×10 ⁻⁴ (Pa.s)	9.26×10 ⁻⁴ (Pa.s)
Salt mass fraction	0.13	0.0035
Temperature	34.7 (Celsius)	23.3 (Celsius)
Brine compressibility*	3.45×10 ⁻¹⁰ (Pa ⁻¹)	4.46×10 ⁻¹⁰ (Pa ⁻¹)
Pore compressibility	1.63×10 ⁻⁹ (Pa ⁻¹)	1.63×10 ⁻⁹ (Pa ⁻¹)
Permeability	30, 50, 80 mD	30, 50, 80 mD
Porosity	0.1	0.1
Specific Storativity	2.11×10 ⁻⁶ (1/m)	2.04×10 ⁻⁶ (1/m)
Injection well radius	0.15 m	0.15 m
Injection rate	835.32 m ³ /d	0
Leaky well radius	0.15 m	0.15 m
Leaky well permeability	10 ⁻⁷ m ²	10 ⁻⁷ m ²



- CO₂ injection rate is 7.921 kg/s for 4 years.
- Assuming the density of CO₂ is 819.3 kg/m³, the equivalent single –phase injection rate is equal to 835.32 m³/d.
- The thickness of the formations between the storage reservoir and the USDW is 172.8 m.

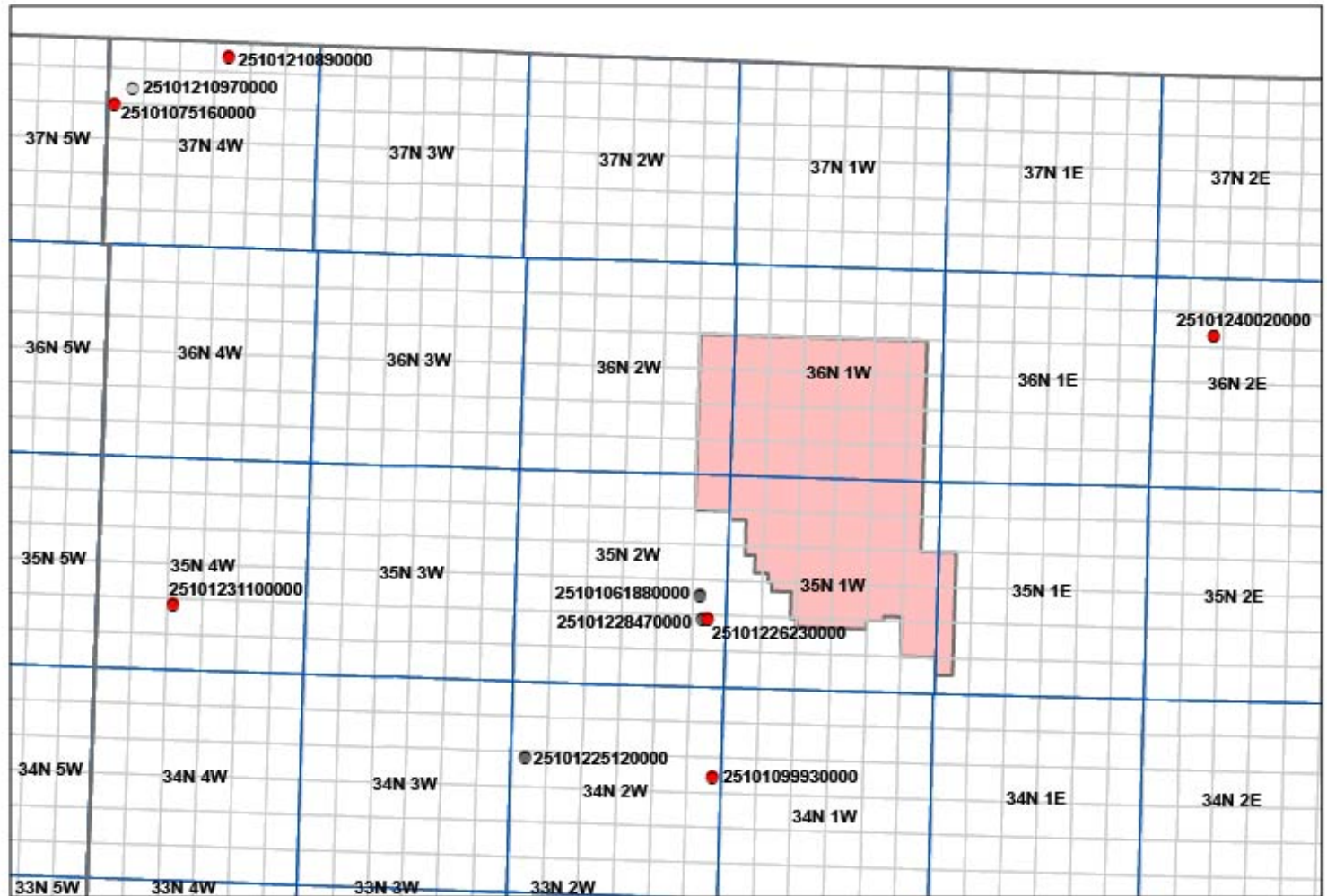
Guidance Document Area of Review

Radius of the location of a hypothetical conduit through which the incrementally larger flow rate of saline water would be acceptably small relative to the flow rate of saline water rising through the same hypothetical conduit under existing (natural) conditions.



 = hypothetical conduit

Wastewater Disposal in USDW?



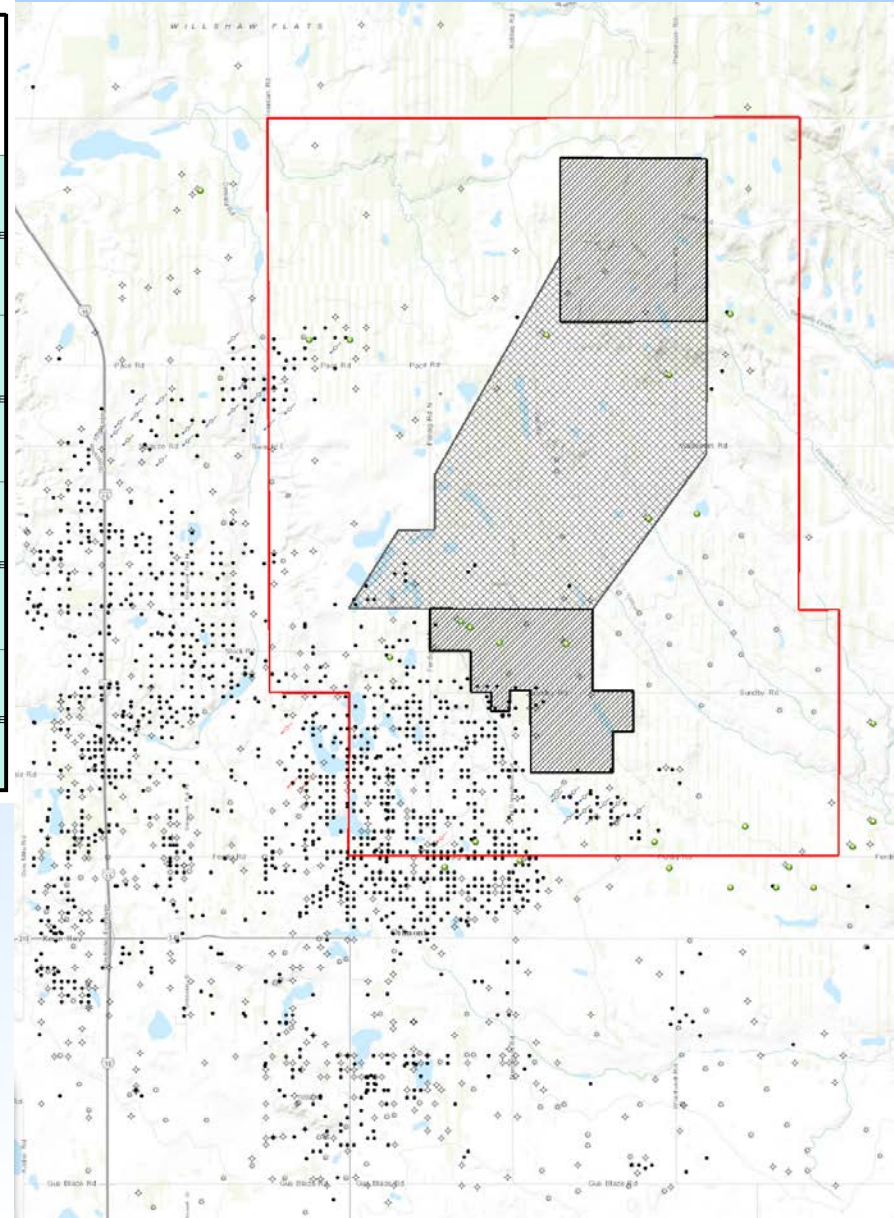
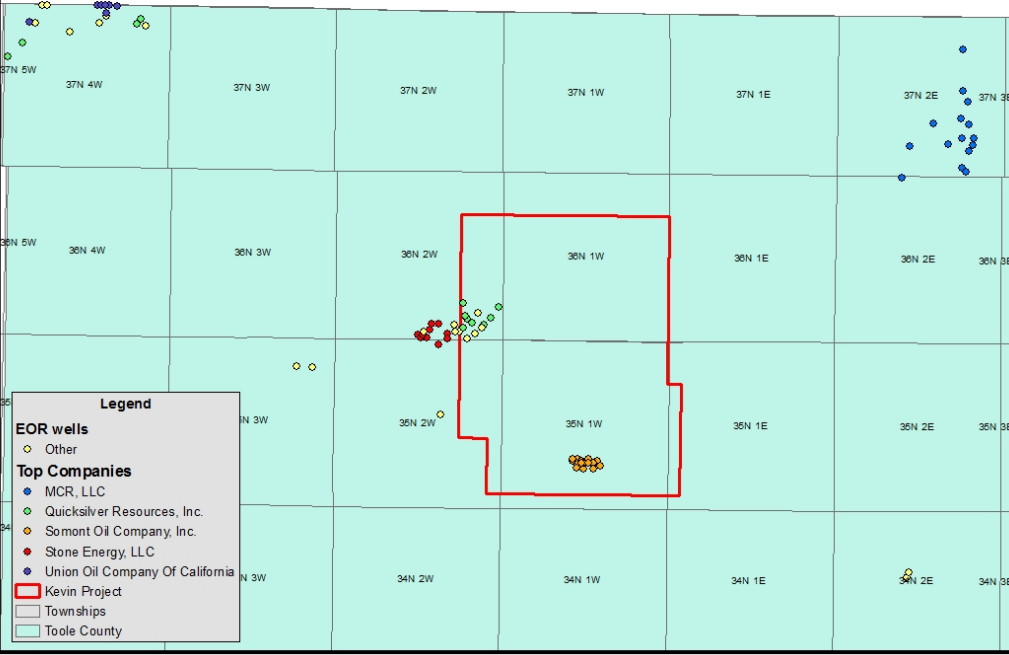
Madison Injection Wells

- Active Injection
- P&A - Approved
- Temporarily Abandoned

0 2.5 5 Miles

EOR in USDW?

EOR Wells in Toole County



Compliance or Science?

- Project was not designed with Class VI compliance in mind
- Class VI compliance is significantly more expensive
- Those costs cannot come out of infrastructure or operations because then there would be no project
- Those costs directly impact the amount of science performed reducing information useful to agencies, industry, etc.
 - Injector requires larger diameter through Madison (2100'). Lost circulation risk.
 - Madison Monitoring Well
 - PISC – Larger surveys later will cost as much as several smaller surveys earlier
 - Mitigation test – PISC implied liability means we can't do this

Why is Class VI so much more expensive?

Why is Class VI so much more expensive?

- Injector requires larger diameter through Madison (2100'). Lost circulation risk.
 - Madison Monitoring Well
 - PISC – Larger surveys later will cost as much as several smaller surveys earlier
 - Mitigation test – PISC implied liability means we can't do this
 - These are examples, not underlying reason
- } Expense of 1-2 deep observation wells

Why is Class VI so much more expensive?

- EPA documentation indicates concern about risk related to total quantity of injectate (Preamble to Rule, Factsheet, Multiple presentations).
- This makes sense. A 500 MW power –plant could inject ~4MT / yr for 50 years – 200 MT total. And there could be many. This is a different scale than current UIC activities.
- But current experimental demos are ~250 kT over 4 yrs, 6.25% of the injection rate and 2% total quantity of a commercial project.
- Can we do something to confirm EPA's intuition that risk scales with injectate quantity? Can EPA issue guidance reducing stringency so demos can yield more useful information?

Everything we can do to SAFELY reduce the 4-dimensional extent of compliance monitoring / actions will recoup some of the science

Challenges

- PISC
 - Default period has private sector partner & university uneasy
 - May have to incur significant cost to have period reduced via directors discretion
 - Uncertainty in this process is an issue
- Financial Assurance
 - Affordable assurance may not be long enough term



Illinois Basin – Decatur Project

CCS Regulatory Lessons Learned

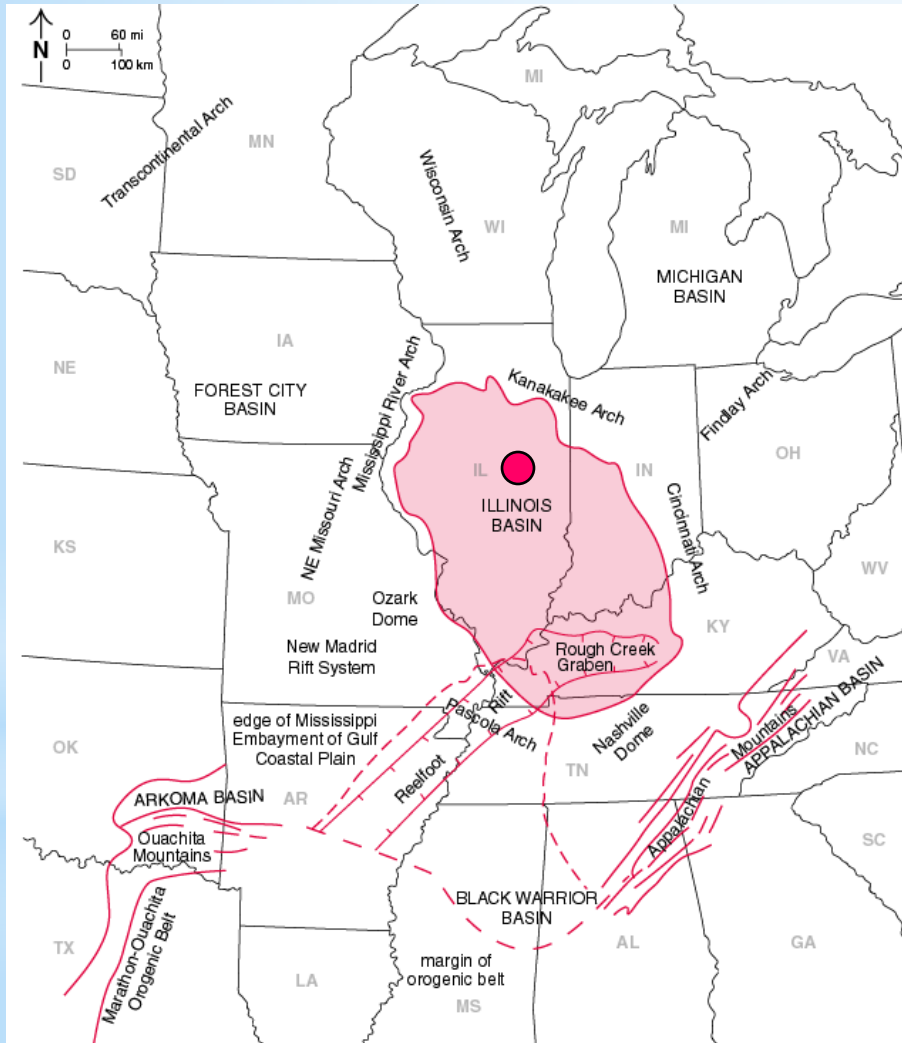
Presented by

Dr. Sallie E. Greenberg

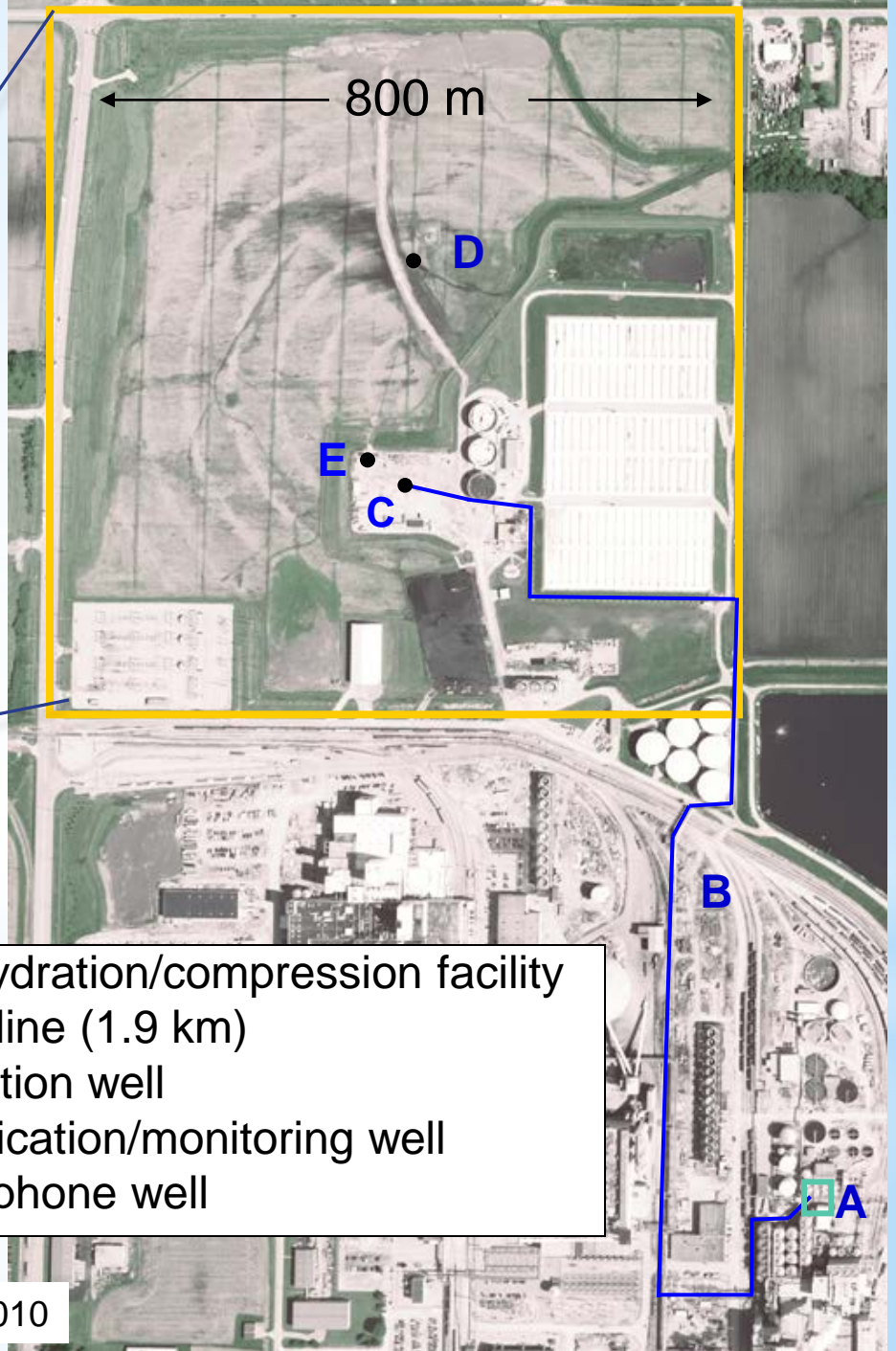
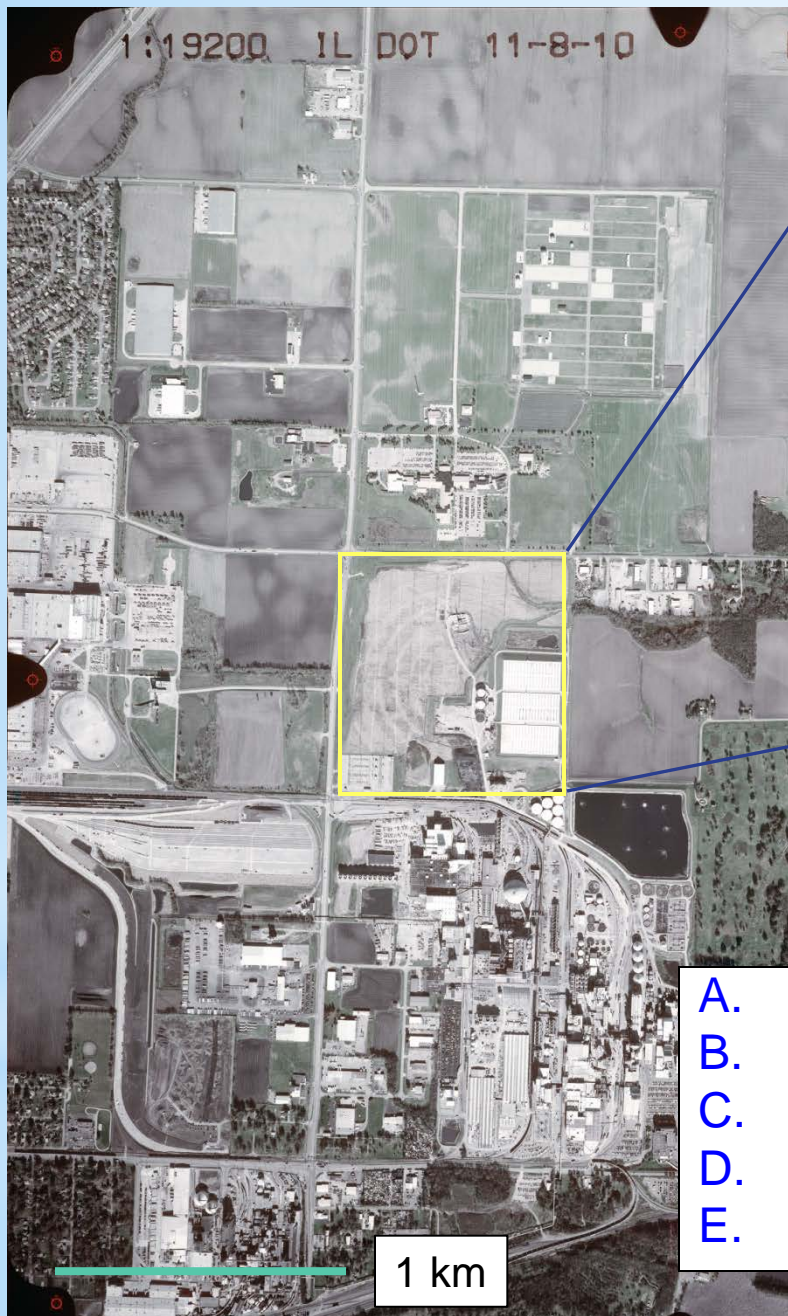
Assistant Director, Advanced Energy Technology Initiative - Illinois
State Geological Survey

2013 Carbon Storage R&D Project Review Meeting
20-22 August, Pittsburgh, PA

Illinois Basin – Decatur Project

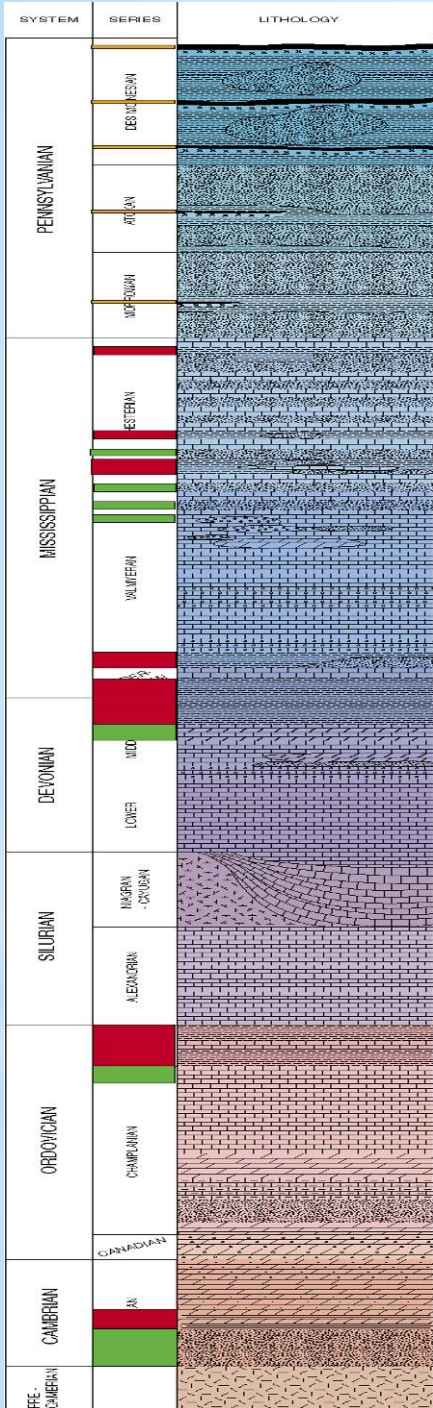


- Collaboration:
 - Midwest Geological Sequestration Consortium,
 - Archer Daniels Midland Company (ADM),
 - Schlumberger Carbon Services,
 - Additional subcontractors
- Objective:
 - Inject 1 million metric tons of anthropogenic carbon dioxide at a depth of ~2,130 m
 - Demonstrate geological carbon sequestration in a saline reservoir at a site in Decatur, IL



- A. Dehydration/compression facility
- B. Pipeline (1.9 km)
- C. Injection well
- D. Verification/monitoring well
- E. Geophone well

photo by Illinois Dept. of Transportation, 8 November 2010



Illinois Basin Stratigraphic Column

Pennsylvanian coal seams

New Albany Shale

Back-up seals

Maquoketa Shale

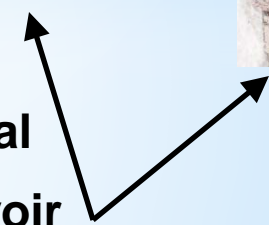
St. Peter Sandstone

Eau Claire Shale – Primary Seal

Mt. Simon Sandstone - Reservoir



fluvial sandstones



Permitting Context

- Underground Injection Control (UIC) program under Safe Drinking Water Act – subsurface injection
- IBDP permitted as Class I – non hazardous by Illinois
- Submitted Jan 2008, permission to inject October 2011
 - Application, hearing, minor modification, major modification, completion reports, permission to inject
- Class VI – federal primacy
 - December 2010
 - Reapply
 - Awaiting response
 - Monitoring implications

IBDP Regulatory Lessons

- Regulations will drive monitoring activities
 - Ongoing and evolving
 - Research has not yet defined monitoring requirements
 - Researchers should consider obligation to evaluate commercial needs
- Environmental baseline essential regardless of regulatory requirements
 - Risk mitigation
 - Support CCS primary deployment goals
- Public engagement guidelines should be exceeded
 - Proactive approach increases transparency
 - Move beyond formal engagement requirements
- Provide balance of information – detail important, but can distract

IBDP Regulatory Lessons

- Modeling
 - Generation
 - Verification
- Proactively educate regulators
 - Engage early
 - Familiarize yourself with regulatory time clock
- Start early
- Seek out examples (publicly available)
- Remain flexible

IBDP Environmental Monitoring Framework

Near Surface

Deep Subsurface

Atmos.

**Soil and
vadose
zone**

**Shallow
ground
water**

**Above
seal**

**Injection
zone**

**Eddy
covariance**

**Meteorological
conditions**

Ambient CO₂

**Tunable diode
laser for CO₂**

**CIR aerial
imagery**

InSAR and GPS

Soil gases

Soil CO₂ flux

**Tunable diode
laser for CO₂**

**Geophysical
surveys**

**Geochemical
sampling**

P/T monitoring

**Geophysical
surveys**

**Geochemical
sampling**

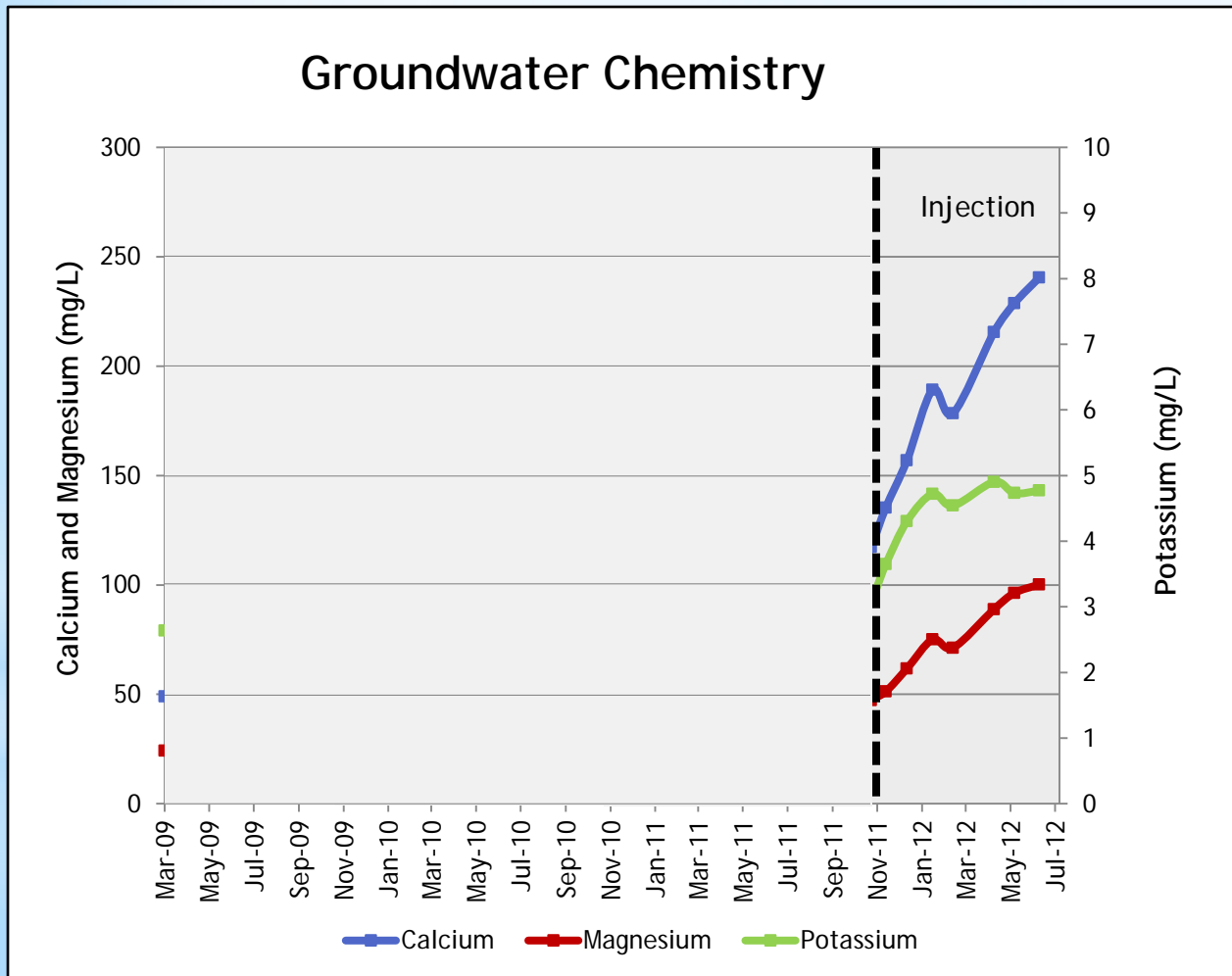
P/T monitoring

**Geophysical
surveys**

**Geochemical
sampling**

P/T monitoring

Baseline Is Important



- Increases in Nov 2009 and Nov 2011, but not Nov 2010
- One year of preinjection data not enough to show seasonal cycle

Acknowledgments

- The Midwest Geological Sequestration Consortium is funded by:
 - **U.S. Department of Energy** (DOE) through the National Energy Technology Laboratory (NETL) via the Regional Carbon Sequestration Partnership Program (contract number DE-FC26-05NT42588)
 - And by the **State of Illinois** via a cost share agreement with the Illinois Department of Commerce and Economic Opportunity, Office of Coal Development through the Illinois Clean Coal Institute.



Southeast Regional Carbon Sequestration Partnership

Citronelle Project: Experiences with Permitting and Regulations on CCS

The logo for SECARB features the word "SECARB" in a bold, green, sans-serif font. A black, curved swoosh arches over the letters "C" and "A".

SECARB



***Carbon Storage R&D
Project Review Meeting
August 21, 2013***

Kimberly Sams
Assistant Director, Geoscience Programs
Southern States Energy Board

Permitting Outline & Project Location

- National Environmental Protection Act (NEPA)
- Alabama Historical Commission
- U.S. Fish and Wildlife
- U.S. Army Corps of Engineers
- Alabama Department of Environmental Management (ADEM)

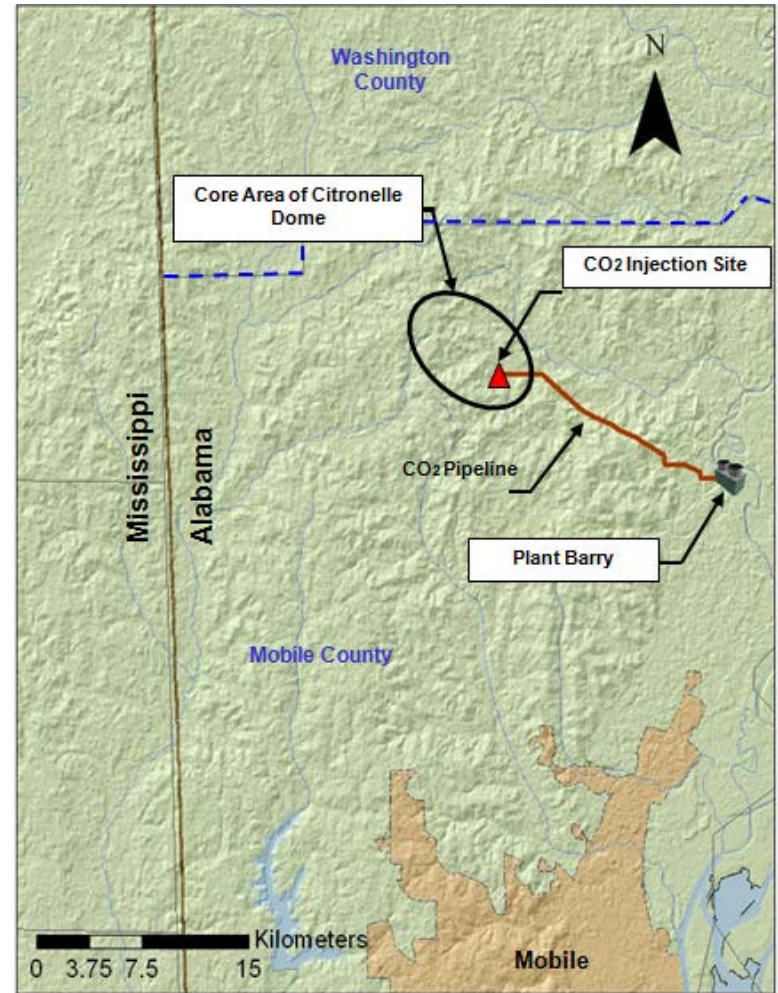
Anthropogenic Test

Capture: Alabama Power 's Plant Barry, Bucks, Alabama

Transportation: Denbury

MVA: SSEB, EPRI, ARI

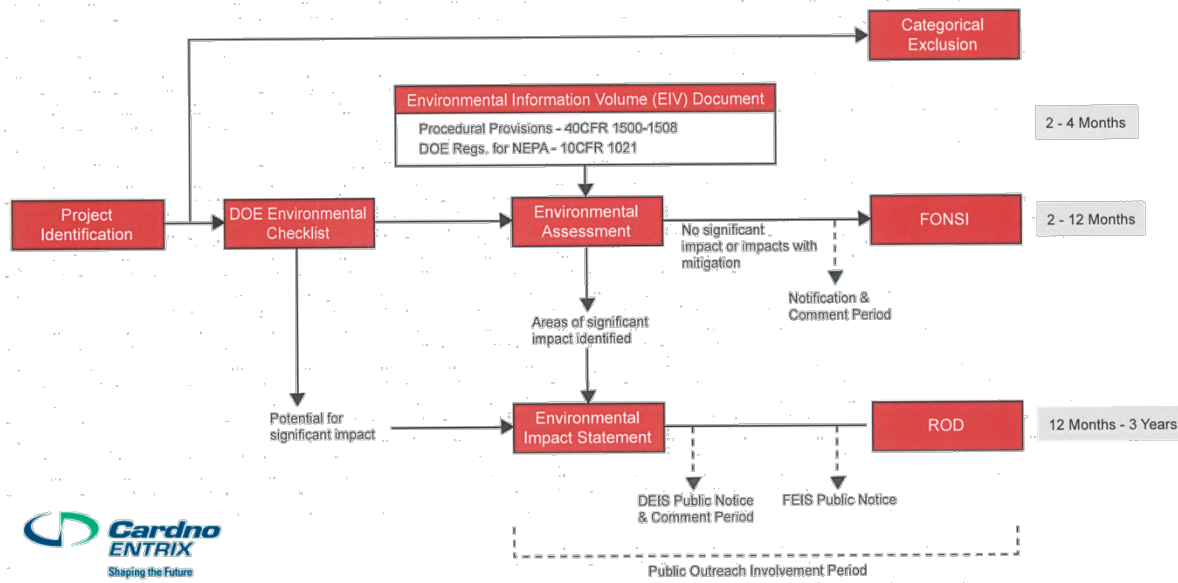
Geo Storage: Denbury's Citronelle Field, Citronelle, Alabama



National Environmental Protection Act

Environmental Impacts

- Categorical Exclusion: All locations performing office work, planning, coordination, etc.
- Environmental Assessment (EA)
 - Environmental Information Volume and Supplements for Pipeline and Electric Transmission Line
 - Finding of No Significant Impact (FONSI) issued by NETL on March 18, 2011



Alabama Historical Commission

State Cultural or Archaeological Assets

- 2 cultural resources assessments
- 4 archaeological sites discovered in the Transmission Line survey, though not eligible under the National Register of Historic Places – no further investigations warranted
- No cultural resources were discovered – no further investigations warranted
- Following review of EA, “...agree with the EA as it pertains to no effect to National Register eligible cultural resources” by State Historic Preservation Officer, April 2011



U.S. Fish and Wildlife

Threatened and Endangered Species

- Endangered Gopher Tortoise habitat
- 110 burrows in/adjacent to construction area
- Directional drilling of pipeline
- Marked burrows at well pad site



U.S. Army Corps of Engineers

Wetlands

- Pipeline route
 - 12 miles
 - Directional drilled 18 sections of the pipeline, 30-60 ft deep, under wetlands, roads, utilities, railroad tracks, and tortoise colonies
 - Surface re-vegetation and erosion control
- Well pad construction
 - Wetlands impacts mitigated after drilling completed



AL Dept. of Environmental Management

Underground Sources of Drinking Water

- Class V Experimental UIC Permit issued by the Alabama Department of Environmental Management (ADEM) on November 22, 2011
 - U.S. Environmental Protection Agency Headquarters Involvement
 - Provided comments to ADEM regarding permit requirements
 - Many Class VI standards applied to the Class V Permit (see below)
- Permission to Inject issued by ADEM on August 8, 2012
- Injection began in August 20, 2012

Injection Area of Review (AOR) determined by annual modeling
Periodic AOR updates based on monitoring and modeling results
Extensive deep, shallow and surface CO₂ monitoring

Monthly reporting of injection pressures, annular pressures and injection stream composition
Injection stream monitoring

Periodically updated Corrective Action Plan

Site closure based on USDW non-endangerment demonstration (5-yr renewal)

Pressurized annulus throughout injection (+/- 200 psig)

Emergency and remedial response plan

Post-injection site care plan