

# Illinois Basin – Decatur Project CCS Regulatory Lessons Learned

Presented by

Dr. Sallie E. Greenberg

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

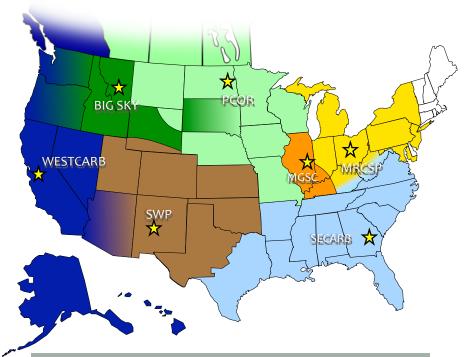
IEA International CCS Regulatory Network Meeting 18 June, 2013 Paris, France



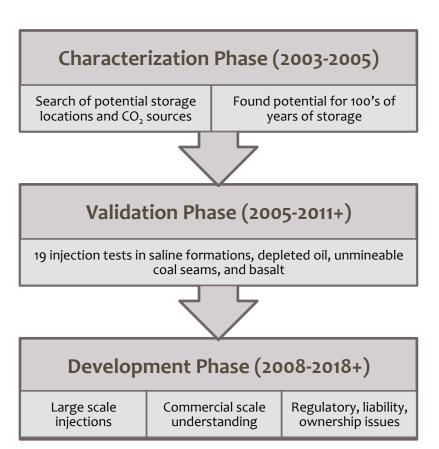


#### Seven Regional Partnerships

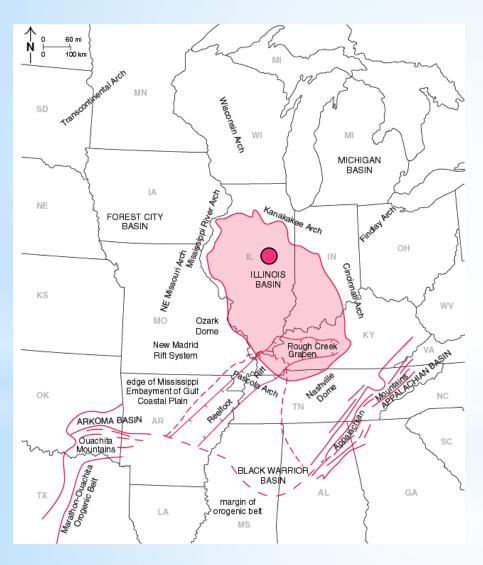
400+ distinct organizations, 43 states, 4 Canadian Provinces



- Engage regional, state, and local governments
- Determine regional sequestration benefits
- Baseline region for sources and sinks
- Establish monitoring and verification protocols
- Address regulatory, environmental, and outreach issues
- Validate sequestration technology and infrastructure



#### Illinois Basin – Decatur Project

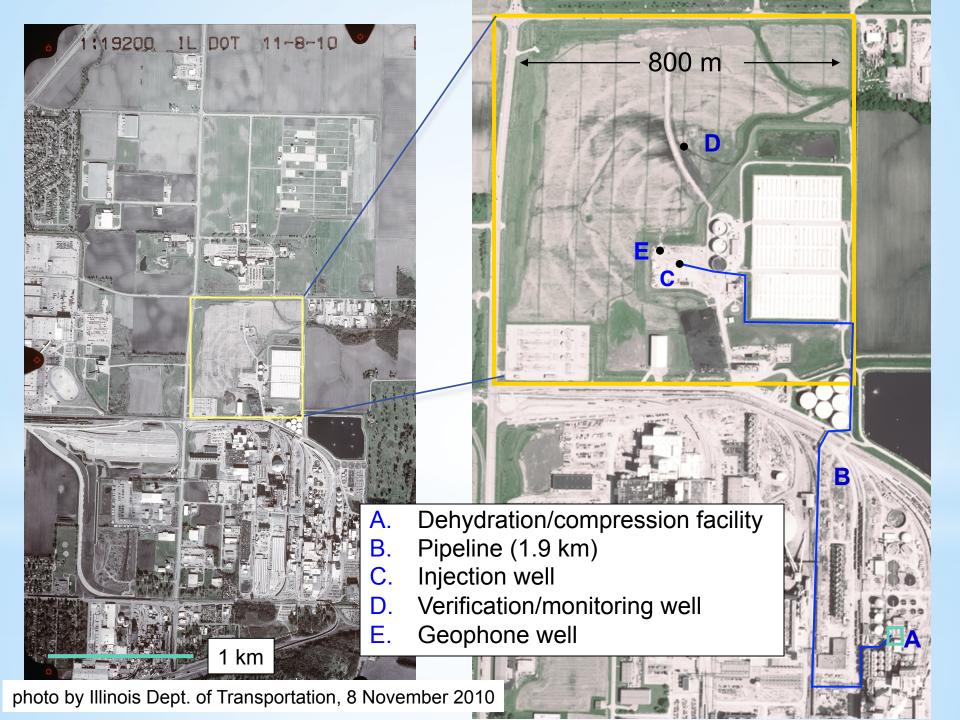


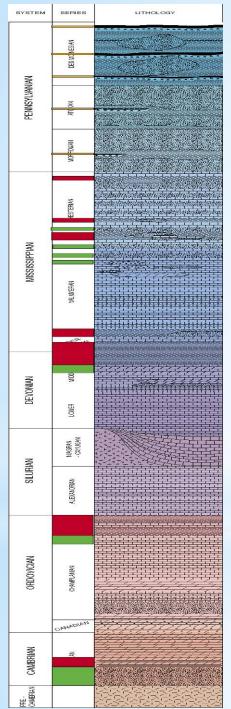
#### Collaboration:

- 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





Pennsylvanian coal seams

Illinois Basin Stratigraphic Column

**New Albany Shale** 

Back-up seals

Maquoketa Shale

St. Peter Sandstone

Eau Claire Shale – Primary Seal

Mt. Simon Sandstone - Reservoir



### **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



## Public Engagement – Communication of Risk Risk of Communication

- Effective public outreach can help identify main concerns
- Outreach provides no guarantee of public acceptance of CCS
- Outreach goal is well-informed stakeholders comfortable with potential project risks & benefits, and trust project team
- In absence of outreach effort, public forms own opinions of CCS
- Perceived risks no less "real" for implementing outreach and can rapidly transform into public opposition if ignored

### Bottom-Up Approach to Public Engagement

- Engage multiple stakeholders in every way possible
- Be transparent and use permit requirements and public hearings to disseminate information
- Reach out to local opinion leaders: newspaper, electronic media, farm organizations, all levels of government, economic development officials, inform industry partner employees

#### **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 CO,

Tunable diode laser for CO,

CIR aerial imagery

InSAR and GPS

Soil gases

Soil CO, flux

Tunable diode laser for CO

Geophysical surveys

Geochemical sampling

P/T monitoring

Geophysical surveys

Geochemical sampling

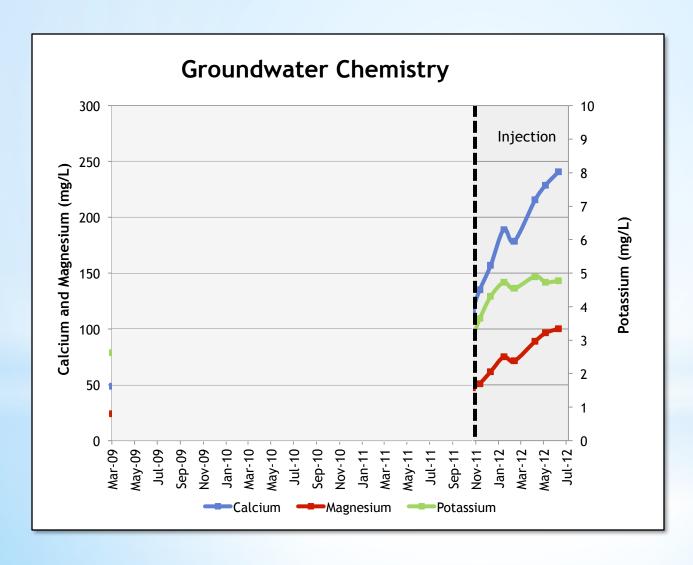
P/T monitoring

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

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