# Using e-GGRT to Submit Your Subpart RR Project Exemption Request or MRV Plan

This page provides an overview of sub-topics that are central to Subpart RR - Geologic Sequestration of Carbon Dioxide.

Subpart RR - Geologic Sequestration of Carbon Dioxide reporting:

- Overview
- Subpart RR R&D Project Exemption Request
- Subpart RR MRV Plan Extension Request
- Subpart RR Proposed MRV Plan Submission

The end of this page contains links you can use for more information on these topics.

If you reported for the previous reporting year, the Agency has carried some of your data from last year into the current reporting year to reduce the reporting burden. It is still your responsibility to review and ensure that all of the information in your submission is correct, but the Agency believes that most of the data that is carried forward is unlikely to change significantly from year to year. For more information about carry forward data, please see the Carry forward of data from previous submissions help content

#### Overview

Under Subpart RR, facilities that conduct geologic sequestration by injecting a CO<sub>2</sub> stream for long-term containment in subsurface geologic formations, including Underground Injection Control (UIC) Class VI wells, are required to:

- Report basic information on CO<sub>2</sub> received for injection (40 CFR 98.446).
- Develop and implement an EPA-approved site-specific monitoring, reporting, and verification (MRV) plan (40 CFR 98.448).
- Report the amount of CO<sub>2</sub> geologically sequestered using a mass balance approach and annual monitoring activities (40 CFR 98.446).

Facilities that conduct enhanced oil and gas recovery are not required to report geologic sequestration under Subpart RR unless:

- the owner or operator chooses to opt-in to Subpart RR (40 CFR 98.440(c)(1)), or
- the facility holds a UIC Class VI permit for the well or group of wells used to enhance oil and gas recovery (40 CFR 98.440(c)(2))

R&D projects will be granted an exemption from Subpart RR provided they meet the eligibility requirements (40 CFR 98.440). EPA will consider a project eligible if it meets the Subpart RR definition of an R&D project: "a project for the purpose of investigating practices, monitoring techniques, or injection verification, or engaging in other applied research, that will enable safe and effective long-term containment of a CO<sub>2</sub> stream in subsurface geologic formations, including research and short duration CO<sub>2</sub> injection tests conducted as a precursor to long-term storage" (40 CFR 98.449).

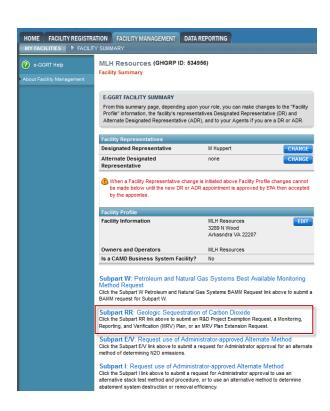


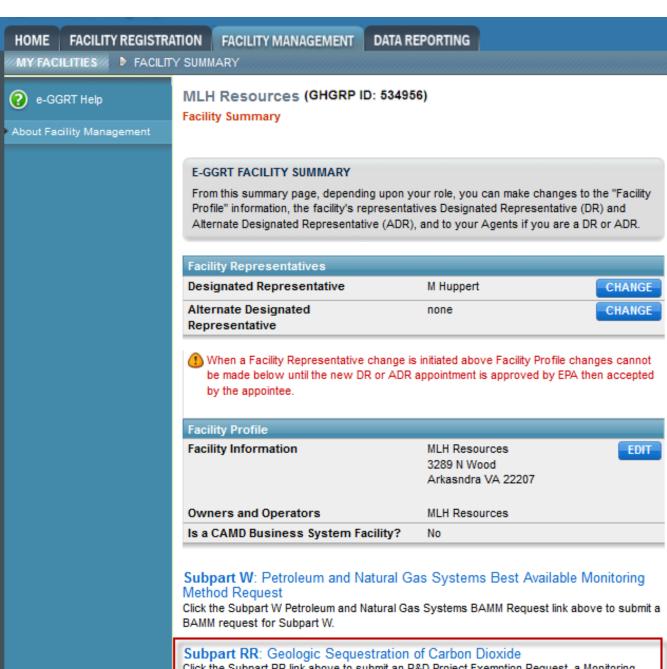
#### Submissions Schedule:

- Register your facility and submit your Certificate of Representation 60 days before making a submission under Subpart RR (according to the provisions in 40 CFR 98.4).
- 2. Submit a proposed MRV plan, MRV plan submission extension request (up to 180 day extension), or R&D project exemption request through e-GGRT by the following deadlines (according to the provisions in 40 CFR 98.448(b)):
  - If you were issued a final UIC permit authorizing the injection of CO<sub>2</sub> into the subsurface on or before December 31, 2011, you must submit a proposed MRV plan, MRV plan extension request, or R&D project exemption request by June 30, 2012
  - If you were issued a final UIC permit authorizing the injection of CO<sub>2</sub> into the subsurface on or after January 1, 2012, you
    must submit a proposed MRV plan, MRV plan extension request, or R&D project exemption request within 180 days of
    receiving a final UIC permit
  - If you are injecting a CO<sub>2</sub> stream in subsurface geologic formations to enhance the recovery of oil or natural gas and you are not permitted as Class VI under the UIC Program, you may opt to submit an MRV plan at any time
- 3. Submit annual reports through e-GGRT (40 CFR 98.446).

To access these features click the Facility Management tab on the top of the e-GGRT window. You will be presented with the following screen:

>> Click this link to expand





Click the Subpart RR link above to submit an R&D Project Exemption Request, a Monitoring, Reporting, and Verification (MRV) Plan, or an MRV Plan Extension Request.

## Subpart E/V: Request use of Administrator-approved Alternate Method

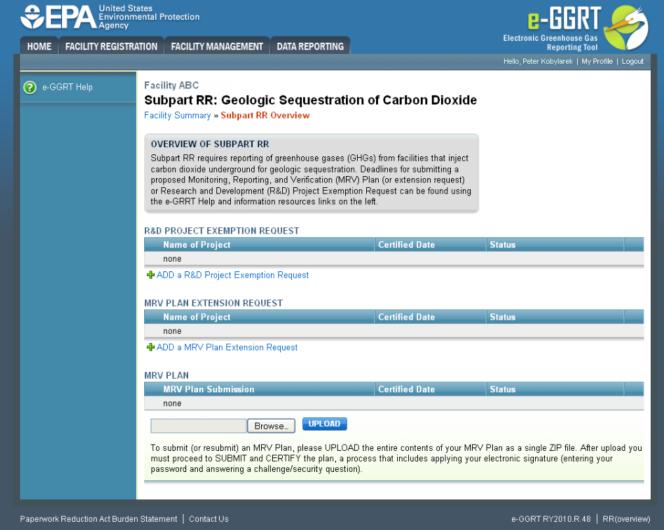
Click the Subpart E/V link above to submit a request for Administrator approval for an alternate method of determining N2O emissions.

## Subpart I: Request use of Administrator-approved Alternate Method

Click the Subpart I link above to submit a request for Administrator approval to use an alternative stack test method and procedure, or to use an alternative method to determine abatement system destruction or removal efficiency.

Click on the "Subpart RR: Geologic Sequestration of Carbon Dioxide" link and you will be presented with the Subpart RR R&D Project Request and MRV Plan Processes page, as shown below:





#### **R&D Project Exemption Request**

The following information is required when submitting an R&D Exemption Request:

- Name of Project
- Estimated CO<sub>2</sub> injection Start Date
- Estimated CO<sub>2</sub> injection End Date
- · Class of UIC permit

- · Date of submission of the UIC permit application
- UIC permit Start Date
- UIC permit End Date
- · Source and type of funding
- Research Purpose
- Proposed CO<sub>2</sub> injection volumes

## **MRV Plan Extension Request**

Subpart RR allows facilities to request one extension of up to an additional 180 days in which to submit a proposed MRV plan. The following information is required when submitting an MRV Plan Extension Request:

- Name of Project
- Date of final UIC permit authorizing subsurface injection of CO<sub>2</sub>
- Number of days requested for extending the MRV plan due date (180 days maximum)

## **Proposed MRV Plan Submission**

Subpart RR requires you to develop and submit a proposed MRV plan for monitoring, reporting, and verification of geologic sequestration at the facility. Your proposed MRV plan must contain the following components:

- · Delineation of the maximum monitoring area and the active monitoring areas
- Identification of potential surface leakage pathways for CO<sub>2</sub> in the maximum monitoring area and the likelihood, magnitude, and timing, of surface leakage of CO<sub>2</sub> through these pathways
- A strategy for detecting and quantifying any surface leakage of CO<sub>2</sub>
- A strategy for establishing the expected baselines for monitoring CO<sub>2</sub> surface leakage
- A summary of the considerations you intend to use to calculate site-specific variables for the mass balance equation
- Well permitting information
- Proposed date to begin collecting data for calculating total amount sequestered according to equation RR-11 or RR--12 of Subpart RR

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#### See Also

Screen Errors
Subpart RR R&D Project Exemption Request
Subpart RR MRV Plan Extension Request
Subpart RR Proposed MRV Plan Submission