

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 CO₂ stream for long-term containment in subsurface geologic formations, including Underground Injection Control (UIC) Class VI wells, are required to:

- Report basic information on CO₂ 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 CO₂ 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 CO₂ stream in subsurface geologic formations, including research and short duration CO₂ injection tests conducted as a precursor to long-term storage" (40 CFR 98.449).



Submissions Schedule:

1. 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 CO₂ 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 CO₂ 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 CO₂ 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](#)

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About Facility Management

MLH Resources (GHGRP ID: 534956)

Facility Summary

E-GGRT FACILITY SUMMARY

From this summary page, depending upon your role, you can make changes to the "Facility Profile" information, the facility's representatives Designated Representative (DR) and Alternate Designated Representative (ADR), and to your Agents if you are a DR or ADR.

Facility Representatives

Designated Representative

M Huppert

CHANGE

Alternate Designated Representative

none

CHANGE

When a Facility Representative change is initiated above Facility Profile changes cannot be made below until the new DR or ADR appointment is approved by EPA then accepted by the appointee.

Facility Profile

Facility Information

MLH Resources

3289 N Wood

Arkansas VA 22207

EDIT

Owners and Operators

MLH Resources

Is a CAMD Business System Facility?

No

Subpart W: Petroleum and Natural Gas Systems Best Available Monitoring Method Request

Click the Subpart W Petroleum and Natural Gas Systems BAMI Request link above to submit a BAMI request for Subpart W.

Subpart RR: Geologic Sequestration of Carbon Dioxide

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.

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Facility Representatives

Designated Representative	M Huppert	CHANGE
Alternate Designated Representative	none	CHANGE

⚠ When a Facility Representative change is initiated above Facility Profile changes cannot be made below until the new DR or ADR appointment is approved by EPA then accepted by the appointee.

Facility Profile

Facility Information	MLH Resources 3289 N Wood Arkasndra VA 22207	EDIT
Owners and Operators	MLH Resources	
Is a CAMD Business System Facility?	No	

Subpart W: Petroleum and Natural Gas Systems Best Available Monitoring Method Request

Click the Subpart W Petroleum and Natural Gas Systems BMM Request link above to submit a BMM request for Subpart W.

Subpart RR: Geologic Sequestration of Carbon Dioxide

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.

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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:

>> Click this link to expand

The screenshot shows the e-GGRT web application interface. At the top, there is a navigation bar with links: HOME, FACILITY REGISTRATION, FACILITY MANAGEMENT, and DATA REPORTING. The user is logged in as Peter Kobylarek. The main content area is titled "Facility ABC" and "Subpart RR: Geologic Sequestration of Carbon Dioxide". It includes a link to "Subpart RR Overview". Below this is an "OVERVIEW OF SUBPART RR" section explaining the requirements for reporting greenhouse gases (GHGs) from facilities that inject carbon dioxide underground for geologic sequestration. The interface also features three tables for "R&D PROJECT EXEMPTION REQUEST", "MRV PLAN EXTENSION REQUEST", and "MRV PLAN", each with columns for Name of Project, Certified Date, and Status. There are links to "ADD" a new request or plan. At the bottom, there is an "UPLOAD" button and a text box for submitting or resubmitting an MRV Plan as a single ZIP file.

This screenshot shows the e-GGRT web application interface, similar to the one above but with a slightly different layout. The navigation bar includes links: HOME, FACILITY REGISTRATION, FACILITY MANAGEMENT, and DATA REPORTING. The user is logged in as Peter Kobylarek. The main content area is titled "Facility ABC" and "Subpart RR: Geologic Sequestration of Carbon Dioxide". It includes a link to "Subpart RR Overview". Below this is an "OVERVIEW OF SUBPART RR" section explaining the requirements for reporting greenhouse gases (GHGs) from facilities that inject carbon dioxide underground for geologic sequestration. The interface also features three tables for "R&D PROJECT EXEMPTION REQUEST", "MRV PLAN EXTENSION REQUEST", and "MRV PLAN", each with columns for Name of Project, Certified Date, and Status. There are links to "ADD" a new request or plan. At the bottom, there is an "UPLOAD" button and a text box for submitting or resubmitting an MRV Plan as a single ZIP file.

R&D Project Exemption Request

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

- Name of Project
- Estimated CO₂ injection Start Date
- Estimated CO₂ 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 CO₂ 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 CO₂
- 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 CO₂ in the maximum monitoring area and the likelihood, magnitude, and timing, of surface leakage of CO₂ through these pathways
- A strategy for detecting and quantifying any surface leakage of CO₂
- A strategy for establishing the expected baselines for monitoring CO₂ 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

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