Name of submitter: Katherine Romanak

Affiliated organization of the submitter (if any): The Bureau of Economic Geology at The University

of Texas at Austin

Contact email of submitter: katherine.romanak@beg.utexas.edu

Date: June 21, 2013

Questionnaire for soliciting public inputs on the 'concept note on operationalizing carbon dioxide capture and storage as a CDM project activity'

Background: The Conference of the Parties serving as the meeting of the Parties to the Kyoto Protocol (hereinafter referred to as the CMP) adopted at its seventh session decision 10/CMP.7; "Modalities and procedures for carbon dioxide capture and storage in geological formations as clean development mechanism project activities" (hereinafter referred to as the CCS modalities and procedures).

At its seventy-second meeting, the CDM Executive Board (the Board) approved the 'workplan of the CDM Executive Board for 2013'. In the workplan Board approved to launch a public call for concept note of project 160 'Operationalizing carbon capture storage (CCS)'. The input received from this call for input will be considered in seventy fourth meeting of the Board.

QUESTIONNAIRE

Part I: Overall assessment of the concept note

Please provide general suggestions for improvement and editorial comments on the draft document. For example, is the document:

- (a) Well written;
- (b) Simple and accessible;
- (c) User-friendly;
- (d) Well-organized, with flow of logic that is clear;
- (e) Exemplified:
- (f) Complete

The concept note is well written, clear and easy to follow. I have no recommendations for overall quality.

Part II: Input on specific and technical issues

The concept note has discussed the main issues in CCS modalities and procedures which may need clarity for implementation. The inputs are sought on the following:

- a. **Coverage of issues:** Are the issues covered in concept note adequate? Is there any other issue which require further clarification?
- b. *Options and recommendations:* Do you propose some other option and recommendation other than mentioned in the concept note?
- c. **Additional standards/procedures:** Do you require any additional procedures/guidelines/standards which may help fulfilling the requirements for CCS project activity as mentioned in CCS modalities and procedures? If yes, kindly explain.

The overall coverage of issues, procedures and options seem well-thought and well-communicated. A few recommendations based on my field of expertise are outlined in the following chart.

Call for	public	inputs	– T	emplate
for inpu		•		-

Concept note on operationalizing carbon capture and storage as a CDM project activity

Part III: Other comments/inputs

Please provide comments/inputs on any other general or specific issue that you identify with the draft or any other issue which may help in operationalizing the CCS CDM project activities, using the commenting table below:

0	1	2
Para	Issue to be addressed	Proposed change
No.	(including need for change)	(including proposed text, if applicable)
21	possible consequences if the site is suitable for potable water supply	Potable water can occur as regionally-important primary aquifers or as secondary less important supplies based on hydrology, rock type and flow systems. An aquifer with potable water may or may not be an important source of drinking water for a population based on many geologic and hydrologic factors. Therefore decisions on eligibility of a potable water supply for CCS project may best be made on a case by case basis using expert assessment and resource characterization. Recommendation is for paragraph (b)
24	Definition of a "significant deviation"	Deviations between predicted and monitored fluid behaviour do not necessarily represent an increased risk from original predictions. It is not the deviation (deviations may be a common occurrence) or even the magnitude of the deviation that is of importance but the type and character of the deviation. Therefore "significant" should not be defined quantitatively but should be based on expert opinion and assessment.