

**QUANTIFICATION PROTOCOL FOR
GEOLOGICAL SEQUESTRATION THROUGH
ENHANCED OIL RECOVERY USING OR
ACID GAS INJECTION:**

Technical and Policy Issue Summary

Submitted to:

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Background

In conjunction with the development of the protocol document, a listing of key technical and policy issues were tracked for discussion as part of the technical and stakeholder review processes. The following document provides a listing of the key issues for discussion. Many of the issues have both a technical and policy component and are listed under both sections, as required.

Summary of Technical Issues

The following technical issues may be considered as part of the technical and stakeholder review processes:

- Would it be more streamlined for project developers to see the AGI and EOR components of the protocol split apart?
- Would it be more practical to split industrial process and solution gas streams as separate sources?
- Is the assessment of reservoir containment appropriate at 99.9% over 100 years?
- Are there additional terms that need to be defined for the purposes of the protocol?
- Is the definition of the baseline condition suitably broad? Does it allow for gaming?
- Are the monitoring and measurement criteria too stringent?
- Should we be including some of the SSRs (P8/B8 and P9/P9) for which exclusion is conservative in order to capture the incremental emission reductions for EOR?

Summary of Policy Issues

The following policy issues may be considered as part of the technical and stakeholder review processes:

- Is there a streamlining of the protocol required in advance of a large scale pipeline network?
- Is the inclusion of formation CO₂ produced as a by-product of fuel production acceptable?
- Are other restrictions on gas sources required to meet with the intent of the regulation and prevent double counting?
- Would it be more streamlined for project developers to see the AGI and EOR components of the protocol split apart?