

From: [John Cowan](#)
To: [GHGInventory](#)
Subject: Draft Inventory and exported CO2
Date: Wednesday, March 15, 2017 12:59:23 PM

Dear Sirs,

As a Canadian I follow EPA's actions on GHG Inventory matters with interest, due to its trend-setting role. Thank you for EPA's work.

After reading the draft 2015 Inventory I would like to comment on one *small* aspect that I believe warrants clarification for the sake of all who may follow EPA's lead.

My concern relates to EPA's accounting for the generation of the CO2 exported by pipeline from North Dakota as part of a Carbon Capture and Storage system. I note on page 3-27, lines 1-3, that EPA states, "Since this CO2 is not emitted to the atmosphere in the United States, energy used to produce this CO2 is subtracted from energy consumption statistics." Though this same statement was accepted by the ERT in 2011, it strikes me as incomplete because it does not identify what constitutes the energy used to produce the CO2.

I presume you do not actually subtract *all of* the fossil fuel used in the generation of CO2, since that would mean the CO2 *not* captured at the site is ignored, though it is clearly a US emission.

Also your statement relates to the energy used to "produce" the CO2. Creation of the CO2 from fossil fuel combustion is only part of what it takes to produce the CO2 for export. So your "produce" statement implies that the energy used for capturing the CO2 (e.g. for scrubbing, liquefaction, pumping) is *also* subtracted, even though the energy is probably in the form of electricity. Such methodology departs from the principle of assigning emissions to their sources. If this principal is to be broken, then why couldn't the energy used to create exported electricity (or exported anything) be ignored in the inventory?

So presuming you subtract only the fraction of the *fossil fuel* representing the *recovered fraction* of the CO2, a more clear statement about this would be:

Since this CO2 is not emitted to the atmosphere in the United States, the associated fossil fuel burned to create the exported CO2 is subtracted from fossil fuel consumption statistics. The associated fossil fuel is the total fossil fuel burned at the plant with the CO2 capture system multiplied by the fraction of the plant's total site-generated CO2 that is recovered by the capture system.

In the interests of transparency, I trust EPA will more fully explain its processes as I suggest above.

Sincerely

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