

Regional Carbon Dioxide (CO₂) Transport Infrastructure Action Plan

Executive Summary

Experts agree that climate change mitigation requires the deployment of a multi-disciplinary portfolio of policies and technical approaches that will work together to reduce and eventually eliminate carbon emissions to the atmosphere. As such, carbon capture utilization and storage (CCUS) is an integral component for achieving decarbonization by the mid-21st century. Full-scale CCUS projects have been safely and successfully deployed, both domestically and abroad, and offer a proven means to store CO₂ permanently. CCUS will be necessary for meeting emission reductions in power, industry, and other sectors, because of the relatively large storage volumes afforded by many subsurface geologic units. CCUS also provides industrial and thermal sources a pathway to eliminate CO₂ emissions when decarbonization cannot be achieved solely by fuel-switching.

Infrastructure is needed on a significant scale to decarbonize the industrial and power sectors, even when accounting for aggressive low-carbon and renewable energy adoption. In addition to the economy-wide retrofit of carbon capture equipment at industrial and thermal facilities, delivering captured CO₂ to sites of utilization and long-term storage will require regional-scale transport infrastructure.

To facilitate this large-scale buildout, the State Carbon Capture Work Group launched the Regional Carbon Capture Deployment Initiative in 2018. On October 1, 2020, several states executed a [CO₂ Transport Infrastructure MOU](#) to establish a collaborative mechanism to develop and implement an action plan for the buildout of regional CO₂ transport infrastructure to enable large-scale carbon management. The current signatory states are Kansas, Louisiana, Maryland, Montana, North Dakota, Oklahoma, Pennsylvania, and Wyoming.

This Action Plan is the culmination of a year-long process engaging states and stakeholders aimed at supporting the expeditious buildout of CO₂ transport infrastructure for CCUS projects across the country. The Action Plan describes a range of potential strategies to incentivize CCUS project deployment, including federal and state financial incentives and investments, public-private partnerships with companies, partnerships with local and federal governments, and the identification of funding sources to support dedicated state resources and other appropriate mechanisms for the individual states.

Introduction and Purpose

The development of regional and national CO₂ transport networks and associated geologic storage along with proposed tax credits and other financial incentives for

carbon capture from industrial facilities, power plants, and ambient air through direct air capture can support long-term production and use of America's abundant and affordable natural resources. This development can further create and preserve high-paying jobs in the country's energy-producing, agricultural, and industrial states while significantly reducing net carbon emissions.

Signatory states and regional stakeholders created this action plan during a year-long collaborative process focused on the expeditious buildout of CO₂ transport infrastructure through a range of potential strategies. They include federal and state financial incentives and investments, public-private partnerships with companies, partnerships with local and federal governments, and identification of funding sources to support dedicated state resources or other mechanisms, as appropriate, for the individual states.

Interconnected transport infrastructure systems will enable more CO₂ capture by connecting storage sites and emitters. These systems will allow economies of scale and reduce the overall cost of the carbon capture system, create a carbon management market, and reduce risks by connecting multiple capture and storage projects.

A comprehensive suite of incentives at the federal and state level is necessary to drive the buildout of carbon capture and related infrastructure and permanent geologic storage. Federal policymakers can create a positive regulatory and policy environment for CO₂ transport infrastructure development and buildout, which can be complemented by efforts at the state and regional levels.

Background

The State Carbon Capture Work Group launched the Regional Carbon Capture Deployment Initiative in 2018, which then embarked on a more than two-year research effort analyzing near to mid-term opportunities for carbon management project deployment across the West and Midwest regions of the US. The results were published in 2020 as part of a paper - [Transport Infrastructure for Carbon Capture and Storage: Regional Infrastructure for Midcentury Decarbonization](#) – showcasing the analytical work and translating project investment and operation costs into employment potential on a state-by-state basis in the two regions. The Regional Carbon Capture Deployment Initiative now works with approximately 500 stakeholders across the country.

On October 1, 2020, a [CO₂ Transport Infrastructure MOU](#) was executed by several states with the purpose of establishing a collaborative mechanism to develop and implement an action plan for the buildout of regional CO₂ transport infrastructure to enable large-scale carbon management. The signatory states – Kansas, Louisiana, Maryland, Montana, North Dakota, Oklahoma, Pennsylvania, and Wyoming – undertook a series of educational webinars in 2020 and early 2021 to engage stakeholders and industry experts on issues of interest relating to CO₂ transport infrastructure and geologic storage.

The webinar series explored topics including legal, regulatory, and policy opportunities at the federal and state level and updates on current infrastructure and storage projects across the United States and Canada.

Recording links and related topics of the learning webinars are below:

- [Webinar #1](#)
 - Overview of RDI Modeling Results
 - Stage-setting for Future Analysis
 - Overview of Federal Policy Landscape
 - Storing CO₂ and Lowering Emissions (SCALE) Act & Infrastructure Opportunities
- [Webinar #2](#)
 - Alberta Trunk Line Project Overview
 - Wyoming Pipeline Corridor Initiative Overview
- [Webinar #3](#)
 - Class VI Update
 - Carbon Capture Announced Projects
- [Webinar #4](#)
 - Legal Liability and Pore Space
- [Webinar #5](#)
 - Class VI Program, Permitting & Primacy

Federal Recommendations

The CO₂ Transport Infrastructure MOU states strongly believe that **financing the buildout of regional CO₂ transport and storage networks** to ensure that we achieve robust infrastructure to safely transport and store captured CO₂ in secure saline geologic formations is a key pillar of any broader strategy to achieve net-zero emissions.

Earlier this year, Governor John Bel Edwards (LA), Governor Kevin Stitt (OK), Governor Tom Wolf (PA), and Governor Mark Gordon (WY) sent a [letter of support](#) to congressional leaders on behalf of the signatory states of the CO₂ Transport Infrastructure MOU in support of the Storing CO₂ and Lowering Emissions (SCALE) Act, which would create policies for the development of CO₂ transport infrastructure from industrial facilities, power plants, and direct air capture for geologic storage.

The [SCALE Act](#) builds on the successes of 45Q and the Energy Act of 2020 by supporting the construction of CO₂ transport and storage infrastructure and, if fully appropriated and utilized, will enable an estimated \$19 billion combined federal and private investment in CO₂ transport and storage infrastructure. Implementation of the SCALE Act would create approximately 13,000 direct and indirect jobs per year through the five-year authorization.

The development of regional and national CO₂ transport networks, together with proposed tax credits and other financial incentives for carbon capture from industrial facilities and power plants and direct air capture, can support long-term production and use of America's abundant and affordable natural resources. This development can create and preserve highly skilled jobs in energy-producing, agricultural, and industrial states that consistently pay above prevailing wages while significantly reducing net carbon emissions. To achieve the development of regional and national CO₂ transport infrastructure networks, collaboration among states, federal agencies, tribal government, industry, non-governmental organizations, labor, and other stakeholders will be key.

The signatory states also recognize that carbon management is an essential part of the solution set to ensure that America's domestic energy, industrial, and manufacturing sectors can thrive while allowing us to reach the goal of net-zero emissions by midcentury.

In addition to financing the buildout of regional CO₂ transportation and storage networks, we urge Congress to include the key policy elements described below in any moving legislative package. These elements are featured in bipartisan legislation and are critically important to realizing economywide deployment of carbon capture, removal, transport, utilization, and storage:

- **Providing a direct pay option for the federal Section 45Q tax credit:** The 45Q tax credit is the cornerstone federal policy for enabling economywide deployment of carbon management technologies, and a direct pay option is crucial to realizing the full emissions reduction and job creation benefits of the credit.
- **Extending the commence construction window for the 45Q credit:** Extending the commence construction window to qualify for 45Q by an additional ten years (to the end of 2035) would establish a critically needed investment horizon to give carbon management projects the time required to scale up between now and midcentury.
- **Enhancing 45Q credit values for industrial, thermal, and direct air capture:** Current 45Q credit values are insufficient to drive the early deployment needed in industry, electric power generation, and direct air capture to bring costs down and reduce commercial risk so that these technologies can scale. Congress should increase current 45Q credit values in a manner that is consistent with currently proposed bipartisan legislation.
- **Eliminating annual carbon capture thresholds:** Current thresholds in the 45Q program are arbitrary, serve no policy purpose, and reduce the overall technology innovation and emissions reduction potential of the incentive.

- **Robust funding for commercial-scale carbon capture pilot projects and demonstration programs:** Large-scale pilot and demonstration projects are key to achieving our emissions reduction objectives. Reaching the authorized levels for demonstrations in the 2020 Energy Act is crucial to see significant deployment of carbon capture and direct air capture projects. Additionally, the bipartisan Energy Infrastructure Act incorporates these funding priorities and, for the first time, establishes regional direct air capture and hydrogen hubs to help establish domestic supply chains and drive down costs.

The portfolio of carbon management policies outlined above and included in bipartisan bills before Congress could deliver a 13-fold scale-up of carbon management capacity by 2035. Analyses by the Rhodium Group show the potential to create hundreds of thousands of high-wage jobs and generate hundreds of billions in investment from carbon capture and direct air capture deployment in states around the country. Enacting this important portfolio of policies will help ensure the long-term viability of vital industries and safeguard millions of existing middle-class jobs, which represent the lifeblood of American workers, their families and communities, and state and regional economies.

In addition to the policies described above, federal support that addresses the following issues will provide additional clarity and reduce challenges to states and industries:

- **Class VI Primacy:** Additional federal resources should be provided to assist states as they pursue and implement Primacy. While precedent has been set with North Dakota and Wyoming achieving Primacy, procedurally, the approval process could be improved. EPA should be allocated additional resources to complete states' applications in a timelier manner. EPA should consider providing states that have achieved Primacy with greater levels of funding to implement their programs. Additionally, for states that do not pursue Primacy, EPA should allocate additional resources to operators to ensure they complete their applications for Class VI permits correctly.
- **Federal Lands:** Deployment of transport and storage infrastructure on federal lands is currently challenging. Federal land managers do not have adequate guidance to allow use of their lands for these projects. Federal land managers should develop rules and regulations that address pore space ownership and permanent storage of CO₂. There is no need to address this with federal legislation, as this can be achieved using current legal structures, which may include National Environmental Policy Act (NEPA), the Federal Land and Policy Management Act (FLPMA), and the National Forest Management Act (NFMA). Additionally, federal land managers should allocate resources to allow for the efficient processing of these projects.
- **Safety:** Transportation of CO₂ is a safe practice that has historically resulted in minimal human risk, and no related fatalities. However, with the anticipated expansion of infrastructure, it is reasonable to assume that there will be

additional risk. The Utilizing Significant Emissions with Innovative Technologies (USE IT) Act contemplates this risk. As the Task Forces convene, as required by the Act, they should take an in-depth look at potential hazards associated with CO₂ transportation and storage infrastructure, and develop best practices to manage and mitigate safety risks.

- **Offshore Storage:** Global assessments suggest that about 40 percent of the potential carbon storage resource associated with deep saline formations are found in offshore settings. Offshore transportation and storage of CO₂ faces many of the same challenges as onshore projects that are proposed on federal lands. Federal guidance is required to establish regulatory frameworks for pore space ownership, leasing procedures, and long-term liability. Management of offshore projects should be delegated to the Department of Interior, as they have a long history of leasing and managing subsurface resources. Once a framework is established, federal managers will require adequate resources to develop and implement offshore projects.

State Recommendations

State policies can play an important role in complementing federal policy to help individual CCUS projects achieve financial feasibility and to support the buildout of integrated regional carbon and hydrogen hubs. Regional hubs capitalize on shared transport infrastructure, geologic storage, and other synergies to leverage investment, achieve economies of scale, and reduce costs. Analyses of potential deployment scenarios reveal that many industrial capture and utilization projects are not economic at current federal 45Q tax credit values, but that a significant proportion are at or near the margin of feasibility. In that context, further priority enhancements to 45Q and other federal policies outlined above, complemented with targeted state policies, can accelerate economywide deployment of carbon management generally and specifically expand deployment to additional industries with higher – and unavoidable – costs of capture, such as cement, steel, refining, chemicals, and pulp and paper.

The policy approaches outlined below present options and best practices that can positively affect the economics of the entire carbon management value chain, which includes carbon capture at industrial facilities and power plants and direct air capture plants, beneficial use of captured carbon, transport of CO₂, and its secure storage in geologic formations. Enactment of these approaches better positions states to take full advantage of the potential for emissions reductions, investment, and jobs. It bears emphasizing that state policies can play important supplementary roles in leveraging 45Q and other federal policies without significant additional fiscal impact for states, given the opportunity to target new investments that are unlikely to occur without state policy support. State policies can also set important precedents for responsible project development, including considering measures to ensure environmental and economic benefits to affected communities during implementation.

To date, there are three broad categories of policies that states have implemented:

- **Regulatory policies and planning:** Enabling regulation and planning to facilitate the development of carbon capture and utilization projects and associated CO₂ transport and storage infrastructure;
- **Financial incentives:** Optimization of state taxes and other policies to drive private investment in projects to capture, utilize, transport, and store CO₂ from industrial facilities, power plants, and from ambient air; and
- **Market development:** State procurement programs, portfolio requirements, and mandatory power purchase or offtake agreements to build markets for low and zero-carbon industrial products and energy, which support private investments in carbon management projects and infrastructure.

Below is a compilation of policies and best practices implemented and/or under consideration in states with carbon management potential. The compilation is meant to provide a menu for state policymakers and stakeholders to consider.

Regulatory Policies and Planning

States can play a critical role in supporting the development, permitting, and financing of CCUS projects and facilitating the broader development of large-scale regional carbon and hydrogen hubs by establishing and clarifying enabling statutory and regulatory policies. Such policies do not carry a significant price tag, but they are essential to providing regulatory and financial certainty for project development and creating the confidence for multiple private sector actors to proceed with project and investment decisions together across the entire capture, transport, utilization and storage value chain. This clarity is especially important in the realm of geologic storage.

Clarifying Agency Roles and Responsibilities for Regulating Geologic Storage

The widespread availability of geologic storage is key to broader deployment of carbon management to achieve industrial decarbonization goals, and states can play an important enabling role by developing and clarifying regulatory frameworks and agency responsibilities. In this context, a state's oil and gas agency could expand its role to include regulating and permitting geologic storage projects and conducting public engagement. In some states, this will require particular focus to coordinate current and future subsurface activities, which may include petroleum hydrocarbon extraction, coal and mineral mining, petroleum hydrocarbon storage, and/or injection wells for various purposes. In addition, roles and responsibilities for regulating geologic storage also involve the regulation of aboveground activities (erosion and sedimentation control, site preparation, surface water protection, air quality management, etc.). State conservation and environmental agencies may also provide public outreach and engagement, given that captured CO₂ is being injected into subsurface geologic resources for environmental benefits.

Establishing Rules for Geologic CO₂ Storage

In addition to specifying agency roles and responsibilities, clarity regarding rules for CO₂ storage is essential for project developer and investor certainty and confidence to undertake projects in a given state. Rules related to CO₂ storage that may be clarified at the state level include:

- **Declaring CO₂ storage is in the public interest.** A state can designate secure geologic storage of CO₂ to be in the public interest, which can provide clarity in other state-level rulemakings, such as providing for utility cost recovery for carbon management-related investments.
- **Rules for CO₂ ownership.** In most cases, the party that captures CO₂ is responsible for its safe disposal. Some states have clarified in law who will be considered the legal owner of captured CO₂ and how parties can transfer ownership of CO₂.
- **Requirements for CO₂ responsibility.** Federal Underground Injection Control (UIC) rules provide flexibility to states in establishing specific requirements for CO₂ injection and storage at the state level. States, therefore, may designate specific pathways for projects to meet federal requirements.
- **Pore space ownership, access, and eminent domain.** A state must establish in law that the subsurface area, or pore space, where CO₂ is injected and stored, can be owned and then designate an owner, typically the owner of surface land, to be the responsible party for negotiating pore space access. States also need to specify rules for transferring the title of pore space to the party performing CO₂ injection. Several states have laws for the unitization of pore space, a process whereby a state recognizes ownership of a given unit of pore space. States recognize ownership once a certain percentage of ownership interests (typically 50 percent to 80 percent) in that defined area agree to aggregate their ownership interests or manage that area as one unit. An additional measure for consideration may be eminent domain, whereby subsurface pore space would be acquired for public use without the pore space owner's consent.
- **State Primacy for EPA Class VI geologic storage permits.** EPA permits Class VI wells required for CO₂ injection for the purposes of saline and other dedicated geologic storage under the Agency's UIC Program. North Dakota and Wyoming have been granted Primacy to administer the Class VI UIC Program directly, and several other states are applying for Primacy. Given concerns about the timeframe, cost, and complexity of obtaining a Class VI permit, state Primacy – and sufficient staffing and resources to evaluate applications – will be important as project developers and investors consider states in which to invest for their initial projects.

- **Government assumption of long-term liability for stored CO₂.** Government assumption of long-term liability for CO₂ storage projects can reduce perceived investment risk and increase private investment on more favorable terms. Government assumption of long-term liability should only apply when the regulatory authority has determined all permit conditions are met, the site is closed, and monitoring is no longer required. Some states have established a fund for long-term site stewardship. These commonly require a nominal fee per ton of CO₂ stored to pay into the fund.

Regulation and Planning of CO₂ Transport and Storage

- **Pollution control device qualification.** In many states, qualifying all anthropogenic CO₂ pipeline and other transport infrastructure as pollution control devices under the laws and regulations of the state makes critical CO₂ transport infrastructure eligible for state and local tax abatements, which can be important for financing such infrastructure.
- **Interstate planning and policy alignment for CO₂ transport and storage infrastructure.** Given the geographically dispersed nature of industrial and power plant emissions and of suitable storage locations, future CO₂ transport and storage networks will need to be regional and interstate in scope. Our eight states have already joined together through the CO₂ Transport Infrastructure Memorandum of Understanding to work toward policy alignment across state boundaries and jointly advocate for needed federal policy support such as the SCALE Act. Also, federal implementation of the recently passed bipartisan USE IT Act will provide practical opportunities for interested states to engage with federal agencies, tribal governments, community groups, and key stakeholders to develop collaborative regional approaches to planning, regulation, siting, and permitting of CO₂ transport and storage infrastructure.
- **CO₂ pipelines and eminent domain.** Eminent domain refers to the legal authority to acquire privately held land for public use without the landowner's consent; the state government or a third party must compensate the landowner. For states wishing to grant eminent domain for CO₂ pipelines, that authority and benefit can be usefully tied to the future pipeline owner committing to operate the pipeline as a "common carrier," meaning it would also be open for parties other than the owner to access and use.

Facility Siting and Integrated Resource Planning

- **State regulatory commission siting of facilities and infrastructure.** Carbon management projects typically include a source facility, transportation infrastructure, and a point of utilization and/or geologic storage, unless a carbon management project being developed will tap into an existing infrastructure network. While state utility commissions do not generally have authority over geologic storage, commissions may play an important role with

respect to source carbon capture facilities and CO₂ transport infrastructure. They may be able to take steps to help reduce delays in the permitting process and encourage planning and collaboration among key private sector project developers and other parties to reduce environmental, social and other impacts and improve economies of scale that can reduce the future costs of new projects and infrastructure.

With respect to source facilities, state regulatory commissions may:

- Consider pre-approving project siting and environmental criteria;
- Grant a certificate of public convenience and necessity;
- Include environmental and social considerations in the certification process; and
- Recommend legislative action to allow utilities to apply for an advance determination of prudence.

Commissions may also be able to play a nonbinding, but important, role in facilitating the development of carbon management projects and associated transportation infrastructure by convening stakeholder and community engagement and hiring specialized staff to support such efforts.

- **Integrated resource planning.** Most regulated utilities are required to file integrated resource plans (IRPs) under state statutes outlining a utility's future plans to regulatory commissions and the public. Individual commissions can require regulated utilities to consider carbon capture, removal and utilization technologies and associated CO₂ transport and storage infrastructure in their IRPs.

Financial Incentives

While states typically do not provide incentives comparable to the value of the 45Q tax credit, tailoring existing state taxes and other incentive policies and programs to complement 45Q can help project developers and investors to reach commercial feasibility.

- **Eligibility for State Low Carbon Fuels Standards and Other Clean Fuels Programs.** By providing eligibility for carbon management projects, California's Low Carbon Fuel Standard (LCFS), together with 45Q, plays a significant role in driving project developer and investor interest in the development of carbon capture and direct air capture projects with associated geologic storage. Other states are developing LCFS policies modeled after California or broader clean fuels policies adapted to states' and regions' industries and economic needs. By incorporating appropriate eligibility – based on net lifecycle emissions reductions of CO₂ – for carbon capture, carbon utilization (e.g., CO₂ and CO to fuels), and geologic storage, state LCFS and clean fuels policies, in conjunction with federal policy, have significant potential to help foster commercial project deployment.

- **Optimization of State Tax Policies.** States may opt to tailor their tax policies to provide incentives for deployment of carbon capture, direct air capture, carbon utilization, CO₂ transport, and geologic storage. Analysis for the State Carbon Capture Work Group concluded that optimization of a suite of state tax policies common to oil and gas-producing states would meaningfully incentivize a wide range of projects, especially with the subsequent reform and expansion of the federal 45Q tax credit.

Opportunities include:

- Exemptions or reductions in property and sales taxes on machinery and equipment used across the carbon management value chain, including carbon capture, direct air capture, carbon utilization, CO₂ transport, and geologic storage; and
 - Temporary and targeted production and severance taxes to encourage the use and storage of anthropogenic CO₂ captured from industrial facilities, power plants, and ambient air in existing oil fields and enhanced oil recovery operations. This may be especially valuable where there are opportunities to displace current use of natural CO₂ produced from geologic formations with captured anthropogenic CO₂ that would otherwise be emitted to the atmosphere.
- **State Financing and Grant Programs.** States have a wide array of existing lending, loan guarantees, and grant programs, especially in the economic development arena. The eligibility and prioritization of these programs can be expanded to include the development and deployment of carbon management projects. While state programs do not tend to reach the scale of DOE grants, cost-share, loans, and the impact of state financing and grants can be significant. Notably, these programs can cover costs incurred in the early stages of project development, such as Front-End Engineering Design (FEED) studies, which are challenging to finance with private dollars. In this context, carbon utilization and direct air capture provide targets of opportunity for states. Many utilization technologies and business models tend to start at smaller scales that fall within the scope of potential state financing and grant support, creating opportunities for states to position themselves as leaders in these emerging industries.
- **Utility Cost Recovery Mechanisms.** State legislatures can provide regulatory commissions with the statutory authority to offer timely reimbursement of costs incurred during construction and operation, as well as favorable rates of return for regulated utilities' investments in projects to capture and manage carbon emissions. Some states have explicitly included carbon capture as an eligible technology for utility cost recovery.

Market Development

Tax credits, grants, loan guarantees, and other incentives are critical to financing capture, utilization, transport, and storage projects. However, project developers and investors must also have confidence in a future market for their low and zero-carbon industrial products, fuels, and electricity that will justify their carbon management investments over the long term. Ahead of the federal government, several states have taken the lead in establishing procurement standards and programs, portfolio standards, and other policies to build markets that can work in synergy with supply-side financial incentives for private investment.

State actions include:

- **Establishment of State Procurement Standards and Programs.** Several state legislatures have implemented “buy-clean” policies that establish standards for low and zero-carbon products, a common disclosure and reporting framework, and procurement programs that require state agencies and contractors to purchase all or a percentage of industrial products, (steel, cement, concrete, etc.), fuels and electricity from low and zero-carbon sources for the operation of state buildings, facilities, and fleets and for the construction of public buildings and infrastructure projects. State procurement policies should ultimately include a wide range of industrial sectors and ensure eligibility for the full carbon management value chain in industry, including carbon capture, carbon utilization, direct air capture, and geologic storage. Policies should further prioritize products with greater lifecycle emissions profiles and local benefits. These may include product use in low-income areas, opportunities for manufacturing involving fence line community training and employment, or reductions in criteria and other pollutants from electricity generation and industrial production beyond greenhouse gas emissions.
- **Providing Off-Take Agreements.** State legislatures and regulatory commissions can provide a guaranteed buyer for electricity, fuels, and industrial products produced in conjunction with carbon capture, direct air capture, carbon utilization, and geologic storage.
- **Including Carbon Capture in Electricity Generation Portfolio or Clean Energy Standards.** Carbon capture has an important role to play in decarbonizing the large supply of 24-7 power required by industrial facilities. Some state legislatures have incorporated eligibility for CCUS in their state electricity portfolio standards. When carbon capture is included in such standards, power producers can earn saleable compliance credits by generating electricity from facilities equipped with carbon capture. Additionally, formal inclusion of carbon capture and utilization in portfolio standards could facilitate utility cost recovery approval from state regulatory commissions.

Future Work

Signatory states discussed potential initiatives that they would like to consider addressing with future work. The states are interested in developing an Appendix to this Action Plan that discloses current state statutes and regulations, which support the deployment of CCUS infrastructure. Additionally, with the increasing national interest in safety associated with CCUS transport and storage infrastructure, the states would like to consider developing a document that discusses safety considerations when planning and implementing CCUS projects. This document would disclose current safety requirements and provide recommendations to improve existing conditions. Finally, the signatory states expressed an interest in continued interstate coordination. They would like to continue to meet periodically to discuss the status of CCUS policies and projects, as well as continue active outreach to recruit additional states as MOU signatories.