

CCC/CURC model guidance	Treasury guidance
<p>Allow taxpayers claiming Section 45Q Credits to certify the mass of qualified CO disposed of in secure geological storage based on annual reports prepared under the requirements of Subpart RR as it existed on December 31, 2024, and certified by a qualified independent engineer or geologist.</p>	<p>Safe harbor for 2025: if EPA does rescind Subpart RR, qualified storage will be considered to have satisfied the § 45Q Subpart RR Requirement if (i) such storage is in compliance with the applicable requirements of subpart RR as in effect on December 31, 2025, and (ii) instead of submitting the Annual Report for reporting year 2025 with respect to such storage through the e-GGRT pursuant to 40 CFR §§ 98.3 and 98.5, the taxpayer prepares and submits the Annual Report to an independent engineer or geologist, who certifies the Annual Report, in the manner specified in section 3.02(3)(A) and (B) of this notice.</p> <p>Future tax years not addressed</p>
<p>Allow taxpayers claiming credits based on the requirements of Subpart RR to have their MRV Plans, and all updates to the MRV Plans, certified by a qualified independent engineer or geologist.</p>	<p>Approval of MRV for the current tax year/future tax years not addressed</p>
<p>Apply the requirements of Subpart RR, including cross-references to other subparts of the GHGRP as they existed on December 31, 2024, taking into account that the GHGRP would no longer be in force. Thus, for example the approval of MRV plans and any other reports filed under Subpart RR which required filing with or actions taken by the EPA would instead be certified by a qualified independent engineer or geologist.</p>	<p>Safe harbor for 2025: if EPA does rescind Subpart RR, qualified storage will be considered to have satisfied the § 45Q Subpart RR Requirement if (i) such storage is in compliance with the applicable requirements of subpart RR as in effect on December 31, 2025, and (ii) instead of submitting the Annual Report for reporting year 2025 with respect to such storage through the e-GGRT pursuant to 40 CFR §§ 98.3 and 98.5, the taxpayer prepares and submits the Annual Report to an independent engineer or geologist, who certifies the Annual Report, in the manner specified in section 3.02(3)(A) and (B) of this notice.</p> <p>Only applies to 2025.</p>

<p>Allow taxpayers to claim Section 45Q Credits based on the requirements of Subpart RR as it existed on December 31, 2024, with modifications as outlined in Appendix A, regardless of whether they use captured qualified CO as a tertiary injectant prior to secure geological storage.</p>	<p>CO2: EOR excluded from guidance: Specifically, this notice provides a safe harbor for determining eligibility for the § 45Q credit for qualified carbon oxide that is captured and disposed of in secure geological storage (and carbon oxide described in § 1.45Q-2(h)(5)) and not used as a tertiary injectant in a qualified enhanced oil or natural gas recovery project during calendar year 2025.</p>
<p>Provide that taxpayers may prepare Form 8933 and accompanying schedules based on MRV plans and annual reports that satisfy the requirements of Subpart RR as it existed on December 31, 2024, with modifications as outlined in Appendix A, and certified by a qualified independent engineer or geologist.</p>	<p>Not addressed.</p>
<p>Provide that documentation and certification requirements provided by Treas. Reg. § 1.45Q-3 would be applied in light of the requirements of Subpart RR as it existed on December 31, 2024, with modifications as outlined in Appendix A.</p>	<p>Calendar Year 2025 Secure Geological Storage will be considered to have satisfied the Certification Requirements of § 1.45Q-3(d) if the taxpayer satisfies the requirements of section 3.02(3)(A) and (B) of this notice with respect to such storage.</p>