

To whom it may concern,

Thank you for considering my response to the comments. Section 45Q may help the taxpayer decide whether a carbon oxide capture and utilization project is a financially feasible option or not. In general, it would really help if a) the tax credits were not limited to 12 years, and b) there was more support for new technology commercial demonstrations for economic carbon oxide capture.

Comment 1. Guidance is required in defining what types of utilization qualify as "fixation of qualified carbon oxide through photosynthesis or chemosynthesis, such as through the growing of algae or bacteria" as described in 45Q(f)(5)(A).

45Q(f)(5)(A)(ii) "the chemical conversion of such qualified carbon oxide to a material or chemical compound in which such qualified carbon oxide is securely stored".

Clarification is needed regarding the materials or chemical components that would qualify for the tax credit. A list would be of great help for taxpayers. Even a list of materials and chemical compounds that would NOT qualify would help.

Clarification is also needed regarding secure storage. What is defined as securely stored? How long does the carbon oxide need to be securely stored? This definition is especially important for the conversion of carbon oxide to a material or chemical compound. For example, if the carbon oxide was converted to renewable fuels, would the carbon oxide be considered securely stored? Would the conversion of carbon oxide to renewable fuels qualify for tax credits?

45Q(f)(5)(A)(ii) "the use of such qualified carbon oxide for any other purpose for which a commercial market exists (with the exception of use as a tertiary injectant in a qualified enhanced oil or natural gas recovery project), as determined by the Secretary".

Clarification is needed regarding the commercial markets that would qualify for a tax credit. Even if it is just a preliminary list, or a list of the commercial markets that would NOT qualify, this would help guide the taxpayer.