

From [REDACTED]
Sent: Wednesday, March 23, 2022 8:59 PM
To: PUC-PUC <PUC@state.sd.us>
Subject: [EXT] CO2 Pipeline Permit

South Dakota Public Utilities Commission
Capitol Building 1st Floor
500 E Capitol Ave
Pierre, SD 57501

Re: HP22-001 In the Matter of the Application by SCS Carbon Transport LLC for a Permit to Construct a Carbon Dioxide Transmission Pipeline

Dear Commissioners:

As a landowner and concerned citizen of SD, I am writing in opposition to the Summit Carbon Solutions (SCS) Pipeline permit filed with the SD Public Utilities Commission, in support of the landowner's on the proposed CO2 pipeline route and the general public.

I am not opposed to the ethanol industry. Our farm and ranch does business with the local ethanol plant. Those who chose to invest in the ethanol industry had a choice to invest, the decision was not forced upon them. Those landowners who chose not to invest for whatever reason are now being requested, at their expense, to financially support ethanol plants so that the ethanol industry will be more profitable, with minimal to no profit to landowners. Yes, I understand the landowners will be reimbursed with payments for three years. This payment will barely cover the disruption of the land and loss of crop in the short term for three years. There will be no payment for the long term disruption of the land, while those who invested in the ethanol plants will profit for years to come. There will be long term disruption of the land no matter what SCS is saying. Numerous comments on this PUC docket site are reporting the various disruption of the land that occurred since the Dakota Access Pipeline went through the area.

I strongly urge the PUC to thoroughly consider the impact of this project to the landowners on the pipeline route as well as the general public. This pipeline is classified as hazardous. Even though SCS is promoting this pipeline as very safe, it is still hazardous. It is not a matter of if it will leak or rupture, it is a hazardous pipeline, it is a matter of when it will leak or rupture.

Attending meetings and reading the comments on this docket I have learned of tactics used by SCS for this project. It is disturbing that if SCS wants support of their project they would conduct business in such a manner. I suspect if any business on main street in the rural Midwest conducted business like this their doors would close. Trust needs to be earned, not expected, actions speak much louder than words.

In addition, outside of the landowners and those who have learned about this project by word of mouth, most of the general public is completely in the dark about this project. It is concerning that more of the general public is not aware of this project, specifically that this is a hazardous pipeline and the route of the pipeline. I suspect this is another tactic to push this hazardous pipeline through before a majority of unsuspecting SD citizens know what is going on in their state.

Although he is not listed on the SCS website, Dan Lederman who works for SCS in the public relations division of the company opened the presentation of the public meeting that I attended. Dan Lederman is the State of SD GOP chair. In my opinion this is a conflict of interest. The buzzword these days is “transparency”, where is the transparency in this, Mr. Lederman being the SD State GOP chair, yet working for SCS? Is this another tactic to push this pipeline agenda by unsuspecting SD citizens?

SCS stated at a public meeting that this is a 4.5 billion dollar project, yet they do not have half of the money to begin the project. Their plan is to begin this project in approximately one year. So much of this project is “up in the air” that I question the quality of the project altogether.

In closing, I would ask the PUC to honestly look at who stands to gain from this CO2 pipeline project, the landowners and general public, or big money private industry. If you the PUC grants a permit to this big money pipeline project, you will be setting a precedent for years and generations to come. I highly encourage the PUC to give due diligence to your decision on the request for a permit to build a hazardous CO2 pipeline that will affect landowners, the general public, and generations to come. As elected members of the SD PUC I trust that you will do the right thing, support landowners and the general public, deny the permit for the proposed hazardous CO2 pipeline and big money private industry. Reject the permit, so that eminent domain cannot force landowners to financially support a private project.

Sincerely,

Sandra Jungwirth

[REDACTED]
Athol, SD 57424

See Attachment of Concerns

CONCERNS ON THE PROPOSED HAZARDOUS CO2 PIPELINE:

A. SETBACK

1. How far from an occupied building (house, office, barn, etc)? Federal minimum 50 feet; SCS 500 feet
2. What is acceptable setback???
 - a. ½ mile- 880 yards- 2640 feet
 - b. 1 mile 1760 yards- 5280 feet

B. DEPTH

1. How far under crop ground, pastures, hay ground? Federal 12 inches; SCS 3 feet and 4 feet from ground surface to top of pipe.
2. How far under highways, railroads, county roads, township roads, WEB water lines, tiling, creeks, rivers, wetlands, etc? At certain times of the year and under certain conditions, county and township roads can have significant ruts due to the heavy farm equipment going over them. Due to these conditions, what depth of a hazardous pipeline is appropriate? (In the SCS permit to the PUC I think I saw a depth of 25 feet??? under highways.)
3. What is acceptable depth???
 - a. 6 feet- 72 inches under crop ground, pastures, hay ground
4. What depth of the hazardous pipeline is acceptable due to natural freezing and thawing of the ground????

- a. How will the temperature of the hazardous CO2 pipeline affect the depth???
- b. 6 feet/72 inches underground to the top of the pipe , to prevent the hazardous CO2 pipeline from heaving or rising over time to the surface due to natural freezing and thawing of the ground.

C. CONCERNS CROSSING AT RIGHT ANGLE:

1. Weight of vehicles- 4-wheel drive tractors, 2-wheel tractors, track tractors, combines, self-propelled silage cutter, semi-truck and trailer loaded with corn, wheat, hay bales, etc., grain carts loaded, gravity wagon loaded, loaded hay mover, loaded silage wagon, etc

D. CONCERNS IF THE HAZARDOUS CO2 PIPELINE THAT RUNS PARALLEL TO ROW CROPS:

1. Same as 90-degree crossing with equipment above-except is there a shock wave produced ahead of equipment?

E. EFFECTS OF HEATED HAZARDOUS CO2 PIPELINE- 80 TO 120 DEGREES F:

1. How will this temperature affect corn, wheat, soybeans, etc; grasses, native plants, etc
2. How will this temperature change the amount of moisture available for the plants?
3. How much evaporation will there be?
4. How will it affect a tree planting after installation of pipe, depending on pipe depth?
5. How will this temperature affect the microbial make-up of the soil?
6. Could this soil temperature lead to new soil pests over the winter? Or will pests survive in the warm temperatures of the soil over the winter, thus requiring more chemical to eliminate them the following year? Increased use of chemicals would be harmful to good insects such as bees. Less bee population would result in poor crop pollination.
7. How will this temperature affect livestock pests and diseases?
8. How will this temperature affect wildlife and wildlife habitat?
9. What can be done yearly to appropriately compensate land owners along the route of the pipeline due to loss of crops, etc.???

F. SAFETY CONCERNS WITH HAZARDOUS CO2 PIPELINE:

1. Who will be responsible???
2. Will diesel, gasoline engines operate in area of leak or rupture?
3. What happens to pumping stations and valves during electric outages?
4. When there is a leak or rupture, how will the pipeline be shut down?
5. Will the sensors be controlled by SCS?

6. Could the Hazardous CO2 leak into ground water and nearby wells? If so, what are the effects?
7. Will there be manual shut off valves and who will have access to these? SCS only, local Fire Department, Law Enforcement, Emergency Management, Landowner?
8. Who will alert people of the Hazardous CO2 Pipeline leak or rupture? a. How will people be alerted?
b. When will they be alerted-people need to be alerted immediately? The incident in Mississippi in February 22,2020, NO ONE WAS NOTIFIED OF THE LEAK.
c. Who will be alerted, EMT's, Emergency Management, Law Enforcement, Fire Department, Healthcare Facilities, and those living and working near the pipeline, general public, schools, and area towns/ EMT's, Emergency Management, Law Enforcement, Fire Department, healthcare facilities (in the event additional help, ambulances, helicopters, etc., are needed so they avoid the area of the leak/rupture)???
9. Who will educate and in-service local Fire Departments, EMT's, Emergency Managers, Healthcare Facilities, Law Enforcement, etc., so these individuals know how to provide proper care for themselves and those in the area of the leak or rupture so there is proper medical management. INDIVIDUALS IN THE MISSISSIPPI INCIDENT WERE IMPROPERLY MANAGED MEDICALLY- SOME WERE SENT HOME FROM THE HOSPITAL TOO SOON, ONLY TO RETURN FOR FURTHER MEDICAL TREATMENT AS THEY STILL HAD HIGH LEVELS OF CO2 IN THEIR BLOODSTREAM.
10. Who will provide annual education? Annual education needs to be done due new treatments and staff turnover. Since the education is needed due to the hazardous CO2 pipeline, it should be at the expense of SCS.
11. What safety equipment – breathing apparatus, etc., is appropriate for the various individuals. Since the equipment is needed due to the hazardous CO2 pipeline, it should be at the expense of SCS.
12. Who will provide appropriate CO2 meters, detectors, etc.? Since the CO2 meters, detectors, etc., are needed due to the hazardous CO2 pipeline, it should be at the expense of SCS.
 - a. What personnel and citizens will be provided with CO2 meters, detectors, etc.?
 - b. Where will CO2 meters, detectors, etc., be placed??? Near cities, towns, schools, highways, county and township roads, homes, etc., along the route of the hazardous CO2 pipeline???
13. Who will pay for the appropriate education, safety equipment and annual equipment upgrades? Upgrades will be needed. The upgrades needed needs to be determined by all entities affected by the hazardous CO2 pipeline: Fire Department, Emergency Management, EMT's, Healthcare Facilities, Law Enforcement, etc., at the expense of SCS.

14. Any and all education needs to be completed prior to use of the hazardous pipeline.
15. All entities affected by the hazardous CO₂ pipeline: Fire Department, Emergency Management, EMT's, Healthcare Facilities, Law Enforcement, etc., need to be involved in selecting all educational and in-service materials, safety equipment, CO₂ meters, detectors, etc., at the expense of SCS.

G. HEALTHCARE CONCERNS FOR PEOPLE WHO ARE EXPOSED TO CO₂:

1. Short term: breathing problems, circulatory problems, cardiac problems, headaches, sweating, numbness, irritability, disorientation, unconsciousness, death
2. Long term: mental fogging, lung dysfunction, kidney dysfunction, chronic fatigue, anxiety, insomnia, digestive disorders
3. What are the short and long term effects of CO₂ poisoning on the development of an infant, child, teenager???
4. Who pays for healthcare and/or funeral expenses for those who are exposed to a CO₂ leak/rupture???

H. LIABILITY CONCERNS OF HAZARDOUS CO₂ PIPELINE:

1. SCS for leaks or ruptures of pipeline in pipe or joint failure?
 - a. Has SCS show proof of liability insurance on the permit they have filed with the PUC???
 - b. Liability for duration of the use of the hazardous pipeline???
2. If Landowner, Utility, or Construction Company, etc., damages the pipeline?
 - a. Landowner will be unable to get insurance for their property with hazardous CO₂ pipeline on their property, what are they to do???
 - b. Will Utility, Construction, etc., companies insurance cover any damages, etc., when they need to do work in the area of a hazardous CO₂ pipeline???

I. WHAT MEASURES ARE GOING TO BE TAKEN TO SECURE THIS HAZARDOUS CO₂ PIPELINE FROM ACTS OF TERRORISM???

1. This plan needs to be in place prior to any use of a hazardous pipeline.

J. WHAT MODIFICATIONS CAN BE MADE DURING THE EASEMENT AGREEMENT?

1. Examples: routing of pipeline, setback, depth?
2. Where the Hazardous CO₂ Pipeline is near a town, how close would housing be allowed in the future as towns expand?
3. Would tree planting be allowed in easement area? Could a calf shelter be located on the easement area?
4. Limit additional pipelines from being included on the agreement.

K. CONCERNS WITH USE OF EMINENT DOMAIN:

1. Eminent domain should not be used for something that is toxic and hazardous to the public.
2. Laws need to be in place so that if eminent domain is used the easement cannot be sold to a foreign country.

L. HOW MUCH WILL THIS HAZARDOUS CO2 PIPELINE BE TAXED?

1. Who will benefit from these tax dollars? Emergency management, Fire Department, EMT's, healthcare facilities, counties and townships, schools, etc.???
2. How much do taxes need to increase yearly???