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**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

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**IN THE MATTER OF THE APPLICATION  
OF NAVIGATOR HEARTLAND  
GREENWAY, LLC FOR A PERMIT UNDER  
THE SOUTH DAKOTA ENERGY  
CONVERSION AND TRANSMISSION  
FACILITIES ACT TO CONSTRUCT THE  
HEARTLAND GREENWAY PIPELINE IN  
SOUTH DAKOTA**

**HP22-002**

**BILL CARAM  
INITIAL PRE-FILED TESTIMONY  
IN SUPPORT OF LANDOWNER  
INTERVENORS**

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**Q: Please state your name and purpose for providing testimony in these proceedings.**

A: My name is Bill Caram. The purpose of my testimony is to provide the PUC information helpful when considering the threat of serious injury to the environment, to the social condition, and substantial impairment to the health, safety or welfare of current and expected inhabitants should the PUC approve this Application. In addition, when there is negative impact on or threats to the foregoing considerations that also leads to negative economic impacts.

**Q: What experience, education, training, or background qualify you to provide opinions and your concerns as you have herein?**

A: Please see a summary of my education and experience in **Attachment No. 1.**

**Q: Does Attachment No. 2 to your testimony include research you have done related to CO2 pipelines and your opinions and concerns that you want the PUC to be aware of relative to the proposed CO2 pipeline in question?**

A: Yes, it does. Included are a true and accurate copies of my research related to regulatory and knowledge gaps and shortfall related to CO2 pipelines which underlies the need to not rush consideration of these projects without due diligence on missing regulatory framework. Also included of an article I authored about the dangers of CO2 pipelines. Lastly, is an article entitled CO2 Pipeline Material and

Safety Considerations which details eight (8) conclusions I adopt and urge the PUC to also consider. I stand by my positions and opinions discussed and am competent to testify about them as necessary. I urge the PUC to carefully consider this testimony during the Hearing in this matter and in your deliberations. I further reserve the right to amend or modify these opinions upon presentation of any additional information that may justify such a change.

/s/ Bill Caram

Bill Caram