

From: Jane Payfer <jpayer@gmail.com>
Sent: Sunday, January 12, 2025 6:36 PM
To: PUC-PUC <PUC@state.sd.us>; PUC Admin <PUCAdmin@state.sd.us>; PUC <PUCPF@state.sd.us>
Subject: [EXT] My comments for the upcoming PUC meetings.

The Docket #, and all my contact information as required is listed at the top of the attached document.

Thank you very much.

Sincerely,
Jane Rodmyre Payfer

Docket # HP24-001
Comments submitted by:
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January 12, 2025

Dear Commissioners,

Thank you for your attentive consideration today.

I have four areas of primary concern and questions for your and will present them in ascending order of concern

The first has to do with economics. Have you collaborated with local assessors to decide how they will proportionately reduce property taxes on our properties, should the pipeline route be approved and our property values diminish? Will Summit pipeline compensate each county for the loss in tax revenue, or will the state – for the lost property tax revenue?

The second has to do with both transparency and sequestering. While I realize the end point of the pipeline is not located in South Dakota: that falls outside your purview.

No matter what political party we're affiliated with, South Dakotans are true Conservationists. We take care of our soil and waterways. Not too long ago, neighboring state MN allowed 60,000 tons of taconite tailings to be dumped daily into Lake Superior. The tailings were considered to be safe and no more harmful than sand. When asbestos fibers were found in both the lake and drinking water in Duluth, years of litigation ensued, which ended this practice.

While there are hundreds of carbon capture facilities and over 50 CO2 pipelines in the US,

the Global CCS Institute reports there are 22 existing and proposed implementations of capture, transport and storage. Of these, 16 are pumping CO2 underground to directly force more oil production out of oil wells. Currently, only 4 implementations are actively sequestering CO2.

Of these four, NONE are anywhere close to sequestering the “hundreds of millions of metric tons” Summit claims will happen and for which NorthDakota gave them a license. The most recorded sequestered carbon to date is 20 million, then 4 million and “millions”. The 4th does not list any capacity . And a 5th that was operational in Texas is currently not functioning due to “economic conditions.”

What is fair to say is that basic laws of nature still apply -- to every action there is always an equal opposite reaction. While sequestering “over a mile deep” sounds reassuring – the reality of this issue is no one knows what the true impact is of a plan to have sequestered 350 million metric tons of CO2. (Dec 12, 2024 Summit Press Release). There are additional metric tons contributed by the MinnKota Project Tundra plan.

The CEO of Summit says there is rigorous scientific studies supporting this sequestering initiative. There are two studies publicly available that highlight it’s economic impact. Announcements have been made that seismic data and drilling stratigraphic test wells has taken place, however, these reports are not available to the public. That raises three questions for Summit:

1. What will the equal but opposite reaction be?
2. Does Summit know or have an expectation of which type of reaction is most likely?
3. If so, why isn’t that information being shared publicly?

And, If not, then we ask ourselves:

Will the CO2 find fissures and slowly dissipate back into the environment?

Will the pressure cause seismic activity in the surrounding area?

Will the increased pressure build stress on fault lines, triggering earthquakes?

Will CO2 contaminate freshwater aquifers?

Will the carbon find its way into saline aquifers, forcing the brine closer to sub surface wetlands?

Will the pressure increase over time so much that there is a sudden, massive emission?

In a fully transparent project, all of this information would be shared.

The third concern has to do with capability of a new company, Let’s explore the likelihood that a new company and new team members’ first ever project is to flawlessly design and build “the world’s largest carbon capture and storage project” (May 11, 2022 Summit Carbon Solutions press release) Working extensively with product development engineers through proof of concept, design verification testing, engineering verification testing, and proto-type builds, even when the most rigorous attention has been paid to the final specification fed into computer aided design, (and I imagine Artificial Intelligence) never have I seen a perfectly executed, flawless first-time product build.

For many products these initial flaws are not a critical path item and the “bugs” can be

fixed with the next software update or tooling revision. This proposal highlights an overwhelmingly complex schematic, significantly different from other projects.

Pressurized pipelines' most common fail point is due to joints and connections. In addition to the typical welded joints, mechanical fittings and couplings, this pipeline includes incorporation from 57 additional "spur" lines. These penetration and connection points create their own significant engineering challenges: flow dynamics and pressure stabilization, compressor stations, and control systems, each with their own fail rates.

With the utmost respect for each of you and the enormous responsibility of your elected position, do you believe this new company's first ever project can achieve flawless execution?

The fourth issue is the area is accountability. I have recently learned that every nut, bolt and component part of a SpaceX rocket is tied to a person who is responsible for that component, This provides traceability and accountability, not only to the assembly team, but to the manufacturer and engineering team that designed and implemented it. Will this mission critical project offer a similar level of accountability? Will the company become responsible should there be a failure, or will that be the individual State's responsibility?

Please, for the record, tell us now where the buck will stop.

In summary, gentlemen, together with many hundreds of others, I believe there are too many unanswered questions, too many unknowable issues, and too many predictable failures to outweigh the contested benefits of this pipeline.

Please give your decision the prayerful, thorough and weighty consideration it deserves.

My sincere thank you for being able to express my concerns.

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