

From: Holly Hansen <holly@hansenwheel.com>
Sent: Thursday, January 9, 2025 4:55 PM
To: PUC Docket Filings <PUCDocketFilings@state.sd.us>
Subject: [EXT] Existing Docket Filing

Docket Number: HP24-001 Last Name: Hansen First Name: Holly
Company: Intervenor Address: 40979 245th Street City: Letcher State:
SD Zip: 57359 Phone: 605-999-0329 Email: holly@hansenwheel.com
Comments:

Thank you for the opportunity to comment on Docket #HP24-001, Summit Carbon Solutions pipeline permit request. I appreciate your consideration in recognizing that even though the pipeline does not physically run through my property, I would be personally and negatively affected, to a much greater degree than a neighboring landowner who has signed an easement but does not have a residence on that property.

As a resident, landowner, business owner and taxpayer of Davison County, I am directly and negatively affected by this hazardous pipeline crossing under the river 1 mile directly upstream of our property along the James River Valley. I believe it will pose a serious threat to the health, safety, and welfare of our family & home (where I provide full-time daycare for my young grandchildren), to our elderly parent whose property is adjacent to ours, to the 12 employees of our family-owned and operated manufacturing business, (one of which is our daughter) and to our livestock operation. It will greatly restrict our ability to maintain financial stability for 13 families, and our responsibility to maintain a safe work environment and liability insurance for our business and employees, thus restricting economic development and potential future expansion and next-generation growth of our business and cattle operation.

Our other daughter and her family live south of Aberdeen and are in the direct path of the pipeline there. We are very concerned for the safety and wellbeing of their family and livestock as well. The purposed route would run along the road ditch right-of-way, only 100 feet from our daughter's in-laws' residence, where her three young children are for day-care. A high-pressure CO2 pipeline running this close to properties possesses a constant 24/7- 365 day a year threat. Our daughter and her husband own property, and a residence, with a farm and cattle operation just up the road from there, and within 1.5 miles of the pipeline.

Another concern is the lack of emergency response preparedness and the high costs of equipment for local and volunteer first responders, placing a huge financial burden upon these small, rural communities. The river crossing and river bottom is an area that is highly susceptible- year after year- to flooding, washouts, cutouts, erosion, river channel changes; as well as it would cross an existing NuStar pipeline that cuts diagonally through our back yard pasture and several neighboring properties. This NuStar pipeline has dry-land markers that are currently underwater because of the floodplain erosion and the riverbed channel constantly changing. This highly saturated floodplain is also highly susceptible to experiencing substantial frost-heave, a critical concern for CO2 pipelines. In addition, we are directly in the immediate low-lying area, where in the event of a leak, the CO2 being heavier than air, will flow and settle in the river valley and act as an asphyxiant to our family, employees, neighbors, and livestock. I have concerns about who will be compensated for any losses and damages in the event of a leak, especially as we are renters of some of the property where we run livestock, and have read that only landowners, not renters or neighboring occupants, would be able to receive compensation.

I feel that the premise of building this pipeline for reducing harmful greenhouse gases is disingenuous. According to data presented in Joshua Haiar's SD Searchlight article of September 9, 2024, Summit pipeline would only capture CO2 from the corn fermentation process, because this is a purer CO2. The CO2 emissions from gas powered industrial equipment would still be released into the air. The ethanol plant's industrial machinery uses a lot of natural gas, which releases harmful gases in addition to CO2 when burned as fuel. The US Environmental Protection Agency only reports the amount of CO2 that ethanol plants emit from gas-powered processes; an approximate 7 million metric tons annually from the 57 Summit-partnered ethanol plants in 2022, that would not be captured but would still go into the atmosphere. However, the EPA does not even report the amount of corn-fermentation CO2 emitted. That is because fermentation emissions are considered cyclical. Corn pulls CO2 out of the air as it grows, then releases the nearly pure CO2 back to the atmosphere as it ferments. Farmers plant more corn and the cycle continues. Crop production is enhanced in the vicinity near the ethanol plants. Why sequester the pure CO2, which is beneficial plant-food, while doing nothing to reduce (rather this would allow for an increase through the use of carbon credits) in the harmful emissions? Solely for the profit to a privately owned company, by collecting taxpayer dollars, through incentives from the Federal government.

Little is said about the huge amount of water (in addition to the large amount needed to produce ethanol) that will be required for the process of capturing and transporting the CO2, and where that water source would come from. Likewise, the excessive amount of electricity required is of concern since the ethanol plant is only 5 miles from our manufacturing business and the increased demand has the potential to cause outages that would disrupt our production, and the capacity and integrity of our three-phase equipment. I am concerned about the unintended, negative consequences of water and electrical supply shortages.

I have concerns about the significance and reasoning behind the Alternate Routes that are included with this pipeline application, and whether granting a permit would allow Summit to switch to these alternate routes; there by negatively impacting people who have not had an opportunity to voice their concerns, and possibly interfering with economic development and environmental issues in additional areas, or resulting in the use of eminent domain for private gain.

Finally, it is inconceivable that any new build-out of a hazardous pipeline would be permitted prior to promised, up-dated safety rulings from PHMSA. Following their investigation into the 2020 CO2 pipeline rupture in Sartartia, MS; PHMSA announced on May 26, 2022, that a new rulemaking was necessary to address the need for more stringent safety standards. Although the agency planned to publish a Notice of Proposed Rulemaking this past June, it has been consistently pushed back and to date has not yet come out.

Thank you for your time in considering my many concerns about the permitting of this hazardous pipeline, that I feel very strongly will prevent me from fulfilling my responsibilities of seeing to the health, safety, physical and economic well-being of my family, employees, & elderly neighbors; as well as maintaining our family property, business, and the viability of our farm & livestock operation for future generations. I and countless other South Dakota residents and landowners have nothing to gain and everything to lose if this pipeline is forced upon the citizens of our state. That simply is not right.

Respectfully Submitted
Holly Hansen / Negatively impacted Davison County resident.

Attached is one document for filing:

* Holly Hansen Party Status Application

Thank you - Holly Hansen