

From: Don Johannsen [REDACTED]
Sent: Wednesday, January 1, 2025 1:50 PM
To: PUC-PUC <PUC@state.sd.us>
Cc: Donald Johannsen [REDACTED]
Subject: [EXT] Objections to docket HP24-001 - Summit Carbon Solutions LLC

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I tried to find a way to submit these objections on the PUC@state.sd.us website but didn't get it to work.

If this is not the proper method please let me know so I can do it properly. Thank you

South Dakota Objection No. 1

Sequestration to address climate change is not a viable concept.

I am a landowner in Cherokee County Iowa affected by the Summit Carbon Solutions LLC pipeline. I have been fighting against the pipeline for over three years now. Although my land is in Iowa many of the same reasons to object against the pipeline in Iowa are just as valid in South Dakota.

I am a retired mechanical engineer. I worked as a design engineer in private industry for over 50 years. I have led and participated in countless design reviews and brainstorming sessions over my career. During the course of these sessions different concepts for the design are proposed and evaluated but rule No.1, that every idea had to pass, was simple – the design had to work. Regardless of how economical, or easy to manufacture, or easy to assemble, or whatever, the design had to work. The Summit pipeline fails this basic test.

- 1.) The amount of CO2 Summit intends to sequester (18 million metric tonnes per year (MMTY)) is miniscule in comparison with current global CO2 emissions (40,000 MMTY and increasing). This amount is only $18 / 40,000 = 0.00045$ of the total. From my experience I can say with very high certainty that if you have to look as far as the fourth decimal point to evaluate a change, that change will be insignificant. The truth about sequestration is that you just cannot physically bury enough CO2 to make a difference,
- 2.) The concept that you can inject huge quantities of CO2 deep underground and it will stay safely in that location for eternity has been proven to be flawed. The ADM injection well in Decatur Illinois has been operating since 2011 and has injected a total of 4.5 MMT into the sequestration site since then, an average of 0.3 MMT per year. In October of 2023 ADM noted corrosion in the tubing of the well. In March of 2024 ADM detected a leak but waited until July to notify the EPA. The EPA instructed ADM to perform additional testing and in September of 2024 a second leak was detected. After the second leak was detected, ADM and the EPA finally notified the public. As a result of the leakage ADM has withdrawn their permit to build application.

Two leaks in 14 years is a very long way from eternity. And the amount of CO2 amount that ADM was injecting (0.32 MMTY) is only 0.02 of the amount that Summit plans to inject each year (18

MMTY). The concern that CO2 injected deep underground will migrate and have unintended consequences such as polluting the aquifers and drinking water is entirely justified.

I object to the fact that Summit will receive over \$1.5 billion dollars a year to sequester an amount of CO2 that will have no noticeable effect on climate change.

I object to Summit making repeated public statements that sequestration is a safe proven technology when it is clearly not. Summit is taking huge risks on a regional scale in return for \$1.5 billion dollars a year.

Summit Carbon Solution's permit to build should not be approved.

South Dakota Objection No. 2

Summit will not disclose the identity of their investors.

I am a landowner in Cherokee County Iowa affected by the Summit Carbon Solutions LLC pipeline. I have been fighting against the pipeline for over three years now. Although my land is in Iowa, many of the reasons to object against the pipeline in Iowa are just as valid in South Dakota.

Summit Carbon Solutions (SCS) is asking South Dakota landowners to decide whether or not to sign their easements without providing necessary critical information.

One of the pieces of critical information missing is the failure to disclose the principal investors in the SCS pipeline project. Once obtained by Summit, whether through voluntary signing or through eminent domain, the easements can be sold to any party, foreign or domestic. In Iowa, the Iowa Utilities Commission (IUC) ruled that Summit did not have to disclose the investors and despite several attempts from landowners to obtain this information, Summit has refused. Only Summit knows who the investors are, but if the investors were solid American companies or individuals in good standing, Summit would have no reason to hide their identity. It appears likely that the investors are people in countries that you would not like to have control of your land.

By Federal definition CO2 pipelines are considered hazardous and by definition CO2 is considered a pollutant that is not covered by liability insurance. Both Summit and the State are covered in the event of a rupture. But due to the pollution exclusion clause in liability insurance policies, the landowner is unable to obtain liability coverage. After a rupture, when things have settled beyond the initial settlement, the insurance company will be coming after someone to pay. And that will come down to either Summit or the landowner. Summit is on track to be making \$1.53 billion dollars a year in tax credits and has both a large staff of corporate lawyers and deep enough pockets to litigate large claims for an extended period. The landowner has neither. Does anyone believe that billionaire investors from China, or the Middle East will pay insurance damage claims when they can shift the burden to South Dakota farmers? There is not a chance Summit will pay. Summit and their investors are in the sequestration business for one thing only, and that is to make every penny they can, whatever the cost is to individual farmers in the U.S.

If the landowner realized that by signing the easement they were giving control of their property to characters whose interests and goals are not in the best interest of America, they would not sign. That is the true reason Summit will not disclose the investors.

I object to the fact that Summit has not been required to disclose their investors and that landowners are being forced to make uninformed decisions that could possibly have large consequences to them after a rupture occurs. The landowner has a right to know this information.