

From: [REDACTED]
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To: PUC-PUC <PUC@state.sd.us>
Subject: [EXT] comments 2

2024/HP24-001
Jamie Fisk
[REDACTED]
Tulare, SD 57476
[REDACTED]

Concerns that need to be considered.

1. How far under crop ground is safe? Summit's proposed depth is 48 inches. The CO2 when compressed into a liquid state leaving the Ethanol plant will be approximately 120 degrees F., 2183 psi. If as SCS estimates it will cool to approximately 80 degrees F. How will this affect the moisture? How will this affect the natural freezing? What will happen to the soil fertility (microscopic microbes)?
2. Weight of tractor, combine and other farm equipment. When this pipeline is only 48 inches deep, how will the pipeline be affected by this heavy equipment crossing at right angles or driving parallel down the field?
3. What measures are going to be taken to protect the pump stations and exposed pipeline from acts of terrorism as CO2 is considered hazardous colorless and orderless gas once it turns from a liquid in the pipeline to a gas when there is a break (either natural or man-made)?
4. Who will respond if there is a fracture, break, accident? Is Summit going to fund Self Contained Breathing Apparatus for all fire departments, ambulance responders? Along with this, is Summit going to pay for the training of these individuals? What OSHA standards and exposure guidelines will apply?
5. Appendix 2: PHMSA Compliance Table. On the docket 3 pages: explains how SCS will exceed all the Federal requirements. PHMSA has not published CO2 pipeline regulations to my knowledge. I may be wrong: CFR 49 Part 195 requirements are for Natural Gas Pipelines. Will the PUC pass this permit, on these Federal Requirements? Will PUC contact engineers outside Summit to decide if this permit is following the correct Federal Law for CO2 pipelines?
6. The docket maps show alternate routes. Will Summit be allowed to use these alternate routes on this permit, or will they have to reapply? This is very unclear on the current docket. In studying the maps from their previous permit application: in Spink County the alternate route is the old permit route. Are those landowners on the old route going to be able to be Intervenor? This issue is very unclear. Summit has many easements on the old route. Will they be able to use them?