

From: Judy Wilts [REDACTED]
Sent: Monday, January 6, 2025 5:25 PM
To: PUC-PUC <PUC@state.sd.us>
Subject: [EXT] PUC Docket: HP24-001 [re-submission]

In the Matter of the Application by SCS Carbon Transport LLC for a Permit to Construct a Carbon Dioxide Transmission Pipeline

Submitted by: Judy L Wilts

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Thank you for accepting comments regarding HP24-001 for the January 16th meeting in De Smet.

We received a letter regarding this meeting, as our property is within close proximity to the proposed CO2 pipeline path. I have spent time reviewing the Summit Carbon Solutions Dispersion Analysis document on your website. While doing so, I kept in mind the 'Applicant Responsibility' when seeking the PUC's approval as noted in your Pipeline Siting Information Guide.

Based on the modeling performed and documented by SCS, I did not see enough that satisfied the following:

- will not pose a threat of serious injury to the environment nor to the social or economic condition of inhabitants or expected inhabitants in the siting area [I'm anticipating it will lower our property values]
- will not substantially impair the health, safety or welfare of the inhabitants

There is not enough information that assures me this pipeline will not pose a threat of serious injury to residents, livestock, wildlife and/or the environment in general. I cannot fathom why a path has been proposed to go through wildlife management, wetland areas and near both Lakes Henry & Thompson.

This also didn't convince me that it will not substantially impair the health, safety or welfare of the inhabitants in the rural areas or the towns of De Smet & Lake Preston, and especially those who live by, travel to/from, or vacation near the lakes mentioned.

If this pipeline has to go through Kingsbury County somewhere, then there needs to be an alternate route to avoid damaging wildlife, wetland areas and lakes. We also need to have all of the 'modeling' done and thorough time for communities to consider the impact of and preparation for response to leaks which can have a devastating impact to the health and well-being not only of our residents, but those traveling to, and through these areas to enjoy our rich history, cultural, recreational and/or hunting experiences.

At minimum, it would be helpful to know exactly what is considered a 'safe distance' from the impact of a vapor plume or the spread of dense material after a leak occurs, either 'full bore' or 'mechanical'? What is the timeline & degree of impact as it either drifts overhead or spreads out based on topography? Since CO2 is heavier than air, the greatest threat will be at ground level where it will ultimately sink and spread to lower level areas such as the wetlands and the lakes mentioned.

In addition, we need to know how long it will take for someone to address a leak and how soon first responders will be notified. In regards to first responders, it was recorded via 911 calls that vehicles quit functioning during the Sartartia, MS leak in the Denbury pipeline in 2020. Beyond being able to get to the affected area, or people being able to get out of the area, there is the added concern as to whether or not first responders will have enough oxygen for themselves, let alone be able to provide for those who have been impacted by the leak. [as documented by NPR.org 5/21/2023 in their story: "A rupture that hospitalized 45 people raised questions about CO2 pipelines' safety".]

Federal safety regulations have yet to be updated; PHMSA notice of proposed rulemaking (NPRM) for May, 2024 is still outstanding as of January, 2025. [PDF attached]

I don't understand how we can be issuing permits before these regulations are complete, and fully understood by those needing to prepare via training and obtaining appropriate PPE.

Thank you for your time and consideration.