

From: Valley Springs Body Shop [REDACTED]
Sent: Wednesday, August 16, 2023 5:33 PM
To: PUC <PUCPF@state.sd.us>
Subject: RE: [EXT] HP22-001, HP22-002

[REDACTED] valley springs south dakota 57068

Commissioners Fiegen, Hanson and Nelson

I am writing you in great concern of the two proposed CO2 pipelines. Navigator plans to build their pipeline 5 ft underground with 2100 - 2200 psi of liquified carbon dioxide that will be in an extremely volatile state with shut off valves 20 miles apart. Summit is proposing a 4 ft depth. The proposed depth of these pipelines is not sufficient considering heavy farm equipment, wet seasons, frost heave, etc. When CO2 is condensed to pressures and temperatures needed for transport over large distances, it becomes more hazardous. CO2 is an asphyxiant/intoxicant. If there is a rupture, CO2 can be released for miles.

After investigating a hazardous carbon pipeline explosion in Satartia, MS, the US DOT Pipeline and Hazardous Materials Safety Administration (PHMSA) reported on May 26th, 2022 that carbon pipelines are severely under regulated and do not provide the necessary and adequate protection. PHMSA will not have new regulations available until the fall of 2024. Both Summit and Navigator would like to have their pipelines built before the new regulations are in place. Their pipelines will be at a much larger scale than the industry has experienced.

Another PHMSA report shows that with the current carbon pipelines in use, these CO2 pipelines are averaging 6 leaks per year since 2010. Out of 5100 miles of CO2 pipelines currently in place, 66 leaks in 10 years equals 1 leak every 77 miles. CO2 pipelines can be very corrosive. Even trace amounts of water mixed in with the CO2 stream can rapidly corrode the pipes. On behalf of Valley Springs Fire and Rescue, I am requesting plume modeling and risk assessment reports.

Do our fire departments/first responders have enough SCBA's and air tanks to respond to a CO2 pipeline rupture? If there is a carbon pipeline rupture, vehicles will not run due to the lack of oxygen needed. Will we be provided with electric fire trucks and vehicles for all departments that would be called to respond?

To my knowledge, there has only been one training meeting for first responders by Navigator's safety representatives which was held in Sioux Falls. At this meeting, they told us that CO2 is an asphyxiant, showed us a sample rupture done in Europe and told us that we needed a good plan in place on how we should deal with a hazardous CO2 pipeline rupture. We have had no formal training or any idea on what we should do to prepare for a CO2 pipeline rupture. From my experience, the training that was provided did not compare to any other training that we have had with other pipelines, railroads, etc. We walked out of that meeting with no additional knowledge that what we had going into the meeting.

South Dakota has only 5 Hazmat teams: Sioux Falls, Rapid City, SD National Guard, Aberdeen and Watertown. If there is a leak near our department, I will not send anyone into the zone until we wait for the Hazmat teams to arrive and designate a safe area.

PHMSA's new regulations need to be in place before any CO2 pipelines are permitted in SD. Valley Springs Fire and Rescue is asking you to deny both the Navigator and Summit pipeline permits.

Respectfully,

Don Johnson

Valley Springs Fire Chief for 25 years

EMT for 28 years

Valley Springs Fire Department for 31 years