

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA

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IN THE MATTER OF THE APPLICATION  
OF SCS CARBON TRANSPORT LLC FOR  
A PERMIT TO CONSTRUCT A CARBON  
DIOXIDE PIPELINE.

HP22-001

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**REBUTTAL TESTIMONY OF**

**ROD DILLON**

**ON BEHALF OF**

**SCS CARBON TRANSPORT LLC**

**SCS EXHIBIT #**

July 7, 2023

1 **Q. Please state your name and business address for the record.**

2 A. Rod Dillon, 2321 N. LOOP DR. SUITE 221 AMES, IA. 50010

3 **Q. What is your position with SCS Carbon Transport, LLC (“SCS”)?**

4 A. Director, Compliance employee of Summit Carbon Solutions.

5 **Q. Please briefly describe your educational experience.**

6 A. I have 39 years of professional background in firefighting, hazardous materials response, Incident  
7 management, pipeline emergency response management.

8 **Q. Please describe your duties with SCS.**

9 A. I am responsible for ensuring compliance with PHMSA regulations.

10 **Q. Have you previously submitted direct testimony and exhibits in this proceeding?**

11 A. No

12 **Q. Is carbon dioxide considered a regulated substance? Is any release regulated by the**  
13 **South Dakota Department of Agriculture and Natural Resources (DANR)?**

14 A. SCS agrees with Kindt’s testimony in that carbon dioxide is considered a regulated  
15 substance and that any release is regulated by the SD DANR.

16 **Q. Does SCS agree with Kindt’s testimony that any discharge of a regulated substance**  
17 **must be reported immediately as “suspected discharges” within 24 hours?**

18 A. Yes. SCS agrees with Kindt’s testimony.

19 **Q. Kindt describes the potential groundwater remediation scenario following a CO2**  
20 **release. Does SCS agree with this testimony?**

21 A. No groundwater remediation will be needed.

22 **Q. Does SCS agree with Gerald Briggs’ testimony regarding Satartia EMS Fire Chief’s**  
23 **testimonial of his own personal experience with the Denbury Pipeline in Mississippi, being**  
24 **concerned with outreach and education from pipeline companies, first responders needing**

25 **to know best practices, methods, and equipment and needing SCBA, annual training, and**  
26 **coordinated warning systems from the pipeline company, and the concern about CO2 being**  
27 **odorless?**

28 A. SCS's plan is to equip and educate the first responders that will respond to ensure the  
29 safety of the public along the pipeline route if there is a CO2 release. SCS will coordinate with  
30 county emergency management personnel to secure the equipment needs for first responders  
31 once the State has issued a construction permit and coordinate the training schedule once SCS  
32 has scheduled the pipeline construction. SCS will supply all county first responders who could  
33 potentially respond to a SCS pipeline release with CO2 air monitoring instruments and evaluate  
34 other requested specialized equipment needs on a case-by-case basis. SCS operations and first  
35 responders will participate in tabletop exercises twice a year, which will include training new  
36 first responders and calibrating air monitoring instruments. The SCS Control Center will ensure  
37 a notification system is in place and all potentially affected including the public and first  
38 responders are educated regarding the notification procedure. Odorant and SCS's rationale for  
39 not odorizing the MCE pipeline is provided in other SCS employee testimony.

40 **Q. Does SCS agree with Terry Gann's testimony regarding the complaint that they did**  
41 **not know about the pipeline in Mississippi?**

42 A. I have read Mr. Gann's testimony and have addressed his concerns in planning for first  
43 responders. Without contesting Mr. Gann's assertion, he and Mr. Briggs testified that other  
44 pipelines exist in their respective counties of residence. Existence of pipelines, familiarity with  
45 pipeline markers, and their professional training should have alerted them to the presence of the  
46 Denbury pipeline. According to Mr. Briggs, it's also interesting the Emergency Manager  
47 apparently didn't realize there was a high pressure 24" pipeline traversing the county. While it is

48 the responsibility of the operator to notify area first responders, it seems that someone would  
49 have noticed pipeline markers, above ground valves, etc.

50 **Q. Did Fire Chief Briggs follow standard protocol when responding to the Satartia, MS**  
51 **release?**

52 A. No. Per Fire Chief Briggs testimony: *“We arrived at the checkpoint again and I asked*  
53 *what type of leak we were dealing with ... they still didn’t know. So, we just loaded up everything*  
54 *... and proceeded towards the sound of what we believed was coming from the site of the*  
55 *explosion.”* Due to Fire Chief Briggs extensive training, he should know that a first responder  
56 never enters a “hot zone” without fully understanding what hazards may be encountered.

57 **Q. Were apparent victims at the Satartia checkpoint experiencing effects from CO2**  
58 **exposure?**

59 A. Inconclusive. The Denbury CO2 stream contained H2S which is a highly toxic chemical  
60 and effects experienced by the victims could be attributable to H2S. Since CO2 is odorless and  
61 colorless, firsthand reports of a “green gas” support the Denbury stream contained impurities the  
62 SCS CO2 stream will not contain. Per Fire Chief Brigg’s testimony: *“no, the symptoms that I*  
63 *observed with the victims that I dealt with were not typical symptoms of H2S.”* With all due  
64 respect, Fire Chief Briggs is not a trained Industrial Hygienist and his familiarity with H2S was  
65 not established. In my broad professional experience, the symptoms of victims as described is  
66 indicative of exposure to H2S.

67 **Q. Have you come to any conclusions regarding what if any public engagement and**  
68 **first responder education efforts are necessary to prepare for an incident such as the**  
69 **Satartia, MS release?**

70 A. As stated in previous testimony, SCS agrees with Fire Chief Briggs assessment that  
71 operators should contact first responders, provide annual training, help assess response readiness,  
72 and provide equipment and resources necessary to response to a CO2 release.

73 **Q. Do you agree with SCS's position that CO2 pipelines are no more dangerous than a**  
74 **natural gas pipeline or an oil pipeline?**

75 A. Fire Chief Briggs answered no. I disagree strongly with Fire Chief Brigg's assertion that  
76 a CO2 pipeline is as dangerous or even more dangerous than other pipelines. Per Mr. Briggs  
77 testimony: "*All hazardous pipelines are dangerous but the one difference is the weight of the*  
78 *product with CO2 that is not going to go straight up in the atmosphere it's going to sink*". To the  
79 contrary, Natural gas may have heavy components such as ethane, butane, and propane which are  
80 also heavier than air. Unlike CO2, natural gas and crude oil vapor are combustible and  
81 flammable. As such, SCS feels strongly that a nearly pure stream of CO2 is a less dangerous  
82 product than either natural gas or crude oil.

83 **Q. Does this conclude your testimony?**

84 A. Yes.

85

86 Dated this 7th day of July, 2023.

87

88 /s/ Rod Dillon

89 Rod Dillon