

From: [REDACTED]
Sent: Monday, January 30, 2023 11:54 AM
To: PUC-PUC <PUC@state.sd.us>
Subject: [EXT] Objection to Navigator pipeline HP22-002

I would prefer this email content would not be posted for public view, but I am OK with it being available to staff and PUC members who have the password to view it.

I originally submitted comments which were filed in the list of docket comments on 12/8/2022. Since then, I have completed additional research which further expands on my original submission and corrects some errors. I have also filed this attachment with the Iowa PUC and also as you suggested in response to my first document, I sent it directly to the person responsible for the Navigator route, Ann Marie Welshan.

I talked with Amanda Reiss if I could update what I filed previously, and she indicated that it is likely they would have to add this as a separate document. I would like to refile this update with SD so all three (Navigator Management, Iowa PUC and SD PUC) have the same updated document.

In response to the attachment, Ann Marie Welshans Director of Right of Way for Navigator emailed me her comment that the Iowa PUC had rules relating to how far Navigator could move a route (within 1/2 mile) without rescheduling public meetings etc. She did not indicate that South Dakota PUC had any restrictions. Given this change is approximately 2 miles she indicated considering this change would cause a delay in the project. However, in follow-up with a rep at the Iowa PUC he indicated it allows for waiver of rules which Navigator could request in order to make the changes avoiding delays to the project due to the need for public meetings etc. I forwarded the form to Ann indicating she could mitigate the delay by completing a request for a waiver. I am assuming she was correct that Navigator can make changes to the route in SD without SD PUC Approval. Is that correct? If not, what is the process for Ann to obtain approval of an alternative route we are suggesting, does SD PUC have a process for route change requests?

Changes to this document vs the prior one filed 12/8/22

- I discovered there has been a prior breakage of a CO2 pipeline less than 2 years ago. This is extremely relevant information. I believe it is important that both the commissioners and the public are fully aware the unique dangers of CO2 pipelines. The incident involving Satartia, Mississippi absolutely proves that CO2 can travel along the ground at least 1/2 mile (likely much more) from a burst pipeline resulting in serious impact on humans and animals. I provided some information I gleaned from articles on the Satartia, Mississippi incident in 2021.
- I also remapped and calculated our suggested alternate route length versus the current Navigator proposed route for the last 5+ miles as it enters Iowa from SD, correcting an error I made. The proposed alternative route is 1/2 mile shorter, I

originally measured it to be 1 mile shorter. I did additional research on pipeline costs using XL pipeline estimated cost per mile, and based the savings that Navigator would realize if it followed the alternate route. The approximate savings by shortening the pipeline ½ mile would be \$3,000,000.

- I also updated the exhibits to more clearly show the impact on the SD side of the Sioux River by highlighting existing residences along the 5.7 mile leg of the Navigator route (yellow icon houses). It is now much more obvious how the proposed route does not comply with Navigators primary principle of avoiding areas that has a high consequence due to existing and future population growth areas. These images clearly show the issue between stated principles and reality.

I realize the SD PUC does not have authority to change a permit route, only Navigator can. It would however be very unlikely that the PUC has no negotiating ability prior to approval of the permit. If the SD PUC members felt there existed an issue which was valid and if they considered it a "show stopper", I would assume that a phone call or two would be made to negotiate with Navigator to come up with a solution to mitigate the issue. We are providing evidence of such an issue and a suggested solution.

Images are embedded into the pdf file if you need those separated out, I can send them as separate attachments.