



November 21, 2022

Minnesota Public Utilities Commission  
121 7th Place E, Suite 350  
Saint Paul, MN 55101-2147

Re: *Route Permit Application for the Summit Carbon Solutions Otter Tail to Wilkin Project in Wilkin and Otter Tail Counties, Minnesota; PUC Docket No. IP7093/PPL-22-422*

On behalf of the members of the Minnesota Environmental Partnership (MEP) and the undersigned organizations, I submit these comments to the Public Utilities Commission on the Summit Carbon Solutions' permit application for the proposed Midwest Carbon Express CO<sub>2</sub> pipeline.

### **An Environmental Impact Statement is Needed**

MEP shares the concerns expressed by an abundance of individual Minnesotans, organizations, and tribes regarding the potential hazards and uncertainties regarding Summit's proposed CO<sub>2</sub> pipeline project. We agree with comments from Clean Up the River Environment (CURE), Public Employees for Environmental Responsibility (PEER), Minnesota Environmental Advocacy (MCEA) and Sierra Club, Laborers' International Union of North America (LiUNA), International Union of Operating Engineers Local 49 (IUOE 49), and others that given these unanswered questions this project necessitates a strong environmental review. Moreover, we agree with MCEA and Sierra Club, CURE, and PEER that environmental review in the form of an Environmental Impact Statement (EIS) of the entire Minnesota portion of the proposed project is essential and required to meet the standards of the Minnesota Environmental Policy Act (MEPA). This is a large, multi-state pipeline that would span more than 230 miles throughout Minnesota. Neither the state nor the company proposing this project has any previous experience with these pipelines. Minnesotans across the state deserve to know what the real impacts of this project will be, especially those who will bear the direct effects from having it placed in and near their communities.

We would especially like to elevate consideration of the "no-action alternative" that is an essential part of an EIS. Our members bring a range of expertise in climate mitigation strategies like advanced renewable energy deployment, beneficial electrification, regenerative farming practices, continuous cover cropping, and restoration of native forests and prairies, peatlands, and wetlands. Consideration of the "no-action alternative" should include these and other opportunities for significant greenhouse gas emissions reductions, biodiversity protection and restoration, water quality improvements, and just transitions in energy production and distribution.

### **Concerns about CO<sub>2</sub> Pipelines**

Minnesota's lakes, wetlands, and waterways are a vital and arguably undervalued resource, considered sacred by many who live here. Carbon capture technology requires large amounts of water and will significantly increase water usage at the facilities that implement it. At a time when

large parts of Minnesota are experiencing another year of drought conditions, it is imperative that we understand what kind of strain this project will put on our water resources.

Moreover, while the dispersal and effects of CO<sub>2</sub> into a waterbody resulting from a pipeline leak or rupture are understudied, we do know that when CO<sub>2</sub> reacts with water, it forms caustic carbonic acid. Even just the limited portion of Summit's overall project that is included in this permit application would cross three major waterbodies—the Pelican River, the Otter Tail River, and the Bois de Sioux River—and will impact an estimated 5.5 acres of wetlands. The entire project will of course impact many more streams, rivers, lakes, wetlands, and other water bodies. We urge the Commission to carefully consider the potential impacts of this pipeline on such vital resources.

Our members are also very concerned about the health and safety impacts the proposed project may have on humans and the environment. High concentrations of CO<sub>2</sub> as could result from a pipeline rupture are highly hazardous, forming a cold, dense cloud that sinks to the ground and can sicken and asphyxiate humans and animals. As documented by the Pipeline Safety Trust (see attached), CO<sub>2</sub> pipelines are prone to fast running ductile and brittle fractures. More information about CO<sub>2</sub> pipeline integrity including risks posed by impurities in the CO<sub>2</sub> feed, the potential size of the impacted area, and emergency response in the event of a leak or rupture is needed to avoid putting surrounding communities, animals, and the environment at unknown and undue risk.

### **Regulatory Gaps for CO<sub>2</sub> Pipelines**

As CURE and PEER noted, the Pipeline and Hazardous Materials Safety Administration (PHMSA) has recognized the inadequacy of their current regulation regarding CO<sub>2</sub> pipelines and will initiate a new rulemaking “to update standards for CO<sub>2</sub> pipelines, including requirements related to emergency preparedness, and response.” Earlier this year, PHMSA also conducted research solicitations “to strengthen pipelines safety of CO<sub>2</sub> pipelines.” One of the research areas PHMSA is particularly interested in is determining the potential impact radius for CO<sub>2</sub> pipelines. MEP and its members respectfully request that the PUC not approve any route permits for CO<sub>2</sub> pipelines until PHMSA has completed their updates to the regulations.

Thank you for your consideration and the opportunity to provide these comments. Along with many individuals, organizations, and tribes, we are deeply concerned about Summit's proposed CO<sub>2</sub> pipeline project and the potential hazards and threats it presents to the health of Minnesotans and our state's natural resources.

Sincerely,



Steve Morse  
Executive Director

*Submitted on behalf of the organizations listed on the following page:*

Clean Water Action Minnesota

CURE (Clean up the River Environment)

Friends of the Mississippi River

Lakeville Friends of the Environment\*

Land Stewardship Project

League of Women Voters Minnesota

League of Women Voters Upper Mississippi River Region\*

Minnesota Interfaith Power & Light

Minnesota Ornithologists Union

Pesticide Action Network

Roots Return Heritage Farm LLC\*

Save Lake Superior Association

Save Our Sky Blue Waters

St. Paul Audubon Society

Vote Climate

WaterLegacy

*\*denotes non-MEP member*