Written Statements submitted to
CCUS Non-Federal Lands Permitting Task Force
May 2024 meeting

From: Deb Freeman
To: DOE.CCUS.permitting.task.force
Subject: [EXTERNAL] "Written Statement to Task Force."
Date: Monday, May 13, 2024 2:09:07 PM

I am writing to make comments on the permitting process for May 21-22 meeting Carbon Dioxide Capture Utilization and sequestration Non-Federal Lands permitting.

For any permit to be approved, it must include:
1. Proof of the environmental benefit. So far this is unavailable, there is no reason to use this technology if it does not work to reduce the climate crisis.
2. Eminent Domain threat should not be used for private company benefit.
3. Risk analysis and plume studies should be shown to landowners affected, prior to any easement discussion.
4. No forever easements. No selling of land easements to foreign governments or companies.
5.Do not confuse the permitting by allowing many LLCs to be part of the project, water asking and land asking should all be under one LLC.
6. Neighbors to the pipeline should be allowed to speak at hearings and be made aware of the risks, any one within 2 miles of the proposed supercritical, hazardous pipeline has a right to know.
7. Safety of persons is the primary goal, not only in High Density areas, but all people have value, Turn off values need to be closer together, the same for all areas.
8. Proof that the turn off valves will not freeze open when CO2 is leaked and becomes like dry ice.
9. Environmental Impact studies need to be conducted prior to drawing a pipeline path, studies done by University or scientific researches, not someone hired from out of the area, by the pipeline company.
10. Water permitting should not be requested during any drought times, permits should only be granted for 3-5 years,to evaluate the integrity of the companies.
11. The thickness of the pipe used is also a safety risk, 0.2 inches thick is a very thin pipe when expected to be exposed to the environment 24/7 and last the lifetime of the pipeline. The same can be said for welds and connections with in the line.

This is not an all inclusive list, but I sincerely hope you will take each of these comments under review.
I have been studying this process for the past 10 months, the Pipeline Safety Trust is a good resource.
Thank you for this opportunity to make comments.

Sincerely,
Debra R Freeman

Landowner, RN, LBSW
St. Ansgar, Iowa

****

From: Kathy Carter
To: DOE.CCUS.permitting.task.force
Subject: [EXTERNAL] Written Statement to Task Force
Date: Monday, May 20, 2024 4:34:16 PM

I would like to file these statements with the task force.
1) The CCS and CCUS technology has proven, so far, to be inadequate and all claims to reach certain percentages of "capture" have been greatly inflated and underachieved. Something like only 14% efficiency at this point, not just in the US but globally.
2) Companies intending to build pipelines have no previous experience with highly-pressurized, hazardous content pipelines. Case in point: Summit Carbon Solutions, which wishes to build over 1000 miles of pipe IN IOWA ALONE. None of the people involved have EVER built a CO2 pipeline.
3) There is no long-term proof that the CO2 will stay "permanently and forever" buried (sequestered). There is no long-term proof that the CO2 will never leak, will never contaminate water sources, will never contaminate surrounding soils, will never leach into nearby wells, etc.
4) There is no overwhelming proof that any CO2 captured will not actually create MORE of a carbon footprint in the undertaking: from the mining of the materials to make the pipe, the capture and compression equipment, the heavy equipment to build the infrastructure, to the constant energy and water demands to keep the project operational, to even the transportation emissions created by the movement of the installation crews, the land acquisition people, the officers traveling to public meetings and to events to lobby legislators….. what a massive footprint must be overcome before ANY conceivable "benefit". Studies have shown that there will be little to no "benefit".
5) Questions abound regarding who will monitor, who will "police" the amounts supposedly captured and the amounts supposedly sequestered. Will the US simply take the word of the reports given them by companies like Summit Carbon Solutions? The very company who has been caught in frequent misrepresentations in their PR, whose employees have skirted the truth of many aspects of the project, such as misinforming the public and legislators alike that the 2100 psi CO2 pipeline is merely "like the bubbles in your soda"? The company whose easement acquisition agents have resorted to fear and intimidation tactics to "convince" vulnerable landowners to sign? The company that claims the project is to "save ethanol" and corn growers? The company who couldn't even do the initial required mailings correctly? The company that commissioned "studies" that include the disclaimers "all figures may not be accurate"? The company that now has a high-level employee under investigation for perjury regarding statements made under oath about the project? WHY WOULD ANYONE BELIEVE THEM? And the American taxpayer will foot the bill to pay these companies billions in "incentives"??????
6) Again, referring to Summit Carbon Solutions, there is no longer any belief that the CO2 will actually BE SEQUESTERED. Major investor Harold Hamm, of Continental Resources Oil, has publicly proclaimed that "we need the CO2 to get another 10 million barrels of oil" out of the

North Dakota oilfields. Echoing that statement is North Dakota Governor Doug Burgum, as well as energy commissioner Helms. Summit CEO Bruce Rastetter has also openly stated that EOR is “a possibility”. Summit’s head attorney Bret Dublinski has also stated that uses for CO2 other than sequestration is definitely possible.
7) These CO2 pipeline projects are proposed for ONE thing, and ONE thing only : to HARVEST TAX DOLLARS , not to eliminate CO2 or help climate changes.
THESE PROJECTS MUST BE STOPPED IMMEDIATELY.

****

Institute for Policy Studies

To: Carbon Dioxide Capture, Utilization, and Sequestration Federal Lands Permitting Task Force; Carbon Dioxide Capture, Utilization, and Sequestration Non-Federal Lands Permitting Task Force
From: Basav Sen, Climate Policy Director, Institute for Policy Studies
Subject: Public comment on open meeting of the Task Forces
Date: May 21, 2024

Thank you for the opportunity to provide public comments on the CCUS Task Forces meeting. Please find below a written comment from the Institute for Policy Studies Climate Policy Program. IPS is a progressive organization dedicated to building a more equitable, ecologically sustainable, and peaceful society. In partnership with dynamic social movements, we turn transformative policy ideas into action.

We are a member of the Climate Justice Alliance, a growing member alliance of 89 urban and rural frontline communities, organizations and supporting networks in the climate justice movement. Member organizations lead CJA by anchoring major Just Transition projects focused on the social, racial, economic and environmental justice issues of climate change.

We provide our responses to several of the proposed activities of the Task Forces in detail below.

(1) inventory existing or potential Federal and State approaches to facilitate reviews associated with the deployment of carbon capture, utilization, and sequestration projects and carbon dioxide pipelines, including best practices that avoid duplicative reviews to the extent permitted by law, engage stakeholders early in the permitting process, and make the permitting process efficient, orderly, and responsible.

The very premise of this task is flawed. “Responsible” permitting of CCUS is an oxymoron, and making the permitting more “efficient” (which presumably means making it faster and easier) is counterproductive, for the following reasons:

- ***CCUS is ineffective and expensive:*** The Intergovernmental Panel on Climate Change (IPCC), a global scientific body, has found that CCS is one of the least effective and most expensive ways to cut emissions in both the electricity generation and industrial sectors.[1] It

[1] Intergovernmental Panel on Climate Change (IPCC), Climate Change 2022: Mitigation of Climate Change, Working Group III Contribution to the IPCC Sixth Assessment Report, Summary for Policymakers, Figure SPM-7, p. 38, 2022, available at: https://www.ipcc.ch/report/ar6/wg3/downloads/report/IPCC_AR6_WGIII_FullReport.pdf

logically follows that the US government would do better to use precious public resources on proven solutions to greenhouse gas emissions, instead of wasting time and federal funding on ineffective distractions such as CCUS.

- ***Developing CCUS is a risky distraction.*** Critically, wasting time on developing CCUS instead of proven climate mitigation solutions increases the risk that we will not be able to cut our emissions rapidly enough to keep global temperature increase to within 1.5 degrees Celsius above pre-industrial levels.
- ***CCUS projects have an empirical record of failure.*** High-profile CCUS projects have been expensive failures:
  - The Boundary Dam CCS-equipped coal-fired power plant in Canada.[2]
  - The Decatur ethanol plant in Illinois.[3]
  - The Gorgon liquefied natural gas (LNG) export terminal with CCS in Australia.[4]
- ***CCUS is energy and water intensive.*** CCS has an "energy penalty" (meaning, a facility with CCS requires more energy input for a given energy output than it would have required without CCS), and adding CCS to power plants could increase their water consumption between 25% and 200%.[5] As the availability of freshwater is further constrained because of climate change, it is unacceptable to promote a technology that necessitates such high levels of water consumption, thereby threatening supplies of drinking water, and water needed for cultivating food crops.
- ***CCUS increases methane emissions when used for natural gas-fired facilities.*** Methane leakage from oil and gas drilling is underestimated by official data.[6] This is a serious problem, because the warming impact of methane is 81 times more than CO_2 over a 20-year window, and 28 times more than CO_2 over a 100-year window.[7] The energy penalty of CCUS will require more oil and gas production for a given energy output, worsening methane emissions.

---

[2] Weber, Bob, "Missed emissions goals at Sask. carbon capture project raising questions: Proponents said process would capture up to 90 percent of plant's carbon emissions," The Canadian Press, 5/2/2024, available at: https://www.cbc.ca/news/canada/saskatoon/boundary-dam-carbon-capture-missing-emmision-goals-1.7191867

[3] Gibbons, Brendan, "In Illinois, a massive taxpayer-funded carbon capture project fails to capture about 90 percent of plant's emissions," Oil and Gas Watch,4/25/2024, available at: https://news.oilandgaswatch.org/post/in-illinois-a-massive-taxpayer-funded-carbon-capture-project-fails-to-capture-about-90-percent-of-plants-emissions

[4] Milne, Peter, "Chevron's troubled carbon capture and storage at Gorgon set to worsen in 2023," Western Australia Today, 7/12/2023, available at: https://www.watoday.com.au/national/western-australia/chevron-s-troubled-carbon-capture-and-storage-at-gorgon-set-to-worsen-in-2023-20230711-p5dngj.html

[5] Intergovernmental Panel on Climate Change (IPCC), Climate Change 2022: Mitigation of Climate Change. Working Group III Contribution to the IPCC Sixth Assessment Report, Chapter 6, Section 6.4.2.5, available at: https://www.ipcc.ch/report/ar6/wg3/downloads/report/IPCC_AR6_WGIII_FullReport.pdf

[6] Maasakkers, Joannes D., Daniel J. Jacob, Melissa P. Sulprizio, Tia R. Scarpelli, Hannah Nesser, Jianxiong Sheng, Yuzhong Zhang, Xiao Lu, A. Anthony Bloom, Kevin W. Bowman, John R. Worden, and Robert J. Parker, "2010–2015 North American methane emissions, sectoral contributions, and trends: a high-resolution inversion of GOSAT observations of atmospheric methane," Atmospheric Chemistry and Physics, Volume 21 Issue 6, 2021, available at: https://acp.copernicus.org/articles/21/4339/2021/

[7] Intergovernmental Panel on Climate Change (IPCC), Climate Change 2021: The Physical Science Basis, Working Group I Contribution to the IPCC Sixth Assessment Report: The Earth's Energy Budget, Climate Feedbacks and Climate Sensitivity: Supplementary Material, available at: https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_Chapter07_SM.pdf

- ***CCUS may be used to extract even more oil!*** 73% of captured CO_2 is used to extract more oil out of depleted oil wells in a process called "enhanced oil recovery," wiping out most of the climate benefits of capturing the CO_2 in the first place.[8]
- ***CCUS does not address other serious environmental impacts.*** CCUS is designed only to address greenhouse gas emissions (ineffectively), and leaves in place other harmful lifecycle environmental and public health impacts of fossil fuels, such as air and water contamination from oil and gas drilling,[9] and toxic pollution from power plants.[10] There are serious racial and economic disparities in exposure to these harmful impacts.[11] There is a plausible risk that levels of some of these pollutants will actually increase if CCUS is adopted, as a consequence of the energy penalty of CCUS.
- ***CCUS creates new hazards.*** CCUS technology requires transporting CO_2 in pipelines to underground injection sites. These pipelines are susceptible to catastrophic fractures that can release large amounts of CO_2, an asphyxiant gas.[12] Since CO_2 is denser than air, a CO_2 discharge can stay at ground level, posing a serious threat to communities. Incidents such as the 2020 CO_2 pipeline rupture in Mississippi[13] and the 2024 CO_2 pipeline rupture in Louisiana[14] will become common if CCUS is widely adopted. Injecting CO_2 underground can contaminate groundwater, threatening the water supply of communities.[15]

For all of these reasons, a rush towards "efficient, orderly" permitting of carbon dioxide pipelines and other CCUS infrastructure is unnecessary, irresponsible, and a waste of time and resources.

---

[8] Robertson, Bruce, and Milad Mousavian, "Carbon Capture to Serve Enhanced Oil Recovery: Overpromise and Underperformance: Shute Creek, the World's Largest CCUS Facility, Consistently Fails to Meet Its Targets," Institute for Energy Economics and Financial Analysis, March 2022, available at: https://ieefa.org/wp-content/uploads/2022/02/Carbon-Capture-to-Serve-Enhanced-Oil-Recovery-Overpromise-and-Underperformance_March-2022.pdf

[9] Blundell, Wesley, and Anatolii Kokoza, "Natural gas flaring, respiratory health, and distributional effects," Journal of Public Economics, Volume 208, April 2022, available at: https://www.sciencedirect.com/science/article/abs/pii/S0047272722000032?via%3Dihub; Rodriguez, Jose, Joonghyeok Heo, and Kee Han Kim, "The Impact of Hydraulic Fracturing on Groundwater Quality in the Permian Basin, West Texas, USA," Water 2020, 12(3), 796; https://doi.org/10.3390/w12030796

[10] European Environment Agency, "Carbon capture and storage could also impact air pollution," 11/17/2011, available at: https://www.eea.europa.eu/highlights/carbon-capture-and-storage-could

[11] Donaghy, Timothy Q., Noel Healy, Charles Y. Jiang, and Colette Pichon Battle, "Fossil fuel racism in the United States: How phasing out coal, oil, and gas can protect communities," Energy Research & Social Science, Vol. 100, June 2023, available at: https://www.sciencedirect.com/science/article/pii/S2214629623001640

[12] Kuprewicz, Richard B., "Accufacts' Perspectives on the State of Federal Carbon Dioxide Transmission Pipeline Safety Regulations as it Relates to Carbon Capture, Utilization, and Sequestration within the U.S.." prepared for the Pipeline Safety Trust, 3/23/2022, available at: https://pstrust.org/wp-content/uploads/2022/03/3-23-22-Final-Accufacts-CO2-Pipeline-Report2.pdf

[13] Zegart, Dan, "The Gassing Of Satartia," HuffPost, 8/26/2021, available at: https://www.huffpost.com/entry/gassing-satartia-mississippi-co2-pipeline_n_60ddea9fe4b0ddef8b0ddc8f

[14] Louisiana Against False Solutions Coalition, "Yesterday's Carbon Dioxide Leak in Sulphur, LA Highlights the Dangers of Carbon Capture and Storage Infrastructure Emergency Plans Are Not in Place for Residents' Safety," press release, 4/4/2024, available at: https://www.lagainstfalsesolutions.org/press-releases

[15] Lawrence Berkeley National Lab, "Potential Impacts of CO2 Leakage on Groundwater Quality," available at: https://eesa.lbl.gov/projects/potential-impacts-of-co2-leakage-on-groundwater-quality/

The stated desire to "engage stakeholders early in the permitting process" will be meaningful if and only if communities impacted by the infrastructure are not an afterthought to other "stakeholders" such as project proponents. Further, an emphasis on "efficient, orderly" permitting is likely to undermine deep engagement of communities, a process that inevitably takes time if it is done right, and cannot be rushed.

The process of engagement must be robust. Representatives of the community must be provided ample time to study and analyze a proposal before the public hearing or the deadline for written comments. Communities must be provided with a variety of tools to provide their input (in-person hearings, written comments online, written comments by mail, etc.). Comments must be accepted in multiple languages, not only English, to make the comment process accessible to communities where a significant share of the population do not speak English.

When engaging Indigenous communities and Tribal nations in particular, the principle of Free Prior and Informed Consent[16] must be adhered to.

Finally, it is imperative for the Task Forces to recognize that communities have a right to say no. "Engagement" with communities where they voice their overwhelming opposition to a project is a meaningless ritual if the project is eventually forced upon them without their consent.

(4) inventory current or emerging activities that transform captured carbon dioxide into a product of commercial value, or as an input to products of commercial value

Taking into account the very serious technological feasibility, climate mitigation, and environmental justice concerns with CCUS that we have outlined earlier, a rush towards commercialization of captured carbon dioxide is ill-advised.

(5) identify any priority carbon dioxide pipelines needed to enable efficient, orderly, and responsible development of carbon capture, utilization, and sequestration projects at increased scale

This is an invitation to create new sacrifice zones, perpetuating this country's disgraceful legacy of concentrating pollution in vulnerable communities.

Regardless of the ultimate route and destination of the pipelines, they will all originate at facilities with CCUS. These will be power plants, oil refineries, and plastics, petrochemicals, fertilizer, and other manufacturing facilities. These are highly polluting facilities, often located in communities overburdened with multiple polluting facilities.[17]

---

[16] United Nations Office of the High Commissioner for Human Rights, "Free, Prior and Informed Consent of Indigenous Peoples," September 2013, available at: https://www.ohchr.org/sites/default/files/Documents/Issues/IPeoples/FreePriorandInformedConsent.pdf

[17] Donaghy, Timothy Q., Noel Healy, Charles Y. Jiang, and Colette Pichon Battle, "Fossil fuel racism in the United States: How phasing out coal, oil, and gas can protect communities," Energy Research & Social Science, Vol. 100, June 2023, available at: https://www.sciencedirect.com/science/article/pii/S2214629623001640

Many of the proposed direct air capture[18] hubs and hydrogen hubs producing "blue" hydrogen (which requires CCUS)[19] are also in regions with high concentrations of polluting industries such as refineries and plastics and petrochemicals manufacturing, such as the Louisiana and Texas Gulf Coast region and the Appalachian and Ohio valley region.

It is unacceptable that communities already facing high levels of pollution should become testing grounds for new kinds of hazardous infrastructure.

(7) identify Federal and State financing mechanisms available to project developers

The Federal government is already wasting resources on CCUS, with direct funding through the Infrastructure Investment and Jobs Act (IIJA) carbon capture demonstration projects[20] and clean hydrogen hubs[21] programs, and through the expansion of the 45Q tax credit in the Inflation Reduction Act (IRA)[22], which Congress enacted in spite of evidence of rampant abuse of the tax credit.[23]

Subsidizing CCUS is bad public policy, and the last thing the Task Forces should consider is finding new ways to throw even more public money at this wasteful, failing technology.

(8) develop recommendations for relevant Federal agencies on how to develop and research technologies that can capture carbon dioxide and would be able to be deployed within the region covered by the Task Force

Our warning about not wasting any more taxpayer money on CCUS applies here as well. There are many worthwhile areas of research and development for Federal agencies to spend their resources on. CCUS is not one of them.

In conclusion, the very premise of Task Forces to promote the "efficient, orderly, and responsible" permitting of CCUS is seriously flawed. The Federal government needs to rethink its headlong rush into propping up a flawed technology, the only point of which is to allow the fossil fuel industry to continue business as usual while pretending to reduce greenhouse gas emissions.

---

[18] https://www.energy.gov/articles/biden-harris-administration-announces-12-billion-nations-first-direct-air-capture

[19] https://www.energy.gov/oced/regional-clean-hydrogen-hubs-selections-award-negotiations

[20] https://www.energy.gov/oced/CCdemos

[21] https://www.energy.gov/oced/regional-clean-hydrogen-hubs-0

[22] Congressional Research Service (CRS), "The Section 45Q Tax Credit for Carbon Sequestration," 8/25/2023, available at: https://crsreports.congress.gov/product/pdf/IF/IF11455

[23] Inspector General for Tax Administration, Department of the Treasury, letter to Senator Robert Menendez, 4/15/2020, available at: https://www.menendez.senate.gov/imo/media/doc/TIGTA%20IRC%2045Q%20Response%20Letter%20FINAL%2004-15-2020.pdf

From: Robert Niermeyer
To: DOE.CCUS.permitting.task.force
Subject: [EXTERNAL] Written Statement to Task Force.
Date: Tuesday, May 21, 2024 11:54:24 PM

The phrase efficient and responsible carbon capture and sequestration is an Oxymoron. There is no such thing as efficient and responsible carbon capture and sequestration. Transmitting extremely high pressure carbon dioxide by pipeline over long distances places the lives and health of thousands of people in jeopardy. And there are no long term studies to show that this will have any effect on climate change. It is just a scheme to make a quick dollar by the companies promoting the pipelines.

Robert Niermeyer
Clarence, IA 52216

****

From: Jeff Gringer
To: DOE.CCUS.permitting.task.force
Subject: [EXTERNAL] Written Statement to Task Force
Date: Tuesday, May 21, 2024 3:56:13 PM

Dear Task Force,
As a citizen concerned about our environment and the environmental quality of Iowa. I strongly encourage the Task Force take a holistic approach at the impact of the proposed carbon capture pipeline. For Iowa the key issue is "greenwashing" an economic and agricultural policy of extensive conversion of corn to ethanol, which is now widely recognized as counter-productive and harmful on several levels. Converting corn to ethanol for a fuel additive was born in the 1980s as a new market for corn during the energy crises. Those particular crises have largely dissipated. But ethanol continues to be produced, thanks to many special government subsidies.

The new crisis that has yet to be grappled with is the accumulation of greenhouse gases from cars that burn gasoline with ethanol, and all the equipment required to plant, cultivate, fertilize, and harvest the corn for the ethanol. In addition, the over fertilizingWe as a society need to stop subsidizing this harmful policy, and spend the money and energy in ways that can be a net positive, rather than profit those who care more about money than the environment legacy to our children. In addition, the intensive cultivation of corn has led to excessive application of nitrogen fertilizer (including manure from animal confinement operations) that have choked waterways with dead zones all the way to the Gulf of Mexico.

Please help your fellow citizens in turning away from these harmful policies.

Thank you for your consideration of this important issue.

Sincerely,
Jeff Gringer

****

From: Rich Brandau
To: DOE.CCUS.permitting.task.force
Subject: [EXTERNAL] Written Statement to Task Force
Date: Tuesday, May 21, 2024 7:05:58 AM

Greetings.

Among the many challenges to an orderly permitting process for CCUS pipelines is the overwhelming public opposition to the use of CO2 for Enhanced Oil Recovery and its consequences for adverse climate impact of concern to all parties on the pipeline corridor and beyond, as well as broad long-term seismic risk and other public health and safety concerns near pipeline terminus.

Pipeline applications that include a binding and non-expiring commitment that the transported material shall only ever be geologically sequestered without any use for extracting carbon sources will face less opposition, which will facilitate initial public acceptance.

Perhaps equally significant are the legal barriers that can follow award of a permit. If the permitting process mandated that applicants either make or explicitly disavow such a commitment, it could reduce decades of now inevitable court appeals stemming from some applicants' repeated but non-binding public claims of sequestration.

I hope the Task Force is prepared to make explicit commitment to either true geological sequestration or possible EOR utilization a mandatory part of the pipeline permitting process.

****

From: [redacted]
To: DOE.CCUS.permitting.task.force
Subject: [EXTERNAL] written statement to task force
Date: Tuesday, May 21, 2024 9:11:56 AM

Regards,

Summits CO2 pipeline project in the Midwest is Not necessary or convenient. It is dangerous and destructive and an abuse of eminent domain. It will not mitigate climate change. Summit "does not ultimately control" whether future customers would use the pipeline for Enhanced Oil Recovery.

Summit's pipeline would require 1 BILLON gals of water from Iowa's aquifers, per year. Water that belongs to the people of Iowa not a private company looking to make huge profits on tax credits and should be stopped on this issue alone.

Federal regulations for building a pipeline have not been approved and for Summit (a company who has never built a pipeline) to be allowed to start construction should not be allowed until Federal regulations have been approved and tested. Plume studies are needed to protect the people living very close to the proposed pipeline "Summit says it is safe within 300' of your house".

By subsidizing these projects, the Federal Government is sacrificing communities who are already directly adversely affected by polluting industries/farms in their backyards, as well as taxpayers who are forced to continue subsidizing the fossil fuel industry.

CO2 PIPELINES SHOULD NOT QUALIFY FOR ANY TAX INCENTIVES..... THEY DO NOT MITIGATE CLIMATE CHANGE!

Thank you, Roxanne Jackson

Hanlontown Ia

[redacted]

****

From:	Candice Brandau Larson
To:	DOE.CCUS.permitting.task.force
Subject:	[EXTERNAL] Written Statement to Task Force
Date:	Wednesday, May 22, 2024 5:25:15 PM

You can start by not making rural midwest farmers and residents guinea pigs.

This technology:
1: creates just as much if not more co2 than it supposedly extracts.
2. Is unproven to work large scale
3. is an enormous risk to the safety of the people who will live and work within FEET of the pipeline.
4. will use an enormous amount of OUR water - which is not an infinite supply
5. is funded with taxpayer dollars to support mega million dollar corporations and ag barons
6. Is a huge tax scam with little to no oversight by the IRS.

You want to improve the permitting process? Start by holding these companies accountable. They lie time and time again.

Make them work with landowners WITHOUT eminent domain. Don't let them bully their way through OUR LAND and OUR LIVES.

Find ways to USE the CO2 at the sources of the plant. Such as green methanol. No need to sequester, endanger lives and contaminate our water supply.

Most importantly. Put a moratorium in place until PHSMA can get safety rules in place.

Candice Brandau Larson

****

From: Lisa
To: DOE.CCUS.permitting.task.force
Subject: [EXTERNAL] Written Statement to Task Force
Date: Tuesday, May 21, 2024 8:58:10 AM

This carbon dioxide pipeline industry is less than 1% of 3.3 million miles of regulatory pipeline in the industry. The use and location of the pipelines has been for oil fracking across sparsely populated areas. The industry is under regulated.

The federal government, right now, is rewriting rules. States that have nothing particular to CO2 pipelines have done nothing or too little. Local governments are being kept from protecting people by lawsuits from pipeline companies.

There is no proof of this meeting any goals. Where proof exists the goals are missed. More energy and water will be used to capture biogenic carbon dioxide and be of LESS benefit to everyone than these projects are touting.

How is it that anyone is surprised that permitting issues exist?

Why is this moving forward with so much lacking?

Why are Americans trusting new companies with grand projects and no track records and hundreds of unknown and foreign investors?

Why are taxpayer dollars being used for non climate purposes from these CO2 intentions?

****

From: Lisa
To: DOE.CCUS.permitting.task.force
Subject: [EXTERNAL] Written Statement to Task Force
Date: Tuesday, May 28, 2024 8:28:44 AM

Thank you for the CCUS Task Force and the opportunity to participate in the recent webinar and opportunity for public statement. I would be interested in participating in the Task Force as a Member of the Public if that opportunity were to come available.

I am including here my public statement in writing followed by a brief comment:

Public statement

My name is Lisa Ritzert, I'm an affected landowner in Iowa.

In my world with regards to hazardous CO2 pipeline projects, clarity, transparency, credibility, and public engagement are not reality. Incentivizing CCS, a nascent industry, for rapid and robust buildout in populated areas with regulation inadequacy is of serious concern.

Community stakeholders were blindsided by pipeline companies and political influencers. The public has been inundated with pipeline misinformation, advanced by politicians heavily lobbied by and receiving large campaign donations from pipeline actors, followed by legislative blockades for needed public and resource safety around a new state industry. The public has been burdened by this project into their lives yet pushed out of discussion, trampled on, and is at an extreme disadvantage in the entire process.

The cart has been put before the horse, a circular mess has been created. The federal government is in process of improving CO2 pipeline regulations and leaves siting authority to states and local governments. The State of Iowa's regulatory body, the Iowa Utilities Board, does not have a hand in siting. In three years, the state has made zero, ZERO, advancements or modifications in regulations by the state regulatory body or the state legislature to protect people and resources with this "world's largest" hazardous CO2 pipeline bearing down on the population. Local governments are being sued by the pipeline company for setback ordinances.

The "world's largest" carbon capture and sequestration project intended by the federal government to reduce carbon dioxide was courted into a state that has not even acknowledged climate change, has no climate action plan, has not considered alternatives, and has turned down federal money for research on this front. No wonder the sales pitch has morphed from climate benefit, to ethanol savior, to sustainable aviation fuel, and CO2 fracking. Taxpayers deserve better accountability and public benefit for their money and risk.

I do not understand how energy- and water- intensive projects are being piece-mealed and pushed forward with NO comprehensive public cost-benefit analysis and NO comprehensive environmental impact studies in capturing biogenic CO2 from ethanol facilities. The creation of anthropogenic CO2 in construction and operation is not beneficial with the cost of water depletion and carbon emissions while consuming high-value food-producing land.

Federal, state, local, and public collaboration and cooperation, are nonexistent from my perspective. This task force is a start, but it's welcomed. I feel more public voices need to be brought into the decision-making fold and a pause or moratorium should be placed on CO2 pipeline projects until goals mentioned here today are put into action.

Comment

The purpose of this task force is to bring about CCUS/CCS responsibly, with efficiency, and

in an orderly manner. Distrust, uncertainty, undermining, and throw-spaghetti-at-the-wall-to-see-what-sticks requires a pause to allow for a responsible restructuring, as businesses do when overwhelming dysfunction is prevalent. A moratorium and start-over with public needs and protections prioritized would be responsible, efficient, and orderly.

A federal moratorium is a necessity to provide for better evaluation, understanding, and transition, where applicable, for an industry that is currently less than 1% of the 3.4 million miles of regulatory pipeline in sparsely located areas for primarily CO2 fracking brought to greater concentrations, right up to people, for different purposes. The cumulative environmental impacts and comprehensive cost-benefits require diligent and sufficient analysis for the levels of risk being put upon the public as well as the public financial costs--accountability up front.

Lisa Ritzert
Member of the Public
[redacted]

****