

CO2 Pipeline Moratorium Now!

May 30, 2023

Dear President Biden:

Billions in public subsidies are spurring the development of pipelines to transport hazardous carbon dioxide (CO₂). Due to serious safety concerns, we call on you to issue an executive order putting a moratorium on all federal permits for CO₂ pipelines and related infrastructure, and urging states to do the same until the Pipeline and Hazardous Materials Safety Administration (PHMSA) finalizes robust new safety regulations that protect communities and the environment.

PHMSA is planning to propose revised regulations in the fall of 2024, in response to a [rupture](#) of a pipeline transporting CO₂ in Sartoria, Mississippi that hospitalized residents and posed significant challenges for first responders who were ill equipped to respond to such an emergency. However, we are facing a massive build-out of CO₂ pipelines now; in the absence of updated federal regulations, our communities face the risk of much larger and more devastating ruptures.

Further, the Army Corps of Engineers is already receiving preconstruction notifications from CO₂ pipeline companies under its nascent Nationwide Permit 58, which was not designed to handle vast complex networks of pipelines containing a uniquely dangerous material. The dangers will be compounded if the Corps permits these pipelines before PHMSA has completed its rule.

There are many issues that are unique to CO₂ pipelines that PHMSA must address prior to the construction of any new pipelines, but chief among our concerns are:

Adequate Safety Zones: The CO₂ pipeline rupture in Sartoria, which sent dozens of people to the hospital, showed us that current dispersion modeling is inadequate for CO₂ pipelines, as the impacted people were outside of the official area of concern for ruptures. Typical pipelines that transport methane and oil can measure impact areas from a rupture in feet or yards, while pipelines that transport CO₂ could spew CO₂ for miles, creating an invisible cloud of suffocating gas that can asphyxiate everything in its path. Pipeline developers, relying on outdated data on impact areas, are looking to build CO₂ pipelines near schools, shopping centers, and other densely populated areas. This will put hundreds or potentially thousands of people at risk of serious harm, and even death, from a CO₂ rupture.

Contaminants: Contaminants in CO₂ pipelines from the point of capture can in and of themselves create risks to pipeline integrity. For instance, water in wet CO₂ from ethanol production can create carbonic acid, which can weaken pipeline integrity and increase the chance of a rupture. Pipeline operators are planning pipelines that will contain CO₂ from many sources, including industrial sources and power plants, which could lead to introduction of countless contaminants that could interact in unpredictable ways in high pressure pipeline environments, furthering risks of CO₂ pipeline ruptures. PHMSA must set maximum levels of contaminants that are based on an understanding of the ways these contaminants will interact in pipelines and how those interactions could contribute to ruptures.

CO₂ Definition: Currently PHMSA only sets safety rules for supercritical CO₂, leaving gaseous and liquid CO₂ unregulated. This could leave thousands of miles of pipelines that are not covered by any safety regulations, despite the tremendous risks.

Safety coordination and resources: The incident in Satartia showed how first responders are not prepared to deal with dangers from CO2 ruptures. Most notably, they lack equipment that can protect them from high levels of CO2 and allow vehicles to function without adequate oxygen in the air to support combustion powered vehicles. PHMSA must require pipeline operators to update required procedural manuals and provide regular training and equipment to first responders to ensure they are adequately prepared for a large-scale evacuation that could occur from a CO2 rupture.

Odorants: There are no requirements for odorants in CO2 pipelines, which can alert the public and first responders to a threat from a CO2 rupture. A cloud of CO2 is impossible to detect since it is invisible and odorless. PHMSA must require odorants in pipelines and must immediately inform first responders and regulators at the first signs of a pipeline rupture.

You must make sure these rules are in place before your administration issues any permits for new CO2 pipelines. The absence of strong regulations leaves urban and environmental justice communities at greater risk, since carbon capture and storage will be increasingly located in industrial areas. Therefore, it is imperative that you issue an executive order putting a moratorium in place on all federal CO2 pipeline permits until PHMSA finalizes its CO2 pipeline rule. We stand ready to work with your administration and other policymakers to ensure the strongest possible rules to protect communities are in place before developers are able to build any new pipelines to transport CO2.

Sincerely,

1000 Grandmothers for Future Generations	Biofuelwatch
198 methods	Blue Mountains Biodiversity Project
350 Bay Area Action	Blue Ridge Environmental Defense League
350 Conejo / San Fernando Valley	Bold Alliance
350 Triangle	Catskill Mountainkeeper
350.org	Center for Biological Diversity
350ma-Berkshires	Center for International Environmental Law
Agricultural Justice Project	Center on Race, Poverty & the Environment
Alabama Interfaith Power & Light	Central Illinois Healthy Community Alliance
Alaska Community Action on Toxics	Chatham Research Group
Alliance for Affordable Energy	Citizens Against Heartland Greenway Pipeline
Bayou City Waterkeeper	Citizens Against Longwall Mining
Between the Waters	Clean Air Action Network of Glens Falls

Clean Energy Now Texas	Friends For Environmental Justice
Climate Generation	Friends of the Earth
Coalition to Stop CO2 Pipelines	GAIA (Global Alliance for Incinerator Alternatives)
Commission Shift	Good Neighbor Steering Committee of Benicia
Concerned Citizens of Wagon Mound and Mora County	Grassroots Environmental Education
CT Climate Crisis Mobilization	Great Plains Action Society
CURE	GreenFaith
Dakota Resource Council	Health Professionals for a Healthy Climate
Detroit Hamtramck Coalition for Advancing Healthy Environments	Healthy Gulf
Don't Gas the Meadowlands Coalition	Houston Climate Movement
Earth Action, Inc.	Hudson River Sloop Clearwater
Eco-Justice Collaborative	Illinois People's Action
ELEE	Imagine Water Works
Environmental Transformation Movement of Flint	Indigenous Environmental Network
Extinction Rebellion San Francisco Bay Area	Ingleside on the Bay Coastal Watch Association
Fairbanks Climate Action Coalition	Institute for Agriculture and Trade Policy
FCCPR Climate Crisis Task Force	Institute for Policy Studies Climate Policy Program
Federated Conservationists of Westchester County	Interfaith Council for Peace and Justice
Florida Rising	Iowa Citizens for Community Improvement
Food & Water Watch	Lakeville Friends of the Environment
For the Greater Good	Louisiana Against False Solutions Coalition
For the Many	Louisiana Bucket Brigade
Fox Valley Citizens for Peace & Justice	LULAC Council 7259
FreshWater Accountability Project	M-W & Associates
Fridays for Future US	Micah Six Eight Mission

Michigan Climate Action Network
Michigan Environmental Justice Coalition
Milwaukee Riverkeeper
MN350
Mountain Lakes Preservation Alliance
Movement Rights
MoveOn.org HobokenRESIST
Native Movement
NC Climate Justice Collective
New Energy Economy
New Mexico Climate Justice
New York Lawyers for the Public Interest
New York Progressive Action Network
Nicaragua Center for community Action
NJ State Industrial Union Council
NM No False Solutions Coalition
North American Climate, Conservation and Environment(NACCE)
Northeast Organic Farming Association of New Hampshire (NOFA-NH)
Northeast Organic Farming Association of Vermont (NOFA-VT)
Northeast Organic Farming Association-Interstate Council
Nuclear Energy Information Service (NEIS)
NYPAN Greene
Occupy Bergen County
Oil and Gas Action Network

Oil Change International
Our Future West Virginia
Partnership for Policy Integrity
Physicians for Social Responsibility -- New York
Physicians for Social Responsibility Arizona
Physicians for Social Responsibility Florida
Physicians for Social Responsibility Iowa
Physicians for Social Responsibility Pennsylvania
Physicians for Social Responsibility Wisconsin
Physicians for Social Responsibility-Los Angeles
Physicians for Social ResponsibilityColorado
Plastic Pollution Coalition
Prairie Earth Nursery
Preserve Montgomery County VA
Preserve Salem
Progressives for Climate
Property Rights and Pipeline Center
Protect Our Water, Heritage, Rights (POWHR)
Public Goods Institute
Rachel Carson Council
Rio Grande International Study Center
Rise Up WV
ROAR (Religious Orders Along the River)
Roots Return Heritage Farm LLC
Safe Energy Rights Group

San Antonio Bay Estuarine Waterkeeper

San Francisco Bay Physicians for Social
Responsibility

SanDiego350

Save Our Illinois Land

Science and Environmental Health Network

Seneca Lake Guardian

Sisters of St. Dominic of Blauvelt, New York

SOMA Action

Southwest Detroit 48217 and the Original
United Citizens of Southwest Detroit

Stand.earth

Stop the Algonquin Pipeline Expansion

Sunflower Alliance

Tampa Heights Acupuncture LLC

Taproot Earth

Terra Advocati

The Last Plastic Straw

The People's Justice Council

The Quantum Institute

The Revolving Door Project

Turtle Island Restoration Network

Unitarian Universalists for a Just Economic
Community

Unitarian Universalists for Social Justice

Unite North Metro Denver

United Native Americans

Uptown Progressive Action, a NYPAN
chapter

Vote Climate

Wall of Women

Waterspirit

WESPAC Foundation, Inc.

WildEarth Guardians

Women's International League for Peace and
Freedom-Triangle Branch