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 Satartia, 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 Satartia, 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 Pipeline developers, relying on outdated data on impact areas, are looking to build CO2 pipelines near schools, shopping centers, and other densely populated areas.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 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
198 methods
350 Bay Area Action
350 Conejo / San Fernando Valley
350 Triangle
350.org
350ma-Berkshires
Agricultural Justice Project
Alabama Interfaith Power & Light
Alaska Community Action on Toxics
Alliance for Affordable Energy
Bayou City Waterkeeper
Between the Waters
Biofuelwatch
Blue Mountains Biodiversity Project
Blue Ridge Environmental Defense League
Bold Alliance
Catskill Mountainkeeper
Center for Biological Diversity
Center for International Environmental Law
Center on Race, Poverty & the Environment
Central Illinois Healthy Community Alliance
Chatham Research Group
Citizens Against Heartland Greenway Pipeline
Citizens Against Longwall Mining
Clean Air Action Network of Glens Falls
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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 Responsibility-Colorado
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