

Pipes Act Fails to Protect Communities from Dangerous CO2 Pipelines

September 17, 2025

Dear Chairman Graves and Ranking Member Larsen:

We the undersigned organizations write in opposition to the current PIPES Act of 2025 (H.R. 5301). The legislation must be changed to address significant safety gaps in carbon dioxide (CO2) pipeline safety, requiring **strong, enforceable federal standards for carbon dioxide pipelines to protect communities from the dangers** posed by these risky and unnecessary projects.

Today, CO2 pipelines operate with rules that are inappropriate and inadequate to ensure safety of communities that could be miles from a CO2 pipeline. In fact the community of Satartia, Mississippi saw first hand how a pipeline rupture nearly a mile from their community created challenges for first responders with inadequate safety information, which resulted in dozens of people being hospitalized, some with permanent disabilities from the incident.

Congress must give **explicit direction to PHMSA** to promulgate binding standards **not** rely on industry guidelines and standards. Congress must:

- **Require public disclosure of safety information and plume dispersion modeling.** Project developers and PHMSA must provide communities and first responders with credible, scenario-based maps showing where CO2 could travel in a release, along with emergency procedures, evacuation zones, and multilingual public notification plans. This life-saving information must be accessible to the public to help mitigate harm in CO2 future pipeline ruptures.
- **Require CO2 pipeline companies to fully fund local preparedness.** Communities near pipelines will be forced to make choices between cutting community investments, raising taxes, or protecting their residents in the face of an emergency, while pipeline developers stand to make billions from public subsidies, which are the predominant source of funding for CO2 projects. The pipeline companies must fully fund ongoing emergency planning, training, equipment, drills, communications equipment, and real-time alerting. This is necessary so fire/EMS, hospitals, and emergency managers are ready before any pipeline is placed in service.
- **Require a meaningful community voice in safety-related siting decisions.** This should include early and ongoing engagement; respect for local land-use protections; robust notice that extends to at least 2 miles on either side of a pipeline, well beyond the immediate right-of-way; requirements to address community-identified hazards; and Tribal consultation that meets free, prior, and informed consent standards.

To truly protect the public, Congress should direct PHMSA to adopt specific CO2 safety requirements, including at minimum:

- **Odorization of CO2** so releases are detectable by smell;
- **Performance-based leak detection and rupture mitigation** that require rapid detection of significant flow loss and automatic/remote-operated valves with protective spacing;
- **Materials and contaminants controls** limiting total contaminants to less than 5% to help prevent corrosion and brittle fracture in CO2 pipelines, and ensure proper materials are used to help prevent CO2 related corrosion;
- **Prevent the conversion of oil or gas pipelines to CO2 pipelines** and vice versa;
- **Financial assurance (insurance and bonding)** for response, cleanup, and decommissioning.
- **Oppose criminalization of pipeline opposition** to ensure that communities are not silenced due to over aggressive policing and overreach from CO2 pipeline operators and developers.

Absent these core protections, advancing the current draft would leave communities at risk. We therefore **oppose the bill as written** and urge you to pair any reauthorization with clear, enforceable CO2 pipeline safety mandates that center public health, first-responder readiness, and community self-determination.

Sincerely,

Alternatives for Community & Environment

Between the Waters

Bold Alliance

Center for Biological Diversity

Dakota Rural Action

Eco-Justice Collaborative

Food & Water Watch

Indigenous Environmental Network

Institute for Policy Studies Climate Policy Program

Just Transition Northwest Indiana

Mid-Ohio Valley Climate Action

Science and Environmental Health Network

WE ACT for Environmental Justice