



## THE ADMINISTRATION SHOULD AVOID AN OVERLY BROAD OR UNSUBSTANTIATED CO<sub>2</sub> PIPELINES RULEMAKING THAT RISKS DELAY AND IMPERILS FINALIZATION

- **Administration Goals to Reduce Greenhouse Gas Emissions Are Impossible without Pipelines –** Expert modeling of greenhouse gas reduction scenarios, including maximizing renewable energy, all require use of carbon capture and sequestration, which in turn depends on pipelines to deliver captured emissions to permanent storage locations. (see *Net-Zero America: Potential Pathways, Infrastructure & Impacts*, Princeton University, 2021)
- **Pipelines Are the Safest Way to Transport Liquid Products –** A 2019 DOT report to Congress comparing transportation mode safety rates found trucks are 13 times and trains 14 times more likely to have an incident than pipelines (1 incident per 720 million gallons delivered v. 1 incident per 55 and 50 million respectively).
- **CO<sub>2</sub> Pipelines Have a Strong Safety Record—** PHMSA incident data shows over the last 10 years CO<sub>2</sub> pipelines averaged 58% fewer incidents per mile than crude oil and 41% fewer incidents per mile than refined products pipelines (CO<sub>2</sub>: 0.0011 inc./mi., crude oil: 0.0027 inc./mi., refined products: 0.0019 inc./mi).
- **CO<sub>2</sub> Pipeline Safety Is Already Heavily Regulated Under PHMSA Federal Regulations –** Numerous current federal pipeline safety regulations apply to the design, construction, operation, maintenance and emergency response to CO<sub>2</sub> pipelines. Federal pipeline safety regulations in applying to hazardous liquids pipelines (crude oil, refined products, etc.) also apply to CO<sub>2</sub> pipelines. (49 CFR Part 195)
- **Industry Recognizes Opportunities Exist to Improve CO<sub>2</sub> Pipeline Safety –** The pipeline industry recognizes and is acting upon lessons learned from the Satartia, MS CO<sub>2</sub> pipeline incident. In 2023, industry published a new tactical emergency response guide for CO<sub>2</sub> pipelines. Industry is also consolidating knowledge on managing landslide risks and CO<sub>2</sub> pipeline construction and operation into new industry-wide recommended practices for the benefit of current and future pipeline operators.
- **Industry Supports Targeted Updates to PHMSA CO<sub>2</sub> Pipeline Requirements –** Building on industry-wide safety improvements, industry is also supporting Congress enacting PHMSA requirements for timely completion of its CO<sub>2</sub> rulemaking, CO<sub>2</sub>-specific dispersion modeling, and extension of PHMSA regulations to transportation of gaseous CO<sub>2</sub>. (LEPA support for bipartisan House Transportation & Infrastructure Committee approved pipeline safety reauthorization bill).
- **Overly Broad PHMSA CO<sub>2</sub> Pipelines Rulemaking Threatens Timely Completion –** Government pipeline incident data establishes CO<sub>2</sub> pipelines as already safer than other systems, undercutting the need for extensive changes. Industry has and is developing additional CO<sub>2</sub>-specific recommended practices. Industry supports targeted statutory and regulatory updates to address the Satartia, MS incident. An overly broad regulatory proposal covering unnecessary or unsupported policy areas would face opposition and potential challenge, slowing down PHMSA's rulemaking and imperiling its completion before the end of the administration.