September 13, 2022

Iowa Utilities Board
RE: HLP-2022-0002 (Wolf Carbon Solutions US LLC; Petition for a Hazardous Liquid Pipeline Permit)
1375 E. Court Ave.
Des Moines, IA 50310-00069

Iowa Utilities Board,

Members of the Scott County Board of Supervisors (BOS) have attended the informational meetings held by Wolf Carbon Solutions US LLC (Wolf) regarding a proposed CO₂ pipeline that will extend across our entire county. On September 1, 2022, the BOS reach a unanimous consensus to submit official comments for the docket regarding this pipeline (HLP-2022-0002). Although not limited to, our primary concerns are as follows:

1) Eminent Domain for a private project – We believe the project serves private interests and does not serve a public purpose. As such we share the concerns of our citizens that Wolf have said they would avoid the use of eminent domain, but they would not commit to not using it.

2) Soils and Geohazards – To date, Wolf has not addressed potential geohazards with Scott County soils along the proposed corridor. Examples of loess (soil) related hazards in Scott County include severe erosion as illustrated beneath many of the steep streets in the City of LeClaire, as well as a slope failure along Highway 67 near Lock & Dam 14. Having over 35 years of experience in the area as a registered professional geotechnical engineer, the slope failure experienced in Mississippi is also possible along the route through Scott County and must be thoroughly explored and addressed prior to final approval and construction.

3) Public safety – The proposed pipeline passes through the heart of our county and very close to small towns, rural homes, and farms. Unlike other pipelines where leaks are readily identified either by an odor or visually, Wolf has not developed a means by which a leak could be detected by a unique odor. During the public meetings, Wolf also acknowledged that dispersion modeling has not yet been performed. A failure of the pipeline would be devastating for small towns, rural residents and farms with livestock
located in close proximity to any leak. Additionally, a pipeline of this type creates training and safety issues for rural first responders. For these reasons the pipeline must be kept very far away from towns, residential structures, and farms with livestock.

Until these issues are adequately addressed by Wolf and the Iowa Utility Board (IUB), Scott County does not support IUB providing Wolf a pipeline permit.

Respectfully,

W. Ken Beck, P.E.
Chair – Scott County Board of Supervisors

Cc: Scott County Board of Supervisors
Filed with the Iowa Utilities Board on September 15, 2022, HLP-2022-0002