STATE OF ILLINOIS ILLINOIS COMMERCE COMMISSION

NAVIGATOR HEARTLAND GREENWAY LLC,)
)
Application Pursuant to the Carbon Dioxide	
Transportation and Sequestration Act (220 ILCS) Docket No. 22-0497
75/1 et seq.) for a Certificate of Authority to	
Construct and Operate a Carbon Dioxide Pipeline)
And When Necessary to Take Interest in Property)
As Provided by the Law of Eminent Domain.)

PETITION TO INTERVENE

NOW COMES Intervenor, CHRISTIAN COUNTY, ILLINOIS ("McDonough County"), by and through its attorneys, Meyer Capel, a Professional Corporation, and pursuant to Section 200.200 of the Rules Practice of the Illinois Commerce Commission ("Commission"), 83 ILL. ADM. CODE 200.200, respectfully petitions the Commission for leave to intervene and participate in this matter, and in support of its Petition to Intervene, hereby states as follows:

- 1. Navigator Heartland Greenway LLC ("Petitioner") is asking the Commission for a Certificate of Authority pursuant to the Carbon Dioxide Transportation and Sequestration Act ("CO2 Act") (220 ILCS 75/1 *et seq.*). Petitioner is also seeking an order authorizing it to construct and operate a pipeline system in Illinois, and if and when necessary, to take and acquire easements and interest in private property through the exercise of eminent domain, as provided in Section 75/20(i) of the CO2 Act.
- 2. Petitioner is proposing to construct the pipeline through the counties of Adams, Brown, Christian, Fulton, Hancock, Henry, Knox, Christian, Morgan, Pike, Sangamon, Schuyler, and Scott.

- 3. Petitioner's proposed pipeline enter span Northern Christian County, from West is currently planned to terminate to a sequestration site in the County. Presumably, Petitioner's pipeline will cross many roads and other improvements operated by Christian County that may be impacted thereby. Christian County, along with other units of local governments
- within the County, provides emergency responders to events occurring within the County.
- 4. Pursuant to Section 20(b) of the CO2 Act, the Commission is to consider whether the proposed pipeline is consistent with the public interest, public benefit, and legislative purpose of the CO2 Act when considering Petitioner's Application for Certificate of Authority. The CO2 Act specifically provides that the Commission is to consider evidence of the proposed pipeline's impact upon the economy, infrastructure, and public safety presented by local government units that will be affected by the proposed pipeline route. 220 ILCS 75/0(b)(8)(A).
- 5. As a unit of local government that will be impacted by Petitioner's proposed pipeline, Christian County is therefore interested in the subject matter of this proceeding as it will be affected by any order entered by the Commission.
 - 6. No other party is able to adequately protect the interests of Christian County.
- 7. Christian County agrees to accept service by electronic means as provided in Section 200.1050 of the Commission's Rule of Practice, 83 Ill. Adm. Code 200.1050.
- 8. Copies of all pleadings, notices, correspondence, and other documents in this docket should be sent to the undersigned attorney:

Joseph D. Murphy Meyer Capel, a Professional Corporation 306 W. Church St. Champaign, IL 61820

Email: jmurphy@meyercapel.com

9. Pending a ruling on this Petition for Leave to Intervene, Christian County respectfully requests that the Administrative Law Judge permit it to participate in this proceeding.

respectfully requests that the Administrative Law Judge permit it to participate in this proceeding.

WHEREFORE, Intervenor, CHRISTIAN COUNTY, ILLINOIS, hereby respectfully requests that the Commission grant it leave to intervene and participate as a party in this proceeding.

Dated this 20th day of October, 2002

Respectfully submitted,

Christian County, Illinois

One of Its Attorneys

Joseph D. Murphy
MEYER CAPEL
A Professional Corporation
306 West Church Street
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Certification

Under the penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that the undersigned verily believes the same to be true with respect to Intervenor Christian County, Illinois.

Dated this 20 day of October . 2022.

Wes Poggenpohl

Christian County State's Attorney

CERTIFICATE OF SERVICE OF ATTORNEY

The undersigned attorney, under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, certifies that the statements set forth in this instrument are true and correct and that the attached **PETITION TO INTERVENE** was submitted for electronic filing with the Illinois Commerce Commission via eDocket filing system on this 20th day of October, 2022 and certifies that a copy of the same was served upon the following persons by email this 20th day of October, 2022:

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