

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, HANCOCK 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, Hancock, Morgan, Pike, Sangamon, Schuyler, and Scott.

3. Petitioner's proposed pipeline bisecting Hancock County from Northwest to the Southeast. Presumably, Petitioner's pipeline will cross many roads and other improvements operated by Hancock County that may be impacted thereby. Hancock 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, Hancock 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 Hancock County.

7. Hancock 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, Hancock County respectfully requests that the Administrative Law Judge permit it to participate in this proceeding.

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

Respectfully submitted,

Hancock County, Illinois

By: 
One of Its Attorneys

Joseph D. Murphy
MEYER CAPEL
A Professional Corporation
306 West Church Street
Champaign, Illinois 61826-6750
Telephone: (217) 352-0030
jmurphy@meyercafel.com

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 Hancock County, Illinois.

Dated this 21st day of November, 2022.



Rachel Mast
Hancock 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 13th day of October, 2022 and certifies that a copy of the same was served upon the following persons by email this 8th day of November, 2022:

Nicole Roth

Administrative Law Judge
Illinois Commerce Commission
527 E. Capitol Ave.
Springfield, IL 62701
Nicole.roth2@illinois.gov

Phillip A Casey

Scott C. Franson
Calfee Halter & Griswold LLP
115 W. Washington St., Ste. 1585
Indianapolis, IN 46204
pcasey@calfee.com
sfranson@calfee.com

Mark Maple, Case Manager
Illinois Commerce Commission
527 E. Capitol Ave.
Springfield, IL 62701
mark.maple@illinois.gov

Michelle Coady Carter
Young Law Partners PC
1300 S. 8th, Ste. 2
Springfield, IL 62703
michelle@lyblaw.com

Bridget A Sheehan

Meagan M Morley

Joan E. Simpson

Andrea Jakubas

Office of General Counsel
Illinois Commerce Commission
160 N. LaSalle St., Ste. C-800
Chicago, IL 60601
bridget.sheehan@illinois.gov
meagan.morley@illinois.gov
joan.simpson@illinois.gov
andrea.jakubas@illinois.gov

Bina R. Joshi

Samuel A Rasche

Ryan Granholm

Owen E. MacBride

ArentFox Schiff LLP
233 S. Wacker Dr., Suite 7100
Chicago, IL 60606
bjoshi@afslaw.com
sam.rasche@afslaw.com
ryan.granholm@afslaw.com
owen.macbride@afslaw.com

Kevin Strehlow

General Counsel
Navigator Heartland Greenway LLC
13333 California St., Ste. 202
Omaha, NE 68154
kstrehlow@navco2.com

Christine Baranowski Ouska

Senior Legal Analyst
Exelon Business Services Company
Three Lincoln Centre, 04-SE-042
OakBrook Terrace, IL 60181
christine.ouska@exeloncorp.com

Richard Bernet

Michelle McCarty

Eileen Vuolo

Commonwealth Edison Company
10 S. Dearborn St., 52nd Fl.
Chicago, IL 60603
richard.bernet@exeloncorp.com
michelle.mccarty@comed.com
Eileen.vuolo@comed.com

Marjorie R Kennedy
Carline M. Giberson
John E. Rooney
Jenner & Block LLP
353 N. Clark St.
Chicago, IL 60654-3456
mkennedy@jenner.com
cgiberson@jenner.com
jrooney@jenner.com

Charles Y Davis
Daniel L. Hamilton
Brown Hay & Stephens, LLP
PO Box 2459
205 S. Fifth St., Ste. 1000
Springfield, IL 62705
cdavis@bhslaw.com
dhamilton@bhslaw.com

Garrett W Thalgott
Laura A Harmon
Office of General Counsel
Illinois Agricultural Association
1701 Towanda Ave.
Bloomington, IL 61702-2901
gthalgott@ilfb.org
lharmon@ilfb.org

Jeremy S. Karlin
Knox County State's Attorney's Office
200 S. Cherry St.
Galesburg, IL 61401
jkarlin@knoxcountyil.gov

Rachelle Whitacre, Director of
Regulatory Affairs
Namrata Mishra
Michael Naughton
Northern Illinois Gas Company d/b/a
Nicor Gas Company
1844 Ferry Rd.
Naperville, IL 60563
rwhitacr@southernco.com
namishra@southernco.com
mnaughto@southernco.com

Kathleen M. Gilligan
Elizabeth U. Witmer
Saul Ewing Arnstein & Lehr, LLP
1200 Liberty Ridge Dr., Ste. 200
Chesterbrook, PA 19087
kathleen.gilligan@saul.com
elizabeth.witmer@saul.com

Joseph D. Murphy
Meyer Capel, A Professional Corporation
306 West Church Street
P.O. Box 6750
Champaign, IL 61826
jmurphy@meyercapel.com

Marjorie R Kennedy
Carline M. Giberson
John E. Rooney
Jenner & Block LLP
353 N. Clark St.
Chicago, IL 60654-3456
mkennedy@jenner.com
cgiberson@jenner.com
jrooney@jenner.com

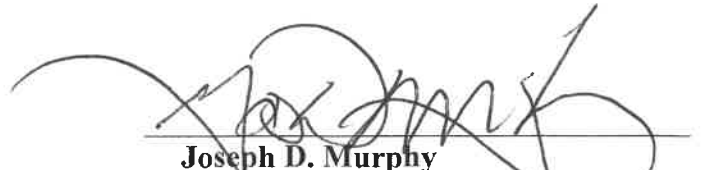
Charles Y Davis
Daniel L. Hamilton
Brown Hay & Stephens, LLP
PO Box 2459
205 S. Fifth St., Ste. 1000
Springfield, IL 62705
cdavis@bhslaw.com
dhamilton@bhslaw.com

Garrett W Thalgott
Laura A Harmon
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1701 Towanda Ave.
Bloomington, IL 61702-2901
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Jeremy S. Karlin
Knox County State's Attorney's Office
200 S. Cherry St.
Galesburg, IL 61401
jkarlin@knoxcountyil.gov

Rachelle Whitacre, Director of
Regulatory Affairs
Namrata Mishra
Michael Naughton
Northern Illinois Gas Company d/b/a
Nicor Gas Company
1844 Ferry Rd.
Naperville, IL 60563
rwhitacr@southernco.com
namishra@southernco.com
mnaughto@southernco.com

Kathleen M. Gilligan
Elizabeth U. Witmer
Saul Ewing Arnstein & Lehr, LLP
1200 Liberty Ridge Dr., Ste. 200
Chesterbrook, PA 19087
kathleen.gilligan@saul.com
elizabeth.witmer@saul.com



Joseph D. Murphy
Meyer Capel, A Professional Corporation
306 West Church Street
P.O. Box 6750
Champaign, IL 61826
jmurphy@meyercapel.com