

interest in private property through the exercise of eminent domain, as provided in Section 75/20(i) of the CO2 Act.

3. Many of CAPP's members own, use and/or enjoy land that is currently designated as part of or in proximity to the route of Wolf's proposed carbon dioxide pipeline to be addressed in this proceeding, or will be impacted financially or in other ways described herein, if the pipeline is installed and becomes operational. This proposed pipeline raises a number of concerns for CAPP and its members, including:

- Proximity to incorporated communities; rural residential developments and subdivisions; federally-designated environmental justice and state Restore, Reinvest and Renew (R3) areas; public lands; livestock facilities; businesses; school(s); churches; senior living facility(ies); prisons; airport(s); and other occupied buildings or structures, including those associated with farm operations.
- Threats to human health and livestock, including the potential for loss of life from ruptures of the pipeline that can spread harmful carbon-related gasses for more than a mile from the point of rupture.
- Reduced property values for land acquired for construction and operation of the pipeline.
- Reduced values for properties located up to a mile or more from the carbon pipeline that are at risk from a pipeline rupture.
- Loss of farm income due, but not limited to, reduced crop yield from mixing of soils, compacted soils, costs associated with repair to damaged infrastructure that will exceed the compensation offered by the pipeline company, and restrictions to the use of productive farmland that will occur due to the existence of the pipeline.
- Inability of first responders to adequately assist in the event of a rupture, due to, among other things, insufficient training and equipment needed to respond to a carbon pipeline rupture.
- Lack of *inter alia*: carbon dioxide monitors, alarm systems, air supply breathing equipment, and appropriate vehicles, all of which are necessary to detect, survive and escape from a pipeline rupture.

- Lack of federal regulations and oversight, as concluded by the Pipeline and Hazardous Materials Safety Administration (PHMSA) for the design, construction, operation, and maintenance of the carbon pipeline that endangers the public.
- Loss of income and associated costs of rebuilding infrastructure that would be required in the event of a rupture that is in proximity to highways and bridges, other pipelines, residential developments, and businesses of all kinds.
- Increased costs to CAPP's members, including tax increases associated with construction, operation, and preparedness for any failures of the carbon pipeline.

These concerns will negatively impact individual members of CAPP and will have a contrary impact on the interests that CAPP seeks to protect.

4. CAPP therefore opposes Wolf's plan to construct a carbon pipeline across certain lands as set forth in the Petition in this proceeding.

5. CAPP's name, address and telephone number are:

Citizens Against Predatory Pipelines
c/o Tracy Meints Fox
15215 N Ivy Lake Road
Chillicothe, IL 61523
(309) 369-5331

6. That electronic service in this proceeding, as provided in Section 1050 of the Commission's Rules of Practice (83 Ill. Admin. Code § 200.1050), should be on the CAPP's attorneys listed below.

7. That, by virtue of its interests and the effect Wolf's plan may have on its interests, CAPP and its members are interested in the subject matter of the above-referenced docket and could be affected by any Commission Order in this proceeding.

8. There is not yet a schedule in place and this intervention in this proceeding by CAPP will not cause any undue delay.

9. Copies of all pleadings, notices, and correspondence in this Docket should be sent to the undersigned counsel for CAPP at the following address:

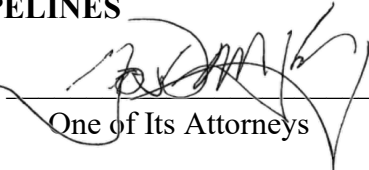
Joseph D. Murphy
Lauren B. McQueen
MEYER CAPEL
A Professional Corporation
306 West Church Street
Champaign, Illinois 61826-6750
Telephone: 217/352-0030
jmurphy@meyercafel.com
lmcqueen@meyercafel.com

WHEREFORE, the CAPP prays that this Commission grant it leave to intervene and be treated as a party to this proceeding.

DATED this 10th day of July, 2023.

Respectfully submitted,

**CITIZENS AGAINST PREDATORY
PIPELINES**

By:  _____
One of Its Attorneys

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

Certification

Under 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 the instrument are true and correct, except as to matters therein stated to be on information and belief which the undersigned verily believes to be true with respect to Intervenor Citizens Against Predatory Pipelines.

Dated this 10th day of July, 2023



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 for Leave to Intervene** was submitted for electronic filing with the Illinois Commerce Commission via eDocket filing system on this 10th day of July, 2023 and certifies that a copy of the same was served upon the following persons by email this 10th day of July, 2023:

David Streicker

Benjamin Jacobi

Sean Pluta

Polsinelli PC

150 North Riverside Plaza

Suite 3000

Chicago, IL 60606

(312) 873-2941

dstreicker@Polsinelli.com

bjacobi@Polsinelli.com

spluta@polsinelli.com

Nicole Roth

Leslie D. Haynes

Administrative Law Judges

Illinois Commerce Commission

527 E. Capitol Ave.

Springfield, IL 62701

Nicole.Roth2@illinois.gov

Leslie.Haynes@illinois.gov

Bridget A Sheehan

Ashley A Bukowski

Andrea Jakubas

Monica Singh

Office of General Counsel

Illinois Commerce Commission

160 N. LaSalle St., Ste. C-800

Chicago, IL 60601

bridget.sheehan@illinois.gov

ashley.bukowski@illinois.gov

andrea.jakubas@illinois.gov

monica.singh@illinois.gov

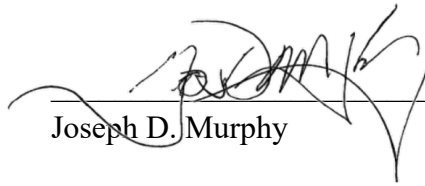
Brett Seagle, Case Manager

Illinois Commerce Commission

527 E. Capitol Ave

Springfield, IL 62701

Brett.Seagle@illinois.gov



Joseph D. Murphy