

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

WOLF CARBON SOLUTIONS US LLC,)	
)	
Application Pursuant to the Carbon Dioxide)	
Transportation and Sequestration Act (220 ILCS)	Docket No. 23-0475
75/1 et seq.) for a Certificate of Authority to)	
Construct and Operate a Carbon Dioxide Pipeline)	
And When Necessary to Take Interests in Property)	
As Provided by the Law of Eminent Domain.)	

PETITION TO INTERVENE

NOW COMES Intervenor, PHENIX TOWNSHIP, HENRY COUNTY, ILLINOIS (“Phenix Township”), by and through its attorneys, Brown, Hay & Stephens, LLP, 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. Wolf Carbon Solutions US 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 Rock Island, Henry, Knox, Stark, Peoria, Tazewell, Logan, DeWitt, and Macon.

3. Petitioner’s proposed pipeline will span the entirety of Phenix Township, from the Northwest to Southeast. Presumably, Petitioner’s pipeline will cross many roads and other improvements operated by Phenix Township that may be impacted thereby.

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, Phenix Township 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 Phenix Township.

7. Phenix Township 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 attorneys:

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

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

**PHENIX TOWNSHIP, HENRY COUNTY,
ILLINOIS, Intervenor**

By: /s/Charles Y. Davis
One of Its Attorneys

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VERIFICATION

STATE OF ILLINOIS)
) SS
COUNTY OF SANGAMON)

I, Charles Y. Davis, certify that: (i) I am an attorney for Phenix Township, Henry County, Illinois; (ii) I have read the foregoing Petition to Intervene; (iii) I am familiar with the facts stated therein; and (iv) the facts are true and correct to the best of my knowledge, information and belief.

Charles Y. Davis

Charles Y. Davis

SUBSCRIBED AND SWORN to before me this 24th day of October, 2023.



Kristina L. Miller

Notary Public

PROOF OF SERVICE

The undersigned certifies that a copy of the foregoing instrument was served upon:

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via electronic transmission on this 24th day of October, 2023.

/s/Charles Y. Davis