

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

WOLF CARBON SOLUTIONS US LLC,)	
)	
Application Pursuant to the Carbon Dioxide)	
Transportation and Sequestration Act (220 ILCS)	
75/1 et seq.) for a Certificate)	Docket No. 23-0475
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, STARK COUNTY, ILLINOIS ("Stark County"), by and through CAROLINE BORDEN CAMPION, State's Attorney for Stark County, and pursuant to 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 Counties.

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).

3. Petitioner's proposed pipeline includes land in Stark County. Stark County provides emergency responders to events occurring within the County. Locating the pipeline in Stark County will affect the economy, infrastructure, property values, and public safety of citizens in Stark County.

5. As a unit of local government that will be impacted by Petitioner's proposed pipeline, Stark County is therefore interested in the subject matter of this proceeding as it will be affected by any order entered by the Commission. Stark County is permitted to appear in these proceedings pursuant to 220 ILCS 5/10-108.

6. No other party is able to adequately protect the interests of Stark County.

7. Stark 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 Caroline Borden Campion, Stark County State's Attorney, 130 W. Main St., PO Box 476, Toulon, Illinois, 61483.


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

10. This Petition to Intervene will not delay these proceedings.

11. Attached as Exhibit A is Stark County Board Resolution 23-28, passed October 16, 2023, opposing the construction and use of eminent domain for any CO2 pipeline in Stark County.


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

STARK COUNTY, ILLINOIS, Intervenor

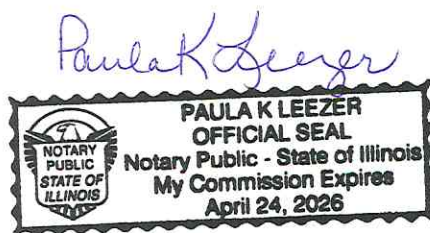
By 
Caroline Borden Campion

STATE OF ILLINOIS)
) SS.
COUNTY OF STARK)

I, Caroline Borden Campion, certify that I am the State's Attorney for Stark County, Illinois; I have read the foregoing Petition to Intervene and I am familiar with the facts stated therein and the facts are true and correct to the best of my knowledge, information and belief.


Caroline Borden Campion

SUBSCRIBED AND SWORN to before me this 23 day of October, 2023.



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 23 day of October, 2023.



Caroline Borden Campion

RESOLUTION 23-28

WHEREAS the elected officials of Stark County, Toulon, Illinois do hereby oppose the construction of any CO2 Pipeline in our county because CO2 Pipelines are a threat to the health and safety of all residents of Stark County Illinois, and

WHEREAS residents of Stark County Illinois, would be negatively impacted by living under the constant threat of a CO2 Pipeline leak and explosion, as was seen in Satartia, Mississippi, and

WHEREAS residents of Stark County Illinois would need to pay increased taxes to allow our fire and EMS department to buy electric vehicles that would be able to run during a CO2 leak, since CO2 crowds out oxygen and disables gas combustion engines, which is a burden to both taxpayers and emergency planners, and

WHEREAS The U.S. Department of Transportation's Pipeline and Hazardous Materials Safety Administration (PHMSA) announced on May 26, 2022, the agency's plan to initiate a new rulemaking process with a goal of strengthening its safety oversight of carbon dioxide (CO2) pipelines, as well as enforcing actions against Denbury Gulf Coast Pipelines for its CO2 pipeline failures in Satartia, Mississippi that caused the evacuation of 300 people and resulted in the hospitalization of nearly 50, thus confirming that existing regulations for such pipelines are inadequate to protect communities from dangerous pipeline failures and potential loss of life, and

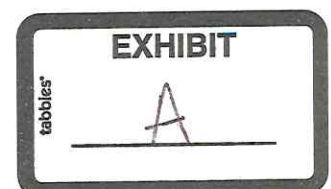
WHEREAS, at a minimum, in light of the PHMSA creating new measures for CO2 Pipeline Safety, the Illinois Commerce Commission should not grant any CO2 Pipeline the right to build in Illinois until the new safety measures are finalized, and

WHEREAS, we as elected officials of Stark County Illinois need to review these new PHMSA measures and enact ordinances to protect our residents and ensure CO2 Pipelines must adhere to both the PHMSA measures and any addition measures we find to be in the best interest of our residents' safety and general welfare, and

WHEREAS we the elected officials of Stark County Illinois are responsible for the upkeep of all Township Roads, CO2 pipelines threaten drainage of farm fields which can cause standing water on our roads, and

WHEREAS our residents would likely experience reduced property values if they are forced to have a CO2 Pipeline through their property, as any reasonable person would choose to buy property without a CO2 Pipeline or near a CO2 Pipeline, all other factors being equal, and

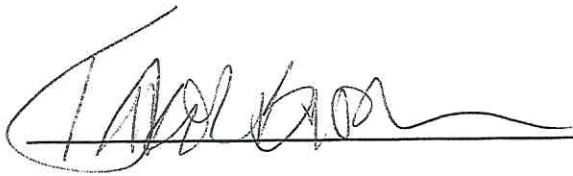
WHEREAS this reduction in property values and the hope of alternative retail, commercial, or other productive, tax-paying development along a CO2 Pipeline route will diminish the fiscal health of our Township tax base, and



WHEREAS as stewards of tax dollars and the public trust we oppose this entire CO2 Pipeline scheme as a false and unproven method of helping the environment, and

WHEREAS the Federal tax dollars subsidizing this CO2 Pipeline could be much better spent on more proven methods of reducing carbon dioxide emissions without the need to use Eminent Domain and put our county residents at permanent risk of CO2 pipeline leaks.

NOW, THEREFORE BE IT RESOLVED, by the elected officials of Stark County Illinois that we hereby oppose the construction and use of eminent domain for any CO2 Pipeline in Stark County Illinois and urge the Illinois Commerce Commission to join us in opposing CO2 pipelines to protect the health and safety of our residents.

A handwritten signature in dark ink, appearing to read 'Kari Bush', is written over a horizontal line.

Date 10/16/2023

Kari Bush
Stark County Board Chair