

Good morning Commissioners Tyler, Cheryl, and Jeff,

In consideration of the CCS Ordinance presented to you by the planning and zoning department, you have only one rational action available to you. Reject it and send it back to the planning and zoning department for lack of supportive evidence for the set-back distances presented in the ordinance.

Knowledge necessary to evaluate ccs projects is generated through a number of scientific disciplines of study. I have been unable to learn from planning and zoning the methods by which set-back distances were determined. Whatever the methods may have been this ordinance is not acceptable to any scientific community of which I am aware, or of which I have been a member.

My observation of county government during this past year is that it has played the role of passive listener when the expected and appropriate role would be active listener; active meaning assessing the risk of every scenario created by the fears, concerns, and opinions communicated to county government. Now what do I mean by risk assessment?

There is time for only one example which can be used as a model for other scenarios. First, the risk must be defined, then the probability of that defined level of risk occurring must be determined by searching peer reviewed literature and consulting with folks having knowledge and experience in the appropriate scientific disciplines.

Asphyxiation by Carbon Dioxide can be quantified. Parameters of concentration, duration, and location guide the assessment. The threshold of risk for negative effects on life is readily available in the literature at 40,000 ppm. 40,000 ppm is typically obtainable only in closed spaces. However, for completeness there is an exception, that of the extremely rare event of a Limnic Eruption associated with deep volcanic lakes.

The Department of Transportation's Failure Report of the Denbury Gulf Coast Pipeline rupture did not report levels of 40,000 ppm. A generalized summary indicates that 5,000 ppm could be detected during the monitored hours after the rupture. 5,000 ppm is an accepted level of exposure for a weighted 8-hour period.

The Denbury Gulf Coast Pipeline is a 24" diameter pipe. The rupture occurred in a section with valves 9.5 miles apart. This event has no bearing on the local ccs project because the local project will consist of one 4" high pressure line somewhere between 200 and 500 feet in length, all on private property. It can be concluded that the risk of asphyxiation from this short 4" pipe is very nearly if not zero.

There are hundreds upon hundreds of references and people available to guide county government if it decides to pursue the necessary and rewarding task of risk assessment.

The EPA Region 5 office is very responsive to inquiries. The office in Chicago consists of some 30 to 40 people of many talents including scientists, engineers, and legals, all with academic credentials, experience, and licensing where required in their respective professions. Safety is the important consideration in Class VI well applications, approvals, and oversight.

Here in Indiana a Class VI well was permitted and the project is currently in progress. Listen carefully to what EPA Region 5 administrator, Anne Vogel, released to the press.

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March 3, 2026 Today, U.S. Environmental Protection Agency issued a permit for One Carbon Partnership to inject and store carbon dioxide underground at the Cardinal Ethanol facility in Randolph County, Indiana. Following a thorough, science-based technical review and extensive public engagement, EPA is approving this permit with stringent safeguards and long-term monitoring to protect underground sources of drinking water. This carbon storage project is expected to spur economic development in Randolph County by supporting local jobs and attracting private investors

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Randolph County has no local ordinances concerning ccs. Macon County, Illinois having 15 years' experience with ccs has no local ordinances concerning ccs. Why should Wabash County attempt to have local ordinances controlling ccs to the

point of total restriction and the unnecessary intervention of government into private enterprise?

The only rational action for you today, Tyler, Cheryl, and Jeff is to reject the ordinance, send it back to planning and zoning, and hopefully never see it again.

I have a quick footnote about the human element. I have some understanding and even empathy for those citizens in the county that have expressed dissatisfaction with their communication with the entities of the local ccs project. But that dissatisfaction and anger does not lend itself to any form of risk assessment and for that reason does not enter into the scientific analysis of the local ccs project. There are excellent conflict resolution resources in the county.