February 17, 2023

Mr. Alan Mayberry
Associate Administrator for Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
US Department of Transportation
1200 New Jersey Ave. SE
Washington, DC 20590

Re: Pipeline Safety Trust Request for a Public Meeting on CO2 Pipeline Rulemaking

Dear Mr. Mayberry:

The Pipeline Safety Trust is writing to formally request that PHMSA hold a public meeting on Carbon Dioxide pipeline safety and the announced rulemaking under RIN 2137-AF60. There is much to be gained by a two-day public meeting, similar in format to the methane advanced leak detection meeting held May 5-6, 2021. PHMSA could learn from the many experts working on CO₂ pipeline safety, public health, and environmental justice. The public could learn quite a bit from both PHMSA’s team of experts as well as the aforementioned public safety experts.

In addition to traditional pipeline safety panels exploring the knowledge gaps, safety issues, and published research, other panels would be of great benefit, such as: Public health, environmental justice, lessons from the Satartia investigation, state regulators, technology recommendations, and international regulations and research.

In addition to staff members of the Pipeline Safety Trust, PHMSA would gain insight by inviting representatives from organizations who have been working hard on pipeline safety issues such as CIEL, SEHN, Indigenous Environmental Network, and NAPSR. It would also be beneficial to hold an international panel with representatives from European regulatory agencies, Canadian Energy Regulator, and other countries who have been regulating CO₂ pipelines.

It's important for PHMSA to meet the public where they are. Therefore, we propose holding the public meeting in the Midwest where communities are grappling with the safety issues of proposed CO₂ pipelines.

Sincerely,

Bill Caram
Executive Director