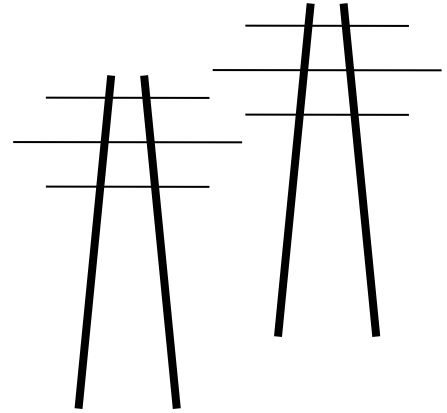


Legalelectric, Inc.

Carol Overland Attorney at Law, MN #254617
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1110 West Avenue
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612.227.8638



January 31, 2022

Charley Bruce, Consumer Affairs Office
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul MN 55101

publicadvisor.puc@state.mn.us

RE: Comments of Carol A. Overland
Potential Rule Amendments Related to Liquefied Carbon Dioxide Pipeline
PUC Docket U999/CI-21-847; IP999/M-21-836; 21-879 and 21-880.

Dear Mr. Bruce:

Attached please find comment filed in Iowa's Summit Carbon Solutions CO2 pipeline docket earlier today. Summit Carbon Solutions, LLC filed its Petition/Application in IUB Docket No. HLP-2021-001 on Friday, January 28, 2022, and it was very light on details. This application in Iowa is a demonstration of the need for regulatory update in Minnesota. A change in the definition of "hazardous" is inadequate. The Commission should initiate a thorough rulemaking for CO2 pipeline proposals. Much was learned during the Excelsior Energy Mesaba Project, but the Commissioners and much of the Commission and Commerce staff was not on the job in those years.

Again, no CO2 pipeline should advance in permitting process until rules have been updated to address CO2 specific issues and any and all applications require through environmental review via an Environmental Impact Statement.

Thank you in advance for your consideration.

Very truly yours,

Carol A. Overland
Attorney at Law

cc: All parties via eDockets

STATE OF IOWA
DEPARTMENT OF COMMERCE
IOWA UTILITIES BOARD

In Re:

**SUMMIT CARBON SOLUTIONS, LLC's
PETITION FOR HAZARDOUS LIQUID
PIPELINE PERMIT**

IUB Docket: HLP-2021-0001

OVERLAND - ADDENDUM TO OBJECTION OF OCTOBER 25, 2021

On October 25, 2021, Carol A. Overland submitted an objection to the notion of a CO2 pipeline through Iowa, and into southern Minnesota. For the record, I am filing this Addendum to Objection, and the October 25, 2021 Objection, as an individual, and not in the course of representation of any party.

I am filing this Addendum to Objection because I have had experience with and have knowledge of CO2 pipelines due to representation of an intervenor in the Excelsior Energy docket at the Minnesota Public Utilities Commission for the Mesaba Project, a proposed, and thankfully never built, IGCC coal plant on the Range in Minnesota. That docket was open and required 5 years of intense work, complicated by the last-minute claim that the project would utilize carbon capture, 30% proposed, and dangling 90% in wishful thinking¹. What was learned through acquisition of proprietary documents was that carbon capture is utterly inefficient, because capturing the carbon, even at 30%, a low percentage of that generated, results in tremendous efficiency loss in the generator. The CO2 capture proposed by the project, inefficient

¹ Mesaba Project Exhibit EE1067: https://legalelectric.org/f/2020/02/Ex_EE1067_Plan-for-Carbon-Capture-and-Sequestration.pdf (and public version attached)

as it was, was only “designed” to the plant gate, and did not include anything beyond that – it did not include the pipeline capitol costs, nor did it include the pumping stations and transmission necessary to power the pumping stations, which would have been required roughly every 75 miles of pipeline.

This Addendum to Objection is offered because after a quick review of the Petition, which is lacking in substance, I ask that the Iowa Utilities Board find this Petition incomplete. Because I know details of pipeline pressurization, I am again raising this issue, and am presuming that others will raise issues lacking in this Petition that they are familiar with.

The Summit Carbon Solutions, LLC, Petition, Exhibit C, states:

The maximum operating pressure of the Pipeline will be **2,183 pounds per square inch in gauge (“psig”)**, and while there is no definition in the controlling Department of Transportation Pipeline and Hazardous Materials Safety Administration regulations, or relevant Board regulations, of ‘normal operating pressure,’ the line is expected to run at pressures ranging from **1,200-2,150 psig**. The maximum capacity of the pipeline in Iowa is **12 million metric tons/year of CO2**.

Exhibit C, p. 1, Petition for Hazardous Liquid Pipeline Permit, Summit Carbon Solutions, LLC (emphasis added).

In terms of CO2 production generally and pipeline capacity, 12 million metric tons/year is a very small percentage of CO2 generated.

In my admittedly rather quick scan of the filings, there is no disclosure of details, and some needed details include:

- The total CO2 generation of each facility proposed to utilize this pipeline;
- The tons/year of CO2 to be captured from each facility proposed to utilize this pipeline;
- The percentage of total CO2 generation at each facility to be captured and shipped from each facility proposed to utilize this pipeline;
- Megawatts of CO2 capture technology at each facility and whether there is sufficient capacity in facility transmission to operate carbon capture equipment;

- Efficiency impact of CO2 capture to each facility proposed to utilize carbon capture;
- Pumping stations at each facility to bring psig to pumping level and megawatt requirements of each;
- Disclosure of transmission load and capacity and whether there is adequate transmission capacity at CO2 generation facilities to handle CO2;
- Locations and megawatts of each pumping station along the pipelines' approximately 681 miles traversing Iowa;
- Disclosure of transmission infrastructure, load, and capacity for pumping stations at each location along the pipelines' approximately 681 miles traversing Iowa;
- Disclosure of company's plan for acquisition of land for pumping stations and transmission lines to power pumping stations;
- Megawatt requirements for all the pumping stations combined for total parasitic load;
- Disclosure and consideration of CO2 impacts of increased electric generation required to capture CO2, pump into pipeline; pump through pipeline, and pump into earth at receiving end;
- Disclosure and consideration of annual operations and maintenance costs.
- Disclosure of locations and total area of land needed and costs for easements and fee purchases;
- Disclosure and consideration of cost per ton of CO2 capture, pipeline, pumping stations, and transmission capital and interconnection costs, and easements for all infrastructure.

For this one crucial aspect of a CO2 pipeline, pressurization, there are many unanswered questions. The economic and efficiency questions are equally concerning. In the case of Excelsior Energy's Mesaba Project, the details of CO2 capture and pipelines were hidden, and kept as trade secret, proprietary information. Reviewing the details after execution of confidentiality agreement showed the absurdity of the notion of CO2 capture, and the ineffectiveness of the proposed plan. The Summit Carbon Solutions, LLC plan, so light on

details, is likely as absurd. The details require examination, particularly for a project of this magnitude.

The answers to the questions above will likely present additional questions, particularly regarding the feasibility of capturing sufficient CO₂ to make a difference in overall CO₂ emissions; whether the efficiency cost of carbon capture will render the participating facilities uneconomical; whether the parasitic electric load of pumping to pipeline pressure and sustaining that pressure is a reasonable cost; whether a cost/benefit analysis demonstrates that the capital costs of proposed CO₂ capture and piping it away is reasonable.

This information should be obtained in order to give adequate consideration to this project, and disclosed to the public as a matter of principle. The Iowa Utilities Board must review the facts of this proposal, and diligently separate the facts from wishful thinking and incomplete planning and/or disclosure.

Respectfully submitted,

January 31, 2022



Carol A. Overland MN #254617
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Customer, IUB <customer@iub.iowa.gov>

Form Submission: Customer Comments

Overland via Iowa Utilities Board <iub@iowa.gov>

Mon, Oct 25, 2021 at 11:42 AM

Reply-To: Overland <overland@legalelectric.org>

To: customer@iowa.gov

Submitted on Monday, October 25, 2021 - 11:42am

Submitted values are:

==Consumer Information==

First Name: Carol

Last Name: Overland

Address: Legalelectric - 1110 West Ave

City: Red Wing

State: MN

Zip Code: 55066

Email Address: overland@legalelectric.org

List of IUB Dockets: HLP-2021-0001 (Summit Carbon Solutions LLC, Petition for a Hazardous Liquid Pipeline Permit)

Comments: OBJECTION! I've just learned of this proposal for CO2 pipeline, and searched for a Notice with a comment and objection deadline and can find none, though I see the last public meeting was October 22, 2021. I strongly OBJECT. Carbon capture is unsustainable and inefficient. First, it takes tremendous energy to pull carbon out, with a severe efficiency hit to the source, making the source economically uncompetitive. Second, pipeline cost, as externality to source, makes that source economically uncompetitive. Third, CO2 pipelines require pressurization stations every 75 miles to keep the high pressure up in the lines, both costly and an electric parasitic load. Fourth, cost of land for pipeline is high. Fifth, as a policy matter, a private company such as Summit Carbon Solutions does not, and should NOT be allowed, power of eminent domain. Sixth, there are the laws of physics -- if you pump CO2 into the ground, there will be seismic impacts and earthquakes (see "Gas Migration: Events Preceding Earthquakes" by Khilyuk, et al.). Seventh, this is an effort to keep coal plants and ethanol plants running without regard for impacts and costs. Just no. This is a fundamentally bad idea.

EXHIBIT

EE 1067

OAH No. 12-2500-17260-2

MPUC No. E-6472/M-05-1993

EXHIBIT NO. ____ (RS-1)

Mesaba Energy Project

Mesaba One and Mesaba Two

Plan for Carbon Capture and Sequestration

Public Version

Prepared by

EXCELSIOR ENERGY INC.



October 10, 2006 Revision 1

Executive Summary

Excelsior Energy Inc., the developer of the Mesaba Energy Project has prepared this plan to identify the opportunities for capture and sequestration of carbon dioxide (“CO₂”) emissions from its integrated gasification combined-cycle (“IGCC”) power stations. This carbon capture and sequestration plan (“CCS Plan”) was prepared to provide a concrete option for the State of Minnesota to meet its obligations under future CO₂ regulations, which if promulgated, would affect coal-fired power plants, including the Mesaba Energy Project. We undertook the plan with the goal of providing the Minnesota Public Utilities Commission (the “Commission”) with information about all options that available now and in the future with respect to carbon management through capture and geological sequestration from the Mesaba Project.

The decision to implement a carbon capture and sequestration (“CCS”) program is one that the Commission must weigh from time to time, based upon the costs to ratepayers associated with CCS and the benefits to ratepayers associated with a CCS program. This Plan provides a framework within which the Commission can make such a decision. The costs to ratepayers of implementing CCS would include additional capital and operating costs, reduced output and plant efficiency and potential downtime to implement the system. The benefits would include (a) any revenues from enhanced oil recovery (EOR), and (b) the ability to cost-effectively comply with any form of legislation limiting or regulating carbon dioxide emissions as part of an initiative to stabilize atmospheric concentrations of greenhouse gases (“Carbon Constraints”), whether in the form of avoiding carbon taxes or the purchase of allowance credits, or the ability to reduce carbon emissions to levels specified on a fleetwide or statewide basis.

The first option for CCS presented by the Mesaba Project entails capture and sequestration carbon dioxide present in the syngas, which represents 30% of the total carbon dioxide emissions from the plant. Technologically, this option would entail the installation of amine scrubbers downstream of the acid gas removal system in the IGCC power stations to remove up to 85% of the CO₂ in the synthesis gas that fuels the plants, resulting in an overall CO₂ capture rate of 30% for the plant. This technology is available now to achieve 30% capture at a relatively low cost to ratepayers. This option could be implemented as early as 2014, following the commercial operation date for the first unit of the Mesaba Energy Project. Implementation of CCS prior to the availability of credits or carbon avoidance benefits would rely exclusively on revenues that may be available from EOR. Sequestration at EOR sites would have higher costs, due to the longer distances to the candidate oil fields, than would sequestration in saline formations closer to the plant site. Those additional costs would be weighed against the revenues that would accompany the supply of CO₂ for EOR. A decision to implement this form of CCS prior to the imposition of Carbon Constraints would have to weigh the likelihood that the base line emissions year would be established such that reductions implemented before that date would be given credit.

The second, longer-term option for CCS presented by the Mesaba Project would reduce CO₂ emissions by approximately 90%. This option could be implemented following the successful demonstration by the DOE’s FutureGen of full capture from an IGCC plant. The costs of this option are significantly higher than the 30% capture approach using currently available technology. Significant ongoing research and development efforts sponsored by the Department

of Energy ("DOE") are expected to reduce these costs significantly and result in commercial offerings of these technologies. Given the fact that IGCC is a least-cost source of carbon reductions in the power sector, these deeper reductions are likely to be cost justified in the event Carbon Constraints are imposed that require any meaningful reduction in total greenhouse gas emissions. Implementation of 30% capture option would not preclude later decisions to increase capture levels to 90%.

In an EOR scenario, the captured carbon dioxide would be transported via pipeline to oil fields in North Dakota, southwestern Manitoba, and/or southeastern Saskatchewan. Once the CO₂ arrives at its destination, it would be sequestered underground, potentially in connection with enhanced oil recovery operations.

Alternatively, the saline formation scenario would entail transporting the CO₂ to a saline formation located much closer to the plant site, reducing the pipeline costs but also eliminating the revenues associated with the sale and beneficial use of the CO₂.

The economics of CCS look promising. The 30% capture option identified in the CCS Plan would enable CO₂ capture at a cost per ton below that of any other existing power plant in the state. IGCC plants' ability to economically capture CO₂, combined with the potential for revenues described above, have the potential to significantly decrease the cost of CCS.

Under this proposed Plan, Excelsior would commit to undertake capture, transportation and sequestration of carbon dioxide, upon a decision by, and at the direction of, the Commission, upon approval of a modification to the proposed power purchase agreement that would allow for Excelsior to be compensated at a reasonable cost of capital for the necessary capital investments, and to be made whole on the other costs associated with the CCS program. This commitment, together with Excelsior's ongoing work to refine the costs and technical means to implement CCS, will position the State to respond in a timely and economic fashion to carbon constraints.

I. Introduction

This ability to capture and sequester CO₂ is important because Carbon Constraints are likely to be implemented within the next ten years. As evidence of this, various proposals to regulate greenhouse gas emissions ("GHGs") have been introduced in the United States Congress, and various states have embarked upon their own GHG programs.

Identification of strategies to comply with likely Carbon Constraints is a critical element of protecting Minnesota's consumers and economy. Excelsior is working in conjunction with the Energy and Environmental Research Center ("EERC") as part of the Plains CO₂ Reduction Partnership ("PCOR") initiative to develop CO₂ management options for the Mesaba Energy Project based on evaluations of sequestration opportunities associated with regional geologic formations/features and nearby terrestrial features.¹

¹ The EERC is part of the University of North Dakota and has been selected by the Department of Energy to develop a regional vision and strategy for dealing with carbon management in the Plains Region

What follows is Excelsior's CCS Plan for the first two of six IGCC units to be constructed over time on three state-authorized sites within the Taconite Tax Relief Area of Northeastern Minnesota. The proximity of the three sites with IGCC units, together with the potential opportunities for carbon sequestration identified by the EERC, affords the State of Minnesota the opportunity to carefully plan for and implement the most cost-effective and flexible response to carbon constraints.

II. Background: Mesaba Energy Project Phases I and II

The IGCC Power Station described in this document consists of Phase I and Phase II of the Mesaba Energy Project ("Mesaba One" and "Mesaba Two," respectively). Each phase is nominally rated at peak to deliver 606 megawatts ("MW") of electricity to the bus bar.

Excelsior has submitted the necessary regulatory petitions and preconstruction permit applications to support construction of Mesaba One and Mesaba Two. The key pending regulatory filings made in connection with the Mesaba Project include the following: On December 22, 2005, Excelsior submitted to the Commission a petition to approve a Power Purchase Agreement with Xcel Energy under Minn. Stat. § 216B.1693 and 1694. On June 16, 2006, Excelsior submitted a Joint Permit Application for a Large Electric Power Generating Plant Site Permit, a High Voltage Transmission Line Route Permit, and a Natural Gas Pipeline Route Permit to the Commission for Mesaba One and Mesaba Two. On June 28, 2006, Excelsior submitted applications for New Source Review Construction Authorization and National Pollutant Discharge Elimination System Permits to the Minnesota Pollution Control Agency for Mesaba One and Mesaba Two. On June 29, 2006, Excelsior submitted an application for a Water Appropriation Permit to the Minnesota Department of Natural Resources.

When operational, the Mesaba Energy Project will allow Minnesota and the nation to benefit from the environmental advantages that IGCC technology offers over conventional, solid fuel alternatives. Beyond its capability for achieving an emission profile unmatched by conventional coal combustion systems, IGCC is adaptable to capture significant amounts of carbon dioxide from the synthesis gas prior to its combustion. Mesaba One and Two will be configured to allow for the installation of additional equipment that can capture up to 30% of the potential carbon in its selected feedstock.

III. Regulatory Context for Carbon Capture and Sequestration

Excelsior's intent in proposing a framework for CCS is to commence a process to identify and define conditions for development of CCS when state or national considerations require GHG reductions, and/or when such reductions might otherwise become an economic choice for the ratepayers of Northern States Power Company under the PPA, in the context of Mesaba One and

(including the Canadian Provinces of Alberta, Saskatchewan, and Manitoba, and the states of Montana, NE Wyoming, North Dakota, South Dakota, Nebraska, Minnesota, Wisconsin, Iowa, and Missouri). See PCOR Partnership Profile, <http://www.undeerc.org/pcor/partnership.asp>.

Mesaba Two. Excelsior's efforts will advance State decision makers' practical knowledge regarding the role IGCC and the Mesaba Energy Project can play in achieving actual reductions in the state's CO₂ emissions.

Several states are undertaking initiatives to reduce greenhouse gas emissions, most notably carbon dioxide, in isolated sectors of their economies.² To achieve significant reductions of such emissions, it is probable that future climate change initiatives will extend nationwide and to all sectors of the economy. The ability to physically reduce the volume of GHG emissions from Minnesota's economic activity will be a critical component to the State's economic health, whether the constraints require roll-backs from any one sector or sources, or whether the constraints take the form of a tax or a cap-and-trade system. The precise form that the carbon limits take is outside the scope of this CCS Plan, and in any event is not critical to the analysis of IGCC, which has the lowest cost of capture of any fossil fuel technology. In a carbon-managed economy, large sources of CO₂ emissions that can economically achieve significant GHG reductions will likely be the major source of CO₂ offsets for other economic sectors whose only meaningful alternative for achieving reductions may be the purchase of GHG offset credits. Because IGCC is the technology best suited to carbon capture of all the fossil technologies, it is a least-cost means to achieve actual reductions in GHG emissions, and will therefore very likely be able to achieve emission reductions at a cost below where credits will trade or where tax levels are established in order to signal sufficient reductions to meet the national program goals.

² Connecticut, Delaware, Maine, New Hampshire, New Jersey, New York and Vermont have formed the Regional Greenhouse Gas Initiative ("RGGI") with the goal of creating a regional cap-and-trade program. The plan will begin addressing carbon dioxide emissions from power plants in the member states by capping 2009 carbon dioxide emissions at current levels. Beginning in 2015, RGGI states will begin reducing carbon dioxide emissions to achieve a 10% reduction by 2019. To facilitate the process, power plants will receive CO₂ emission allowances, which they may trade with other power plants. See Press Release, Regional Greenhouse Gas Initiative, States Reach Agreement on Proposed Rules for the Nation's First Cap-and-Trade Program to Address Climate Change (Aug. 15, 2006), *available at* http://www.rggi.org/docs/model_rule_release_8_15_06.pdf; Regional Greenhouse Gas Initiative, Model Rule (Aug. 15, 2006), *available at* http://www.rggi.org/docs/model_rule_8_15_06.pdf.

Similarly, California recently enacted legislation that calls for the development of regulations and market mechanisms that will reduce the state's greenhouse gas emissions by 25% by 2020. The law will impose mandatory caps beginning in 2012 and will incrementally tighten emission limits to reach the 2020 goals. See Press Release, Gov. Arnold Schwarzenegger, Gov. Schwarzenegger Signs Landmark Legislation to Reduce Greenhouse Gas Emissions (Sept. 27, 2006), *available at* <http://gov.ca.gov/index.php?/press-release/4111/>; California Global Warming Solutions Act of 2006, Assembly Bill No. 32, *available at* http://www.leginfo.ca.gov/pub/bill/asm/ab_0001-0050/ab_32_bill_20060927_chaptered.pdf.

In 2001, Massachusetts developed regulations that apply to power plants in the state. Under the regulations, CO₂ emissions may not exceed the historical actual emissions for the three-year period from 1997 to 1999, and CO₂ emissions may not exceed 1800 lbs/MWh. See Massachusetts Dept. of Environmental Protection, Governor Swift Unveils Nation's Toughest Power Plant Regulations, Inside DEP, April/May 2001, at 1, *available at* <http://www.environmentalleague.org/Issues/Enforcement/DEPMay2001.pdf#search=%22Governor%20Swift%20air%20regulations%22>; 310 Mass. Code Regs. 7.29 (2004), *available at* http://enviro.blr.com/display_reg.cfm/id/48436.

Mesaba One and Mesaba Two are therefore likely to be ideal sources of carbon offsets under such circumstances, and are likely to provide the State with a meaningful, cost-effective hedge in meeting any federally-imposed GHG reductions.

IV. Preliminary Plan Description and Analysis

There are two primary components of the CCS Plan. First, Excelsior identifies the most promising, commercially available CO₂ capture technology to install at the IGCC power station. As described later in this section, an amine scrubber process currently has the most potential for carbon capture at the Mesaba Project. Second, Excelsior develops engineering plans for different methods of sequestering the captured CO₂. Based upon studies to date, the CCS Plan suggests a staged development of CO₂ pipelines from its Iron Range plant sites to North Dakota oil fields and proximate locations. The pipelines would likely utilize existing railroad, pipeline, or transmission line rights of way.

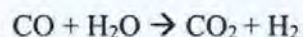
A. CO₂ Capture

Several processes have been proposed for carbon capture in coal power plants, consisting primarily of scrubbing or membrane separation-based processes. In conventional coal plants, the carbon must be scrubbed from very large volumes of stack gases at low pressures and temperatures. The most mature and proven of these is amine scrubbing, which is similar to the process used by the Mesaba Energy Project to capture sulfur from the syngas. In this process, the amine solution first adsorbs carbon dioxide from the gas being treated, and then CO₂-enriched amine is regenerated, recycling the amine and producing a relatively pure stream of CO₂.

IGCC plants enable pre-combustion capture of CO₂, which provides the intrinsic advantages of treating an undiluted and pressurized gas stream. An additional advantage enjoyed by IGCC is that CO₂ captured from high-pressure syngas requires less compression before transport and/or storage.

The Mesaba Energy Project features a design that is adaptable to carbon capture, which enables relatively simple upgrades to be made in order to commence carbon capture. These upgrades entail installing a CO₂ amine scrubber downstream of the acid gas removal system and adding driers and compressors for captured CO₂. In this design, the CO₂ available for capture is limited by the proportion of carbon dioxide in the syngas, which varies for different fuels. Up to 30% of the potential CO₂ could be removed from the design subbituminous coal, while up to 20% could be removed from other design feedstocks.

Higher capture rates are not commercially available today, but will be demonstrated in the future. This is the primary objective of DOE's FutureGen project, which aims to capture at least 90% of the CO₂ from a non-commercial plant to begin operation in 2013. After such a demonstration of commercial viability, the Mesaba Energy Project could achieve 90% capture by adding a gas reheater and a water gas shift reactor upstream of the CO₂ amine scrubber. The shift reactor process converts CO to CO₂ by the following reaction:



Nearly all of the carbon in the resulting syngas stream is in the form of CO₂, enabling the amine scrubber to remove at least 90% of the CO₂. However, at the current state of technology, this process would increase capital cost and reduce efficiency of the plant, making it more expensive for capturing CO₂ on a per ton basis than the 30% configuration. It should be noted that a plant that has implemented 30% capture would still be technically capable of being converted to capture 90% once the technology is demonstrated by DOE's FutureGen project.

Because the 90% approach has not yet been demonstrated and the 30% approach is the most mature and proven option, Excelsior concludes that the 30% approach is the most likely candidate for CCS in the near term. The 30% CO₂ capture configuration represents a cost-effective, commercially available option today for the Mesaba Project.

B. Economic Considerations Relating to Sequestration

The potential economic drivers for CCS by the Mesaba Energy Project include opportunities to supply the CO₂ to an oil field for sale and use in enhanced oil recovery ("EOR"), and the opportunity for financial benefits to ratepayers from reductions in the costs of complying with carbon limits imposed in the future. This CCS Plan contains information on economical sequestration opportunities within the oil fields located in closest proximity to the Mesaba IGCC power stations. Because CO₂ used for EOR is also sequestered, the Mesaba Energy Project would likely earn carbon credit revenues (or avoid costs in other carbon limit scenarios) once regulations limit CO₂ emissions, which would be in addition to the EOR revenues. Therefore, investments in pipeline infrastructure for EOR will provide additional value as a method of sequestration once a carbon credit market is established.

1. Enhanced Oil Recovery

Carbon dioxide has been proven to be very effective for secondary and tertiary oil recovery by both displacing and decreasing the viscosity of otherwise unrecoverable oil. Upon extraction of the oil, the EOR process easily removes pressurized CO₂ and recycles it by reinjecting into the pool. Economic benefits from EOR have been realized in at least two regions in North America. Kinder Morgan CO₂ has a CO₂ pipeline network of 1100 miles servicing the Permian Basin in western Texas and eastern New Mexico.³ Similarly, the Dakota Gasification Project in the Northern Plains pipes CO₂ over 200 miles to the Weyburn oil field in southeastern Saskatchewan. The market for CO₂-based EOR is still available in oil fields across the country, so the Mesaba Energy Project, by virtue of its advanced stage of development, may be poised to exploit some of the most economical oil recovery operations available to the benefit of Minnesota ratepayers.

2. Carbon Credits or Other Economic Benefits of CCS

Carbon credits or other economic benefits derived from CCS under other forms of potential carbon regulation also represent a potential economic driver for the Mesaba CCS development,

³ See Kinder Morgan CO₂, http://www.kindermorgan.com/about_us/about_us_kmp_co2.cfm.

with future regulation in the U.S. determining the final value of the Carbon Benefits generated by CCS undertaken by the Mesaba Energy Project.

D. CCS Approach

This CCS Plan analyzes the most promising initial approach for CCS from the Mesaba Energy Project under present circumstances, which would entail capture of 30% of the CO₂ generated by the power stations and would direct that captured CO₂ to EOR sites. This approach requires a longer pipeline than would direct sequestering of CO₂ in closer, non-EOR sites. Therefore, targeting EOR sites will require higher front-end costs than if Excelsior were to sequester carbon simply to meet carbon limits without providing CO₂ for EOR opportunities. EOR and future carbon credit markets may offset the higher costs associated with initially targeting EOR sequestration sites.

While the timetable for implementation of regulations governing the operation of a carbon-managed economy is unknown, Excelsior anticipates that it would have adequate time to implement the power station upgrades and construct a CO₂ pipeline.

Numerous in-depth studies exist describing the technological means to capture 90% of the carbon dioxide from an IGCC plant.⁴ Because of the real-time research and development efforts with respect to 90% capture, and the expected reductions in costs of this option as the technologies are demonstrated, Excelsior has not attempted to quantify the costs nor describe the technological approach in detail in this phase of the plan.

V. Currently Available Regional Sequestration Studies and Experience with CO₂ Pipelines

A. Regional Sequestration Studies

The EERC has extensively characterized three major types of sinks for carbon sequestration that are within the appropriate geographic proximity of the Mesaba Energy Project. The options are geological sequestration in oil fields (for enhanced oil recovery or storage only) or saline formations, and terrestrial sequestration (primarily using wetlands). Terrestrial sites are not suited to accommodate direct injection of CO₂ because such sites rely on changing the existing physical configuration of large areas of the earth's surface, rather than accepting the direct input of CO₂ at a stationary point. This CCS Plan focuses on geological sequestration, to which IGCC is uniquely suited.

Oil fields have proven to be CO₂ sinks with sufficient storage capacity to accommodate CCS projects equivalent to the long-term output of all six phases of the Mesaba Energy Project. Fields in the Permian Basin in western Texas have sequestered CO₂ for decades at scales even larger than those addressed in this CCS Plan.

⁴ For a summary of such studies, see the Oct. 10, 2006 testimony of Douglas H. Cortez, OAH Docket No. 12-2500-17260-2, MPUC Docket No. E-6472-/M-05-1993.

During Phase I of the PCOR project, the EERC conducted exhaustive bottom-up characterizations of the EOR potential for each field in the PCOR region.⁵ The EERC's methodology has produced reliable and conservative estimates of the CO₂ capacity for EOR in each field. This data forms the basis for the EOR-driven scenarios in the CCS Plan by the Mesaba Energy Project presented below. The economic benefits that could be achieved from EOR alone (that is, not including sales of carbon credits) are substantial. For example, the EERC projects that the total value of oil that could be recovered by EOR in North Dakota alone exceeds \$15 billion (at a price per barrel of \$59.50).⁶

Saline formations have the potential for still greater sequestration capacity than oil fields. The EERC's studies of the CO₂ sequestration capacity of the Broom Creek Formation in North Dakota have confirmed this observation.⁷

B. Experience with CO₂ Pipelines

Carbon dioxide suppliers, purchasers, and third parties that own existing CO₂ pipelines provide practical knowledge about how such pipelines operate. CO₂ pipelines are similar to natural gas pipelines, and they can transport CO₂ from its source to a sink. The primary difference between CO₂ and natural gas pipelines is that CO₂ pipelines require higher pressures (roughly 2,000 psi instead of 1,000 psi). Dedicated CO₂ pipelines are currently used for EOR in the Permian Basin and the Weyburn Oil Field. In the Kinder Morgan pipeline, which services the Permian Basin, 1 billion cubic feet per day of CO₂ is compressed from 800 to 2,000 psi and transported 500 miles.⁸ Applying this knowledge, IGCC power stations will dry and compress carbon dioxide and inject it into pipelines. Over long pipeline distances, booster stations will periodically recompress the CO₂.

VI. Scenarios to Be Further Investigated

This section evaluates five CCS configurations associated with the Mesaba Energy Project in an effort to give policymakers further information about potential CCS options. CCS based on EOR alone will be examined for the 30% capture configuration, across one to six Mesaba Energy Project units (each unit is assumed to have roughly 600 megawatts of capacity). As discussed in Section IV, the 90% capture configuration is not yet commercially available. Therefore, although this may change in time, Excelsior does not assume 90% capture for the purpose of generating the economics in this CCS Plan. As a simplifying baseline assumption, this CCS Plan further assumes that cost-sharing opportunities with other CO₂ sources will not be available.

⁵ See PCOR Partnership, *Plains CO₂ Reduction (PCOR) Partnership (Phase I) Final Report/July–September 2005 Quarterly Report*, January 2006, available at <http://gis.undeerc.org/website/PCORP/cdpdfs/FinalReport.pdf>.

⁶ EERC, Presentation, Potential Sequestration Options in the Plains CO₂ Reduction (PCOR) Partnership Region & Estimated Capacities, Aug. 9, 2006 (on file with Excelsior Energy).

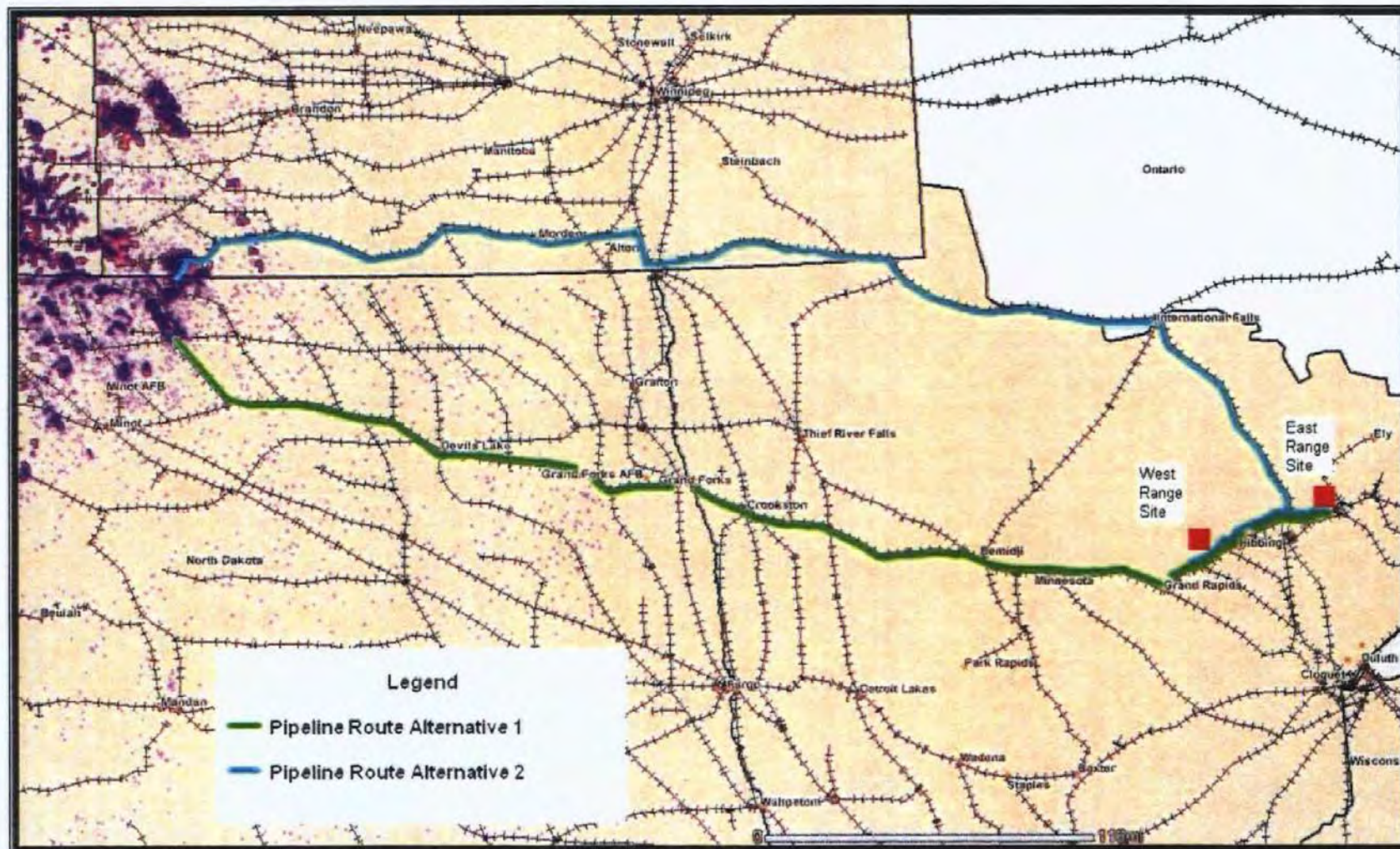
⁷ Testimony of Edward N. Steadman, Oct. 10, 2006, MPUC Docket No. E-6472/M-05-1993, OAH Docket No. 12-2500-17260-2.

⁸ Kinder Morgan, Cortez Pipeline and McElmo Dome, http://www.kindermorgan.com/business/co2/transport_cortez.cfm.

A. Scenario 1

For Scenario 1 and its alternatives, pipelines would be constructed between the three Mesaba Energy Project's Iron Range plant sites (each site containing two generating units) and a cluster of oil fields in north central North Dakota, the southwestern corner of Manitoba, and the southeastern corner of Saskatchewan. Many of these oil fields are either unitized or run by a single operator, which expedites the establishment of EOR in a field. (Unitization is a process by which field operators combine all oil and gas interests in a field into a single operation.) Non-unitized, multiple operator fields may take longer to set up EOR, so the readily available fields would be advantageous and the likely economic choice. For the main trunk pipeline connecting the plants and oil fields, two options for rights of way ("ROWs") are shown in Figure 1. The pipeline corridors in these scenarios follow existing rail ROWs only for the purpose of illustration – other potential corridors may exist.

Figure 1. Potential Pipeline Routes for the Mesaba Energy Project CO₂ Pipeline



Source: EERC

B. Scenario 1A

For the CO₂ captured at Mesaba One, a cluster of oil fields in north-central North Dakota and southwestern Manitoba are targeted, with preliminary expectations that such fields could accommodate EOR for 22 years. This duration, which is used throughout the analysis of the various scenarios, corresponds to that of the financial model and does not reflect cessation of capture. Following existing railroad track (for purposes of illustration) from the preferred West Range site, a 12-inch pipeline approximately 405 miles long could reach the first proposed oil field. Over the course of 22 years, an additional 40 miles of pipeline would be needed to connect to nearby fields. Two of the fields are unitized. The pipeline network needed to serve this scenario is shown in Figure 2.

Legend

— Mesaba One pipeline

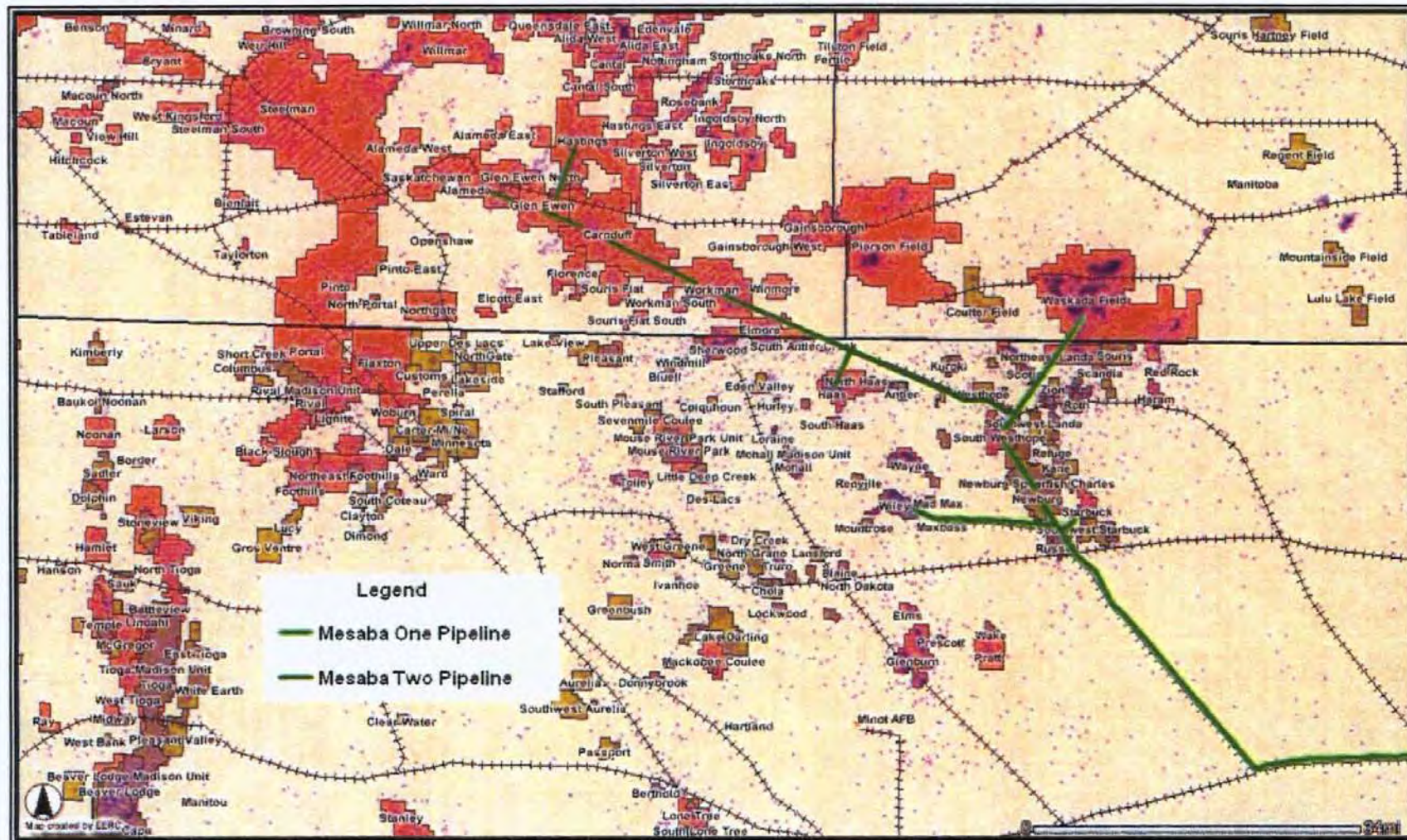
Map created by EPRC

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C. Scenario 1B

For Mesaba One and Two, the network of pipelines would expand to a chain of oil fields in southeastern Saskatchewan. To accommodate 22 years of EOR from both units, approximately 120 additional miles of pipeline would be added for a total system length of 525 miles. This length is inclusive of additions required for a single unit as described above, and such additions could be staged. To illustrate the economies of scale, it will be assumed that the trunk pipeline is sized to accommodate two units, such that looping (i.e., duplicating) the 405 mile base pipeline is not necessary. The pipeline network for this scenario is shown in Figure 3.

Figure 3. Extension of Western Terminus of Mesaba One Pipeline to Accommodate Mesaba Two



Source: EERC

D. Scenario 1C

For Mesaba Units One through Six, the pipeline network could reach much larger fields in Saskatchewan and North Dakota. The incremental pipeline additions for these units would include 85 new miles, for a total system length of 610 miles, as shown in Figure 4. While this scenario would be the most efficient and economical, the degree of uncertainty is too great to model even on a preliminary basis at this time. This scenario demonstrates that the potential for EOR present a CCS opportunity, and that a cost-shared pipeline accommodating multiple sources is a very promising means to defray the overall final costs of CCS.

The introduction of carbon credits or other benefits for reductions under mandated carbon constraints to these scenarios would improve the economics presented in the CCS Plan and would not otherwise intrinsically alter the ideal implementation of pipeline routes. Other sources may be induced to pursue EOR, but the relative cost competitiveness among those sources would not likely change.

Legend

- Mesabi One Pipeline
- Mesabi Two Pipeline
- Mesabi Three-Six Pipeline

Map created by CERCO

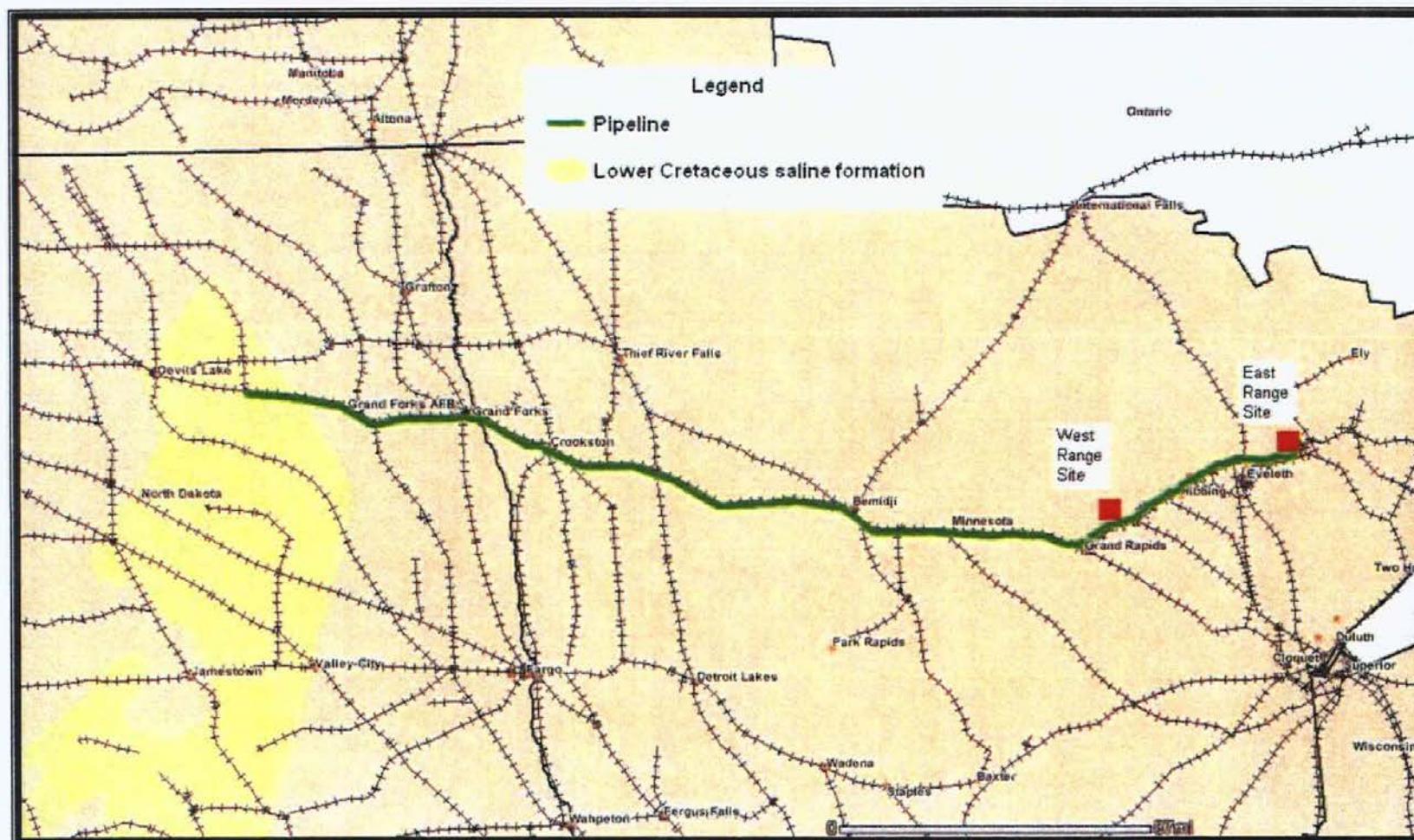
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E. Scenario 2

Scenario 2 considers CCS based solely on carbon credit revenues or other benefits of CCS under carbon constraints, with the Mesaba Energy Project as the only source. In this case, CO₂ would only need to be piped approximately 265 miles from the West Range site to the Lower Cretaceous saline formation in eastern North Dakota. Once again, existing right-of-way is shown for purposes of illustration. The EERC projects that the capacity of this saline formation dwarfs that of the oil fields considered in Scenario 1, so it is expected that the same pipeline route could serve all units at 30% or 90% capture.⁹ The route in Scenario 2 is shown in Figure 5.

⁹ EERC, Presentation, Potential Sequestration Options in the Plains CO₂ Reduction (PCOR) Partnership Region & Estimated Capacities, Aug. 9, 2006 (on file with Excelsior Energy).

Figure 5. CO₂ Pipeline to Saline Formations for Carbon Credits (No EOR)



Source: EERC

E. Scenario 3

As Scenario 1C begins to demonstrate, the economies of scale for CO₂ transport could be significant. In a fully implemented GHG regulatory scheme, it would be conceivable that the majority of large industrial facilities (epitomized by large electric generation facilities) would be capturing CO₂. The EERC's vision for a major pipeline system serving the PCOR region is laid out in Figure 6. As the map shows, the concentration of industry on the Iron Range makes it a likely route for a major artery of the CO₂ network.

Figure 6. EERC's Vision of CCS in a Carbon Managed Economy



Source: EERC

VII. Preliminary Economic Analysis

Excelsior used the Mesaba Energy Project's proprietary financial model to identify the breakeven value of CO₂ (in 2006\$ per ton) captured in the 30% approach for each scenario identified in Section VI. This modeling is preliminary in nature and is intended to i) illustrate economic dependencies around important CCS Plan variables rather than absolute costs and ii) determine whether a more thorough investigation is justified. All cases assumed that capital outlays associated with CCS occur in 2011, and that CO₂ capture commences in the third quarter of 2014 and continues for 22 years (through the duration of the financial model).

The financing structure and economic assumptions used in the modeling of these carbon capture scenarios are consistent with Excelsior's assumptions in its current financial model used to evaluate the Mesaba Energy Project. The cases are modeled to recover the costs associated with the CCS program and maintain the required return to the projects equity investors. The effects of the sensitivities shown below are displayed as changes in NPV from a base case and are calculated using an 8% discount rate. Estimates for the cost of 90% removal are not available, so

only 30% capture was modeled.

Fluor developed an estimate for the cost of the 30% capture configuration,¹⁰ and Excelsior integrated that estimate into the Mesaba Energy Project's financial model. There are two main economic impacts associated with carbon capture: equipment capital cost and reduced plant capacity, which also causes an increase in plant heat rate. The equipment includes the amine stripper and the CO₂ drier and compressor. Plant capacity is reduced and heat rate is increased because these processes are steam driven, and because the CO₂ would need to be replaced by steam as a diluent for NO_x control. In an attempt to determine if CCS can be accomplished without additional costs to utility ratepayers, the cost of fuel increase on a megawatt-hour (MWh) basis corresponding to the heat rate increase was attributed and charged to the CCS project in the model assumptions. Total capital cost additions are currently estimated to be [BEGIN TRADE SECRET: END TRADE SECRET] and the anticipated increased O&M costs for that equipment is [BEGIN TRADE SECRET: END TRADE SECRET]. The capacity reduction for the IGCC Power Station is currently estimated to be [BEGIN TRADE SECRET: END TRADE SECRET], with the increased heat rate expected to be [BEGIN TRADE SECRET: END TRADE SECRET].

As for pipeline cost estimates, the Dakota Gasification Project's ("DGP") CO₂ pipeline to the Weyburn oil field was used as the basis for estimating costs. The DGP pipeline was built for \$120 million in 1997, and consisted of 204 miles of nominal 12" and 14" Schedule 40 pipeline. Conservatively assuming it was all 12" pipeline and escalated to 2005 dollars, the total cost for a CO₂ pipeline in the Northern Plains is assumed to be \$60,920 per inch-mile. Based on the design capacity of the Weyburn pipeline, a nominal 12" Schedule 40 pipeline is sufficient to transport CO₂ produced by 30% capture at Mesaba One, with the Mesaba One and Two units requiring a 14" pipeline. A further conservative assumption utilized in the analysis is that the total pipeline network is built up front. Costs could be reduced by deferring network expansions to additional oil fields

Excelsior Energy modeled Scenarios 1A, 1B, and 2, and the results are presented in Table 2. For Scenarios 1A and 1B, revenues could be earned from both EOR and carbon credits sales (or through other carbon reduction benefits to ratepayers when constraints are imposed). This data illustrates that the economies of scale are important for CCS – the required price per ton drops significantly with larger volumes of CCS, despite the fact that 80 additional miles and an increased diameter for the pipeline would be necessary. Scenario 2 demonstrates that the Mesaba Energy Project could capture and sequester carbon at an even lower overall cost, although such capture could not reap EOR revenues. As explained above, these cost estimates are illustrative rather than predictive, and conclusions should be limited accordingly. The accuracy of these estimates must be refined by additional study before the economic viability of the project can be judged.

¹⁰ Fluor Enterprises, Inc., *Mesaba Energy Project Partial Carbon Dioxide Capture Case*, October 2006, attached as Exhibit DC __ (DC-7) to the Oct. 10, 2006 testimony of Douglas H. Cortez, OAH Docket No. 12-2500-17260-2, MPUC Docket No. E-6472-/M-05-1993.

Table 2. Cost of Captured CO₂

	EOR	Pipeline length	Total CCS Cost (\$/ton)
Scenario 1A	Yes	445 miles	\$40
Scenario 1B	Yes	525 miles	\$35
Scenario 2	No	265 miles	\$32

Due to the high degree of uncertainty in many of the important assumptions, Excelsior conducted a sensitivity analysis. Scenario 1A was used as the base case for this analysis, and the results are shown in Table 3. Pipeline costs represent the greatest source of uncertainty, both in terms of the uncertainty of the cost assumed and impact that assumption has on total project cost. It is crucial that the range of this cost be narrowed, and the engineering studies proposed in Section I would address these and other issues. While the effect of capacity loss is nearly as material to the analysis, there is greater modeling certainty in the assumed values.

Table 3. Sensitivity Analysis of CCS Costs

Factor	Case	Input Value Assumed	Required CO2 Value/Total CCS Cost
Pipeline Cost	Low	\$30,145/in-mi	\$30/ton CO ₂
	Base	\$60,290/in-mi	\$40/ton CO ₂
	High	\$90,435/in-mi	\$50/ton CO ₂
Plant Capital	Low	[BEGIN TRADE SECRET:]	END TRADE SECRET]
	Base	[BEGIN TRADE SECRET:]	END TRADE SECRET]
	High	[BEGIN TRADE SECRET:]	END TRADE SECRET]
Capacity/ Heat Rate	Low	[BEGIN TRADE SECRET:]	END TRADE SECRET]
	Base	[BEGIN TRADE SECRET:]	END TRADE SECRET]
	High	[BEGIN TRADE SECRET:]	END TRADE SECRET]
Plant O&M	Low	[BEGIN TRADE SECRET:]	END TRADE SECRET]
	Base	[BEGIN TRADE SECRET:]	END TRADE SECRET]
	High	[BEGIN TRADE SECRET:]	END TRADE SECRET]
Pipeline O&M	Low	\$890/mi-yr	\$40/ton CO ₂
	Base	\$1,780/mi-yr	\$40/ton CO ₂
	High	\$2,760/mi-yr	\$41/ton CO ₂

It is important to note that the greatest uncertainty surrounding the economics of a CCS project is revenue, as EOR depends upon volatile oil prices and carbon credit prices (or other economic benefits from reductions under carbon constraints) depend upon future regulation. However, such uncertainties are not specific to the Mesaba Energy Project and must be overcome by any major undertaking of CCS. The figures presented in the remainder of this section elaborate upon the modeled impact of CO₂ prices on the net present value of different scenarios in the CCS Plan.

Figure 7 shows the impact that the value of CO₂ has on project economics. This value for CO₂ is derived from either EOR or a combination of EOR and carbon credits or other CCS regulatory benefits, and corresponds to Scenario 1A with the baseline assumptions described above. Similarly, Figure 8 examines this impact if revenues are from carbon credits exclusively (that is, no EOR). CO₂ would be sequestered in saline formations, corresponding to Scenario 2. Thus, for Figure 8 the impact to the NPV is based on Scenario 2's \$32/ton case as the \$0 NPV reference.

Figure 7. Sensitivity to Changes in Total CO₂ Revenue (\$/ton CO₂) in Scenario 1A

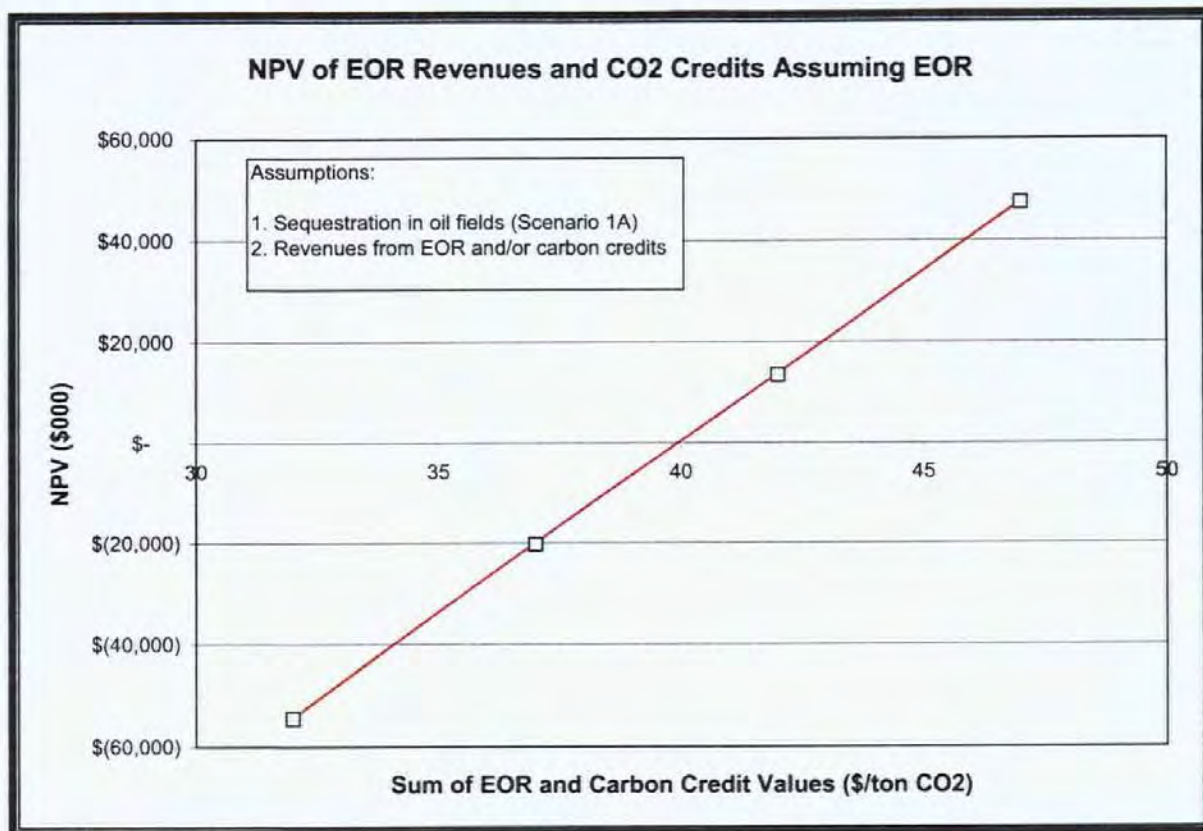
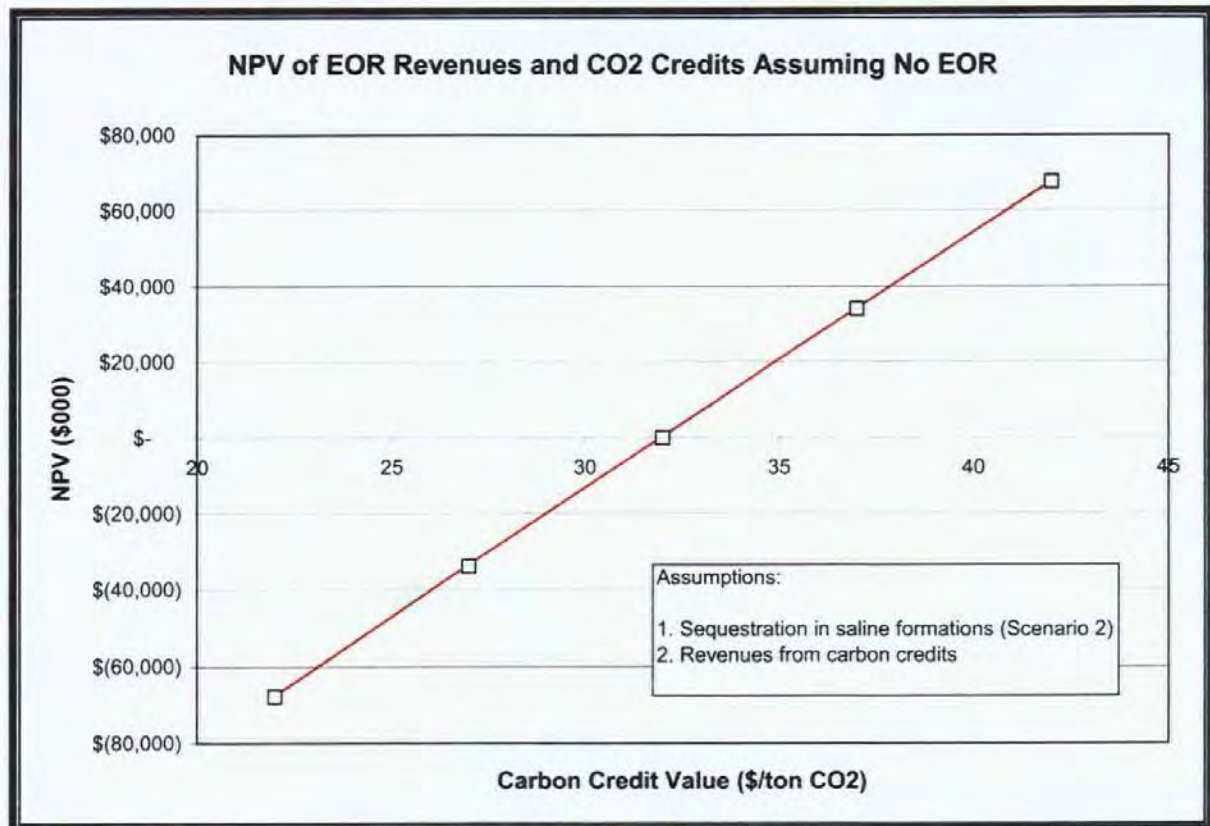
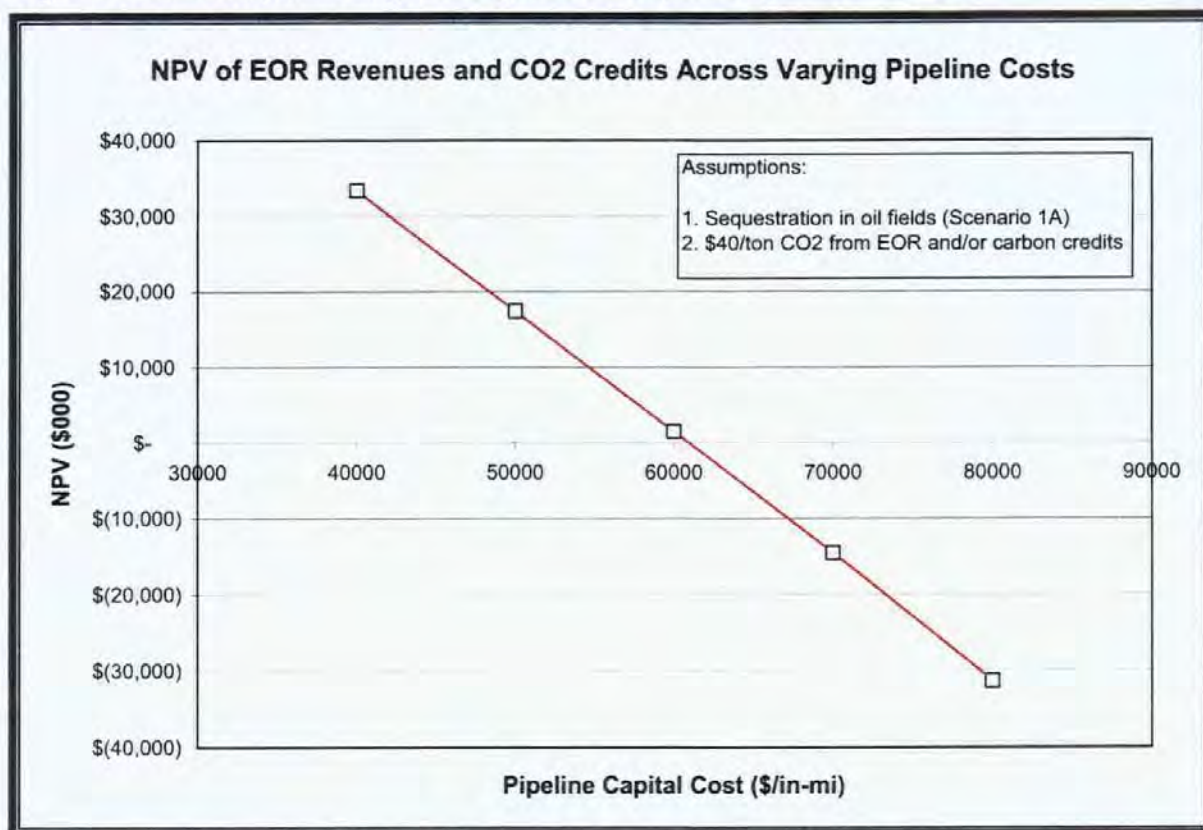


Figure 8. Sensitivity to Changes in Carbon Credit Revenue (\$/ton CO₂) in Scenario 2



Changes in the NPV of different scenarios in the CCS Plan due to changes in pipeline costs are shown in Figure 9. This figure assumes that the total value of CO₂ will average \$40/ton.

Figure 9. Sensitivity to Changes in Pipeline Costs (\$/in-mi) in Scenario 1A



Carbon credits are currently trading at approximately \$17/ton in Europe. The value of CO₂ for EOR is highly variable according to oil prices, specific field geology, and source competition. At oil prices of \$15–20/bbl, CO₂ can be worth \$10–16/ton for EOR, and more at higher prices of oil.¹¹ As carbon regulations are introduced and become stricter, and as the price of oil increases, the price of CO₂ can be expected to rise. Although it is premature to conclude whether CCS in any scenario presented here is economical, Excelsior believes that additional study towards that end is warranted.

The alternative sources of CO₂ for EOR in the fields identified in Scenario 1 are limited. The largest of these by far are conventional coal plants in the region, but post-combustion CO₂ capture for such sources has only been demonstrated at pilot scale. The cost per ton is expected to be higher for conventional coal than for the Mesaba Energy Project, even if a much shorter pipeline is assumed for the former. Ethanol plants and natural gas processing facilities are able to produce CO₂ at a much lower cost than conventional coal plants, but lack the capacity to saturate the EOR market. Fields along the pipeline built by the Dakota Gasification Project can

¹¹ Intergovernmental Panel on Climate Change, IPCC Special Report: Carbon Dioxide Capture and Storage, p. 33 (2005), available at http://arch.rivm.nl/env/int/ipcc/pages_media/SRCCS-final/ccsspm.pdf.

accommodate its supply for decades to come. Therefore, it is reasonable to expect that EOR revenues could be available to the Mesaba Energy Project across the time frames proposed.

Excelsior assumes that it will be positioned to obtain partial DOE cost sharing for construction of the CO₂ pipeline. However, irrespective of such funding potential, Excelsior believes it is in the interests of both the Mesaba Project and the State to better understand the economic drivers for CCS programs and the need to firm up equipment/construction costs at the plant, along the pipeline route, and at the oil fields. Detailed engineering studies conducted under carefully defined scopes of work will help refine such costs.

The EERC, in conjunction with Excelsior, will develop CO₂ management options for the Mesaba Energy Project based on evaluations of sequestration opportunities associated with regional geologic formations/features and nearby terrestrial features. The study will match carbon sinks to the Mesaba Project and rank the sinks according to engineering, economic, and public-acceptance considerations. The schedule calls for the EERC to complete an analysis of the identified CO₂ management options in December 2006. Excelsior will use the results of this analysis to narrow the scope of its Phase III proposal to the DOE for demonstrating the commercial readiness of carbon sequestration via IGCC.

In preparing the Phase III proposal, the EERC and Excelsior will formulate best practices required to accomplish sequestration of CO₂ from IGCC facilities and publish the results as part of a manual that can be used by others undertaking IGCC projects.

VIII. Summary and Conclusions

Excelsior has prepared this CCS Plan to offer the Commission and Minnesota ratepayers options to capture and sequester a significant portion of the CO₂ emissions from the Mesaba Energy Project. Based on the scientific and technical considerations, marketplace and operating assumptions, the financial analyses, and future carbon regulations assumed in this CCS Plan, Excelsior anticipates that future technical studies will verify that it will be feasible to capture and sequester CO₂ emissions from the Mesaba Energy Project. As explained in the CCS Plan, the most promising CCS scenario is for Excelsior to transport its CO₂ via high-pressure pipelines to the depleted oil fields associated in the Williston Basin located in North Dakota, southwestern Manitoba, and southeastern Saskatchewan.

This CCS Plan reflects the work undertaken to date by Excelsior and the PCOR initiative. Significant work remains to refine the engineering and economic information it contains. This work will be advanced by the PCOR initiative. Excelsior will continue to update this information as its work with PCOR progresses. Excelsior would be amenable to exploring a commitment with the Commission to apply the final \$2 million of its RDF award to further efforts to refine this plan. If feasible from the Commission's perspective, Excelsior would propose to accelerate the funding of that amount in order to facilitate a more rapid completion of a detailed engineering plan and cost proposal for CCS. Excelsior anticipates that such a detailed plan could be developed within a year from the date such funding is made available. The CCS Plan could also serve as the foundation for a competitive proposal in response to the Department of Energy's ("DOE") planned Phase III solicitation for demonstrating full scale CCS projects. Accelerating development of a very detailed plan would enhance Minnesota and the Mesaba

Project's prospects to obtain federal matching funds under DOE programs.

It is in the long-term interests of the State to proceed expeditiously with the development of feasible CCS options. Excelsior looks forward to working with regulators, stakeholders, and industry participants to provide the important hedge to Minnesota consumers offered by the timely development of carbon capture and sequestration.