



September 23, 2022

The Honorable Joe Manchin
Chairman, U.S. Senate Committee on Energy and Natural Resources
306 Hart Senate Office Building
Washington, D.C. 20515

Dear Chairman Manchin:

The Energy Equipment and Infrastructure Alliance (EEIA) expresses our strong support for the Energy Independence and Security Act of 2022 (EISA) and applauds your work to remove barriers and unnecessary delays in the permitting of critical energy infrastructure. We urge you and your Senate colleagues to ensure that this initiative remains included in the forthcoming Continuing Resolution and is enacted into law.

EEIA represents the energy infrastructure supply chain: companies and workers that build and provide equipment, supplies and services to energy infrastructure projects including pipelines and upstream, midstream and downstream facilities for production, processing, transport, storage and export of natural gas, petroleum and carbon dioxide (CO₂). The projects our industries build and operate are essential to America's energy security, standard of living and orderly transition to lower carbon emissions.

America's vast energy wealth is stranded. Its potential to lower Americans' exorbitant energy costs, lower global carbon emissions, and save our allies from dependence on Russian natural gas is effectively blocked by inadequate pipeline capacity. This results directly from a permitting system whose flaws and ambiguities are exploited by opponents to make investments in midstream infrastructure prohibitively risky and uncertain. EISA will prevent many of those abuses.

Permitting reform is especially important today. Without the addition of substantial new midstream infrastructure capacity, America's producers cannot supply enough natural gas to American LNG export facilities to replace our allies' loss of Russian natural gas as well as provide Asian economies with the ability to substitute our gas for higher-carbon fuels that threaten to significantly worsen climate change if current projections become reality.

While current export volumes can generally be met by production from southern shale basins, substantial new volumes to supply a potential doubling or more of exports will require major additions to capacity out of the Appalachian Basin. The Marcellus-Utica shales, with tremendous potential for output growth, are effectively constrained to today's production rates because existing transport capacity is at its limit. Opponents of permitting reform support that status quo.

A second compelling need for EISA reforms is driven by the rapid advance of carbon capture and sequestration (CCS), which is an important objective of the recently enacted Inflation Reduction Act. Implementation of CCS at scale will require tens of thousands of miles of new CO₂ pipelines, most of which will be subject to the permitting requirements of NEPA and the Clean Water Act.

One such system, now under development by Summit Carbon Solutions, will collect twelve million tons of CO₂ annually from thirty-two ethanol refineries in the Corn Belt, and transport it to permanent underground storage via a 2,000-mile pipeline system through Iowa, Nebraska, Minnesota, South Dakota and North Dakota. Without this new system, that CO₂ will continue to be vented into the atmosphere. Reforms to NEPA and CWA permitting will help accelerate bringing this system into operation. Many other CCS systems, including those serving power generation and manufacturing, will also depend on a rational, efficient and timely permitting process.

For these reasons, we applaud and support your initiative, as embodied in EISA, to enact much-needed reform in energy infrastructure permitting and unleash our country's vast potential to enhance America's and our allies' energy security, lower Americans' energy costs, and enable further reduction of carbon emissions here and abroad. We stand ready to assist and support you and your Senate colleagues in this effort.

Very respectfully,

A handwritten signature in black ink, appearing to read "Toby Mack". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Toby Mack, President & CEO
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cc: Honorable Charles E. Schumer, Senate Majority Leader
Members of the United States Senate

//Delivered electronically