19. Technological issues related to carbon capture are not the only reason Colstrip would be unable to rely on the CCS pathway to comply with the Final Rule. Even if 90% of CO_2 could be captured by 2032, it would need to be transported for storage and stored. Sequestration sites have not been adequately demonstrated in the vicinity of Colstrip and would require additional time, exploration, and significant cost to complete, in addition to the costs associated with transportation of the CO_2. Colstrip, located in eastern Montana, is not near to any developed CO_2 sequestration sites. It is not known whether the geological formations necessary for CO_2 sequestration exist in the vicinity of Colstrip, and additional drilling and exploration would be required to determine this. Further, no pipeline currently exists to carry captured CO_2 from Colstrip to a storage location.

20. In fact, a study referenced in the proposed Rule reports that the costs of transportation and storage for the purposes of CCS are much higher in Montana's Powder River Basin than in other states. CO_2 pipeline transportation and storage cost in 2018 was $22/tonne for the Powder River Basin. The other basins in the study were Illinois ($10/tonne), East Texas ($11/tonne) and Williston ($15/tonne).

21. On top of these prohibitive costs, there are a number of other challenges associated with evaluating, permitting, siting, designing, and constructing such a CO_2 pipeline. Permits and easements would need to be acquired. It is unlikely such a pipeline could be constructed and operational prior to the compliance date required by the Final Rule.