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Submitted via Ecology's online comment platform

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Washington State Department of Ecology
Cap-and-Invest Carbon Management Team
Air Quality Program
CCA_carboncapture@ecy.wa.gov

Re: Comments of The Williams Companies, Inc. on Engineered Carbon Management (Carbon Capture, Utilization, Removal, and Storage) in the Cap-and-Invest Program

Dear Cap-and-Invest Carbon Management Team:

The Williams Companies, Inc. ("Williams") is pleased to provide this written response to the Washington Department of Ecology's ("Ecology") request for feedback on how engineered carbon management, including carbon capture, utilization, and storage ("CCUS") and technology-based carbon dioxide removal, should be incorporated into the Cap-and-Invest Program. Williams owns and operates more than 33,000 miles of natural gas pipelines nationwide, including Northwest Pipeline, which runs through the State of Washington, and handles approximately one-third of the nation's natural gas. Williams' assets span 24 states across the Gulf Coast, Rockies, Pacific Northwest, Appalachia, and Eastern Seaboard, and include 34 natural gas processing facilities, approximately 417 billion cubic feet of natural gas storage capacity, and operations in 12 of the top U.S. supply basins. For more than a century, Williams has provided infrastructure essential to a prospering economy.

Williams also has direct and growing experience in carbon management. Through its New Energy Ventures group and Upstream Group, Williams develops next-generation low-carbon solutions, including carbon capture, utilization and sequestration, solar and battery storage, renewable natural gas, and independently verified and certified NextGen Gas. Building on its core operations, Williams is also actively exploring the decarbonization of its own assets, such as its processing facilities and compressor stations. Since 2019, Williams has decreased our greenhouse gas ("GHG") intensity by 21%, demonstrating a dedication and strong ability to deliver natural gas with increasing efficiency as we grow.

Williams' carbon capture and storage work includes legacy operations on pre-combustion CO₂ as well as recent efforts with the Echo Springs CarbonSAFE project in south-central Wyoming, a carbon storage complex feasibility study conducted by the University of Wyoming School of Energy Resources in partnership with Williams under the U.S. Department of Energy's CarbonSAFE program and supported by a Wyoming Energy Authority grant. Williams is also a sub-recipient of DOE funding on the Lingleaf CCS Hub where we are conducting feasibility of capture on a compressor station in Alabama. In addition, through its Corporate Venture Capital program, Williams has also invested in carbon-capture technology developer ION Clean Energy. These experiences inform the comments below.

Williams supports Ecology's multi-year effort to provide clarity on carbon management and offers these comments in a constructive and proactive spirit. Williams is actively engaged in Washington state, is a participant in the Climate Commitment Act ("CCA") credit auctions, and has coordinated with other stakeholders in the CCUS space, including Puget Sound Energy and Northwest Natural. The comments below are organized to align with the three feedback areas Ecology identified in its request for comments.

I. Carbon Management Within the Cap-and-Invest Program (Feedback Area 1; Questions 1–3)

Both near-term and long-term solutions are needed to incentivize carbon management, and the program should be designed to encourage and not constrain the full range of viable pathways. Carbon management is not a single technology but a spectrum of capture, transport, utilization, and storage options that vary by facility, geology, and market. To reflect that reality, Williams recommends that Ecology:

- **Recognize multiple points and methods of capture.** Capture can occur at natural gas processing and treatment plants, compressor stations, and customer facilities. The program should accommodate capture across these varied sources rather than prioritizing or indicating a preference towards any single configuration.
- **Allow near-term utilization while long-term storage matures and define "utilization" broadly.** Ecology should permit short-term utilization of captured carbon under the program so that near-term projects can advance while permanent geologic storage capacity develops. Near-term utilization should include sustainable aviation fuel production, building materials and aggregates, food and beverage applications, and other industrial uses.
- **Allow out-of-state transport and sequestration.** Carbon dioxide is a globally mixed greenhouse gas: a ton of CO₂ permanently and verifiably sequestered yields the same atmospheric and climate benefit regardless of where storage occurs. The location of sequestration therefore has no bearing on the program's core climate objective, and Ecology should not condition crediting on in-state storage, particularly because the emission reduction itself, and the associated capture activity, occur at a facility located within

Washington. An in-state-only restriction would secure no additional climate benefit while imposing a concrete near-term cost because in-state sequestration capacity is still developing. Otherwise-viable Washington capture projects could stall waiting for in-state storage that does not yet exist. Ecology should therefore expressly allow captured CO₂ to be transported and sequestered out of state, subject to the consistent, verifiable carbon accounting described in Section III.

- **Recognize a wide range of mineralization and geologic storage options.** Ecology should not focus narrowly on basalt mineralization. A range of geologic storage and mineralization approaches may be viable depending on site geology.
- **Adopt technology-neutral, performance-based criteria.** Crediting carbon management based on measured, verified performance rather than prescriptive technology mandates will encourage innovation and allow the program to incorporate new pathways as they mature.

A restrictive program that recognizes only a narrow set of pathways will dampen carbon-management investment and forgo viable near-term projects, while a flexible, options-based program will attract the projects that build momentum toward Washington's climate goals.

II. Carbon Management in Washington (Feedback Area 2; Questions 4–6)

Two of the major challenges for carbon management in Washington are the cost of capturing carbon and the limited availability of in-state sequestration locations. To address these barriers, Williams recommends that Ecology make meaningful program funding available to help offset the significant costs across all aspects of carbon-management projects, including funding for:

- Carbon capture projects at hard-to-decarbonize facilities, regardless of how the captured carbon is ultimately managed; and
- CO₂ pipelines and the aggregation and transport infrastructure needed to move captured carbon to sequestration, including, where appropriate, sequestration located in other states.

Funding support matters. Public funding has been instrumental in advancing early-stage carbon-management projects. Williams' Echo Springs feasibility work, for example, has been supported by both a Wyoming Energy Authority grant and the U.S. Department of Energy's CarbonSAFE program. Access to stable program funding, such as that envisioned through the CCA's cap-and-invest proceeds, can similarly catalyze near- and long-term projects in Washington and reduce the risk that promising projects stall for lack of capital.

Communities and Tribes (Question 6 & Questions 12 and 13). Potential impacts on communities and Tribes are best addressed by identifying and mitigating those risks proactively, before a project is built and placed into operation. Williams has a long history of engaging directly with community leaders, residents, and Tribes from the earliest stages of project planning to understand local priorities, identify concerns, and resolve as many of those concerns as possible in project siting and design. This early, sustained engagement is how potential impacts on communities, including environmental-justice communities, are surfaced and addressed before

they materialize, and Ecology can look to engagement of this kind as it shapes expectations for carbon-management projects in Washington. Williams applies established techniques such as:

- Formal and informal Tribal and cultural-resource consultation and coordination with the relevant State Historic Preservation Office, which surfaces concerns early and folds them into project design;
- Community engagement opportunities such as open houses and town halls that allow face-to-face interaction with the community to hear concerns, share more information about the project, and build local relationships;
- Cultural and natural resource reviews and field surveys (where appropriate) to identify and avoid sensitive areas during the siting process and before construction begins; and
- Cultural-resource and environmental monitoring during construction, with qualified cultural-resource monitors and environmental inspectors on the ground to enforce mitigation commitments as the project is built.

For Williams, these infrastructure investments represent a long-term commitment to the communities that host them. Williams will be a neighbor in these communities for decades, and that is precisely why it is so important that Williams come to know the community, and that the community come to know Williams, from a project's earliest planning through its operating life.

III. Implementation of the CCA Program Rule (Feedback Area 3; Questions 7–11)

Williams' overarching recommendation is that Ecology preserve and give full effect to the existing carbon sequestration emissions exemption (WAC 173-446-040): entities that capture and sequester carbon should retain the exemption for that carbon, and program funding should be available to help offset carbon-management costs regardless of whether the carbon is ultimately sequestered.

Permanent sequestration definition (WAC 173-407-110; Questions 7-8). Williams encourages Ecology to adopt a durable but flexible, performance-based standard for permanent sequestration. Geologic sequestration in appropriately characterized formations, including deep saline formations, can achieve and demonstrate the substantially 99% containment over 1,000 years that the definition contemplates, provided permanence is established through rigorous, site-specific subsurface characterization, modeling, and monitoring rather than through prescriptive, one-size-fits-all criteria. To avoid foreclosing viable pathways, Ecology should evaluate permanence on a performance basis and should not limit qualifying sequestration to any single geology or technology, leaving room for mineralization and other approaches as the science develops.

The definition can create a barrier, however, if read to limit the exemption to permanently sequestered CO₂, because that reading would exclude the near-term utilization pathways discussed in Section I. CO₂ that is beneficially used rather than vented advances the same climate objective, yet may not be retained for 1,000 years and so may not qualify. Denying utilization any exemption or credit would discourage the very near-term uses that build momentum while storage capacity

matures, undermining the program's goal of encouraging use of CO₂ over its release. Ecology should clarify how utilized CO₂ is treated and provide an appropriate crediting or accounting pathway for qualifying utilization, using transparent, lifecycle-based accounting.

Models and frameworks for implementation (Questions 9–11). As Ecology implements the carbon sequestration emissions exemption and refines the definition of permanent sequestration, Williams recommends that Ecology:

- Collaborate with the Environmental Council of the States (ECOS) and the Interstate Oil and Gas Compact Commission (IOGCC). Several states already have advanced carbon sequestration programs and Class VI primacy; consulting these sister agencies will help Ecology adopt program elements that work and avoid requirements that create barriers;
- Look to the [model statutory framework](#) and guidance document for geologic storage of carbon published by the IOGCC in 2025 as a useful set of examples; and
- Build monitoring, verification, financial-assurance, and reversal requirements on established federal and industry frameworks rather than a parallel regime, keeping them performance- and risk-based so they protect the State without imposing costs or liabilities that deter investment, and apply consistent, non-duplicative accounting aligned with federal methodologies to avoid double-counting across jurisdictions.

IV. Conclusion

The thread running through these comments is that a flexible, technology-neutral, performance-based program will advance Washington's climate goals more effectively than a narrow or prescriptive one. Flexibility and durability reinforce each other: a program that recognizes the full range of capture, transport, utilization, and storage pathways, credits measured performance rather than mandating a single technology, and allows near-term utilization and out-of-state sequestration while permanent storage matures is also the program most likely to attract the long-lead, capital-intensive investment carbon management requires. Because that capital is committed over decades, Williams urges Ecology to design for durability and predictability, minimizing the regulatory uncertainty that deters investment and building it through continued collaboration with state and federal agencies, Tribes, and the IOGCC and ECOS. That combination of durability, predictability, and flexibility is what will give developers the confidence to commit capital in Washington. Williams welcomes the opportunity to serve as a resource and would be glad to meet with Ecology staff to discuss these comments in greater detail.

Respectfully submitted,



Taylor James

Vice President, Western Interstates & Storage
The Williams Companies, Inc.