# Natural Gas Gathering and Transmission Pipelines and Social Vulnerability in the United States

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#### Abstract

Midstream oil and gas infrastructure comprises vast networks of gathering and transmission pipelines that connect upstream extraction to downstream consumption. In the United States (US), public policies and corporate decisions have prompted a wave of proposals for new gathering and transmission pipelines in recent years, raising the question: Who bears the burdens associated with existing pipeline infrastructure in the US? With this in mind, we examined the density of natural gas gathering and transmission pipelines in the US together with county-level data on social vulnerability. For the 2,261 US counties containing natural gas pipelines, we found a positive correlation between county-level pipeline density and an index of social vulnerability. In general, counties with more socially vulnerable populations have significantly higher pipeline densities than with less socially vulnerable populations. In particular, counties in the top quartile of social vulnerability. The difference grows larger for counties at the upper extremes of pipeline density within each group. We discuss some of the implications for Indigenous communities and others affected by recent expansions of oil and gas infrastructure. We offer recommendations aimed at improving ways in which decision-makers identify and address the societal impacts and environmental justice implications of midstream pipeline infrastructure.

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# 12 Abstract

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- 28 makers identify and address the societal impacts and environmental justice implications of
- 29 midstream pipeline infrastructure.
- 30
- 31 Keywords: Environmental Justice, Energy, Infrastructure, Indigenous Peoples, Complex Systems

### 32 Plain Language Summary

33 Recent years have seen a wave of oil and gas development in the United States (US) and elsewhere. Research on human health and other societal impacts of oil and gas focuses mainly 34 35 on upstream activities, including hydraulic fracturing, and on downstream activities, including 36 refining and electricity production. Gathering and transmission pipelines, which connect 37 upstream and downstream parts of the supply chain, also have negative impacts but receive less 38 attention than other areas. No prior research has determined whether negative impacts of 39 gathering and transmission pipelines fall equitably across society. We analyzed publicly-40 available datasets and found that the existing network of natural gas pipelines in the US is concentrated more heavily in counties where people experience high levels of social 41 vulnerability than in counties where social vulnerability is low. These results have implications 42 43 for environmental justice, which is concerned, in part, with how environmental burdens are 44 distributed throughout society. We highlight some of the burdens faced by Indigenous peoples and others who are impacted by ongoing pipeline development. Our work reiterates a need for 45 46 researchers and decision-makers to look closely at these impacts, especially in light of 47 environmental justice policy, to understand the broader societal costs of oil and gas 48 infrastructure.

### 49 Introduction

50 Energy policy in the United States (US) shifted in recent years from a focus on energy 51 independence toward so-called energy dominance (The White House, 2019). The policy shift 52 coincided with major investments in pipelines and other infrastructure to support ongoing 53 extraction and consumption of oil and gas (US Energy Information Administration, 2019). Even 54 as US policy begins to shift away from fossil fuels, analysts within the federal government 55 project that oil and gas will continue to supply most of the energy consumed in the US for 56 decades to come (US Energy Information Administration, 2021). The expansion of oil and gas 57 infrastructure to support high levels of consumption will increase greenhouse gas emissions 58 (Kalen & Hsu, 2020; Pascaris & Pearce, 2020), and climate change associated with these 59 emissions will have long-term implications for the health of people and ecosystems worldwide 60 (IPCC, 2018).

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Besides the indirect impacts associated with climate change, oil and gas infrastructure poses
direct risks to nearby communities. At both upstream and downstream ends of oil and gas
supply chains, communities experience environmental degradation and incur a wide range of
health and safety risks associated with phenomena such as hydraulic fracturing, directional
drilling, worker encampments (i.e., "man camps"), refining, electricity production, and more
(Bullard, 2018; Colborn et al., 2014; Davies, 2019; Kroepsch et al., 2019; Olmstead et al., 2013;
O'Rourke & Connolly, 2003; Rahm et al., 2015; Whyte, 2017).

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In comparison to upstream and downstream regions of oil and gas supply chains, the middle sections have received less attention from researchers who study environmental and societal impacts of oil and gas. So-called midstream infrastructure includes vast networks of gathering and transmission pipelines, pumps, compressors, and storage facilities that link production areas upstream to downstream oil and gas processing and consumption sites. In the case of

unconventional natural gas, which includes shale gas and coal bed methane, a review by Buse et
al. (2019) highlights the research gap, especially as it pertains to socioeconomic and health
impacts associated with midstream infrastructure. Strube et al. (2021) summarize a few of these
impacts, including spills, explosions, and landslides, but the authors emphasize the difficulty in
assessing risks due to confidentiality and security concerns that limit the public availability of
data about pipelines.

81

82 The recent boom in unconventional oil and gas extraction from shale plays in the US (US Energy 83 Information Administration, 2019; Vengosh et al., 2014) has been accompanied by a wave of 84 proposals for major gathering and transmission pipelines to transport oil and gas to downstream 85 consumers (Strube et al., 2021; Wang & Krupnick, 2015; Waxman et al., 2020). Some of these 86 pipelines have already been built and put into service (e.g., Dakota Access Pipeline). Others are still in planning or construction phases (e.g., Mountain Valley and Keystone XL Pipelines). A 87 88 small number have been cancelled altogether (e.g., Atlantic Coast and Northern Gateway 89 Pipelines).

90

The pace of US pipeline development signals an urgent need for research about health, 91 92 socioeconomic, and other impacts associated with pipelines and other midstream infrastructure. 93 In particular, there is a pressing need to understand the extent to which large-scale (e.g., regional 94 or national) distribution of midstream pipelines may create or exacerbate societal inequities in 95 environmental degradation, exposure to health risks, and other harms. Although individual 96 pipeline projects can place disproportionately high and adverse burdens on racially marginalized 97 and low-wealth communities relative to reference populations in the regions surrounding these 98 projects (e.g., Emanuel, 2017; Emanuel & Wilkins, 2020; Whyte, 2017; Wraight et al., 2018),

99 there is no research on social inequities associated with the geographic distribution of networks100 comprising many different pipeline projects.

101

102 Inequities in the siting of harmful or polluting infrastructure spurred the modern environmental 103 justice (EJ) movement and led to the development of EJ policies in the US. The US Environmental Protection Agency defines EJ as the fair treatment and meaningful involvement 104 105 of all people in the environmental decision-making process (US Environmental Protection 106 Agency, 2014). Environmental justice policies in the US aspire to identify disparities in the distribution of environmental burdens and amenities, to address the disparate impacts in various 107 ways, and to remove barriers to participation in environmental decision-making by marginalized 108 109 peoples (Bullard, 1993, 2018; Emanuel, 2017; Holifield et al., 2017; Johnson, 2019; Mohai et al., 110 2009; National Environmental Justice Advisory Council, 2000; Schlosberg & Collins, 2014; 111 Whyte, 2011). Agencies within the US government are required by federal executive order to evaluate potential disparities and EJ implications of their regulatory actions, including the 112 113 authorization of new pipeline projects. However, there has never been an effort to examine EJ implications of the larger networks to which individual pipeline projects typically belong. The 114 practice of evaluating EJ on a pipeline-by-pipeline basis makes it difficult to determine whether a 115 116 new pipeline could exacerbate or alleviate network-wide disparities in the distribution of 117 environmental and public health impacts. By considering the EJ implications of an entire pipeline network, decision-makers, researchers, and others can gain a fuller understanding of the 118 societal impacts of oil and gas flowing through the network. 119

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121 To this end, we examined the US natural gas gathering and transmission pipeline network to 122 determine whether the network as a whole raises system-wide concerns about EJ. Specifically, 123 we compared the density of natural gas gathering and transmission pipelines to social 124 vulnerability on a county-by-county basis for all pipeline-containing counties in the US. Social 125 vulnerability is an integrated measure of a community's capacity to prepare for, deal with, and recover from pollution, natural disasters, and other hazards (Chakraborty et al., 2020; Flanagan 126 127 et al., 2018). It takes into account demographic details about a community (e.g., racial 128 composition, age distribution) and other socioeconomic information (Flanagan et al., 2018). Thus, it is a relevant index for evaluating societal disparities in the siting of hazardous or 129 polluting infrastructure. 130

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132 Geospatial indices of social vulnerability are already used to study societal disparities related to 133 healthcare, flood risk, and other areas (e.g., Flanagan et al., 2018; Saia et al., 2020). For EJ evaluations of pipeline networks, such indices can shed light on a community's ability to cope 134 with risks and threats associated with spills and leaks, explosions, structural failures, 135 construction impacts, and other factors. Finley-Brook et al. (2018) discuss some of these factors 136 in greater detail, but here we note that between 2001 and 2020, federal safety regulators 137 138 documented a total of 36 fatalities, 164 injuries, and approximately \$2.5 billion in costs associated with industry-reported incidents from natural gas gathering and transmission pipelines 139 in the US (US Department of Transportation, 2021). These costs include property damage as 140 141 well as the value of natural gas lost to the atmosphere during incidents. Notably, the costs do not 142 account for the climate implications of methane emissions during incidents, which contribute 143 disproportionately to the greenhouse gas footprint of natural gas supply chains (Brandt et al.,

144 2014; Pandey et al., 2019). Risks of leaks and other incidents increase as these pipelines age145 (Alzbutas et al., 2014; Hendrick et al., 2016).

146

147 Pipelines concentrated in areas of high social vulnerability raise EJ concerns associated with the 148 inequitable distribution of hazards resulting from energy infrastructure. Specifically, the concentration of pipelines in these areas suggests that environmental, health, and other burdens 149 150 are should ered, disproportionately, by communities that have an already limited capacity to carry 151 such loads. After examining the US natural gas gathering and transmission pipeline network, we 152 discuss the implications for marginalized communities targeted by major pipelines in recent years. We then discuss the relevance of these findings for EJ policy and offer recommendations 153 154 to scientists and decision-makers.

155

# 156 Methods

We acquired geospatial data from two different sources. First, we downloaded the social 157 158 vulnerability index (SVI) for 3,142 US counties and county-level equivalents (hereafter counties) in shapefile format from the US Centers for Disease Control and Prevention (CDC) website 159 (http://svi.cdc.gov). The CDC describes SVI as an index to estimate the potential for external 160 161 factors to impact a community's ability to deal with human suffering and financial loss. The 162 index ranges from 0 (least vulnerable) to 1 (most vulnerable), and it has a uniform distribution among US counties. The uniform distribution is an important property that allowed us to create 163 similarly-sized bins of SVI at a later stage in the analysis. We used SVI for 2018, the most recent 164 165 year of data availability when we conducted the analysis.

167 Next, we acquired geospatial data for the US natural gas gathering and transmission pipeline

168 network. We downloaded these data as a polyline shapefile from the US Energy Information

169 Administration (EIA), using a version last updated in January 2020

170 (<u>https://www.eia.gov/maps/layer\_info-m.php</u>). The shapefile contains information on

approximately 370,000 km of interstate and intra-state pipelines, and, according to the embedded

172 metadata, is compiled from data submitted to federal regulators and information gleaned from

173 industry websites and press. The US has approximately 515,000 km of natural gas gathering and

transmission pipelines overall (U.S. Department of Transportation, 2020), which means that

175 more than 25% of the network is absent from the EIA shapefile. Nevertheless, this file represents

176 the most comprehensive US natural gas pipeline dataset currently available to the public.

177

We processed social vulnerability and pipeline datasets using ArcGIS (Redlands, CA). First, we overlaid the pipeline shapefile on an equal-area projected map of US counties. We then used the "Intersect" function to divide the pipeline shapefile into segments within individual counties. Next, we computed pipeline segment lengths (km) by applying the "Calculate Geometry" function to the resulting attribute table. After computing segment lengths, we used the "Spatial Join" function to combine the pipeline and county layers into a data table, modifying the function's merge rules to compute the sum of pipeline segment lengths for each county.

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186 Counties that contained no pipeline segments (881 of 3,142, or 28% of US counties) are visible 187 on the map in Figure 1 but excluded from further analysis. Similarly, pipeline segments located 188 in open water (e.g., the Gulf of Mexico) are visible in Figure 1 but excluded from further 189 analysis. We computed the density of natural gas gathering and transmission pipelines,  $\rho_{NG}$ , as

pipeline km per 100 km<sup>2</sup> of land area. The unit conversion places most density values in the
whole number range, thus improving readability. The conversion has no effect on statistical
analyses or conclusions.

193

194 The preceding ArcGIS operations yielded an attribute table that contained the following 195 information for each of the 2,261 US counties with natural gas pipelines: total length of pipeline 196 segments (km), total land area (km<sup>2</sup>), SVI,  $\rho_{NG}$ , and the Federal Information Processing Standard 197 (FIPS) code. The FIPS code uniquely identifies each county and the state in which it is located. 198 We exported the attribute table as a tab-delimited text file for statistical analysis using Matlab 199 (Natick, MA).

200

We used Matlab's statistics toolbox to test differences in means, medians, and cumulative 201 distributions, and we report p-values from the 2-sample T-test, Wilcoxon Rank-Sum test, and 2-202 203 sample Kolmogorov-Smirnov test, respectively. We also used the toolbox to compute Pearson's correlation coefficient and accompanying p-value. Finally, we used Matlab to bin counties by 204 205 SVI decile in order to select an envelope of counties for further scrutiny if they exceed thresholds of  $\rho_{NG}$  within their respective bins. For exceedance thresholds, we used the 75<sup>th</sup>, 90<sup>th</sup>, 95<sup>th</sup>, and 206 207 97.5<sup>th</sup> percentile of counties within each SVI-decile bin. Bins were similarly-sized, each 208 containing between 200 and 245 counties, and the number of counties in each bin varied 209 independently of SVI values.

210

A few caveats apply to the datasets. No counties in Hawaii and only one county in Alaskacontained any gathering or transmission pipelines in the EIA shapefile. Thus, the results apply

213 mainly to the 48 contiguous states. Also, the CDC did not compute 2018 SVI for one county

214 (Rio Arriba, NM) due to a US Census data collection error (<u>https://www.census.gov/programs-</u>

215 <u>surveys/acs/technical-documentation/errata/125.html</u>). The county, which contained 56 km of

216 pipelines, was excluded from analyses involving SVI. Finally, we analyzed the existing natural

217 gas pipeline network in 2020. We caution against direct comparison of our results and

conclusions with recent work by Strube et al. (2021), which analyzes a sample of proposed newgas transmission pipelines.

220

# 221 Results

222 The US natural gas gathering and transmission network comprises approximately 515,000 km of gathering and transmission pipelines, and approximately 370,000 km of that network is shown 223 224 here (Figure 1). Approximately 280,000 km of pipelines are located on land, traversing 2,261 225 US counties (72% of all counties). Only one county is located outside of the contiguous 48 226 states (Kenai Peninsula, AK). Each county contains, on average, 125 km of pipeline, and half of 227 the counties contain at least 64 km of pipelines. Twenty-six counties have at least 1,000 km of 228 pipelines, and 36 counties contain some amount of pipeline but less than 1 km total. The mean 229 density of natural gas gathering and transmission pipelines,  $\rho_{NG}$ , is 6.1 km of pipeline / 100 km<sup>2</sup> 230 of land area for the 2,261 counties. Half of the counties have  $\rho_{NG}$  of at least 3.7 km / 100 km<sup>2</sup>. 231 The distribution of  $\rho_{NG}$  for all pipeline-containing counties skews positive (right). 232

Gathering and transmission pipelines are located in counties throughout the full range of SVI (Figure 1). Even so, pipeline density is not distributed uniformly among US counties with respect to SVI. In particular,  $\rho_{NG}$  is significantly greater for counties in the highest quartile of SVI (i.e., counties with the most vulnerable populations) than for counties in the lowest SVI quartile (i.e., counties with the least vulnerable populations). Specifically, counties in the highest quartile of social vulnerability have a mean  $\rho_{NG}$  value of 7.5 km / 100 km<sup>2</sup>, which is significantly greater than the mean  $\rho_{NG}$  value of 4.5 km / 100 km<sup>2</sup> for counties in the lowest quartile of social vulnerability (p<0.001). The median  $\rho_{NG}$  values also differs significantly between the highest and lowest quartiles of social vulnerability (p<0.001). The group of 881 counties without any gathering or transmission pipelines did not differ significantly from the group of pipelinecontaining counties in terms of mean  $\rho_{NG}$ , median  $\rho_{NG}$ , or the shape of the SVI cumulative distribution.

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246 For pipeline-containing counties in the top quartile of social vulnerability, the distribution of  $\rho_{NG}$ 247 is shifted to the right of the  $\rho_{NG}$  distribution for counties in the bottom quartile of social 248 vulnerability (Figure 2). Because of the positive skew in  $\rho_{NG}$ , the difference in  $\rho_{NG}$  between the 249 two groups grows larger at higher quantiles of  $\rho_{NG}$ . For example, the difference in  $\rho_{NG}$  is less 250 than 1 km / 100 km<sup>2</sup> for counties that have relatively low densities of pipelines within their 251 vulnerability quartiles, but the difference grows to more than 20 km / 100 km<sup>2</sup> for counties that have relatively high densities of pipelines within their vulnerability quartiles. At the upper 252 253 extreme, pipeline densities are greater than 50 km / 100 km<sup>2</sup> for 1% of counties in the top 254 vulnerability quartile, whereas the top 1% of pipeline densities for counties in the bottom 255 vulnerability quartile range from approximately 27 km / 100 km<sup>2</sup> to 40 km / 100 km<sup>2</sup> (Figure 2). 256 Table 1 summarizes the differences in key descriptive statistics for the two groups, and it 257 provides upper and lower bounds for each group's 95% confidence interval. The upper bound of 258 the confidence interval highlights the large differences in  $\rho_{NG}$  experienced by counties at the 259 high-density end of each group's distribution.

260

For all pipeline-containing counties in the US,  $\rho_{NG}$  and SVI are correlated (Pearson's r = 0.14, p< 0.001). The relationship between  $\rho_{NG}$  and SVI is driven mainly by counties that have relatively high  $\rho_{NG}$  for their SVI (Figure 3). For example, counties in the top 25% envelope of  $\rho_{NG}$  (defined as counties in the top 25<sup>th</sup> percentile of density for a given range of SVI) have a correlation

between  $\rho_{NG}$  and SVI that is much higher (r = 0.33, p < 0.001) than the correlation for all

266 pipeline-containing counties (r = 0.14, p < 0.001). The correlation coefficients grow larger as the

267 envelopes become more extreme; Table 2 summarizes correlations for envelopes ranging from

the top 25<sup>th</sup> percentile of pipeline density to the top 97.5<sup>th</sup> percentile of pipeline density.

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270 Discussion

# 271 Significance of Findings

The correlation between pipeline density and social vulnerability is a previously undocumented characteristic of the US natural gas gathering and transmission pipeline network. Relationships between  $\rho_{NG}$  and SVI suggest that nationally, negative impacts associated with natural gas pipelines, including air and water pollution, public health and safety concerns, and other burdens, fall disproportionately on communities with already limited capacities to deal with challenges created by these impacts.

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Relationships between pipeline density and social vulnerability neither imply that vulnerable
communities were targeted by pipeline developers nor that vulnerable communities sprang up
near pipelines. The relationships do, however, confirm that gathering and transmission pipeline
densities are not randomly distributed with respect to county-level social vulnerability in the US.
in general, counties with more socially vulnerable populations experience higher densities of
gathering and transmission pipelines than counties with less socially vulnerable populations.

Because the pipeline network was constructed over the course of several decades by manydifferent companies operating under various regulatory and policy conditions (US Energy

288 Information Administration, 2020), one possible explanation is that the observed inequitable 289 distribution of pipeline density is an emergent property of an inherently complex system of 290 governance. Governance systems for energy, natural resources, and the environment exhibit 291 structural complexity (e.g., Craig, 2012; Jacquet et al., 2018; Newig et al., 2010), and complex 292 systems are often characterized by emergent behaviors or properties that cannot be traced to any specific system component (Manson, 2001). Perhaps the observed disparity in the distribution of 293 294 gathering and transmission pipelines is an example of such emergent behavior. If so, complex systems theory may prove useful for understanding how governance systems and other structures 295 296 interact to produce racial and socioeconomic disparities in the distribution of pollution and other 297 burdens associated with fossil fuel infrastructure.

298

299 Suggesting that the association between pipeline density and social vulnerability is an emergent 300 property of a complex system does not imply that no one bears responsibility for the inequitable distribution of environmental and public health burdens. On the contrary, multiple parties – local 301 302 and state officials, federal regulators, corporations – share responsibility through decisions that often prioritize economic interests over the equitable distribution of burdens (Foreman, 2011; 303 Steel & Whyte, 2012; Sze et al., 2009). At minimum, our results re-emphasize a major theme in 304 305 EJ research: overt discrimination and malicious intent are not prerequisites for discriminatory 306 outcomes (e.g., Bullard, 1993; Pulido, 2000; Ranganathan, 2016; Vasudevan & Smith, 2020). 307

Regardless of responsibility or intent, the disproportionately high density of natural gas pipelines
in areas of high social vulnerability warrants further attention. Although the concentration of
infrastructure in areas of high social vulnerability is consistent with patterns observed at
upstream and downstream ends of the oil and gas supply chain (Colborn et al., 2014; Davies,

2019), midstream pipelines and related infrastructure have unique burdens. We discuss some of
these burdens in the following section. We focus specifically on Indigenous communities and
others located in rural parts of the US given that many new oil and gas pipelines are routed
through rural landscapes (Strube et al., 2021).

316

# 317 Implications

318 Decision-makers responsible for permitting midstream pipelines have justified rural routes by 319 implying that societal risk is connected to population size density, asserting, in some cases, that 320 societal risks are greater in urban areas than to rural areas. For example, federal regulators 321 eliminated an early route for the Dakota Access Pipeline partly because of its proximity to the 322 city of Bismarck, ND and its urban water supply. Regulators instead chose a rural route 323 adjoining the present-day Standing Rock Sioux reservation (Whyte, 2017).

324

Although population density may predict the severity of certain impacts (e.g., a gas pipeline 325 326 explosion may harm more people in an urban area than an equivalent explosion in a rural area), 327 we contend that rural pipeline impacts, in general, are not simply diffuse or less intense versions 328 of urban impacts. Instead, recent research suggests that gathering and transmission pipelines 329 pose fundamentally distinct cultural, economic, and other challenges for rural areas (Caretta & 330 McHenry, 2020; Donnelly, 2018; Emanuel & Wilkins, 2020; Whyte, 2017). The recent wave of 331 oil and gas pipeline development in the US and elsewhere highlights the need for more nuanced 332 thinking about the implications of expanding pipeline infrastructure into rural areas. We 333 highlight some of these below.

334

335 Several oil and gas transmission pipelines proposed or built in recent years have unique

implications for Indigenous communities in rural areas due to impacts – actual and potential – on

their contemporary and ancestral territories. Although Indigenous peoples in the US

338 overwhelmingly reside in urban areas (Weaver, 2012), Indigenous knowledge systems, cultures,

339 and identities are inextricably tied to certain landscapes, waterways, and other spaces that are 340 predominantly rural in nature (e.g., Emanuel, 2019; Whyte, 2017). The Dakota Access, Keystone XL, Trans Mountain Expansion, Enbridge Line 3 pipelines, and the now-cancelled 341 342 Atlantic Coast and Northern Gateway Pipelines all traverse or proposed to traverse territories of 343 Indigenous peoples in the US and Canada (Emanuel, 2017; Estes, 2019; Hunsberger & Awâsis, 344 2019; Jonasson et al., 2019; McCreary & Milligan, 2014; Whyte, 2017). Some Tribes and First 345 Nations oppose these projects not only because of concerns over pollution or risks to human 346 health, but also because of the pipelines' potential to cause irreparable cultural harm by 347 damaging or destroying present-day or ancestral territories with religious, historical, or cultural 348 significance (e.g., Chen, 2020; Emanuel & Wilkins, 2020; Estes, 2019; Vypovska et al., 2018). 349

350 Despite the high stakes for Indigenous peoples, few culturally-oriented pipeline assessments 351 exist. Those that do are commissioned mainly by affected Tribes or First Nations in response to regulatory processes that fail to address concerns they deem important (e.g., Honor the Earth, 352 353 2020; Tsleil-Waututh Nation, 2015). These assessments describe how pipeline construction and operation may disrupt, for example, the ability of Indigenous peoples to maintain place-based 354 355 food traditions or cultural practices. They also highlight ways in which regulatory proceedings 356 renew or exacerbate longstanding ethical and legal issues surrounding the participation of 357 Indigenous peoples in decision-making about their own lands and communities (Emanuel & 358 Wilkins, 2020; Honor the Earth, 2020; Tsleil-Waututh Nation, 2015; Whyte, 2017). 359 Occasionally, these assessments lead to agreements to provide redress for impacts to Indigenous 360 communities, or they serve to outline co-management strategies (e.g., Vypovska et al., 2018). 361 Often, however, they serve to document various ways in which planning and permitting exclude 362 Indigenous perspectives, weaken sovereignty, or otherwise undermine Indigenous self-363 determination (Emanuel & Wilkins, 2020; Estes, 2019; Whyte, 2017). In the US, issues raised 364 by Indigenous peoples in culturally-oriented pipeline assessments and other venues are often 365 perceived as less important than the priorities of project proponents (e.g., Brown, 2017).

366

367 Pipeline construction and operation have implications for rural landscapes more generally, 368 including implications associated with easements on privately-owned lands. Easements are 369 property rights obtained through landowner negotiation or eminent domain, a legal process that 370 requires landowners to relinquish certain property rights to pipeline builders and operators. The societal implications of pipeline easements, however, extend far beyond delineated and 371 372 compensated boundaries. Easements for gathering and transmission pipelines place practical 373 restrictions on adjacent land uses, affect nearby property values, and increase the risks of fire or 374 catastrophic explosions in areas further away from easement boundaries (e.g., Caretta & 375 McHenry, 2020; Hansen et al., 2006; Holdsworth et al., 2021). Landowners bear these risks and 376 are still obligated to pay taxes on properties crossed by easements (Caretta & McHenry, 2020). 377

378 Rural communities often do not have the same capacity as urban areas to respond to emergencies 379 and disasters and are often limited in their response capabilities (Brennan & Flint, 2007; Furbee 380 et al., 2006). These limitations extend to explosions, leaks, or other incidents related to 381 midstream pipeline infrastructure. Some natural gas transmission pipelines proposed in recent 382 years exceed 1 m in diameter and have internal gas pressures approaching 1 MPa, elevating 383 general concerns about safety and emergency response capabilities (Finley-Brook et al., 2018). 384 Safety and other concerns about pipelines may erode the sense of belonging felt by rural 385 residents, leading some people to move away (Caretta & McHenry, 2020). Moreover, changes 386 associated with midstream infrastructure potentially create rifts between neighbors who disagree 387 about the relative benefits and burdens of hosting pipelines in their communities (Caretta & McHenry, 2020). Overall, research from rural Appalachia confirms that easements, safety 388 389 concerns, and other factors facilitate drastic alteration of communities, transforming rural

landscapes into sprawling, industrial settings within a few years (Caretta & McHenry, 2020;
Donnelly, 2018). Implications of these changes for rural public health and other societal
concerns are still coming into focus, but one emerging theme is that oil and gas infrastructure
often exacerbates existing social vulnerability (Blinn et al., 2020; Hemmerling et al., 2021).
Together, these examples call into question the idea that midstream pipelines have negligible
societal impacts in rural areas simply because populations are less dense than in urban areas.

### 397 Recommendations

398 In the US, federal EJ policy requires inclusion of socioeconomic analyses in pipeline regulatory 399 reviews to help identify and address adverse environmental and other impacts that could fall 400 disproportionately on vulnerable populations as a result of permitted activities (e.g., Emanuel & 401 Wilkins, 2020). For natural gas pipelines, federal regulators are also charged with determining whether projects are in the public interest (Kalen & Hsu, 2020). This work motivates us to 402 403 combine these two policy priorities into a new question: Is it in the public interest to preserve or 404 exacerbate existing patterns that disproportionately burden vulnerable populations with negative 405 impacts from natural gas pipelines? This question guides our recommendations to decision-406 makers and others.

407

408 Federal policy guidance includes recommendations for conducting EJ analyses, which are 409 sections of environmental review documents that allow regulators to identify disparities in 410 environmental impacts by race or income status (US Council on Environmental Quality, 1997). Regulators and proponents rely on these analyses to draw conclusions and make decisions about 411 412 pipelines and other infrastructure projects (Emanuel, 2017). Federal courts in the US have 413 granted agencies wide latitude to choose or develop their own EJ analyses (Sierra Club v. 414 Federal Energy Regulatory Commission, 2017), and although decades of research have 415 improved the ability to identify disparities using demographic data, federal EJ analyses are

416 frequently criticized as methodologically unsound, procedurally rote, or ineffective at preventing 417 or minimizing negative impacts disproportionately imposed on socially vulnerable populations (e.g., Bullard, 2018; Davies, 2019; Emanuel & Wilkins, 2020). In some pipeline cases, federal 418 419 EJ analyses involve only cursory demographic screenings, which can mask racial disparities or 420 other social inequities in pipeline routing (Emanuel, 2017; Estes, 2019). Alone, such screenings 421 are unlikely to capture the complexity of concerns about impacts and potential disparities faced 422 by vulnerable populations, and federal policy guidance cautions against this use (e.g., US EPA, 423 2014). Decision-makers must re-envision the roles of demographic tools and analyses as they 424 work toward more holistic assessments of the societal burdens of pipelines and related 425 infrastructure. Culturally-oriented assessments and community-based research have the potential to complement demographic analyses, and we reiterate many prior calls to better incorporate 426 427 these types of approaches into environmental reviews (e.g., Arquette et al., 2002; Blue et al., 428 2020; Halseth, 2016; Stevenson, 1996; Wilson et al., 2019).

429

430 Regulators and corporations must commit to early, good-faith efforts to incorporate community 431 perspectives into decision-making. At present, however, power asymmetries between 432 corporations and regulators on one hand and socially vulnerable communities on the other sometimes prevent timely and meaningful efforts to incorporate these perspectives into decision-433 making about pipelines (e.g., Emanuel & Wilkins, 2020). Structural changes to the regulatory 434 435 system may be required to overcome this particular barrier. Natural gas regulators in the US 436 have recently signaled that they intend to review policies on identifying and addressing impacts 437 of pipeline authorizations on low wealth and racially marginalized communities (US Federal 438 Energy Regulatory Commission, 2021). Periodic reviews such as this one could help regulators 439 adopt structural changes to improve the effectiveness of their EJ policies, including 440 accountability mechanisms to ensure that impacted communities are engaged meaningfully in 441 environmental decision-making processes.

443 Scientists, for their part, can partner with communities to describe and quantify impacts related 444 to environmental degradation, health and safety, and other issues. This work may include 445 quantifying the value of property or assets lost through eminent domain for the construction of 446 pipelines and related infrastructure, or identifying the extent to which midstream infrastructure 447 increases societal tensions or desires to relocate from rural communities. Scientists also have the 448 ability to provide technical critiques of regulatory claims about EJ and to hold regulators to 449 rigorous standards for the design and implementation of EJ analyses. For example, regulators 450 who draw conclusions based on demographic analyses should understand the sensitivities and 451 limits of detection for these analyses.

452

Scientists and decision-makers should pay closer attention to the cumulative impacts of co-453 located pipelines, compressors, and other types of mid-stream infrastructure. Regulatory 454 455 analyses focus on the implications of newly-proposed infrastructure and – with few exceptions – 456 disregard impacts associated with the gradual accumulation of infrastructure in a community. 457 Yet people nearby do not experience newly-proposed facilities in isolation; they are exposed to 458 the cumulative effects of all nearby infrastructure on air quality, noise, explosion risks, and more. 459 Calls to consider cumulative impacts – and to reconsider how cumulative impacts are evaluated in decision-making – are not new (Parkes et al., 2016), and thorough reviews of cumulative 460 461 impacts should consider how past decisions affect conditions in the present (Halseth et al., 2016). 462 With that in mind, it is important to remember that much oil and gas infrastructure in the US pre-463 dates not only EJ policies but also anti-discrimination laws, including the US Civil Rights Act. The siting of such infrastructure may reflect overt and institutionalized racism that shaped 464 465 infrastructure planning and decision-making during most of US history (Bullard, 2002). It is 466 therefore possible that existing pipeline routes may reflect historical practices that deliberately 467 sought to concentrate polluting infrastructure in marginalized communities. With this in mind, 468 decision-makers who review cumulative impacts of proposed pipelines should acknowledge that

new infrastructure concentrated along existing easements or corridors could reinforce historic
practices of oppression. The relationships between social vulnerability and pipeline density
revealed in this study reiterate an urgent need for researchers and decision-makers to pay close
attention to the cumulative environmental, public health, and other burdens experienced by
vulnerable populations – especially as the buildout of midstream pipelines continues in the US
and elsewhere.

475

# 476 Conclusions

We analyzed multiple, publicly-available datasets and found that the existing network of natural gas pipelines in the US is concentrated more heavily in counties where people experience high levels of social vulnerability than in counties where social vulnerability is lower. The study, however, does more than simply document another way in which vulnerable populations are disproportionately impacted by hazardous or polluting infrastructure. It reiterates a need to identify and address disparate societal impacts of infrastructure at the level of an entire system, whether the system is part of the oil and gas supply chain or some other sector.

484

485 Assuming natural gas gathering and transmission pipelines continue to be built, decision-makers 486 and the general public should keep in mind that the network is already distributed inequitably 487 with respect to social vulnerability, and that future projects can either maintain the inequitable 488 status quo or shift the distribution in ways that will potentially exacerbate or ameliorate current 489 disparities. A more complete view of the oil and gas supply chain can inform decision-makers and the general public about the larger societal costs of US energy dominance, including the 490 491 extent to which vulnerable rural communities subsidize this policy through inequitable exposure 492 to environmental, health, and other risks.

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- 754

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# 759 760 Tables

#### 761 **Table 1:** Pipeline Density Characteristics of US Counties

	Category	Mean	Median	95% CI
	County $SVI > 0.7$	75 7.5	4.1	0.2 - 38.2
	County SVI < 0.2	4.5	3.2	0.2 - 15.4
	All Counties	6.1	3.7	0.2 - 29.4
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763				
764				
765				
766				
767	Table 2: Correlations be	etween $\rho_{NG}$ and S	VI for groups	shown in Figure 3
	Percentile Group	r	р	Ν
	>97.5	0.65	< 0.001	58
	90-95	0.59	< 0.001	113
	75-90	0.47	< 0.001	225

0.33

< 0.001

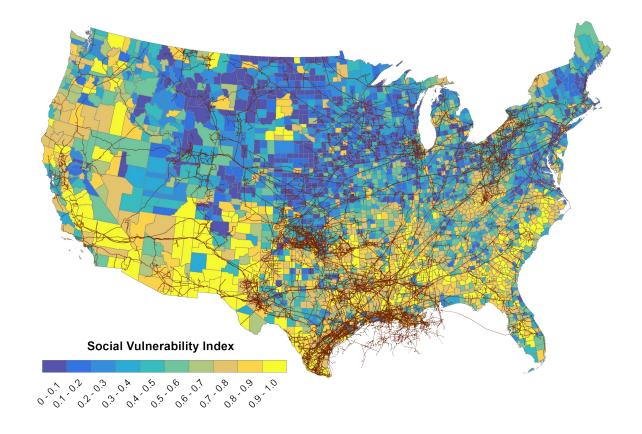
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768

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#### Figures

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- **Figure 1:** Natural gas gathering and transmission pipelines in the conterminous US, with social vulnerability index shown for each US county. One Alaska county is included in the statistical overview of the results but is not shown here.



- Figure 2: Cumulative frequency distributions of natural gas gathering and transmission pipeline
- density for counties in the lowest quartile of social vulnerability (blue), counties in the highest quartile of social vulnerability (red), and all counties (dashed). Distributions of densities for the
- highest and lowest quartiles differ significantly from one another (KS statistic = 0.17, p < 0.001).

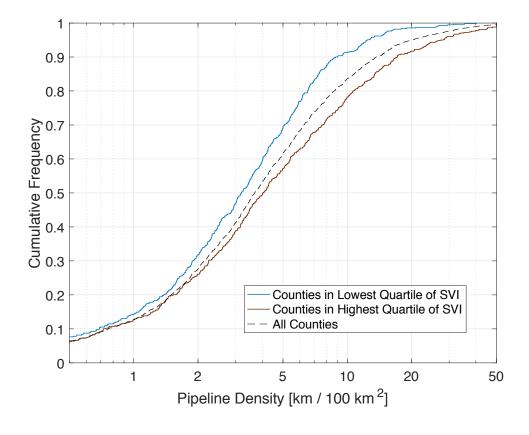
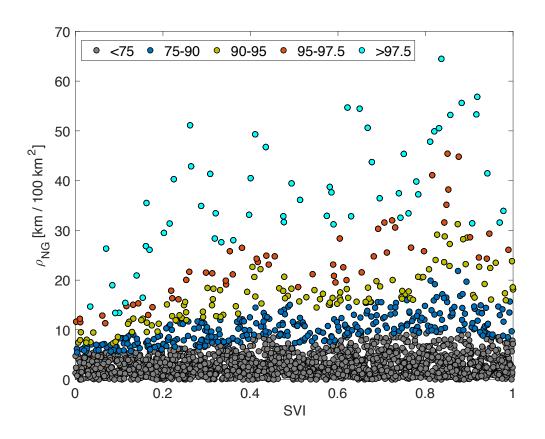


Figure 3: Pipeline density versus social vulnerability for US counties. Colors indicate envelopes
 for pipeline density percentiles based on bins of SVI (e.g., gray points indicate counties in the

101 pipeline density percentiles based on onis of SVI (e.g., gray points indicate counties in the
 10wer 75<sup>th</sup> percentile of density for their SVI bins, blue points indicate counties in the 75<sup>th</sup> to 90<sup>th</sup>
 percentile of density for their SVI bins, etc.).



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