BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

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		HP 22-002
IN THE MATTER OF THE APPLICATION	•	
OF NAVIGATOR HEARTLAND		
GREENWAY, LLC FOR A PERMIT UNDER	:	
THE SOUTH DAKOTA ENERGY		APPLICANT'S
CONVERSION AND TRANSMISSION	:	SUPPLEMENTAL RESPONSE
FACILITIES ACT TO CONSTRUCT THE		TO STAFF'S SECOND SET OF
HEARTLAND GREENWAY PIPELINE IN		DATA REQUESTS
SOUTH DAKOTA,	•	

Applicant Navigator Heartland Greenway LLC makes the following supplemental response to Staff's Second Set of Data Requests pursuant to SDCL § 15-6-33, and SDCL § 15-6-34(a). This supplemental response is made within the scope of SDCL 15-6-26(e) and shall not be deemed continuing nor be supplemented except as required by that rule. Applicant objects to definitions and directions in answering the requests to the extent that such definitions and directions deviate from the South Dakota Rules of Civil Procedure.

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2-29) Please provide a copy of the Agricultural Mitigation Plan and Weed Control Plan when finalized.

RESPONSE: The Weed Control Plans and The Agricultural Mitigation Plan will be provided before the end of April 2023.

SUPPLEMENTAL RESPONSE: Attached are copies of the Weed Management Plans (Rolling Till Prairie MLRA-102A; Till Plains MLRA-102B; Loess Uplands MLRA-102C) and the South Dakota Agricultural Protection Plan.



Dated this 22nd day of May, 2023.

WOODS, FULLER, SHULTZ & SMITH P.C.

By /s/James E. Moore

James E. Moore P.O. Box 5027 300 South Phillips Avenue, Suite 300 Sioux Falls, SD 57117-5027 Phone (605) 336-3890 Fax (605) 339-3357 Email: James.Moore@woodsfuller.com Attorneys for Navigator Heartland Greenway

OBJECTIONS

The objections stated to Staff's Second Set of Data Requests were made by James E.

Moore, one of the attorneys for Navigator Heartland Greenway, for the reasons and upon the

grounds stated therein.

/s/ James E. Moore One of the Attorneys for Navigator Heartland Greenway



CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of May, 2023, a true and correct copy of the foregoing Applicant's Supplemental Response to Staff's Second Set of Data Requests was served via e-mail transmission to the following:

Ms. Kristen Edwards Staff Attorney South Dakota Public Utilities Commission 500 E. Capitol Ave. Pierre, SD 57501 Kristen.edwards@state.sd.us Mr. Jon Thurber Staff Analyst South Dakota Public Utilities Commission 500 E. Capitol Ave. Pierre, SD 57501 jon.thurber@state.sd.us

Mr. Darren Kearney Staff Analyst South Dakota Public Utilities Commission 500 E. Capitol Ave. Pierre, SD 57501 <u>darren.kearney@state.sd.us</u>

> <u>/s/ James E. Moore</u> One of the Attorneys for Navigator Heartland Greenway

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