

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Greg Morgan. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:
- \_\_\_\_\_

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
<u>Spink</u>	<u>24</u>	<u>119</u>	<u>64</u>

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 21, 2025.

Signature: Greg Morgan

County Signed in: Spink  
State Signed in: SD

Printed Name: Greg Morgan

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is RICK HOFER. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:  
WAYNE HOFER CORPORATION

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
<u>SULLY</u>	<u>33</u>	<u>115</u>	<u>75</u>
	<u>34</u>	<u>115</u>	<u>75</u>
	<u>36</u>	<u>115</u>	<u>75</u>

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 21, 2025.

Signature:

Rick Hofer President

County Signed in: SULLY  
State Signed in: SOUTH DAKOTA

Printed Name: RICK HOFER



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Debra F Curtis. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
<u>Spink</u>	<u>30</u>	<u>117</u>	<u>63</u>
<u>Sp. hK</u>	<u>30</u>	<u>117</u>	<u>63</u>

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 21, 2025.

Signature: Debra F Curtis Living Trust

County Signed in: Spink  
State Signed in: South Dakota

Printed Name: Curtis Debra F Living trust

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

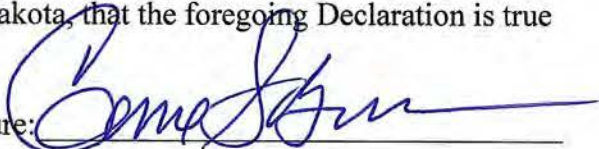
1. My name is Connie Burrer. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is: Connie Burrer Living Trust

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
McPherson	1	127-N	71W
McPherson	2	127-N	71W

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 21, 2025.

Signature: 

County Signed in: Lincoln

Printed Name: Connie S. Burrer

State Signed in: South Dakota



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Raymond Restow. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is: Raymond Restow and Kathleen Restow Living Trust

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
McPherson	1	127-N	71W
McPherson	2	127-N	71W

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 21, 2025.

Signature: 

County Signed in: Pennington

Printed Name: Raymond Restow

State Signed in: South Dakota

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
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**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Kathleen Restow. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is: Raymond Restow and Kathleen Restow Living Trust.

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
McPherson	1	127-N	71W
McPherson	2	127-N	71W

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 21, 2025.

Signature: Kathleen Restow

County Signed in: Pennington

Printed Name: Kathleen Restow

State Signed in: South Dakota



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
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**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Melisa Elijah. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

Alan V. & Rita Brown Living Trust

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
<u>Lake</u>	<u>5</u>	<u>105 N</u>	<u>51 W</u>

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 21, 2025.

Signature

Melisa Elijah

County Signed in: Brookings

Printed Name:

Melisa Elijah

State Signed in: South Dakota

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Rita Brown. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:  
Alan & Rita Brown Trust

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
Lake	5	105	51

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 21, 2025.

Signature: Rita Brown

County Signed in: Lake  
State Signed in: SD

Printed Name: Rita Brown



BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE

DOCKET HP 24-001

DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION

1. My name is David J. Rath. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is: David J. + Valerie L. Rath Trustees.

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
McPherson	28	125	67
McPherson	19	125	67

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to 28 USC § 1746, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 22, 2025.

Signature: David J. Rath

County Signed in: McPherson  
State Signed in: South Dakota

Printed Name: David J. Rath



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Betty Strom. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:  
Betty J. Strom Living Trust.
3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
Lake	25	Orland 105.	53
Lake	36	Orland 105	53

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to 28 USC § 1746, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 21, 2025.

Signature: Betty J. Strom Trustee

County Signed in: Minnehaha  
State Signed in: South Dakota

Printed Name: Betty J. Strom Trustee



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Mary Ann Zerbel. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust owns any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is: Mary Ann Zerbel (owner).

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
Spink County	21	Tetonka Township #59	119-63
Spink County	20	Mellette Township #131	119-63
Spink Country	19	Mellette Township #131	119-63

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 22, 2025.

Signature: Mary Ann Zerbel

County Signed in: Spink  
State Signed in: South Dakota

Printed Name: Mary Ann Zerbel

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Rodney Dobberpuhl. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
<u>Spink</u>	<u>27</u>	<u>119</u>	<u>63</u>
<u>Spink</u>	<u>28</u>	<u>119</u>	<u>63</u>

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 22, 2025.

Signature: Rodney Dobberpuhl

County Signed in: Pinal

Printed Name: Rodney Dobberpuhl

State Signed in: Arizona



BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE

DOCKET HP 24-001

DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION

1. My name is Shelly Bacon. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.

2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

Alan & Rita Brown Trust

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
<u>LAKE</u>	<u>5</u>	<u>105</u>	<u>51</u>

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.

5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.

6. I declare under penalty of perjury, pursuant to 28 USC § 1746, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 21<sup>st</sup>, 2025.

County Signed in: LAKE  
State Signed in: SD

Signature: Shelly Bacon

Printed Name: Shelly Bacon



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
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**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Kirk Schaunaman. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:
- \_\_\_\_\_.

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
<u>Brown</u>	<u>NW 1/4 33</u>	<u>123</u>	<u>64</u>
<u>Brown</u>	<u>NE 1/4 29</u>	<u>123</u>	<u>64</u>
<u>Brown</u>	<u>SE 1/4 30</u>	<u>123</u>	<u>64</u>
<u>Brown</u>	<u>SW 1/4 30</u>	<u>123</u>	<u>64</u>

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 24, 2025.

Signature: Kirk Schaunaman

County Signed in: Brown

Printed Name: Kirk Schaunaman

State Signed in: South Dakota



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Craig Schaunaman. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:
- \_\_\_\_\_

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
Brown	NW 1/4 28-123	123	64
Brown	N 40A SW 1/4 28	123	64
Brown	SW 1/4 34	123	64
Brown	N 1/2 of SW 1/4 25	123	65

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 24, 2025.

Signature: Craig Schaunaman

County Signed in: Brown  
State Signed in: South Dakota

Printed Name: Craig Schaunaman

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE APPLICATION BY SCS CARBON TRANSPORT LLC FOR A PERMIT TO CONSTRUCT A CARBON DIOXIDE TRANSMISSION PIPELINE	DOCKET HP 24-001  DECLARATION IN SUPPORT OF LANDOWNERS' MOTION AND/OR REQUEST TO DENY APPLICATION
--	---

1. My name is KAREN MACK JONES. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:  
MARY M MACK TRUST

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
<u>Codington</u>	<u>17</u>	<u>116</u>	<u>52</u>

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to 28 USC § 1746, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 13, 2025.

Signature: Karen Mack Jones  
Printed Name: KAREN MACK JONES

County Signed in: Codington  
State Signed in: South Dakota



BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE

DOCKET HP 24-001

DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION

1. My name is KAREN MACK JONES. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:  
MARY MACK TRUST

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
<u>Codington</u>	<u>22</u>	<u>116</u>	<u>52</u>

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to 28 USC § 1746, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 23, 2025.

Signature: Karen Mack Jones

County Signed in: Codington  
State Signed in: South Dakota

Printed Name: KAREN MACK JONES

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Darlene Gray Kutzler. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
<u>Beadle</u>	<u>14</u>	<u>111</u>	<u>62</u>

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 22, 2025.

Signature: Darlene Kutzler

County Signed in: Beadle  
State Signed in: South Dakota

Printed Name: Darlene Gray Kutzler



BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE

DOCKET HP 24-001

DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION

1. My name is Kristi Lewis. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
<u>Beadle</u>	<u>14</u>	<u>111</u>	<u>62</u>

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 22, 2025.

Signature: Kristi Lewis

County Signed in: Lake  
State Signed in: South Dakota

Printed Name: Kristi Lewis

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE

DOCKET HP 24-001

DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION

1. My name is Deana Larson. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
<u>Beadle</u>	<u>14</u>	<u>111</u>	<u>62</u>

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 23, 2025.

Signature: \_\_\_\_\_

County Signed in: Lake

State Signed in: South Dakota

Printed Name: \_\_\_\_\_

Deana Larson



BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE

DOCKET HP 24-001

DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION

1. My name is Tamara Mohr. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
<u>Beadle</u>	<u>14</u>	<u>111</u>	<u>62</u>

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 22, 2025.

Signature: Tamara Mohr

County Signed in: Beadle  
State Signed in: South Dakota

Printed Name: Tamara Mohr

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**


1. My name is Londa Hexum. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:  
JR Farms Inc.

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
Brookings	30	109	50
Brookings	20	109	50
Brookings	21	109	50

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 22, 2025.

Signature: 

County Signed in: Brookings  
State Signed in: South Dakota

Printed Name: Londa S. Hexum



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Londa Hexum. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is: Judy M. Jensen Irrevocable Trust.

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
<u>Brookings</u>	<u>20</u>	<u>109</u>	<u>50</u>

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 22, 2025.

Signature:  , Justice

County Signed in: Brookings  
State Signed in: South Dakota

Printed Name: Londa S. Hexum

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Scott Schauer. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is: \_\_\_\_\_.

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
McPherson	1	125	68

SE 1/4

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 21, 2025.

Signature: Scott Schauer

County Signed in: McPherson

Printed Name: Scott Schauer

State Signed in: South Dakota



BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE

DOCKET HP 24-001

DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION

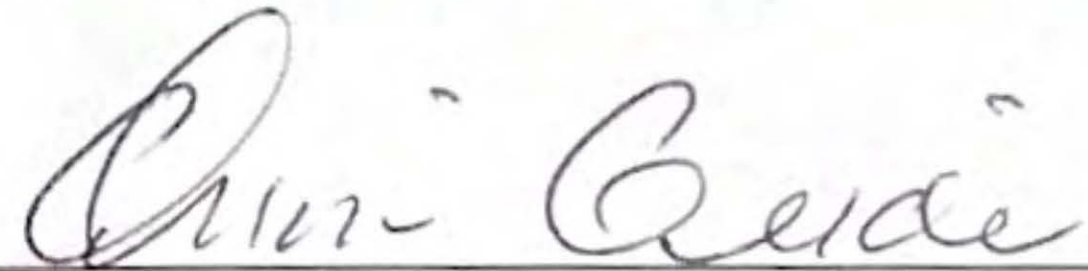
1. My name is ORRIN GEIDE. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
<u>Minnehaha</u>	<u>5</u>	<u>101</u>	<u>51</u>

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 23<sup>rd</sup>, 2025.

Signature: 

County Signed in: Minnehaha  
State Signed in: South Dakota

Printed Name: ORRIN GEIDE



BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE

DOCKET HP 24-001

DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION

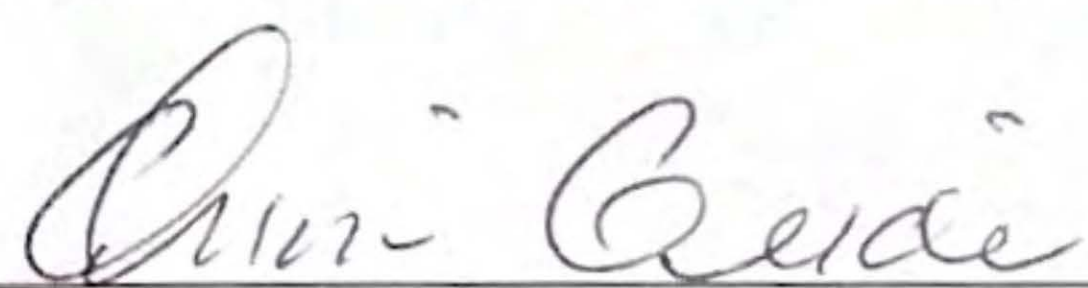
1. My name is ORRIN GEIDE. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
<u>Minnehaha</u>	<u>5</u>	<u>101</u>	<u>51</u>

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 23<sup>rd</sup>, 2025.

Signature: 

County Signed in: Minnehaha  
State Signed in: South Dakota

Printed Name: ORRIN GEIDE



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Brad Severson. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is: \_\_\_\_\_.

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
<u>Lincoln</u>	<u>19</u>	<u>99 North</u>	<u>49</u>

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to 28 USC § 1746, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 23, 2025.

Signature: Brad Severson

County Signed in: Lincoln  
State Signed in: South Dakota

Printed Name: Brad Severson

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE

DOCKET HP 24-001

DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION

1. My name is LuAnn Severson. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
<u>Lincoln</u>	<u>19</u>	<u>99 North</u>	<u>49</u>

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to 28 USC § 1746, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 23, 2025.

Signature: LuAnn Severson

County Signed in: Lincoln

Printed Name: LuAnn Severson

State Signed in: South Dakota



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Richard Close. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
Kingsbury	10	110 North	56 West

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 23, 2025.

Signature: Richard A. Close

County Signed in: Kingsbury  
State Signed in: South Dakota

Printed Name: Richard A. Close

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Lynette Bacon. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
Brookings	23	109	50
Brookings	23	109	50
Brookings	24	109	50

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 24, 2025.

Signature: Lynette Bacon PR for Lyle Monsees estate

County Signed in: Blue Earth  
State Signed in: Minnesota

Printed Name: Lynette Bacon



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is David Close. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that holds the mining license and has a direct legal interest in land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is: Kingsbury Mining Company, LLC.

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
Kingsbury	10	110 North	56 West

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 24, 2025.

Signature: 

County Signed in: Kingsbury  
State Signed in: South Dakota

Printed Name: David Close

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Rita Brownlee. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

Rita Brownlee Living Trust

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
<u>Codington</u>	<u>5</u>	<u>116 N</u>	<u>52 W</u>

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 24<sup>th</sup>, 2025.

Signature: Rita Brownlee

County Signed in: Codington  
State Signed in: South Dakota

Printed Name: Rita Brownlee



BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE APPLICATION BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON DIOXIDE TRANSMISSION PIPELINE

1. My name is Karin Deeg Wommack I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.

2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

Patricia K Deeg Trust

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
<u>Beadle</u>	<u>25</u>	<u>112 N</u>	<u>101 W</u>
<u>Beadle</u>	<u>26</u>	<u>112 N</u>	<u>101 W</u>
<u>Beadle</u>	<u>35</u>	<u>112 N</u>	<u>101 W</u>

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.

5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.

6. I declare under penalty of perjury, pursuant to 28 USC § 1746, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 24, 2025.

Signature: Karin Deeg Wommack

County Signed in: Glynn  
State Signed in: Georgia

Printed Name: Karin Deeg Wommack

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is BRIAN HOFFMAN. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

HOFFMAN RANCH LLC

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
McPherson	12	126	69
McPherson	18	126	68

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 21, 2025.

Signature: Brian Hoffman

County Signed in: McPherson  
State Signed in: SOUTH DAKOTA

Printed Name: BRIAN HOFFMAN



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Ryan Smeenk. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

Smeenk, Merlyn and Lonng - TST

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
<u>Lincoln</u>	<u>20</u>	<u>99</u>	<u>49</u>

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 21, 2025.

Signature: Ryan Smeenk (trustee)

County Signed in: Lincoln  
State Signed in: South Dakota

Printed Name: Ryan Smeenk

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Jerome G. Hoffman. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
McPherson	9	Spring Township	126-68
McPherson	16	Spring Township	126-68

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 24, 2025.

Signature: Jerome G. Hoffman

County Signed in: Hennepin

Printed Name: Jerome G. Hoffman

State Signed in: Minnesota



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Deborah Bortner I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

Rickard & Deborah Bortner

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
<u>Brookings</u>	<u>30</u>	<u>109</u>	<u>50</u>

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 24, 2025.

Signature: Deborah Bortner

County Signed in: Brookings

Printed Name: Deborah Bortner

State Signed in: South Dakota

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Danny Clark. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

Danny & Mary Clark RELP

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
<u>Mines</u>	<u>34</u>	<u>108</u>	<u>56</u>

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to 28 USC § 1746, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 24, 2025.

Signature: \_\_\_\_\_

County Signed in: Mines  
State Signed in: SD

Printed Name: \_\_\_\_\_

Danny Clark



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Laree Giovannettone. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is: LR Wieseler LLC.

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
Hand	31: N1/2NW1/4	116 North	68
Hand	36: N1/2NW1/4	116 North	69

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 24, 2025.

Signature: Laree M. Giovannettone

County Signed in: Minnehaha

Printed Name: Laree M. Giovannettone

State Signed in: South Dakota

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Julie Coughlin. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
<u>Kingsbury</u>	<u>7</u>	<u>110</u>	<u>55</u>

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 25, 2025.

Signature: Julie Coughlin

County Signed in: Kingsbury

Printed Name: Julie Coughlin

State Signed in: South Dakota



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Mark E. Johnson I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

Mark E. Johnson Trust

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
<u>Kingsbury</u>	<u>13</u>	<u>110N</u>	<u>57W</u>

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 24, 2025.

Signature: Mark E. Johnson

County Signed in: Kingsbury  
State Signed in: South Dakota

Printed Name: Mark E. Johnson



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Tyler Gehm. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:
- \_\_\_\_\_

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
Kingsbury	9	110 N	56 SE
Kingsbury	16	110 N	56 NW
Kingsbury	17	110 N	56 NE
Kingsbury	17	110 N	56 NW

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to 28 USC § 1746, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 25, 2025.

Signature: \_\_\_\_\_

County Signed in: Kingsbury  
State Signed in: South Dakota

Printed Name: Tyler C Gehm



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Jeffrey Skelton. I am over the age of 18 years old, have personal knowledge of all facts reg<sup>ed</sup> in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is: Larry Skelton Estate.
3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:
- | County Name: | Section #: | Township #: | Range #: |
|--------------|------------|-------------|----------|
| Codington    | SW 1/4 35  | 116         | 54       |
| Hamlin       | NE 1/4 9   | 115         | 54       |
|              |            |             |          |
|              |            |             |          |
|              |            |             |          |
4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to 28 USC § 1746, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 24, 2025.

County Signed in: Hamlin  
State Signed in: SD

Signature: Jeffrey Skelton

Printed Name: Jeffrey Skelton



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Keith Allison. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is: Allison Farms Inc

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
Brookings	8	Trenton	T109N-R49W
Brookings	18	Trenton	T109N-R49W

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 22, 2025.

Signature: Keith Allison

County Signed in: Brookings SD Printed Name: Keith Allison



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Larry Beck. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
Miner	18	107 Adams	56

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 21, 2025.

Signature: Larry Beck

County Signed in: Kingsbury  
State Signed in: South Dakota

Printed Name: Larry Beck



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Debbie Beck. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:
- \_\_\_\_\_

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
<u>Miner</u>	<u>18</u>	<u>Adams 107</u>	<u>56</u>

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 21, 2025.

Signature: Debbie Beck

County Signed in: Kingsbury  
State Signed in: South Dakota

Printed Name: Debbie Beck



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Betty Karlen. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
Miner	13	107	57
Miner	13	107	57
Miner	18	107	56

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 21, 2025.

Signature: Betty Karlen

County Signed in: Kingsbury  
State Signed in: South Dakota

Printed Name: Betty Karlen



IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE

DOCKET HP 24-001

DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION

1. My name is Ann Cowart. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:  
Cowl + Ann Cowart Living Trust of 2000

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
Lincoln (Trust Three)	SE 1/4 of Section 19	19 North	49 West 5th PM

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to 28 USC § 1746, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 21, 2025.

Signature: Ann Cowart

County Signed in: San Joaquin

Printed Name: Ann Cowart

State Signed in: California



BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE APPLICATION BY  
SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE

DOCKET HP 24-001

DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION

1. My name is Douglas R Lowe. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:  
  
\_\_\_\_\_
3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:  
County Name: Section #: Township #: Range #:  
14-105N-52W Franklin Twp.
4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to 28 USC § 1746, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 23, 2025.

Signature: Douglas R Lowe

County Signed in: Lake

Printed Name: Douglas R Lowe

State Signed in: South Dakota



BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE APPLICATION BY  
SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE

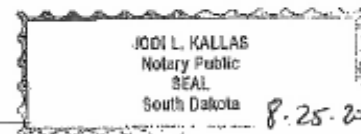
DOCKET HP 24-001

DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION

1. My name is Rett Sieh. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:  
Rett Sieh Farm and Rett Ranch
3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:  
County Name: Section #: Township #: Range #:  
12 - 125 - 68  
23 - 127 - 68  
24 - 127 - 68
4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to 28 USC § 1746, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 21, 2025.

Signature: Rett Sieh



County Signed in: McPherson

Printed Name: Jodi L. Kallas

Jodi L. Kallas

State Signed in: South Dakota



BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE APPLICATION BY  
SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE

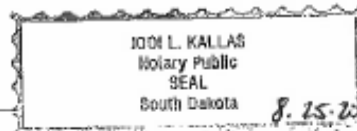
DOCKET HP 24-001

DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION

1. My name is Reetta Sieh. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:  
Rott Farms Inc.
3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:  
County Name: Section #: Township #: Range #:  
18-T125N-R67W
4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to 28 USC § 1746, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 21, 2025.

Signature: Reetta Sieh



County Signed in: McPherson

Printed Name: Jodi L. Kallas

Jodi L. Kallas

State Signed in: South Dakota



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Randy Pickard. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
<u>Logan</u>	<u>36</u>	<u>108 N</u>	<u>R 51 W</u>

4. To the extent Summit needs or desires either any future survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 3-25, 2025.

Signature: Randy Pickard

County Signed in: Moody  
State Signed in: South Dakota

Printed Name: Randy Pickard



1. My name is Darren Nelson. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:  
Sonbrook Farms Inc
3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:  
County Name: Section #: Township #: Range #:  
Brookings County Section 17  
Trenton 109  
R-49-W
4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to 28 USC § 1746, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 23, 2025.

Signature: Darren Nelson President

County Signed in: Brookings

Printed Name:

Darren Nelson President

State Signed in: South Dakota



BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE APPLICATION BY  
SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE

DOCKET HP 24-001

DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION

1. My name is Rodney Mosiman. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:  
  
\_\_\_\_\_
3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:  
County Name: Section #: Township #: Range #:  
Sully    5-114-75  
Sully    4-114-75
4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to *28 USC § 1746*, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 24, 2025.

Signature: Rodney Mosiman

County Signed in: Sully

Printed Name:

Rodney Mosiman

State Signed in: SD



BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE APPLICATION BY  
SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE

DOCKET HP 24-001

DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION

1. My name is Marla Mosiman. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:  
  
\_\_\_\_\_
3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:  
County Name: Section #: Township #: Range #:  
Sully 5-114-75  
Sully 4-114-75
4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to 28 USC § 1746, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 24, 2025.

Signature: Marla Mosiman

County Signed in: Sully

Marla Mosiman

State Signed in: SD

Printed Name:

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Roger E. Meyer. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:  
Roger E Meyer and Elizabeth E Meyer Revocable Living Trust
3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
<u>McPherson Cty</u>	<u>29</u>	<u>125 N</u>	<u>67 W</u>
4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 25<sup>th</sup>, 2025.

County Signed in: Lincoln  
State Signed in: South Dakota

Signature: Roger E. Meyer

Printed Name: Roger E Meyer

My Commission Expires  
March 15, 2028

Tara Schraeder





**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Connie Schlepp. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is: \_\_\_\_\_.

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
<u>Brown</u>	<u>29</u>	<u>12 3</u>	<u>64</u>

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 24<sup>th</sup>, 2025.

Signature: Connie Schlepp

County Signed in: Lawrence  
State Signed in: South Dakota

Printed Name: Connie Schlepp

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE

DOCKET HP 24-001

DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION

1. My name is Linda L. Seck. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:  
SECK REAL ESTATE LLC

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
LINCOLN	15	99	51

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to 28 USC § 1746, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 25, 2025.

Signature: Linda L. Seck

County Signed in: Washtenaw  
State Signed in: Michigan

Printed Name: LINDA L. SECK

SARAH L. DAVIS  
NOTARY PUBLIC - STATE OF MICHIGAN  
COUNTY OF LENAWE  
My Commission Expires November 29, 2025  
Acting in the County of Washtenaw



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Dorothy A. Olson. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

Olsen Trust

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
Lake	25	T108N	R51W

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 25<sup>th</sup>, 2025.

Signature: Dorothy A. Olson

County Signed in: Lake  
State Signed in: South Dakota

Printed Name: Dorothy A Olson



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Joyce D. Welbon. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is: Clair and Joyce Welbon Family Trust.

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
Lake	24	107 N	51 W

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 23, 2025.

Signature: Joyce D. Welbon

County Signed in: Lake

Printed Name: Joyce D. Welbon

State Signed in: South Dakota



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Brian Kizer. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is: Brian Kizer.

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
Miner	17	Adams T107N	R56W

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to *28 USC § 1746*, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 25, 2025.

Signature: Brian Kizer

County Signed in: Miner  
State Signed in: SD

Printed Name: Brian Kizer

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is John T. Schutte. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
Lincoln	32	99	48
Lincoln	33	99	48

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to 28 USC § 1746, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 26, 2025.

Signature: John T. Schutte

County Signed in: Lincoln  
State Signed in: South Dakota

Printed Name: John T. Schutte



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Melissa Schutte. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:
- \_\_\_\_\_

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
Lincoln	32	99	48
	33	99	48

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to 28 USC § 1746, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 26, 2025.

Signature: \_\_\_\_\_

County Signed in: Lincoln

State Signed in: South Dakota

Printed Name: \_\_\_\_\_

Melissa R. Schutte

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Delbert Peterson. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

Delbert Peterson Trust

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
Lake	11	108 N	51 W

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 26, 2025.

Signature: Delbert E Peterson

County Signed in: Lake

Printed Name: Delbert E Peterson

State Signed in: S.D.



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Linda Rippentrop I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

Edna A. Brown Grantor Trust

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
Lake	5	105	51

4. To the extent Summit needs or desires either any future survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 26, 2025.

Signature: Linda Rippentrop

County Signed in: Minnehaha Printed Name: Linda Rippentrop  
State Signed in: South Dakota

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is RODNEY COMBS. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

Combs Farm LLC

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
<u>Kingsbury</u>	<u>SW 1/4 8</u>	<u>110</u>	<u>56</u>

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 26, 2025.

Signature: Rodney Combs

County Signed in: Kingsbury

Printed Name: RODNEY COMBS

State Signed in: SOUTH DAKOTA



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Marvin Alan Smith. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
<u>Kingsbury</u>	<u>7</u>	<u>110</u>	<u>55</u>

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 26, 2025.

Signature: Marvin Alan Smith

County Signed in: Kingsbury  
State Signed in: SD

Printed Name: Marvin Alan Smith

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Kari Black. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is: \_\_\_\_\_.

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
Turner	24	100	52

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to 28 USC § 1746, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 25, 2025.

Signature: Kari Lorraine Black

County Signed in: Turner  
State Signed in: South Dakota

Printed Name: Kari Black



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Douglas Black. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:
- \_\_\_\_\_

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
<u>Turner</u>	<u>24</u>	<u>100</u>	<u>52</u>

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 25, 2025.

Signature: \_\_\_\_\_

Douglas Black

County Signed in: Turner

State Signed in: South Dakota

Printed Name: \_\_\_\_\_

Douglas Black

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE

DOCKET HP 24-001

DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION

1. My name is Joyce Skelton. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
Hamlin	NW 1/4 3	Oxford	115/54
Hamlin	NE 1/4 3	Oxford	115/54

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to 28 USC § 1746, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 26<sup>th</sup>, 2025.

Signature: Joyce Skelton

County Signed in: Codington  
State Signed in: South Dakota

Printed Name: Joyce Skelton



BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTAIN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE

DOCKET HP 24-001

DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION

1. My name is Sally Schwatzer. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
<u>Turner</u>	<u>15</u>	<u>100</u>	<u>5.3</u>

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to 28 USC § 1746, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 27, 2025.Signature: Sally SchwatzerCounty Signed in: MingusPrinted Name: Sally SchwatzerState Signed in: SD

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE APPLICATION BY  
SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE

DOCKET HP 24-001

DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION

1. My name is Brenda Gehm. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.

2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

Larry V Gehm and Brenda Gehm, Trustees of the  
Larry V Gehm Revocable Living Trust dated Jan. 16, 2019  
Document No. 2019-0012-148  
DTOS, DE-14080107

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name: Section #: Township #: Range #:

Kingsbury W/2 15-110-57

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.

5. It is your undersigned declarant's belief that Summit's PUC

Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.

6. I declare under penalty of perjury, pursuant to 28 USC § 1746, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 26, 2025.

Signature: Brenda Gehm

County Signed in: Kingsbury

Printed Name: Brenda Gehm

State Signed in: South Dakota

Donald A Churchill  
Notary of the Public South Dakota  
My commission expires 10/30/2030



My Commission Expires  
October 30, 2030



1. My name is Loryn Gehm. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:  
Loryn V. Gehm Revocable Living Trust
3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:  
County Name: Section #: Township #: Range #:  
Kingsbury W 1/2 15-110-57
4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to 28 USC § 1746, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 26, 2025.

Signature: Loryn Gehm

County Signed in: Kingsbury

Printed Name: Loryn Gehm

State Signed in: South Dakota

Donald J Churchill  
Notary of the Public South Dakota  
My Commission Expires 10/30/2030



My Commission Expires  
October 30, 2030

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Marilyn D. Nelson. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
McPherson	SE 1/4 8	Weber	128 - 67

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 22, 2025.

Signature: Marilyn D. Nelson

County Signed in: McPherson  
State Signed in: South Dakota

Printed Name: Marilyn D. Nelson



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Wade Weiszhaar. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
McPherson	27-SE 1/4	Spring	126N-68W
McPherson	21-N 1/2	Spring	126N-68W

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to 28 USC § 1746, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 25, 2025.

Signature: Wade Weiszhaar

County Signed in: McPherson  
State Signed in: South Dakota

Printed Name: Wade Weiszhaar



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Joan Weiszhaar. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
McPherson	27 - NW 1/4	Spring	626 N - 68 W

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to 28 USC § 1746, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 25, 2025.

County Signed in: McPherson  
State Signed in: South Dakota

Signature:

Printed Name:

Joan Weiszhaar  
Joan Weiszhaar



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Chad Weiszhaar. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
<u>McPherson</u>	<u>27 - SE 1/4</u>	<u>Spring</u>	<u>126N - 68W</u>

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to 28 USC § 1746, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 25, 2025.

Signature: \_\_\_\_\_

County Signed in: McPherson  
State Signed in: South Dakota

Printed Name: \_\_\_\_\_

Chad Weiszhaar

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Brady Weiszhaar. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
<u>McPherson</u>	<u>27 - SE 1/4</u>	<u>Spring</u>	<u>626 N - 68 W</u>

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to 28 USC § 1746, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 25, 2025.

Signature:

Brady Weiszhaar

County Signed in: McPherson  
State Signed in: South Dakota

Printed Name:

Brady Weiszhaar



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is TERRY R HENDRIX. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:
- \_\_\_\_\_.

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
<u>SANBORN</u>	<u>4</u>	<u>RAVENNA</u>	<u>105 59</u>

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 26, 2025.

Signature: Terry R. Hendrix

County Signed in: CUSTER  
State Signed in: SOUTH DAKOTA

Printed Name: TERRY R HENDRIX

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION  
BY SCS CARBON TRANSPORT LLC FOR A  
PERMIT TO CONSTRUCT A CARBON  
DIOXIDE TRANSMISSION PIPELINE**

**DOCKET HP 24-001**

**DECLARATION IN SUPPORT OF  
LANDOWNERS' MOTION AND/OR  
REQUEST TO DENY APPLICATION**

1. My name is Leo E. King. I am over the age of 18 years old, have personal knowledge of all facts recited in this Declaration, and I am competent to testify about them.
2. I own personally or am an authorized member or authorized officer or owner of a company or corporation, or a Trustee of a Trust that owns land in South Dakota targeted by SCS Carbon Transport, LLC (hereinafter "Summit") and upon which Summit seeks to locate a proposed carbon dioxide sequestration pipeline according to its Application on file with the PUC at Docket HP 24-001. If a company or corporation or trust own any portion of the land(s) described below, the name of that entity of which I am authorized to make this Declaration is:

Leo E. King Revocable Living Trust

3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

County Name:	Section #:	Township #:	Range #:
Sanborn	16	Ravenna	T-105-N/R-59-W
Sanborn	23	Ravenna	T-105-N/R-59-W
Sanborn	24	Ravenna	T-105-N/R-59-W
Sanborn	26	Ravenna	T-105-N/R-59-W

4. To the extent Summit needs or desires either a survey or an easement agreement of any kind across, on, under, or through the land(s) described above for any purpose, no survey of any kind and no easement agreement of any kind will be granted to Summit by any owner of the land(s) described above.
5. It is your undersigned declarant's belief that Summit's PUC Application in this docket contains one or more deliberate misstatements of material fact and/or that Summit has failed to file an application in the form and content required by applicable laws or rules.
6. I declare under penalty of perjury, pursuant to **28 USC § 1746**, under the laws of the United States of America, and under the law of South Dakota, that the foregoing Declaration is true and correct.

Signed on March 26, 2025.

Signature: Leo E. King

County Signed in: Clay  
State Signed in: Missouri

Printed Name: Leo E. King