

**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:  
DWAYNE HOFER CORPORATION

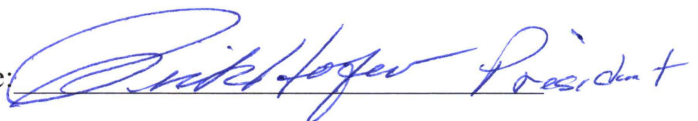
3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:

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:

 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>Spink</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  
DIOXIDE TRANSMISSION PIPELINE**

**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  
State Signed in: South Dakota

Printed Name: Kathleen Restow



**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 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 #:
<u>McPherson</u>	<u>28</u>	<u>125</u>	<u>67</u>
<u>McPherson</u>	<u>19</u>	<u>125</u>	<u>67</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: 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  
State Signed in: Arizona

Printed Name: Rodney Dobberpuhl



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 #:
Brown	NW 1/4 33	123	64
Brown	NE 1/4 29	123	64
Brown	SE 1/4 30	123	64
Brown	SW 1/4 30	123	64

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

Printed Name: Craig 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
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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 #:
Codington	17	116	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 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 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 #:
Codington	22	116	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 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 Gray 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: \_\_\_\_\_



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

Printed Name: Tamara Mohr

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 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>Minnichaha</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: Orrin Geide

County Signed in: Minnichaha  
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: 

County Signed in: Lincoln  
State Signed in: South Dakota

Printed Name: LuAnn 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 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>52W</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

LO 033

**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 Lonna - 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 #:
<u>McPherson</u>	<u>8</u>	<u>Spring Township</u>	<u>126-68</u>
<u>McPherson</u>	<u>16</u>	<u>Spring Township</u>	<u>126-68</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: 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 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 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 #:
Brookings	30	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: 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: Danny Clark

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

Printed Name: Mark E. Johnson

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 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 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 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.

Signature:

Jeffrey Skelton

County Signed in Hamlin

Printed Name:

Jeffrey Skelton

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 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

LO 044



**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

LO 045

**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

LO 046



**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:  
Carl + 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 (Tract Three)	SE 1/4 of Section 19	99 North	49 W of 5 <sup>th</sup> 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 26, 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 #:  
14-105 N - 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: LO 049 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

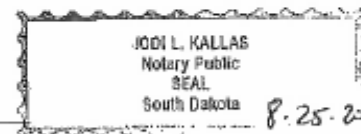
DOCKET HP 24-001

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

1. My name is 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:  
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: Reetta Sieh



County Signed in: McPherson

Printed Name: Jodi L. Kallas

Jodi L. Kallas

State Signed in: South Dakota

LO 050



**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 #:
McPherson Cty	29	125 N	67 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<sup>th</sup>, 2025.

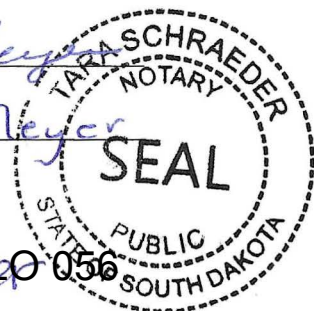
County Signed in: Lincoln  
State Signed in: South Dakota

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 #:
Brown	29	12 3	64

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: Washington  
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 Washington

LO 058

**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:

Olson 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 #:
<u>Miner</u>	<u>17</u>	<u>Adams T107N</u>	<u>R56W</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: 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 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.

Signature:

County Signed in: McPherson  
State Signed in: South Dakota

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 #:
McPherson	27 - SE 1/4	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: \_\_\_\_\_

County Signed in: McPherson  
State Signed in: South Dakota

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

Chad Weiszhaar  
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 - 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: 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 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

LO 067



**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  
State Signed in: SOUTH DAKOTA

Printed Name: RODNEY COMBS



**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  
LO 075



**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 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 Schwatzer

County Signed in: Mingus

Printed Name: Sally Schwatzer

State Signed in: SD

LO 076

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
3. The directly affected South Dakota land(s) in question in HP 24-001 is located at:  
County Name: Section #: Township #: Range #: 5-18-11  
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: 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

LO 077



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 W1/2 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

LO 078

**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



**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 Troy 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 #:
Codington	SW 1/4 35-116-59	Lemmon	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 27, 2025.

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

County Signed in: Codington  
State Signed in: SD

Printed Name: Troy 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 Jennifer Poindexter Runge. 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>Hand</u>	<u>4</u>	<u>T-115-N</u>	<u>R-70-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 20, 2025.

Signature: Jennifer Poindexter Runge

County Signed in: Hand

Printed Name: Jennifer Poindexter Runge

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 Rebecca Lueth. 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 #:
Minnehaha	Section 6 W1/2NW1/4	101 North	51 West of the 5thPM

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: \_\_\_\_\_

Rebecca Lueth

County Signed in: Jackson County

Printed Name: Rebecca Lueth

State Signed in: Missouri

**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 Minor. 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 Minor Living Trust.

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

County Name:	Section #:	Township #:	Range #:
Brookings	31	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: David Minor

County Signed in: Brookings  
State Signed in: South Dakota

Printed Name: David Minor



**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 Jo minor. 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 Jo minor Living Trust.

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

County Name:	Section #:	Township #:	Range #:
Brookings	33	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: Mary Jo Minor

County Signed in: Brookings

Printed Name: Mary Jo Minor

State Signed in: South Dakota