

**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**

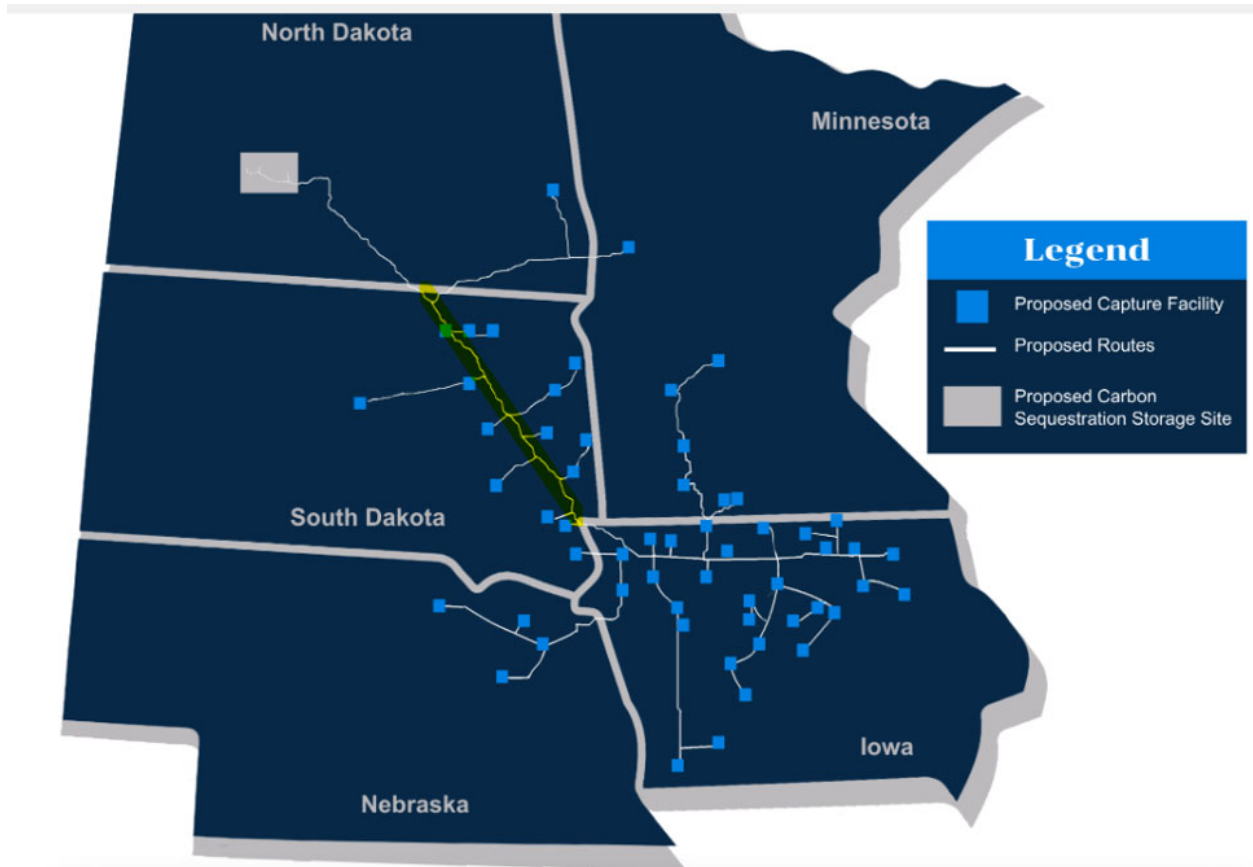
DOCKET HP 24-001

**LANDOWNERS' OPPOSITION TO
SUMMIT'S MOTION TO
RECONSIDER APPLICANT'S
MOTION TO EXTEND DEADLINE &
LANDOWNERS' REASSERTION OF
MOTION TO DENY APPLICATION**

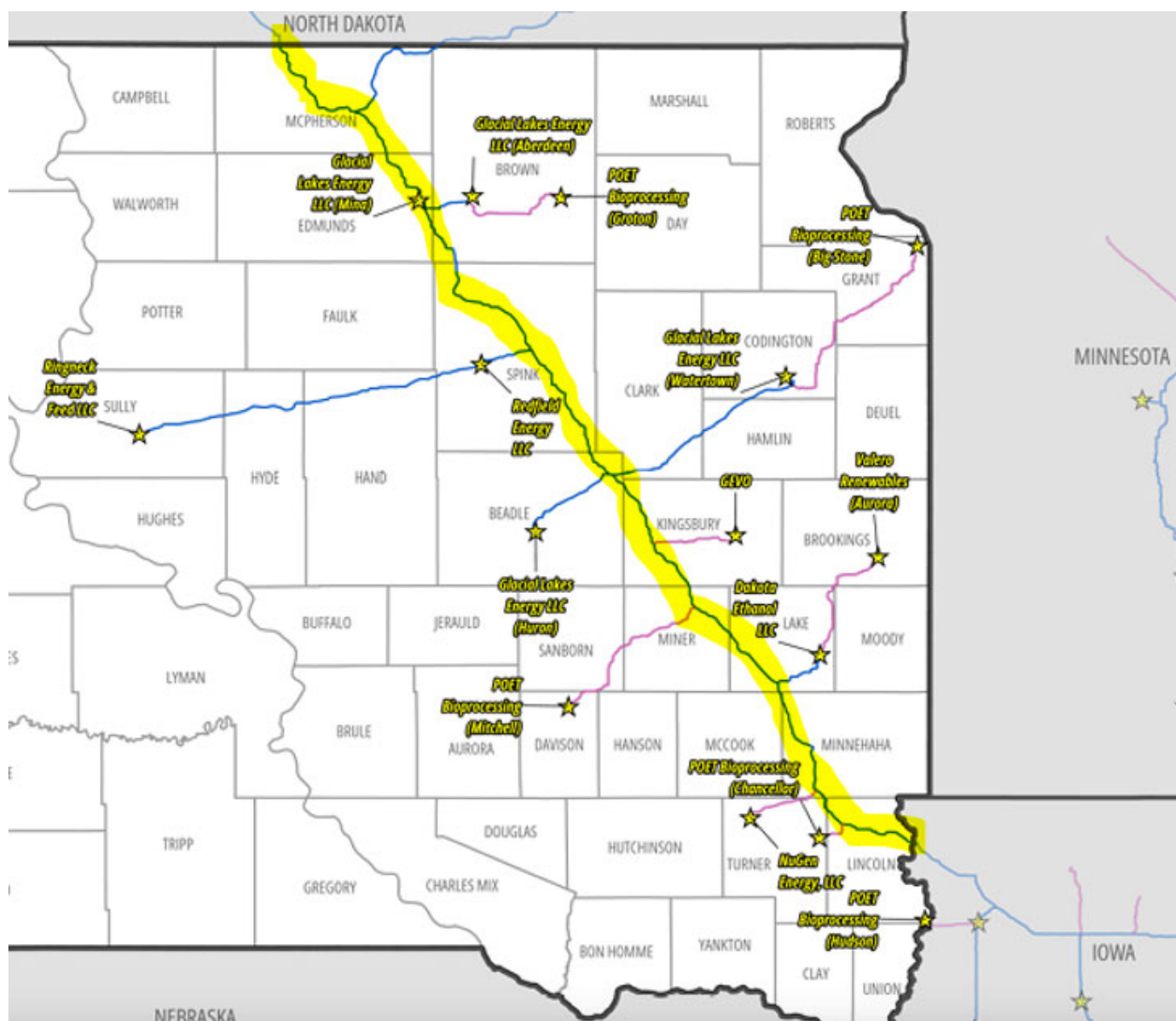
Intervening Landowners by and through their counsel of record, Brian Jorde, Domina Law Group, pc llo, and Ryan Cwach, Birmingham & Cwach Law Offices, PLLC, respectfully again move the Commission to deny the SCS Carbon Transport, LLC (hereinafter "Summit") application for the reasons discussed previously and those that will be further argued at hearing on April 22, 2025, and object to and resist Summit's Motion to Reconsider Applicant's Motion to Extend Deadline.

In further support of Landowners' Motion to Deny and resistance to Summit's reconsideration motion, Landowners respond to Summit's April 17, 2025, "Response to Commissioners" in part by including the following maps which will be discussed in more detail during the April 22, 2025, hearing.

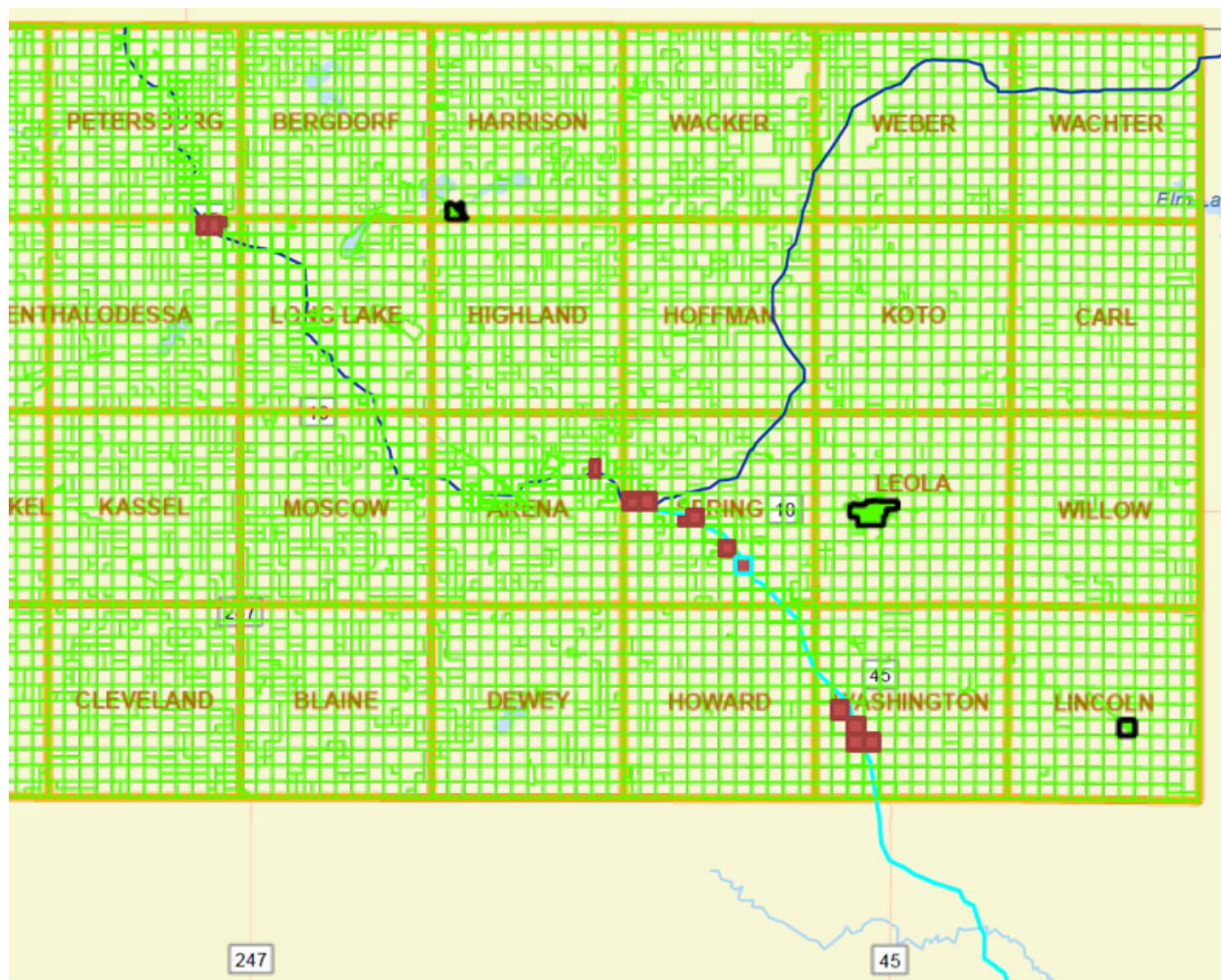
Map 1 below is Summit's five state proposed project footprint taken from Summit's website as of April 22, 2025, [Project Footprint - Summit Carbon Solutions](#). The yellow highlighted portion is the main trunkline of the originally proposed route and the currently proposed route in Summit's application.



Map 2 below was also taken from Summit's website as of April 22, 2025, Project Footprint - [Project Footprint - Summit Carbon Solutions](#) , by clicking on "South Dakota" and is the South Dakota specific proposed route overview as found in Summit's current application. The yellow highlighted portion shows the portion of the main transmission line from Iowa and to North Dakota of the currently proposed route in Summit's application.

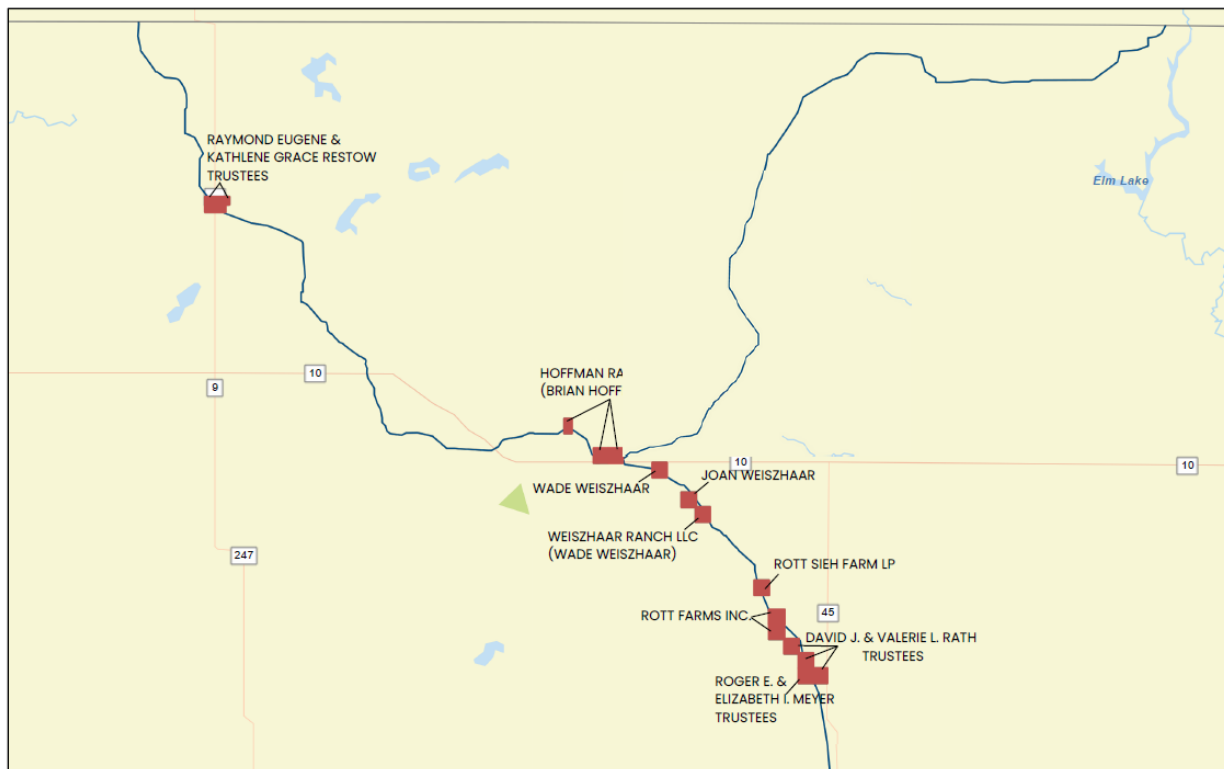


Map 3 below is a McPherson County map showing Summit's proposed McPherson County route, also as depicted in yellow highlighting in Map 2, with parcels shown in red owned by Landowner Declarants who have attested they will not agree to any survey or any easement with Summit. Each parcel shown in red is directly located upon Summit's proposed route in its current application. Summit's proposed route exits South Dakota in northwestern McPherson County.



Map 4 below is also a map showing McPherson County depicting the same as Map 3 but in a different presentation showing relevant Landowner/Declarants' names.

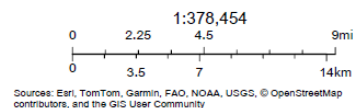
MCPHERSON COUNTY WEB VIEWER



4/18/2025, 3:22:06 PM

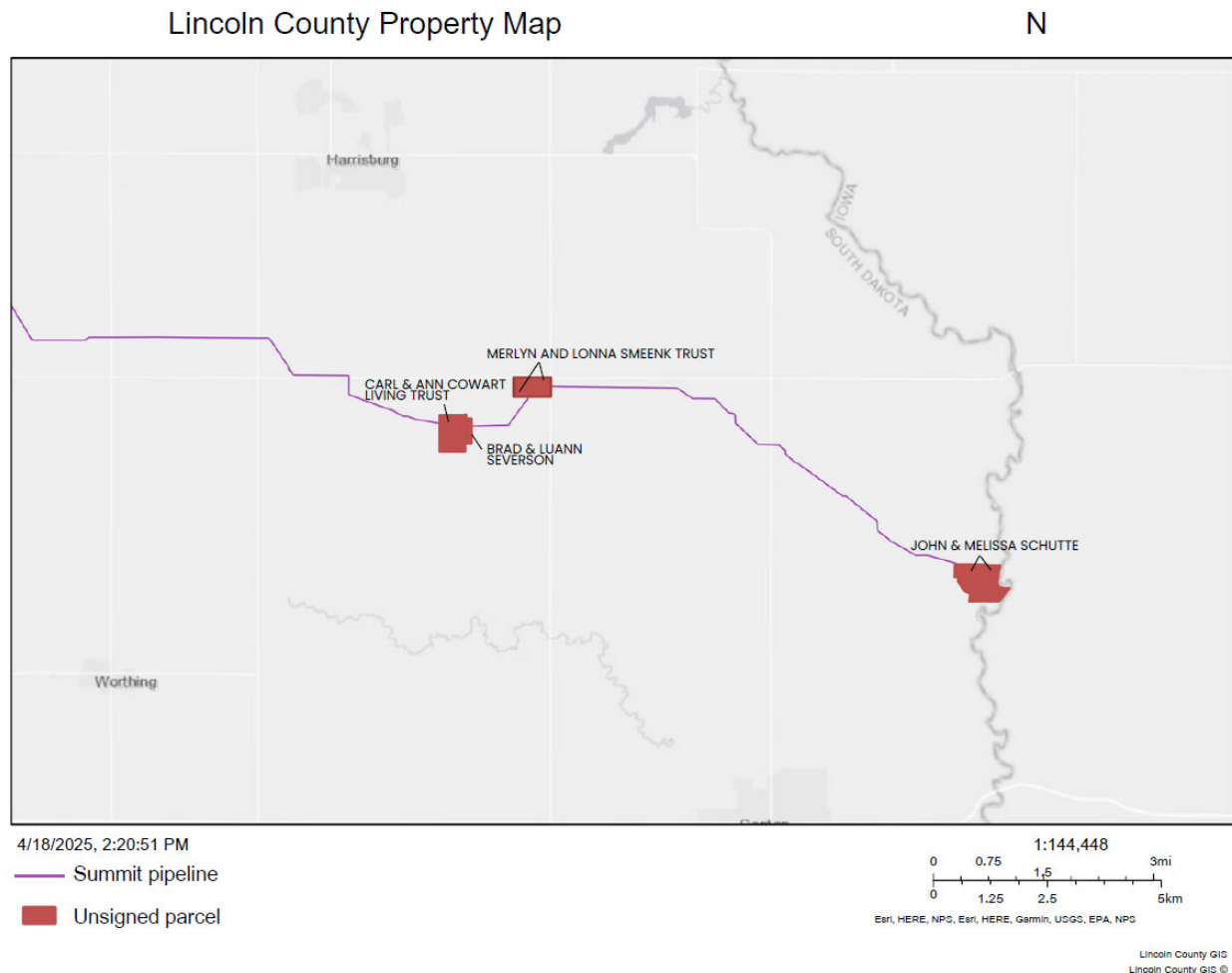
Summit pipeline

Unsigned parcel



This map is intended for general planning purposes only. District III and McPherson County makes no claims, representations, and warranties regarding the accuracy of the data.

Map 5 below shows Summit's proposed route into Lincoln County from Iowa, also as generally depicted in yellow highlighting in Map 2, and the parcels in red are owned by the named Landowner/Declarants who have attested they will not agree to any survey or any easement with Summit. Each parcel shown in red is directly located upon Summit's proposed route in its current application.



Dated April 22, 2025.

By: /s/ Brian E. Jorde

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Lawyers for Landowners/Movants

CERTIFICATE OF SERVICE

On April 22, 2025, a true and correct copy of the foregoing was served electronically to persons on the PUC Service List for this Docket.

/s/ Jordan Custer
Jordan Custer