

Dakota Carbon Pipeline Project- Mercer County

Reclamation Inspection Report

Docket Number: PU-21-150

Prepared for North Dakota Public Service Commission



November 2025

Reclamation Inspection Report

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1 Executive Summary

The North Dakota Public Service Commission (PSC) retained Barr Engineering Co. (Barr) to complete a reclamation inspection for the construction of the Dakota Carbon Pipeline project in Mercer County, North Dakota (ND), constructed by the Dakota Gasification Company (DGC). The purpose of the inspection is to ensure the project is constructed in compliance with siting laws and rules and the applicable PSC Orders for the project.

The reclamation inspection was conducted on October 30, 2025. The inspection included observations of the reclaimed areas located within road ditches, underneath roadways, near industrial development, and reclaimed pastureland and CRP. Wetland areas and roadways were HDD bored with minimal impacts to vegetation. No major issues were observed. Overall, reclamation efforts of the Project are satisfactory and appeared to have been completed according to the Natural Resources Conservation Service (NRCS) recommendations. The Project is in compliance with applicable siting laws, rules, and PSC orders.

2 Background and Scope

2.1 Introduction

The Dakota Carbon Pipeline is a 12-inch pipeline originating at the Great Plains Synfuels plant located near Beulah, North Dakota with 6-inch lateral lines that will carry carbon dioxide (CO₂) to third-party entities to facilitate the geologic storage or sequestration of CO₂.

The pipe for the Project is designed to carry up to 200 million standard cubic feet per day of CO₂. The maximum allowable operating pressure for the pipeline is 2,700 pounds per square inch gauge (psig), at a design temperature of 120 degrees Fahrenheit. The Project is under the jurisdiction of the North Dakota PSC, which issued its Findings of Fact, Conclusions of Law, and Order in Case No. PU-21-150 on July 28, 2021, granting Certificates of Corridor Compatibility No. 223, and Route Permit No. 233 for the Project.

Construction for the Project began in October 2021 and was completed in January 2024.

2.2 Regulatory Purpose and Need

The North Dakota Energy Conversion and Transmission Facility Act (North Dakota Century Code Chapter 49-22) charges the Public Service Commission with determining that the location, construction, and operation of jurisdictional energy conversion and transmission facilities will produce minimal adverse effects on the environment and the welfare of citizens of North Dakota. Inspections during construction ensure that such projects are built in compliance with the siting laws (North Dakota Century Code Chapter 49-22) and rules (North Dakota Administrative Code Article 69-06) and the applicable Commission Orders.

2.3 Scope of Work

The North Dakota Public Service Commission retained Barr Engineering Co. to perform a reclamation inspection of the Project. Barr subcontracted with Meadowlark Environmental, LLC (Meadowlark) to complete the reclamation inspection. Barr's scope of work was to complete and document an on-site reclamation inspection upon completion of a minimum of one growing season after the construction phase of the project to verify the project was constructed in compliance with the siting laws, rules, and applicable Commission Orders and to determine whether the area affected by construction activities has been restored to as near as practicable to the condition as it existed prior to the beginning of construction, including reestablishment of desired plant species where applicable. This report contains site visit observations and a summary of findings and issues that should be addressed for the Project to be considered complete and in full compliance.

3 Findings of Site Inspection

3.1 Methods

Zach Peterson, Project Manager/Field Inspector for Meadowlark visited the Project site on October 30, 2025, to conduct the reclamation inspection. Hunter Eslinger, Pipeline Engineer with DGC accompanied Mr. Peterson during the inspection. The site was visually inspected by walking the ROW and driving to areas that the pipeline was HDD bored under roadways and areas where the pipeline was located along the roadside and ditches of access roads. Photos (iPhone 15) were taken with a GIS overlay and without the overlay at observation points to record the geographic locations of the observation points visited during the inspection.

3.2 On-Site Inspection Observations

Mr. Peterson met Mr. Eslinger at the Dakota Gasification Antelope Valley Station to begin the inspection. The main 12-inch line was inspected first. The majority of the main line is located along the County Road 26 roadway. The pipeline ROW where the main line was located along the west and east sides of County Road 26 was completely vegetated with a mix of native grasses and encroaching nonnative species that make up the majority of the surrounding landscape. No issues were observed with the main line reclamation, and the ROW appeared to be reclaimed properly, and vegetation was similar to the adjacent areas.

Branch 1 of the 6-inch pipeline was bored underneath an access road to the Coteau Mine and did not appear to have any reclamation related issues. Branch 2 of the 6-inch pipeline runs through pasture and hayland. The Branch 2 ROW appeared to be composed of vegetation similar to the adjacent areas on both sides and did not appear to have any reclamation issues. Branches 3 and 4 of the 6-inch pipeline were located in CRP and cropland with vegetation similar to the adjacent areas with no reclamation issues noted. Branch 5 of the 6-inch pipeline crossed through CRP and had vegetative composition similar to the adjacent areas with no reclamation issues noted. Branch 6 of the 6-inch pipeline also ran through mostly CRP with similar plant composition to the areas adjacent to the ROW. Plant composition of the branch lines were composed of a mix of seeded native grasses and invasive non-native plants that made up the majority of the vegetation on the areas directly adjacent to the ROW.

4 Issues to Resolve and Recommendations

The reclamation inspection of the Dakota Carbon Pipeline Project verified that the project is constructed in compliance with the siting laws, rules, and applicable Commission Orders. No major issues were observed during the reclamation inspection. However, Meadowlark makes the following recommendations to prevent potential issues at the project site:

Potential Issues	Recommendations
Noxious Weeds	Monitor the Project ROW for noxious weeds and manage weeds as necessary.

5 Signatures

The services performed by Barr staff, and its subcontractor Meadowlark, for this project have been conducted in a manner consistent with the technical skill and degree of care exercised by professionals currently practicing in this discipline under similar time and budget constraints. Findings and recommendations represent our professional judgement and are based on available information and accepted practices. No warranty is implied or expressed beyond this.



Andrew Unbehaun, Project Manager

11/19/2025

Date



Zach Peterson, Inspector

11/18/2025

Date

Appendices

Appendix A

Photo Log and Observation Maps

On-Site Photographs

Dakota Carbon Pipeline Project- Mercer County

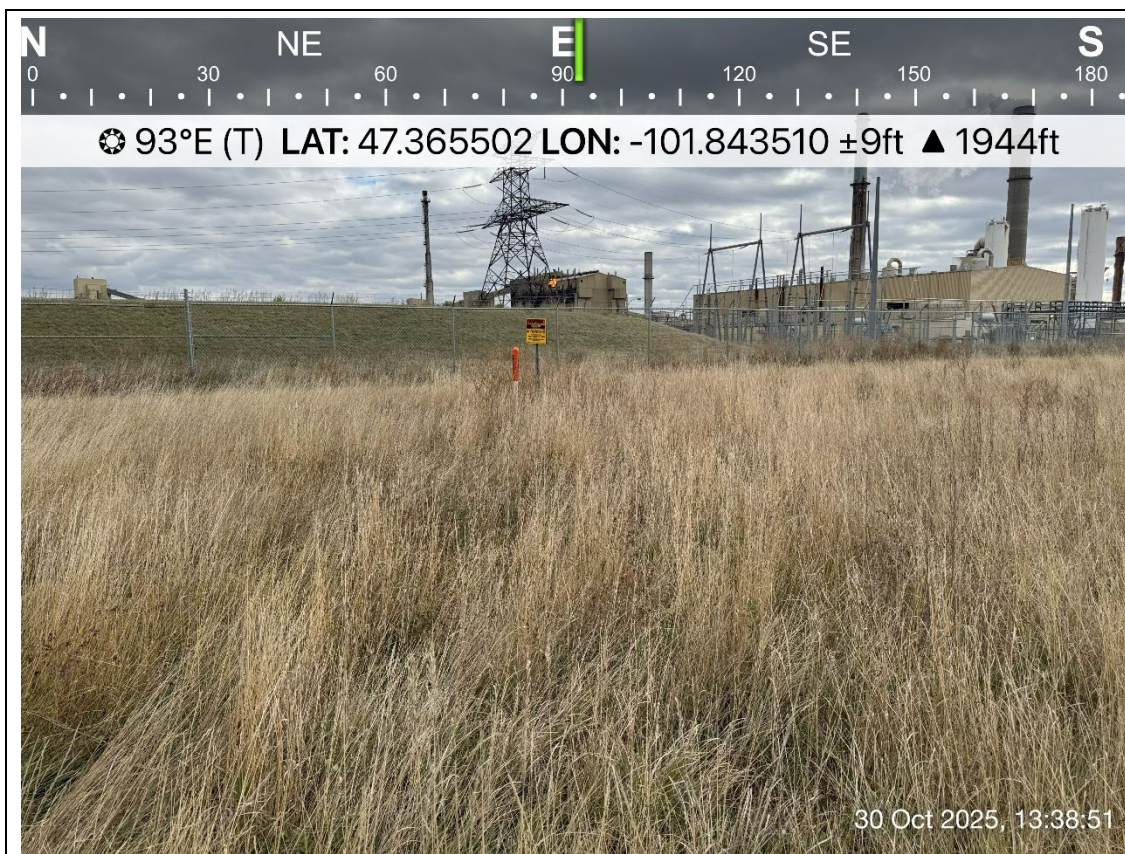




Photo #: 1
Direction: East
Description: 12-inch main line tie-in to DGC Antelope Valley Station.
Observer: Zach Peterson
Date: 10/30/2025
Latitude: 47.365502
Longitude: -101.843510



Photo #: 2
Direction: South
Description: 12-inch main line ROW along west side of County Road 26.
Observer: Zach Peterson
Date: 10/30/2025
Latitude: 47.383098
Longitude: -101.844530


On-Site Photographs


Dakota Carbon Pipeline Project- Mercer County

<p>S 180 SW 210 V 270 NW 300 N 330 0</p> <p>☉ 271°W (T) LAT: 47.386395 LON: -101.847464 ±19ft ▲ 1959ft</p>  <p>30 Oct 2025, 13:54:50</p>	<p>Photo #: 3</p> <p>Direction: West</p> <p>Description: Branch 1 of 6-inch line running underneath access road to Coteau Mine.</p> <p>Observer: Zach Peterson</p> <p>Date: 10/30/2025</p> <p>Latitude: 47.386395</p> <p>Longitude: -101.847464</p>
<p>NW 300 N 330 0 NE 30 E 60 90</p> <p>☉ 22°NE (T) LAT: 47.392459 LON: -101.843953 ±2788ft ▲ 1952ft</p>  <p>30 Oct 2025, 14:02:57</p>	<p>Photo #: 4</p> <p>Direction: North</p> <p>Description: 12-inch main line along east side of County Road 26.</p> <p>Observer: Zach Peterson</p> <p>Date: 12/7/2023</p> <p>Latitude: 46.864600</p> <p>Longitude: -97.002783</p>

On-Site Photographs

Dakota Carbon Pipeline Project- Mercer County

<p>E 90 SE 120 150 S 180 SW 210 240 W 270</p>	<p>Photo #: 5</p> <p>Direction: South</p>
<p>🌐 182°S (T) LAT: 47.400433 LON: -101.843456 ±16ft ▲ 1976ft</p>	<p>Description: Branch 2 of 6-inch line running southeast through pasture and hayland.</p>
 <p>30 Oct 2025, 14:09:09</p>	<p>Observer: Zach Peterson</p> <p>Date: 10/30/2025</p> <p>Latitude: 47.400433</p> <p>Longitude: -101.843456</p>

<p>S 180 SW 210 240 W 270 NW 300 330</p>	<p>Photo #: 6</p> <p>Direction: West</p>
<p>🌐 263°W (T) LAT: 47.402070 LON: -101.842977 ±16ft ▲ 2013ft</p>	<p>Description: Branch 4 of 6-inch line running along north side of County Road 15.</p>
 <p>30 Oct 2025, 14:12:45</p>	<p>Observer: Zach Peterson</p> <p>Date: 10/30/2025</p> <p>Latitude: 47.402070</p> <p>Longitude: -101.842977</p>

On-Site Photographs

Dakota Carbon Pipeline Project- Mercer County

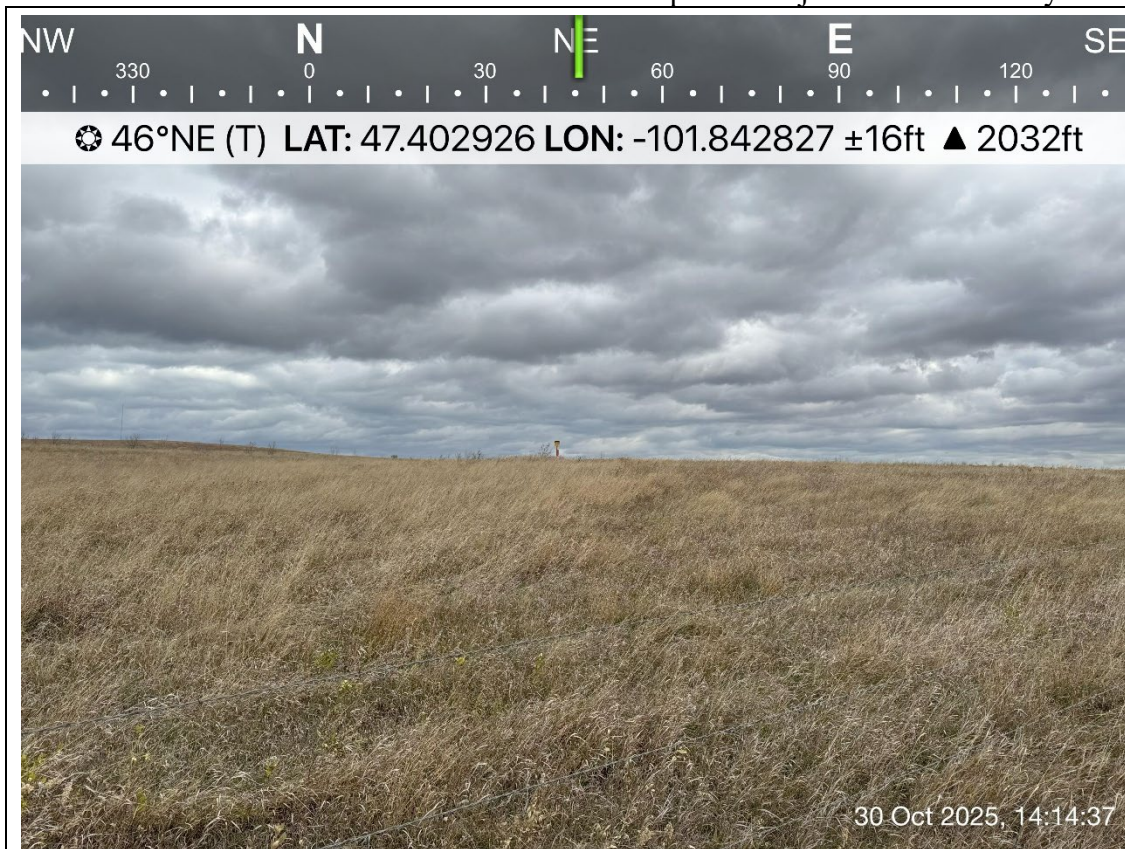


Photo #: 7

Direction: Northeast

Description: Branch 6 of 6-inch line running northeast through CRP field.

Observer: Zach Peterson

Date: 10/30/2025

Latitude: 47.402926

Longitude: -101.842827

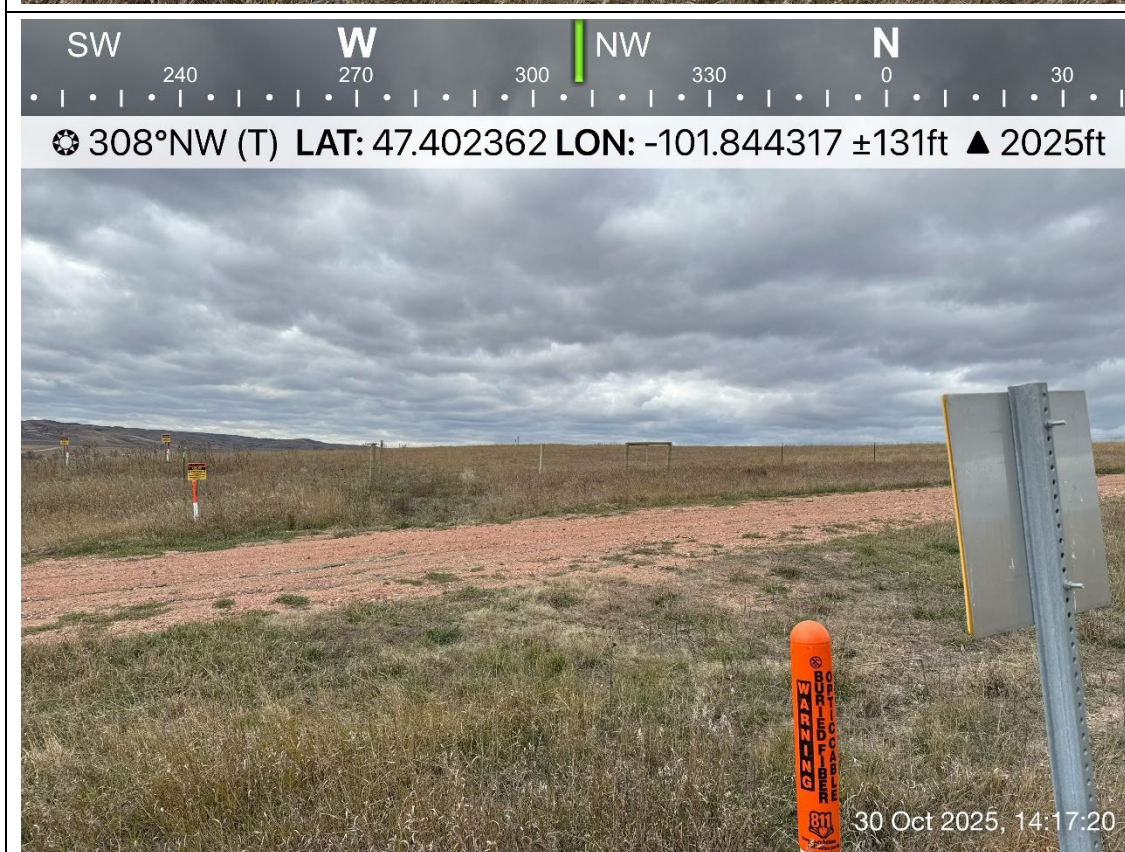


Photo #: 8

Direction: Northwest

Description: Branch 5 of 6-inch line running northwest through CRP field.

Observer: Zach Peterson

Date: 10/30/2025


Latitude: 47.402362

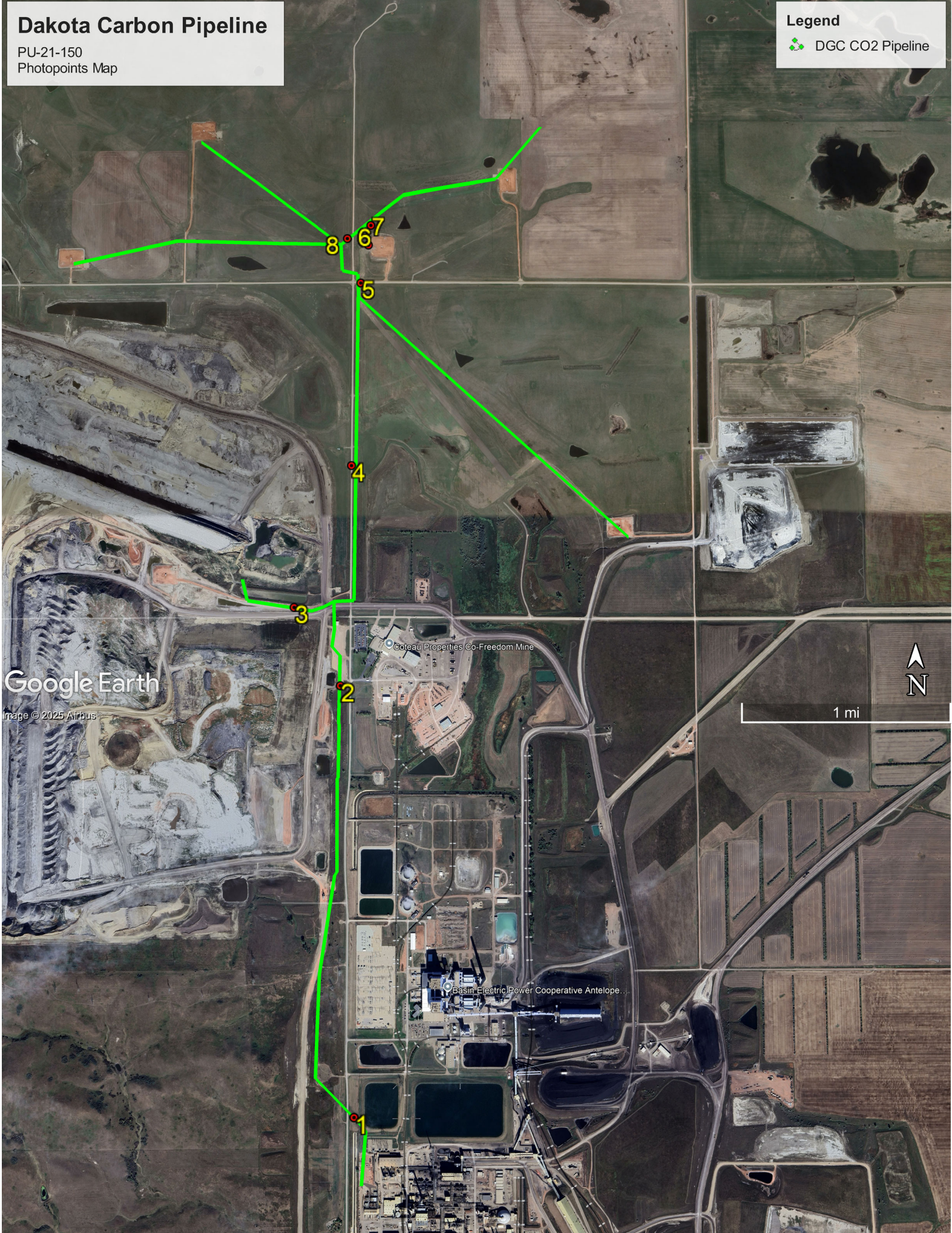
Longitude: -101.844317

Dakota Carbon Pipeline

PU-21-150
Photopoints Map

Legend

 DGC CO2 Pipeline



Google Earth

Image © 2025 Airbus

Coteau Properties Co-Freedom Mine

Basin Electric Power Cooperative Antelope

1 mi

