



Public Service Commission

State of North Dakota

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April 18, 2023

Doug Goehring, North Dakota Agriculture Commissioner
North Dakota Department of Agriculture
600 E. Boulevard Ave., Dept. 602
Bismarck, ND 58505-0020

Dear Commissioner Goehring,

I am writing to request your input regarding a proposed CO2 transmission pipeline that may impact agricultural land in our state. For example, I am concerned about the impacts on field tiling, agricultural land valuations, insurance implications, and risk to livestock if a CO2 pipeline is routed across a landowner's property.

As one of the designated agencies, on February 1, 2023, the North Dakota Public Service Commission (Commission) notified you of the Summit Carbon Solutions Transport LLC, Midwest Carbon Express CO2 Pipeline Project, Case No. PU-22-391, and provided a corresponding map.

The project has been the subject of broad public interest with dozens of intervenors, public comments, and input submitted from agencies and political subdivisions. Three hearings have been held, in Bismarck, Gwinner, and Wahpeton, with many members of the public testifying at each. The Commission is concerned with multiple potential impacts of this project, and I believe your input regarding some of them would be extremely valuable.

One aspect that I am particularly concerned about is the potential impacts on field tiling. I am aware that field tiling is a critical aspect of agricultural land management, as it helps to regulate water levels and prevent erosion. Most of the Commission's experience with pipeline siting is in areas with significantly less field tiling activity. Information or an opinion on the impacts of this project on agricultural producers' existing or potential future field tiling would be appreciated.

I am also concerned about other potential impacts on agricultural operations. Members of the public have expressed that if a high-pressure CO2 pipeline were routed across property, there is a risk that land values could be negatively impacted, making it more difficult for farmers to secure financing and invest in their operations. Land valuation implications may not be readily apparent to many individuals, but your expertise with the agricultural industry would be most valuable.

Questions have also been raised about the liability of landowners and the potential risk to livestock.

Given these concerns, I would greatly appreciate your feedback on the potential impacts of the proposed pipeline. Specifically, I would like your opinion as to:

- What is the likelihood that the pipeline could damage or prevent field tiling, and what measures can be taken to mitigate this risk?
- How would the presence of a high-pressure CO2 pipeline affect agricultural land valuations?
- What steps can be taken to protect our agricultural resources and ensure the viability of our local farming communities with the proposed pipeline?

Thank you for your attention to this matter. The Commission has two more hearings scheduled: Linton May 9, and Bismarck June 2. Your testimony on these or other topics would be greatly appreciated. If you or a representative are unable to attend, your written testimony or comments are, as always, greatly appreciated.

Sincerely,

A handwritten signature in blue ink that reads "Randy Christmann". The signature is fluid and cursive, with the first name "Randy" and last name "Christmann" clearly distinguishable.

Randy Christmann
Chair