

Interrogatories to Applicant in the Application by SCS Carbon Transport LLC for the Midwest Carbon Express CO2 Pipeline Project Siting Application

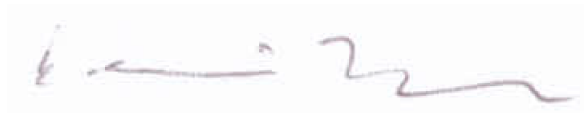
May 1, 2023

Lawrence Bender
Fredrikson & Byron
1133 College Dr. # 1000
Bismarck, ND 58501

Dear Mr. Bender:

Please find, attached, Interrogatories from Laborers District Council of Minnesota and North Dakota ("LIUNA") to the Applicant SCS Carbon Transport LLC concerning the above referenced docket. If you have any questions, please feel free to contact me at 612.224.6464 or kpranis@liunagro.com.

Sincerely,



Kevin Pranis
Marketing Manager
LIUNA Minnesota & North Dakota
(612) 224-6464
kpranis@liunagro.com

NORTH DAKOTA PUBLIC SERVICE COMMISSION

<p>In the Matter of the Application by SCS Carbon Transport LLC for the Midwest Carbon Express CO2 Pipeline Project Siting Application</p> <p>ND PSC Docket No. PU-22-391 OAH File No. 20230002</p>	<p>Interrogatories of the Laborers District Council of Minnesota and North Dakota to SCS Carbon Transport LLC</p>
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The Laborers District Council of Minnesota and North Dakota (“LIUNA”) hereby submits these Interrogatories to SCS Carbon Transport, LLC (“Summit”).

INTERROGATORY NO. 1: Please state the name of each person answering these interrogatories and include for each person their name, address and contact information.

INTERROGATORY NO. 2: Please provide a complete list of pipeline construction projects currently underway or completed in the last five years that Summit considers to be similar in size and scope to the proposed project, and for which Pumpco Inc. was the prime contractor or a subcontractor with primary responsibility for one or more pipeline spreads. Please provide the following information for each listed project (or spread where Pumpco was not the prime contractor), providing reasonable estimates where exact information cannot reasonably be obtained:

- (a) Name of the Project
- (b) Name of the Project Owner
- (c) State(s) and County(ies) where the project is located
- (d) Length of pipeline and material(s) it was designed to transport
- (e) Diameter(s) of pipe and pipe material(s)
- (f) Dates of construction start and completion, if applicable
- (g) Number of drain tile crossings, where known
- (h) Percentage of construction labor hours performed by workers who were residents of the state(s) where the pipeline is located.

INTERROGATORY NO. 3: If not already listed, please provide a complete list of pipeline construction projects currently underway or completed in the last five years that are located in the Northern portion of the United States or Canada (approximately north of 40 degrees latitude) for which Pumpco Inc. was the prime contractor or a subcontractor with primary responsibility for one or more pipeline spreads. Please provide the following information for each listed project (or spread where Pumpco was not the prime contractor), providing reasonable estimates where exact information cannot reasonably be obtained:

- (a) Name of the Project
- (b) Name of the Project Owner
- (c) State(s) and County(ies) where the project is located
- (d) Length of pipeline and material(s) it was designed to transport

- (e) Diameter(s) of pipe and pipe material(s)
- (f) Dates of construction start and completion, if applicable
- (g) Number of drain tile crossings, where known
- (h) Percentage of construction labor hours performed by workers who were residents of the state(s) where the pipeline is located.

INTERROGATORY NO. 4: Please list any completed pipeline construction projects not already listed for which Pumpco Inc. was the prime contractor or a subcontractor with primary responsibility for one or more pipeline spreads, and help to form the basis for Summit's judgment that Pumpco can be relied upon to safely and properly build assigned spreads. Please provide the following information for each listed project (or spread where Pumpco was not the prime contractor), providing reasonable estimates where exact information cannot reasonably be obtained:

- (a) Name of the Project
- (b) Name of the Project Owner
- (c) State(s) and County(ies) where the project is located
- (d) Length of pipeline and material(s) it was designed to transport
- (e) Diameter(s) of pipe and pipe material(s)
- (f) Dates of construction start and completion, if applicable
- (g) Number of drain tile crossings, where known
- (h) Percentage of construction labor hours performed by workers who were residents of the state(s) where the pipeline is located.

Dated: May 1, 2023

Respectfully Submitted,

LIUNA Minnesota & North Dakota



By: Kevin Pranis, Marketing Manager
81 East Little Canada Road
St. Paul, MN 55117

In the Matter of the Application by SCS
Carbon Transport LLC for the Midwest
Carbon Express CO2 Pipeline Project
Siting Application

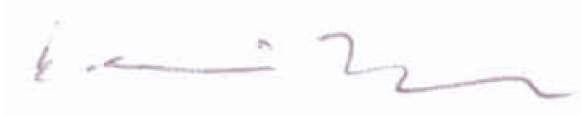
ND PSC Docket No. PU-22-391

OAH File No. 20230002

CERTIFICATE OF SERVICE

I, Kevin Pranis, hereby certify that I have this day served a copy of the foregoing Interrogatories to the Applicant in the Application by SCS Carbon Transport LLC for the Midwest Carbon Express CO2 Pipeline Project on the attached list of persons by personal service to the addresses listed below

Dated this 1st day of May, 2023



Kevin Pranis

Hope Hogan, Administrative Law Judge
Office of Administrative Hearings
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Bismarck, ND 58503

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John Schuh, General Counsel
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