



KNOLL LEIBEL ^{LLP}
ATTORNEYS AT LAW

February 27, 2024

VIA U.S. & E-MAIL ONLY: ndpsc@nd.gov

Steve Kahl
Executive Secretary
North Dakota Public Service Commission
State Capitol
600 E Boulevard Ave, Dept 408
Bismarck, ND 58505-0480

RE: In the Matter of the Application of SCS Carbon Transport LLC for
Certificate of Corridor Compatibility and Route Permit for the Midwest
Carbon Express
Case No.: PU-22-391

Dear Mr. Kahl:

Enclosed for filing please find the following documents:

1. Joinder to Burleigh County's Petition for Reconsideration; and
2. Declaration of Service.

This Joinder to Burleigh County's Petition for Reconsideration is being filed with the North Dakota Public Service Commission (hereinafter "NDPSC") on behalf of the Intervenors represented by Knoll Leibel LLP. Intervenors have a direct and substantial interest in these proceedings, as well as legal property rights which may be substantially affected by NDPSC's findings and conclusions.

Sincerely,

KNOLL LEIBEL LLP

Steven J. Leibel
steve@bismarck-attorneys.com

SJL: rmo

Enclosures

Steven J. Leibel, Partner

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Joinder to Burleigh County's Petition for Reconsideration
Knoll Leibel, LLP, on behalf and at the request of Intervenors
Steven Leibel, Attorney

**STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION**

IN THE MATTER OF THE APPLICATION
OF SCS CARBON TRANSPORT LLC FOR
A CERTIFICATE OF CORRIDOR
COMPATIBILITY AND ROUTE PERMIT
FOR THE MIDWEST CARBON EXPRESS
PROJECT IN BURLEIGH, CASS, DICKY,
EMMONS, LOGAN, MCINTOSH,
MORTON, OLIVER, RICHLAND AND
SARGENT COUNTIES, NORTH DAKOTA

Case No. PU-22-391

**JOINDER TO BURLEIGH
COUNTY'S PETITION FOR
RECONSIDERATION**

Intervenors¹, represented by the undersigned counsel, hereby join in the Petition for Reconsideration filed by Burleigh County and reserve the right to submit a response as permitted by N.D.A.C. § 69-02-06-02(4).

Intervenors request oral argument as permitted by N.D.A.C. § 69-02-06-02(2).

Dated this 27th day of February, 2024.



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David Knoll (ID 06167)
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¹ See Order Granting Petition to Intervene (Doc. 82, 83, 159, 168) and pending Petition to Intervene (Doc. 197).

**STATE OF NORTH DAKOTA
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SARGENT COUNTIES, NORTH DAKOTA

Case No. PU-22-391

DECLARATION OF SERVICE

[1] Rosanne Ogden declares that I am of legal age and not a party to this action, and that I served the following document(s):

- 1. Joinder to Burleigh County's Petition for Reconsideration; and**
- 2. Declaration of Service.**

[2] On February 27, 2024, by sending a true and correct copy thereof by electronic means only to the following email addresses, to wit:

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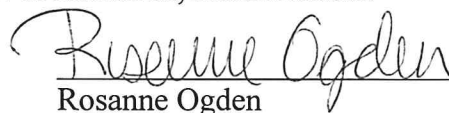
[3] and by sending the originals and seven (7) copies of said documents via U.S. Mail, at Bismarck, North Dakota with postage prepaid, to the following:

Steve Kahl
Executive Secretary
North Dakota Public Service Commission
State Capitol
600 E Boulevard Ave, Dept 408
Bismarck, ND 58505-0480

[4] The addresses of each party served are the last reasonably ascertainable e-mail address and post office address of such party.

[5] I declare, under penalty of perjury under the law of North Dakota, that the foregoing is true and correct.

Signed on the 17th day of February, 2024 at Bismarck, North Dakota.


Rosanne Ogden