



Moss & Barnett

April 12, 2024

Lawrence Bender
Fredrikson & Byron, P.A.
1133 College Drive, Suite 1000
Bismarck, ND 58501

Re: SCS Carbon Transport LLC Midwest Carbon Express CO2 Pipeline Project Siting Application
Case No. PU-22-391

Dear Mr. Bender:

Attached please find the City of Bismarck's second interrogatory in the above-referenced docket.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Patrick T. Zomer
Attorney at Law
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PTZ/keb

Attachment

515 PU-22-391 Filed 04/12/2024 Pages: 6
The City of Bismarck's Second Interrogatory to SCS Carbon Transport LLC
City of Bismarck
Patrick T. Zomer, Moss & Barnett

STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION

SCS Carbon Transport LLC Midwest Carbon
Express CO2 Pipeline Project Siting
Application

CASE NO. PU-22-391

**THE CITY OF BISMARCK'S SECOND
INTERROGATORY TO
SCS CARBON TRANSPORT LLC**

The City of Bismarck, North Dakota ("Bismarck" or the "City") by and through its undersigned counsel and pursuant to North Dakota Administrative Code § 69-02-05-12 and North Dakota Century Code title 49, hereby serves the following interrogatory on SCS Carbon Transport LLC ("Summit") and requests an answer to the below interrogatory within ten (10) business days after service of this interrogatory.

INTERROGATORY

INTERROGATORY NO. 2: Please admit that the attached Exhibit 1¹ to this interrogatory accurately depicts the distances at the identified locations between: (1) the Preferred Route and the City's Future Expansion Boundary; and (2) the Southern Alternative Route and the City's Future Expansion Boundary. If Summit does not so admit, please provide an equivalent map/figure that accurately identifies the distances between: (1) the Preferred Route and the City's Future Expansion Boundary; and (2) the Southern Alternative Route and the City's Future Expansion Boundary at approximately these locations.

ANSWER:

¹ Exhibit 1 is based on Figure 4 from Summit's January 19, 2024 Bismarck Route Analysis (Revision: 2), filed as Docket No. [432](#) on January 24, 2024.

Dated: April 12, 2024

Respectfully submitted,

By: _____ /s/

Patrick T. Zomer

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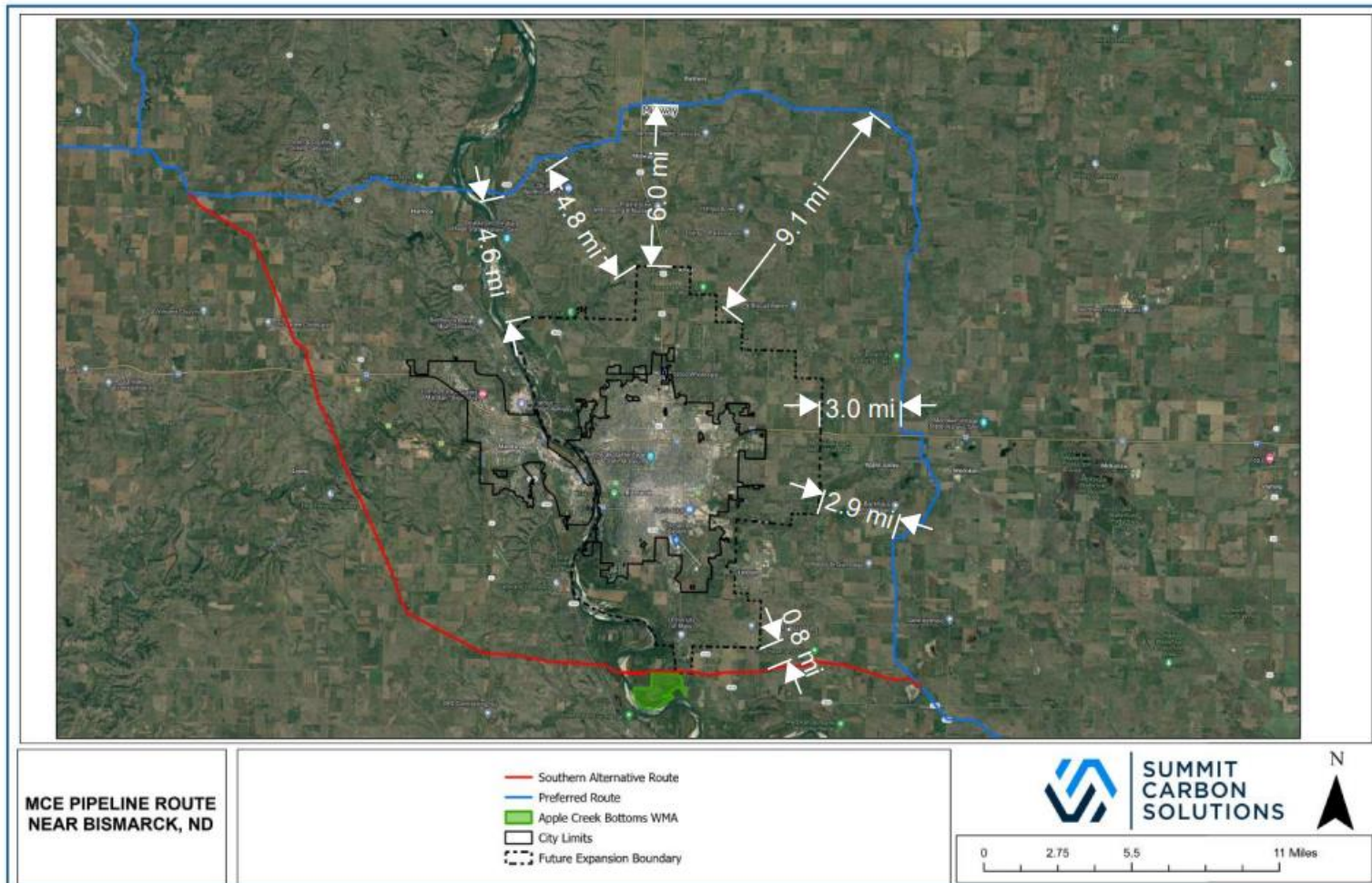
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Attorney on Behalf of the City of Bismarck

**THE CITY OF BISMARCK'S SECOND
INTERROGATORY TO SCS CARBON TRANSPORT LLC**

EXHIBIT 1



STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION

SCS Carbon Transport LLC Midwest Carbon
Express CO2 Pipeline Project Siting
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Case No. PU-22-391

CERTIFICATE OF SERVICE

Karen E. Berg certifies that on the 12th day of April, 2024, she sent a true and correct copy of **The City of Bismarck's Second Interrogatory to SCS Carbon Transport LLC** to the following addresses by United States Mail and electronic means:

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Signed on the 12th day of April, 2024, at Minneapolis, Minnesota.

/s/ Karen E. Berg
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