

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF NORTH DAKOTA**

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, DICKEY,
EMMONS, LOGAN, MCINTOSH,
MORTON, OLIVER, RICHLAND AND
SARGENT COUNTIES, NORTH DAKOTA

CASE NO. PU-22-391

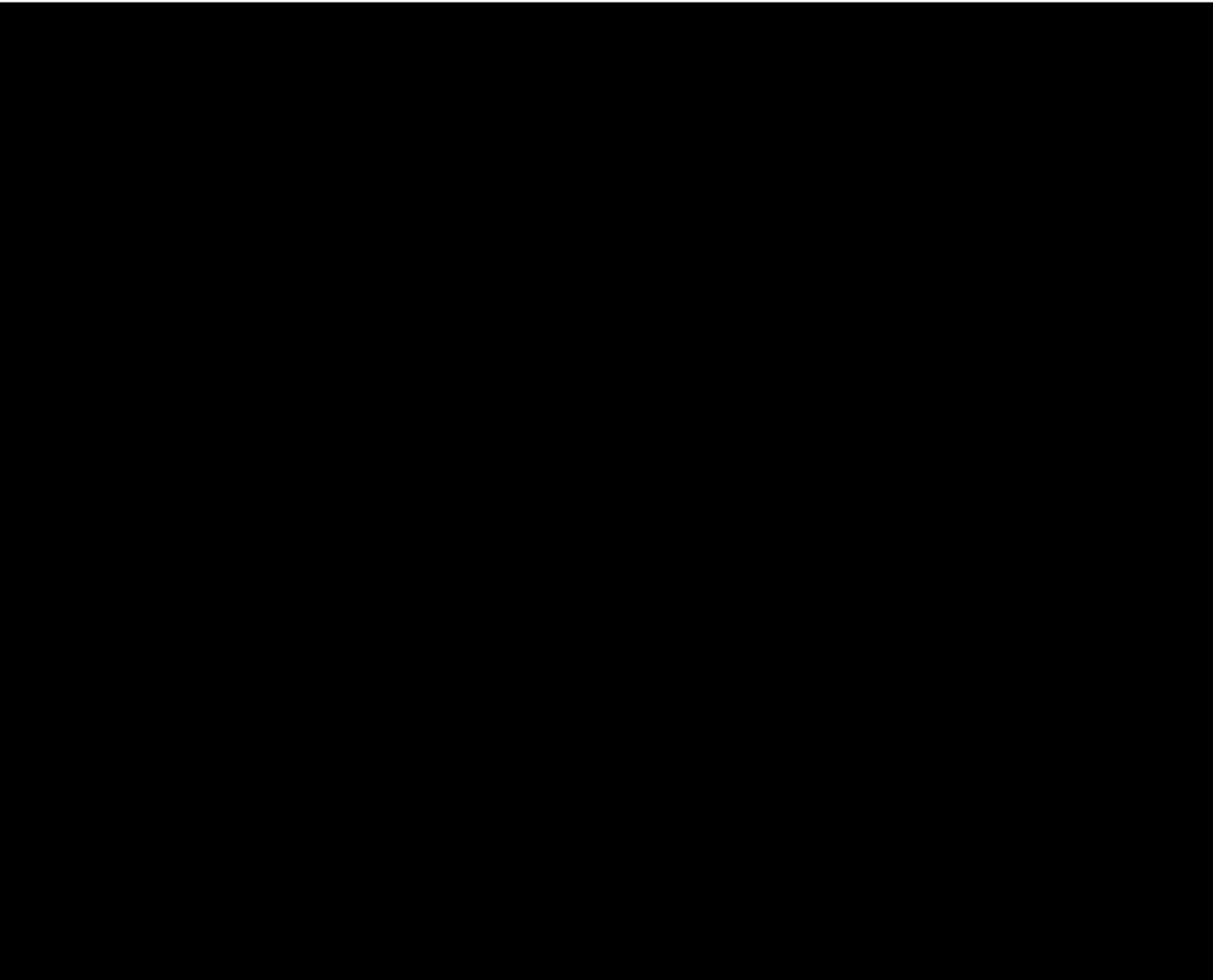
OAH FILE NO. 20230002

**Response of SCS Carbon Transport LLC to the Interrogatories, Request for Admissions,
and Request for Production (Set 3) from Intervenors Represented by Knoll Leibel LLP and
Jorde/Domina Law Group**

SCS Carbon Transport LLC (“Summit”), by and through its attorneys of record, responds to the Interrogatories, Request for Admissions, and Request for Production submitted by Intervenors represented by Knoll Leibel LLP and Jorde/Domina Law Group (“Intervenors”) on March 28, 2024 in the above-captioned proceeding (each a “Discovery Request” and collectively, the “Discovery Requests”). *See* Docket No. PU-22-391. Summit’s response is made without waiving or intending to waive any objection as to relevance, privilege, or admissibility of any information provided in response to the Discovery Requests in any subsequent proceeding of this or any other action on any ground. A partial answer to any Discovery Request that has been objected to, in whole or in part, is not intended to be a waiver of the objection. By responding to the Discovery Requests, Summit is not admitting that any aspect of the Discover Requests is factually accurate or relevant to this proceeding.

GLOBAL OBJECTIONS

The following Global Objections apply to each of the Discovery Requests—even if not separately restated below in response to a particular Discovery Request.

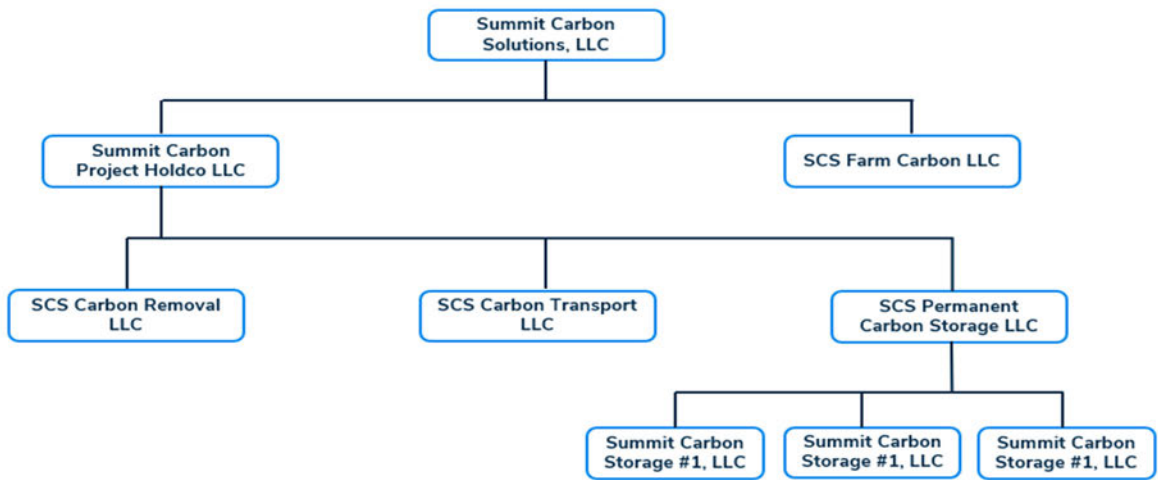


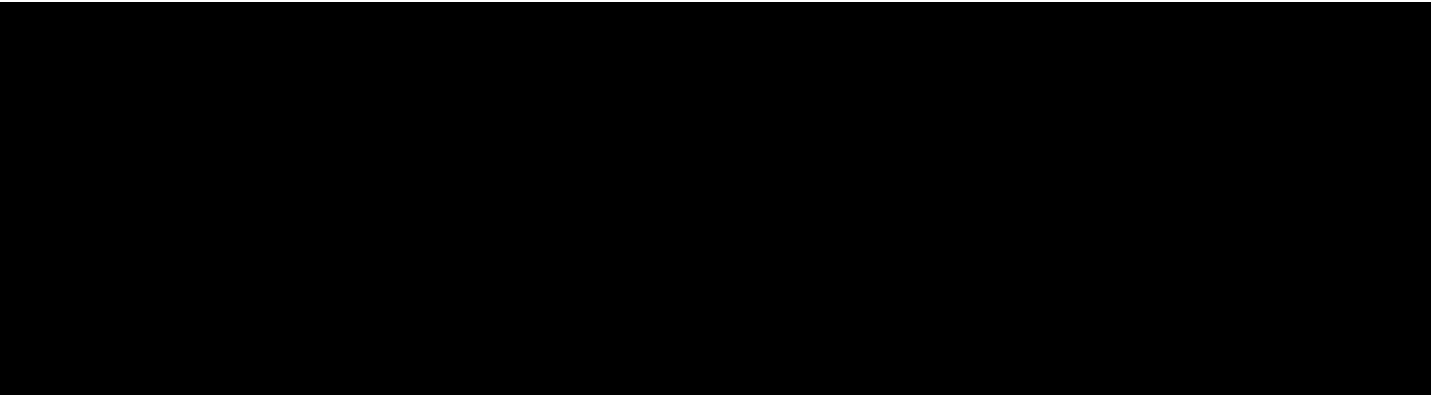
REQUEST NO. 8:

Produce a corporate tree or organizational chart for you and all affiliated companies or corporations.

RESPONSE:

Summit incorporates by reference its Global Objections set forth above. Subject to and notwithstanding the objections, a corporate organizational chart is depicted below:





Dated this 11th day of April, 2024.

FREDRIKSON & BYRON, P.A.

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