



**KNOLL LEIBEL** <sup>LLP</sup>  
ATTORNEYS AT LAW

October 3, 2024

**VIA U.S. MAIL & E-MAIL ONLY:** [ndpsc@nd.gov](mailto: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 Summit  
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 Request for Summit's Limited Liability Insurance Policy; and
2. Declaration of Service.

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

Sincerely,

KNOLL LEIBEL LLP

Steven J. Leibel

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SJL: rmo

Enclosures

**774 PU-22-391** Filed: 10/3/2024 Pages: 6  
**Joinder to Burleigh County's Request for Summit's  
Limited Liability Insurance Policy**

Knoll Leibel, LLP, on behalf of the Intervenors

Steven Leibel, Attorney

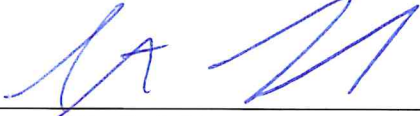
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**Steven J. Leibel, Partner**

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Commission should not allow Summit to punish those landowners who intend to assert their constitutional rights and refuse to voluntarily sign easements.

Dated this 3rd day of October, 2024.



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*Landowner/Intervenor Lawyers*

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

Signed on the 3rd day of October, 2024 at Bismarck, North Dakota.

  
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Rosanne Ogden