

STATE OF IOWA  
DEPARTMENT OF COMMERCE  
UTILITIES BOARD

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IN RE:  SUMMIT CARBON SOLUTIONS, LLC	DOCKET NO. HLP-2021-0001
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**ORDER SETTING PARTIAL PROCEDURAL SCHEDULE, REQUIRING FILING,  
AND GRANTING INTERVENTIONS**

**BACKGROUND**

On January 28, 2022, Summit Carbon Solutions, LLC (Summit Carbon), filed a petition for a hazardous liquid pipeline permit with the Utilities Board (Board) to construct, operate, and maintain approximately 687 miles of 6- to 24-inch diameter pipeline for the transportation of liquefied carbon dioxide within the state of Iowa.

On February 17, 2023, the Board issued an order setting the procedural schedule and technical conference. The order set a technical conference for March 15, 2023, for parties and persons who have filed for intervention to discuss the procedural schedule.

On March 15, 2023, the Board held the technical conference. Participants in the technical conference were Summit Carbon; the Office of Consumer Advocate (OCA), a division of the Iowa Department of Justice; the Iowa Farm Bureau Federation (Farm Bureau); Sierra Club Iowa Chapter (Sierra Club); Jamie Moser, Carmen Moser, and Mary Moser (the Mosers); LSCP, LLC (LSCP), and PLCP, LLLP (PLCP); the Great Plains' Laborers' District Council; Iowans for a Growing Agricultural Economy; Mr.

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George Cummins; and the Boards of Supervisors for Dickinson, Emmet, Floyd, Hardin, Kossuth, Shelby and Wright counties (collectively, the Counties).

### **PARTIAL PROCEDURAL SCHEDULE**

The Board is setting the partial procedural schedule as shown in Attachment A, incorporated into this order by reference. The partial procedural schedule is intended to facilitate the continued exchange of information and proper establishment of the record for the parties to the proceeding and impacted landowners. As part of the procedural schedule, the Board is setting prehearing status conferences for June 6 and July 10, 2023. These dates coincide with the Board's monthly public meeting and will begin after the conclusion of the meeting. The status conferences will be in-person meetings for those who want to participate. The Board will livestream these meetings, but remote participation will not be provided.

The Board will use these prehearing status conferences to receive updates from parties, provide additional information about events and logistics for the docket, and to address any issues or concerns that may arise. At least one week prior to each prehearing status conference, any party that plans to participate will be required to file a notice of participation and include suggested topics for discussion. The Board will review any filed topics and determine what will be discussed at the status conference.

As shown on Attachment A, Summit Carbon's direct testimony will be due on May 25, 2023. This testimony will cover all areas of Summit Carbon's petition except for evidence related to Exhibit H's. Summit Carbon is expected to file its testimony organized in the manner as was described at the March 15, 2023 technical conference.

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By June 26, 2023, Board Staff will file its petition staff report over all items contained within Summit Carbon's petition and petition exhibits, excluding Exhibit H. This staff report will also include outstanding deficiencies or areas where Board Staff believes additional information is needed. The petition staff report due June 26, 2023, is also expected to address any issues with the testimony filed by Summit Carbon on May 25, 2023. On July 10, 2023, Summit Carbon's testimony responding to the petition staff report will be due.

On July 24, 2023, OCA and Intervenor direct testimony will be due. This testimony may contain direct testimony by OCA and Intervenors as well as address the testimony filed by Summit Carbon. On August 7, 2023, OCA and Intervenor cross-rebuttal testimony will be due. The cross-rebuttal testimony will be used by OCA and Intervenors to respond to each other's direct testimony.

The Board is only setting a partial procedural schedule at this time because the Board is exploring actions that are focused on assisting landowners impacted by this project and on facilitating a more efficient hearing. Throughout this proceeding, all parties have expressed a need for transparency and the opportunity to be heard. The Board will continue to seek to provide venues for landowners and Summit to address and resolve concerns.

The Board has consistently heard from landowners, both in person and via submitted comments, that the easement negotiation process is complicated, confusing, and stressful. To address these concerns, the Board is exploring the use of impartial, third-party mediators to balance the negotiation process and reduce regulatory delay.

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Under this proposal, the Board would hire mediators who would set up voluntary mediations between any willing landowner and Summit Carbon to explore a voluntary easement agreement. Mediation would be at no cost to the landowner. The Board will continue to engage OCA, if it chooses to participate. If an agreement is not reached or a landowner does not seek to participate in voluntary mediation, the Board could then receive testimony and evidence from landowners subject to Exhibit H and Summit Carbon as it relates to that landowner's parcel. If it provides for a more efficient process, individual Board members or other presiding officers could be assigned to receive the testimony or other evidence to be considered by the full Board in reaching a final decision as it relates to the specific landowner parcels, as well as decision on the entirety of the project. Such a process can be tailored to the availability of the participants and ensures the schedule is adaptable to the needs of the landowners and other parties.

The Board is exploring this option due to the number of parcels impacted by Summit Carbon's proposed hazardous liquid pipeline and a desire to expand public access to and simplify the proceeding. By having neutral, third-party mediators and presiding officers addressing Exhibit H's, the Board will be able to address Exhibit H issues and reduce the impact of the hearing to everyone involved, including landowners. Having a hearing which lasts six, eight, or ten-plus weeks places a burden on everyone involved and creates uncertainty as to when evidence relating to any one area of the state or issue to be decided will occur. Creating more alternatives available for the gathering of evidence, with the Board making the ultimate decisions, can reduce the overall burden and could allow for a more efficient and less time-consuming process

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while at the same time facilitating greater landowner access through a timely proceeding that is orderly, open, and fair.

The Board is also considering the establishment of satellite locations allowing for remote participation in the hearing to be held in this case. Iowa Code § 479B.6 requires that the hearing be held in the county seat near the midpoint of the proposed hazardous liquid pipeline. The hearing location will be situated in compliance with this requirement; however, the Board is interested in allowing participation and viewing of the hearing from locations closer to the homes and businesses of impacted persons.

The Board seeks input from the parties on these options. Therefore, these items will be the main topics of discussion at the June 6, 2023 status conference.

Furthermore, in its February 17, 2023 order, the Board in Ordering Clauses 2 and 3 requires Summit Carbon to send notice to each landowner or known tenant of a parcel over which eminent domain is requested on the same date Summit Carbon's direct testimony is filed. The notice is to include a copy of the latest procedural schedule set by the Board, the docket number, and the Board's contact information. The order requires Summit Carbon to file an affidavit within five days of its direct testimony, averring that all landowners or known tenants of a parcel over which eminent domain is requested were served notice. Since the Board is only setting a partial procedural schedule, the Board is modifying the requirements in Ordering Clauses 2 and 3 of its February 17, 2023 order. The Board will issue a subsequent order directing Summit Carbon as to when this notice is to be filed.

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### **MOTIONS TO RECONSIDER AND CLARIFICATION**

On February 23, 2023, Sierra Club filed a motion to reconsider the Board's February 17, 2023 order. On February 28, 2023, the Counties filed a response to Sierra Club's motion requesting the Board reconsider the procedural schedule issued on February 17, 2023. On March 10, 2023, Mr. Cummins filed a motion to reconsider the procedural schedule. On March 13, 2023, Summit Carbon filed its resistance to Sierra Club's motion to reconsider.

On March 8, 2023, Farm Bureau filed a motion for clarification with regard to several aspects of the Board's February 17, 2023 order.

At the March 5, 2023 technical conference, the Board stated these motions would be moot with the issuance of this order, as this order sets the official procedural schedule and supersedes the Board order issued on February 17, 2023.

If a party who previously filed for reconsideration or clarification, or a new party desires to seek reconsideration or clarification, they must do so in response to this order and comply with the requirements of 199 Iowa administrative Code (IAC) 7.27.

### **INTERVENTIONS**

On January 24, 26, and 28, 2023, the Boards of Supervisors for Floyd, Emmet, and Dickinson counties (collectively, Intervening County BOS) filed a petition to intervene in this docket. Intervening County BOS state Iowa Code § 331.301(1) grants them the authority to "exercise any power and perform any function it deems appropriate to protect and preserve the rights, privileges, and property of the county or of its residents, and to preserve and improve the peace, safety, health, welfare, comfort,

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and convenience of its residents.” Intervening County BOS further state Iowa Code § 479B.7 governmental entities whose rights or interests may be impacted may file an objection to a proposed hazardous liquid pipeline. Lastly, Intervening County BOS state they have adopted comprehensive plans and zoning ordinances regulating the use of land in their counties pursuant to Iowa Code chapter 335. Intervening County BOS state they desire to ensure Summit Carbon complies with the requirements of Iowa Code § 479B.5(7) and Intervening County BOS ordinances. Intervening County BOS assert they have a unique interest in this proceeding and no other party can adequately represent their interests in this proceeding.

On March 7, 2023, LSCP and PLCP filed a petition to intervene in this docket. LSCP and PLCP state they are ethanol manufacturers that have contractual arrangements with Summit Carbon for the transportation of liquefied carbon dioxide. LSCP and PLCP state intervention will ensure they know whether, when, and where Summit Carbon’s proposed hazardous liquid pipeline may be located and will allow for their involvement should any issue arise related to Summit Carbon’s proposed hazardous liquid pipeline. LSCP and PLCP assert no other party currently represents them and there is no similar participant who can protect their interests. LSCP and PLCP assert they have a unique interest in this proceeding and no other party can adequately represent their interests in this proceeding.

On March 8, 2023, Iowans for a Growing Agricultural Economy (IGAE) filed a petition to intervene in this docket. IGAE states it is a nonprofit association of Iowans who support the production of renewable fuels, the expansion of markets for Iowa farmers, and sustainable growth in the agricultural sector. IGAE asserts its members

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have an interest in the financial and regulatory stability of the agricultural sector, of which renewable fuels play a key role. IGAE states a decision by the Board will directly affect its members. IGAE states Farm Bureau is already a party to this proceeding; however, Farm Bureau seeks to erect additional regulatory burdens upon Summit Carbon's proposed project. IGAE asserts its intervention will allow the Board to hear a broader perspective from Iowans affected by Summit Carbon's proposed project. IGAE states there is no other way to protect its interests and its participation will result in the development of a sound record.

On March 10, 2023, as revised on March 21, 2023, 251 landowners (collectively, Jorde Landowners) filed a petition to intervene. Participating landowners are named in Attachment B to this order, incorporated here by reference. Jorde Landowners state they are landowners directly impacted by Summit Carbon's proposed hazardous liquid pipeline or are interested in land near lands impacted by the pipeline. Jorde Landowners state they have monetary and personal investments in their properties, which may be impacted by Summit Carbon's proposed project. Jorde Landowners assert their intervention is necessary to protect their interests and their participation will result in the development of a sound record.

On March 13, 2023, the Mosers filed a petition to intervene in this docket. The Mosers are landowners in Palo Alto County, Iowa, and have land proposed to be impacted by the proposed route of the Summit Carbon pipeline. The Mosers state their property is subject to flooding and the road to the west of their property, where Summit Carbon proposes to locate its pipeline, has been washed out by flooding in the past. The Mosers assert the Palo Alto County Board of Supervisors has put restrictions in

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place for pipeline construction in flood plains. The Mosers assert their intervention is necessary for the protection of their property and their participation will result in the development of a sound record.

On April 18, 2023, the Crawford County Board of Supervisors (Crawford County BOS) filed a petition to intervene in this docket. Crawford County BOS states Iowa Code § 331.301(1) grants it the authority to “exercise any power and perform any function it deems appropriate to protect and preserve the rights, privileges, and property of the county or of its residents, and to preserve and improve the peace, safety, health, welfare, comfort, and convenience of its residents.” Crawford County BOS further states Iowa Code § 479B.7 governmental entities whose rights or interests may be impacted may file an objection to a proposed hazardous liquid pipeline. Lastly, Crawford County BOS states it has jurisdiction, power, and authority over drainage districts in Crawford County, which may be impacted by Summit Carbon’s proposed hazardous liquid pipeline. Crawford County BOS asserts it has a unique interest in this proceeding and no other party can adequately represent its interest in this proceeding.

No party filed a response to the Intervening County BOS, LSCP and PLCP, IGAE, Jorde Landowners, the Mosers, or Crawford County BOS petitions to intervene.

The Board’s subrule at 199 IAC 7.13(3) provides that “[a]ny person having an interest in the subject matter of a proceeding may be permitted to intervene at the discretion of the board....” In determining whether to grant intervention, the Board shall consider factors including, but not limited to, the prospective intervenor’s interest in the subject matter of the proceeding, the effect a final decision in the proceeding may have

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upon the prospective intervenor's interest, and the extent to which the prospective intervenor may be expected to assist in the development of a sound record. (*Id.*)

Intervening County BOS, LSCP and PLCP, IGAE, the Mosers, and Crawford County BOS have stated that they have a substantial interest in the outcome of this proceeding and will assist in the development of a more complete record. Therefore, applying the 199 IAC 7.13(3) factors, the Board finds Intervening County BOS, LSCP and PLCP, IGAE, the Mosers, and Crawford County BOS have stated sufficient grounds for granting their petitions to intervene.

Before ruling on the intervention for Jorde Landowners, the Board will require Jorde Landowners to file additional information about the 251 persons listed in Attachment B. The Board will require Jorde Landowners to indicate whether they are directly impacted by Summit Carbon's proposed hazardous liquid pipeline and if they are subject to a request for eminent domain. If they are subject to a request for eminent domain, Jorde Landowners will be required to identify which Exhibit H corresponds to which landowner. If Jorde Landowners are not directly impacted by Summit Carbon's proposed hazardous liquid pipeline, the Board will require these landowners to indicate how far their property is located from Summit Carbon's proposed hazardous liquid pipeline and how they are impacted. Once the information has been filed with the Board, the Board will rule on Jorde Landowners' request for intervention.

### **ORDERING CLAUSES**

#### **IT IS THEREFORE ORDERED:**

1. A partial procedural schedule regarding Summit Carbon Solutions, LLC's,

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petition for a hazardous liquid pipeline permit is shown in Attachment A to this order.

2. Not less than seven days prior to the prehearing status conferences shown in Attachment A to this order, any party who anticipates participating at the prehearing status conferences shall file a notice of participation as well as any suggested items or topics they would like to discuss at the prehearing status conferences.

3. Ordering Clause 2 in the February 17, 2023 order is modified to state, "Summit Carbon Solutions, LLC, shall send notice to each landowner or known tenant of a parcel over which eminent domain is requested as directed by the Utilities Board in a subsequent order. The notice shall include a copy of the latest procedural schedule set by the Board, the docket number, and the Utilities Board's contact information."

4. Ordering Clause 3 in the February 17, 2023 order is modified to state, "Summit Carbon Solutions, LLC, shall file an affidavit averring that all landowners and known tenants subject to Exhibit H were provided notice of the Board's procedural schedule, the docket number, and the Board's contact information as directed by the Utilities Board in a subsequent order. The affidavit shall include the landowner and tenant names and mailing addresses, listed by county and by parcel."

5. The petition to intervene filed by the Floyd County Board of Supervisors on January 24, 2023, is granted.

6. The petition to intervene filed by the Emmet County Board of Supervisors on January 26, 2023, is granted.

7. The petition to intervene filed by the Dickinson County Board of Supervisors on February 28, 2023, is granted.

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8. The petition to intervene filed by LSCP, LLC, and PLCP, LLLP, on March 7, 2023, is granted.

9. The petition to intervene filed by lowans for a Growing Agricultural Economy on March 8, 2023, is granted.

10. The petition to intervene filed by Mary Moser, Jamie Moser, and Carmen Moser on March 13, 2023, is granted.

11. The petition to intervene filed by the Crawford County Board of Supervisors on April 18, 2023, is granted.

12. Within 30 days of this order, the 251 landowners listed in Attachment B to this order shall file the information as described in the body of this order.

**UTILITIES BOARD**

Erik M. Helland Date: 2023.05.19  
10:28:41 -05'00'

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Joshua Byrnes Date: 2023.05.19  
10:35:51 -05'00'

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ATTEST:

Keetah Horras 2023.05.19  
11:14:52 -05'00'

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Sarah Martz Date: 2023.05.19  
10:49:35 -05'00'

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Dated at Des Moines, Iowa, this 19th day of May, 2023.

<b>HLP-2021-0001 Procedural Schedule</b>	
<b>Procedural Activity</b>	<b>Dates</b>
Scheduling Conference	12/13/22
Technical Conference (logistics and scheduling)	3/15/23
Summit Carbon Direct Testimony Due	5/25/23
Prehearing Status Conference	6/6/23
Petition Staff Report Due (Excludes Exhibit H)	6/26/23
Prehearing Status Conference	7/10/23
Intervention Deadline	7/10/23
Summit Carbon Petition Staff Report Testimony Due	7/10/23
OCA & Intervenor Direct Testimony Due	7/24/23
OCA & Intervenor Cross-Rebuttal Due	8/7/23

**Attachment B**

1. Alan Tribble
2. Alessandra Gadsby
3. Alessandria Wahl
4. Alice Krumwiede
5. Allen Boeck
6. Allyn Heikens
7. Annabell Soat
8. Anne Gray
9. April Hansen
10. Arlan Schomaker Residuary Trust
11. Arndorfer Brothers Partnership
12. Ashley Alloway
13. Barbara Harre
14. Barbara Hinrichs
15. Barbara Jessen
16. Barbara Schomaker
17. Benita A. Schiltz Revocable Trust
18. Betty H. Nolan Revocable Trust
19. Betty Nolan
20. Bonnema Harvest Farms
21. Bonnie Ewoldt
22. Bonnie Peters
23. Brad Bonnema
24. Brad Franken
25. Brenda Barr
26. Brent Centlivre
27. Carl Kruthoff
28. Carol L. Rieken Living Trust
29. Carol Rieken
30. Casey Schomaker
31. Christiane Esker-Petty
32. Clarence A. Reinig Trust
33. Clarence Coenen
34. Clarence Coenen – Rose Marie Coenen Trust
35. Connie Hansen Esker
36. Craig Beyer
37. Craig Goth
38. Craig Huntoon
39. Craig M. Goth Revocable Trust
40. Craig Woodward
41. Curtis Boeck
42. Cynthia Hansen
43. Cynthia Kruthoff

**Attachment B**

44. Dale Bonnema
45. Dan Gutschenritter
46. Dana Arndorfer
47. Daniel L. Wahl Family Trust Dated April 4, 2018
48. Daniel Tronchetti
49. Daniel Wahl
50. David Gerber
51. David Krumwiede
52. David Peters
53. David Weber
54. Dean Johns
55. Debra Landolt
56. Deborah Main
57. Debra Lavallo
58. Debra Wheeler
59. Delmar Baines
60. Delores Sidener
61. Denise Smith
62. Denise Tindall
63. Dennia Valen
64. Dennis Graham
65. Dennis Johnson
66. Dennis King
67. Dillon Baines
68. Dirk Hoover
69. Dirk L. Hoover Farm Trust
70. Donald Johannsen
71. Donald O. Johannsen Trust
72. Donnell Sorenson
73. Dorla Hill
74. Dorothy Sloma
75. Doug Swartz
76. Edwin Buman, Jr.
77. Edwin F. Tindall Revocable Living Trust
78. Edwin Tindall
79. Elizabeth Richards
80. Elizabeth Tribble
81. Eric Arndorfer
82. Eric Palmquist
83. Eugene Schiltz
84. Evelyn Richards
85. Gadsby Family Farm Co, LLC
86. Gary Boeck

**Attachment B**

87. Gayle Palmquist
88. Gaylord Boeck
89. Gene Johnson
90. George Cummins
91. Georgene Simms
92. Gerald Franken
93. Geraldine Pedersen
94. Geraldine R. Pedersen Revocable Trust
95. Gloria Graham Dorr
96. Golden Oaks, Inc.
97. Graham Ag, LLC
98. Grandma Frieda Boettger Hansen's 40, Inc.
99. Greg L. Pickrell Separate Property Trust
100. Greg Pickrell
101. Gutschenritter Family Farms
102. Heather E. Webb
103. Heikens Farms, LLC
104. Huntoon Farms, Ltd.
105. Ilse Hayslip
106. James Fetrow
107. James Jessen
108. James Schiltz
109. Jane Anna Howard Trust
110. Jane Richards
111. Jane B. Hulstein
112. Janet Miller
113. Janice Johnson
114. Jann Reinig
115. Jason Howard
116. Jean Granger
117. Jeff Jones
118. Jeffrey Colvin
119. Jenifer Berge
120. Joan Centlivre
121. Joan Wills
122. Joann Allegretti
123. Joanne Franken
124. Jody Wilson
125. John R., Webb, III
126. Jon W. Hulstein
127. Joyce Lund Mears Trust
128. Joyce Mears
129. Julie Colvin

**Attachment B**

130. Julie Glade
131. Julie Goebel
132. Justin Bonnema
133. Justin Heikens
134. Karen Ahrenholtz
135. Katherine A. Stockdale Revocable Trust
136. Katherine Stockdale
137. Kathleen Hunt
138. Kent Kasischke
139. Kent Pickrell
140. Kent R. Pickrell Revocable Trust
141. Kerry King
142. Kristine Kruthoff
143. Krumwiede Family Revocable Trust
144. Kruthoff Farms, LLC
145. Kurtis T. Stockdale
146. Larry Hinrichs
147. LB Family Properties, LLC
148. LeAnn Krayenhagen
149. Linda Graham
150. Lines Trust Dated August 21, 2021
151. Lisa Sauder
152. Lori Goth
153. Lori L. Goth Revocable Trust
154. Lori O'Brien
155. LuAnn Barrett
156. Lydia Reinig
157. Maher Farm, Inc.
158. Margaret A. Thomas Revocable Trust
159. Margaret Fetrow
160. Margaret Thomas
161. Margaret Thomson
162. Marjorie Swan
163. Mark Bonnema
164. Mark Kruthoff
165. Mark L. Spooner Revocable Trust
166. Mark Spooner
167. Martin Maher
168. Mary Huntoon
169. Mary J. Woodward Trust
170. Mary Lou Wilson
171. Mary Lou Wilson Revocable Living Trust
172. Mary Powell

**Attachment B**

173. Matt Valen
174. Mau Farm, Inc.
175. Maureen Allan
176. Meghan Kennedy
177. Meghan Sloma
178. Mersch Farms, Inc.
179. Michael Heikens
180. Michael Main
181. Michael Spooner
182. Nancy Allen
183. Nancy Conrad
184. Nancy Erickson
185. Palmquist Carl S. Testamentary Trust
186. Pamela Erbe-Lines
187. Pat & Rita McGuire Family Farms, LLC
188. Pat McGuire
189. Patricia Beyer
190. Paul Berge
191. Paul Goebel
192. Paul Sedgwick
193. Productive Farms, LLC
194. Rachel Franken
195. Randy Sonne
196. Randy Trotter
197. Raymond Stockdale
198. Raymond T and Katherine A Stockdale Revocable Trust
199. Raymond T. Stockdale Revocable Trust
200. Richard L. Hansen
201. Rita McGuire
202. RKR Farms, LLC
203. RMT Family Real Estate, LLC
204. Robert Esker
205. Robert H. Rieken Living Trust
206. Robert Rieken
207. Robert Soat
208. Robert Watts
209. Robin Allen
210. Romona Ritter
211. Ronald Vlaming
212. Ronald Wheeler
213. Rosalie Knigge
214. Rose Welchans
215. Sandy Sonne

**Attachment B**

216. Sauder Farms, LLC
217. Scott Gray
218. Shawna Wahl
219. Sheila Pedersen Eller
220. Sheila Riggs
221. Sherrill Webb
222. Simms, Georgene M. – Trust
223. Stephanie Stich
224. Stephen George Mack
225. Steve Krumwiede
226. Steve Petersen
227. Susan Grote
228. Susan McDonald
229. Teresa A. Thoms Revocable Trust dated September 10, 2020
230. Teresa Thoms
231. The Adella F. Hulstein Revocable Trust, dated December 9, 1999
232. Thomas McDonald
233. Tim Barrett
234. Toni Hoover
235. Tony Schiltz
236. Triple S Farms Partnership
237. Tronchetti Family Trust
238. Troy Aspleaf
239. TSL Farms
240. Vickie Beck
241. Vicky Sonne
242. Virgil Ewoldt
243. Vlaming Farms
244. Vonda Cummins
245. Wanda Maher
246. Weber Acres, Ltd.
247. William Beck
248. William Davelaar
249. Wilmer Hulstein
250. Wilmer J. Hulstein Revocable Trust, dated December 9, 1999
251. Winston Gadsby