

**STATE OF IOWA  
DEPARTMENT OF COMMERCE  
IOWA UTILITIES BOARD**

<b>IN RE:</b>  <b>SUMMIT CARBON SOLUTIONS, LLC</b>	<b>DOCKET NO. HLP-2021-0001 AND DOCKET NOS. HLP-2024-0001-0014</b>  <b>JORDE LANDOWNERS’ JOINDER IN SIERRA CLUBS MOTION TO REOPEN RECORD AND TO CONSOLIDATE OR STAY RELATED DOCKETS</b>  <b>AND</b>  <b>JORDE LANDOWNERS’ JOINDER IN IOWA FARM BUREAU FEDERATION’S MOTION TO REOPEN RECORD IN HLP-2021-0001</b>  <b>AND</b>  <b>JORDE LANDOWNERS’ ALTERNATIVE MOTION TO STAY BOARD DECISION IN HLP-2021-0001</b>
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Jorde Landowners state:

**OVERVIEW**

In dockets HLP-2021-0001 and HLP-2024-0001 through 0014, the Sierra Club filed a Motion to Reopen Record and to Consolidate or Stay Related Dockets. In docket HLP-2021-0001, the Iowa Farm Bureau Federation filed a Motion to Reopen the Record. Jorde Landowners here join the Sierra Club’s Motion, join Farm

Bureau's motion, and alternatively request additional relief to stay any decision in HLP-2021-0001.

**ARGUMENT AND REQUEST FOR RELIEF**

In addition to Sierra Club's and Farm Bureau's arguments, which are all adopted and joined here, Jorde Landowners' state:

On March 4, 2024, SCS Carbon Transport, LLC filed fourteen "new" dockets what amount to Summit 2.0 but each representing proposed hazardous pipelines that cannot exist and cannot be justified without evaluating each of them simultaneously with the first proposed footprint in HLP-2021-0001. At the least each of the new dockets should be consolidated into one docket for judicial economy and efficiency. Upon consolidation, the new dockets should be stayed pending outcome and final resolution of HLP-2021-0001 because the new dockets cannot be approved without the route found in HLP-2021-0001 first being approved. Alternatively, the new dockets should be combined with HLP-2021-0001 and that docket reopened for discovery, motion practice, and hearing so the entire project can be evaluated at once given the initial footprint and the new footprints are part and parcel of one another.

Jorde Landowners share the concern of Farm Bureau regarding the total capacity of the hazardous pipeline in HLP-2021-0001 and likely inability to accommodate the total alleged committed capacity such that approval of the application in HLP-2021-0001 is now an impossibility given the representations of Applicant in that docket.

Therefore, Jorde Landowners respectfully request the Board grant relief as requested in both Sierra Club's and Farm Bureau's motions. In the alternative, should HLP-2021-0001 not be reopened, it should be stayed pending consolidation and final resolution of dockets HLP-2024-0001 through 0014, and any future related Summit Carbon Transportation, LLC dockets, because this is one unified project and the initial footprint and pending decision in HLP-2021-0001 is directly affected by and directly affects all new dockets.

Jorde Landowners

By: /s/ Brian E. Jorde

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