

*Re: HP14-001*

*To: South Dakota Public Utilities Commission and intervenors in the Keystone XL permit hearings.*

In response to Keystone's Motion To Define The Scope Of Discovery Under SDCL 49-41B

I wish to take exception with Keystone's motion to limit discovery as filed on 10/30/14. While Keystone appears agreeable to the (1) 50 Amended Permit Conditions being allowed in discovery I feel that their request to limit the (2) Findings of Fact to only those sections as identified in Keystones Tracking Table of Changes attached as Exhibit C to Keystones Petition For Order Accepting Certification Under SDCL 49-41B as filed on 9/15/14 will unjustly limit the scope of discovery.

Keystone's motion would disallow 70 of the 115 Findings of Fact as well as the 16 Conclusions of Law. Many of these sections that Keystone wants to exclude are important in determining if, in fact, Keystone continues to meet all requirements in the permit.

In addition: since the permit is based on SDCL 49-41B and as Keystone has referenced this chapter of SDCL in their motion to define discovery I am requesting that SDCL 49-41B also be allowed in defining discovery.

Paul F. Seamans, landowner on the KXL route