

Listed Exhibit: 24

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

<b>IN THE MATTER OF THE</b>	)	
<b>APPLICATION OF DAKOTA</b>	)	<b>HP14-002</b>
<b>ACCESS, LLC FOR AN ENERGY</b>	)	<b>REPLY TO</b>
<b>FACILITY PERMIT TO</b>	)	<b>INTERROGATORIES OF</b>
<b>CONSTRUCT THE DAKOTA</b>	)	<b>DAKOTA ACCESS LLC TO</b>
<b>ACCESS PIPELINE PROJECT</b>	)	<b>INDIGENOUS ENVIRONMENTAL</b>
	)	<b>NETWORK</b>

TO: May, Adam, Gerdes & Thompson LLP

Please find replies to the first set of interrogatories to the Indigenous Environmental Network pursuant to SDCL § 15-6-33. It is understood these interrogatories are to be deemed continuing and if I or any agents or representatives obtain any information with respect to them after making original answers, supplemental answers will be made.

INTERROGATORY NO. 1: State the name of each person answering these interrogatories and include for each person their title and business address.

ANSWER NO. 1: Kimberly Craven, Attorney, 3560 Catalpa Way, Boulder, CO 80304

INTERROGATORY NO. 2: State the nature of the entity (LLP, LP, LLC, corporation, unincorporated or other). Provide organizational detail. Name all tribes with which Indigenous Environmental Network has affiliated.

ANSWER NO. 2: The Indigenous Environmental Network is a 501 (c)(3) nonprofit corporation. Established in 1990 within the United States, IEN was formed by grassroots Indigenous peoples and individuals to address environmental and economic justice issues (EJ). IEN's activities include building the capacity of Indigenous communities and tribal governments to develop mechanisms to protect our sacred sites, land, water, air, natural resources, health of both our people and all living things, and to build economically sustainable communities. IEN accomplishes this by maintaining an informational clearinghouse, organizing campaigns, direct actions and public awareness, building the capacity of community and tribes to address EJ issues, development of initiatives to impact policy, and building alliances among Indigenous communities, tribes, inter-tribal and Indigenous organizations, people-of-color/ethnic organizations, faith-based and women groups, youth, labor, environmental organizations and others. IEN convenes local, regional and national meetings on environmental and economic justice issues, and provides support, resources and referral to Indigenous communities and youth throughout primarily North America – and in recent years – globally. There are over 566 federally recognized Tribes in the United States and numerous unrecognized Tribes. There are too many Tribes to name that IEN has been affiliated with since its inception.

INTERROGATORY NO. 3: Provide names of the officers and board members. Who at Indigenous Environmental Network makes decision on this docket?

ANSWER NO. 3: IEN has three board members and no officers. They are Bineshi Albert (Euclaw and Ojibwe), Manual Pino (Acoma Pueblo) and Sayo': kla Kindness (Oneida). Tom Goldtooth, Dallas Goldtooth and Kandi Mossett share decision making for this docket.

INTERROGATORY NO. 4: Please state the names of everyone who will or may appear at the September/October hearings on the above captioned matter. For each such person, state the level of authority to speak which has been granted to each named person.

ANSWER NO. 4: IEN is still deciding who may be appearing at the September/October hearing. Please elaborate on the second part of the question; what does "state the level of authority to speak which has been granted" mean?

INTERROGATORY NO. 5: Please identify any witnesses, whether fact or expert, which you intend to call at the evidentiary hearing on the above-captioned matter. For each such witness, state:

- a. Witness name;
- b. Witness contact information;
- c. Whether the witness is expert or fact;
- d. A general statement descriptive of the matters to which each witness will testify;
- e. Whether the witness will submit sworn pre-filed written testimony; and,
- f. For each expert provide a resume or CV.

ANSWER NO. 5: IEN is still deciding the fact and expert witnesses we will be calling at the evidentiary hearing.

NOTE – INTERROGATORY NO. 6 AND 7 WERE MISSING.

INTERROGATORY NO. 8: Please state with specificity the objections, if any, which Indigenous Environmental Network has to the Dakota Access project. For each such objection:

- a. Outline a complete factual basis, any relevant law, rule or regulation applicable thereto and an expected or desired outcome if any.
- b. For each such objection, state the decision maker responsible for deciding said objection.

ANSWER NO. 8: IEN is still researching the Dakota Access pipeline and the objections that we may be raising based on applicable law, rule or regulation.

Dated this 1st day of May, 2015.

BY: /s/ Kimberly Craven  
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