

Listed Exhibit: 29

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

<b>IN THE MATTER OF THE</b>	)	<b>HP14-002</b>
<b>APPLICATION OF DAKOTA</b>	)	
<b>ACCESS, LLC FOR AN ENERGY</b>	)	<b>YANKTON SIOUX TRIBE'S</b>
<b>FACILITY PERMIT TO</b>	)	<b>ANSWERS TO INTERROGATORIES</b>
<b>CONSTRUCT THE DAKOTA</b>	)	<b>OF DAKOTA ACCESS LLC</b>
<b>ACCESS PIPELINE PROJECT</b>	)	<b>(FOURTH SET)</b>
	)	

**TO: Dakota Access LLC**

Pursuant to SDCL §§ 1-26-19, 15-6-33, and 15-6-34, and ARSD 20:10:01:1.02, the Yankton Sioux Tribe (hereinafter "Yankton") hereby submits its responses and objections to Interrogatories of Dakota Access LLC to Yankton Sioux Tribe (Fourth Set) dated August 10, 2015. The answers that follow shall be supplemented if and when supplementation is required by SDCL § 15-6-26(e) and only as required by that statute.

**INTERROGATORY NO. 1: Provide the name of any water systems which serve the Yankton Sioux Reservation?**

**ANSWER:** Randall Community Water District, Wagner, Lakeview Colony, Clearfield Colony, Pickstown, and Lake Andes water systems serve the Yankton Sioux Reservation.

**INTERROGATORY NO. 2: Do you contend that, if constructed and operated according to the filed application and exhibits, the Dakota Access pipeline will deplete, contaminate or endanger the supply of water available for the above named water system(s) listed in Interrogatory No. 1? If so, explain how.**

**ANSWER:** Yes. It is inevitable that, if built, the pipeline would spill, thus jeopardizing the quality of the Missouri River. While it cannot be known where leaks will occur, it is all but certain that the Dakota Access pipeline (if built) will spill. Because the route would cross the Missouri River as well as tributaries thereto, it is

possible that a spill could result in tar sands being released into the Missouri River or its tributaries (ultimately ending up in the Missouri River). The components of tar sands are highly toxic and would contaminate the Missouri River, which is the source of the water for the water systems that serve the Yankton Sioux Reservation.

INTERROGATORY NO. 3: Describe where all listed (Interrogatory 1) water system intakes or well head protection areas are located?

**ANSWER:** The Yankton Sioux Tribe does not possess this information.

INTERROGATORY NO. 4: Does the Yankton Sioux Tribe sell water? If so, please generally describe.

**ANSWER:** No, the Yankton Sioux Tribe does not sell water.

INTERROGATORY NO. 5: Has the Yankton Sioux Tribe ever sold or otherwise transferred all or a portion of its water rights to any third person for a Consideration? If so, please provide details.

**ANSWER:** No, the Yankton Sioux Tribe has never sold or otherwise transferred all or a portion of its water rights to any third person for a consideration.

Dated this 9th day of September, 2015.



---

Jennifer S. Baker  
Thomasina Real Bird  
FREDERICKS PEEBLES & MORGAN LLP  
1900 Plaza Drive  
Louisville, Colorado 80027  
Telephone: (303) 673-9600  
Facsimile: (303) 673-9155  
Email: [jbaker@ndnlaw.com](mailto:jbaker@ndnlaw.com)

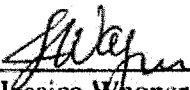
*Attorneys for Yankton Sioux Tribe*

**CERTIFICATE OF SERVICE**

I certify that on this 9th day of September, 2015 I sent by email a true and correct copy of **YANKTON SIOUX TRIBE'S ANSWERS TO INTERROGATORIES OF DAKOTA ACCESS LLC (FOURTH SET)** to the following:

Brett Koenecke  
503 South Pierre Street  
P.O. Box 160  
Pierre, SD 57501  
[brett@mayadam.net](mailto:brett@mayadam.net)

Kara C. Semmler  
503 South Pierre Street  
P.O. Box 160  
Pierre, SD 57501  
[kcs@mayadam.net](mailto:kcs@mayadam.net)

  
\_\_\_\_\_  
Jessica Wagner  
Legal Assistant