BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF SOUTH DAKOTA

	IN THE MATTER OF THE APPLICATION OF DAKOTA ACCESS, LLC FOR AN ENERGY FACILITY PERMIT TO CONSTRUCT THE DAKOTA ACCESS PIPELINE	HP14-002 PRE-FILED TESTIMONY OF Linda Ann Goulet
	STATE OF SOUTH DAKOTA) :SS COUNTY OF _Lincoln)	
1	Linda Ann Goulet	, being first duly sworn on his/her oath,
2	deposes and states as follows:	
3	Please state your name and address.	
4	Linda Ann Goulet	
5	27332 Atkins Place	
6	Tea, SD 57064	
7	How are you involved with the Dakota	Access Pipeline project?
8	I am a landowner in Lincoln County, Sou	th Dakota affected by the proposed Dakota
9	Access Pipeline.	
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11	Please describe the history of your fam	ily's land ownership, and whether farming
12	will be continued by younger generation	ns.
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14 ;	4/23/1923 Sophia Nichel sold to Gilber	t Schoffelman for \$ 18,000. \$112.50 per acre.

	EXHIBIT	
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38	To the best your knowledge, what area(s) of your property will the Dakota Access
39	Pipeline cross?
40	Based on the most recent maps by Dakota Access and flags placed in the road ditch,
41	the pipeline would enter the NW corner going to the SE corner cutting diagonally
42	across the entire farm. This area includes crop production land as well as pasture.
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46	How close is the pipeline to any building, bin or pen, water source, or farming
47	facilities (i.e., storage area, feedlot, grazing area, etc.)?
48	Approximately 300 yards to the nearest building and 340 yards to the well.
49	It is planned to go under the creek which drains the watershed NW of Tea and flows
) 50	into the Sioux River.
51	The pipeline would cross the easement held by South Lincoln Rural Water.
52	As stated previously it would cross the grazing area.
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56	Please describe any special characteristics of your property and farmland, and/or
57	whether you plan to build any houses, outbuildings, shelter belts, or other structures
58	on your property.
59	The land is drain tiled, some of which is clay.
60	Open Waterway ditch running south on east side of property.

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It has 3 housing eligibilities with potential for future development since State Highway # 17 runs on the west side of the property.

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67 Please describe which of your farming operations or other land uses will be impaired by the Dakota Access Pipeline and how they will be impaired. 68 69 Initially, no access for daily operations on cropland on south half of property. 70 Natural waterways blocked and would need to be reconstructed. The tillable acres 71 won't produce the same and the quality of the pasture will be impaired. Future 72 development potential diminished due to restrictions of building on pipeline and 73 lack of desire for homeowners to live near pipeline. 74 There is currently an existing housing development ¹/₂ mile NE of our farm, located 75 outside of the City of Tea; as well as a second development planned (zoning has been 76 changed to agricultural/residential) ½ mile north of our farm. These developments 77 are outside the City of Tea growth plan. Just because a particular city doesn't have 78 these affected areas in their growth plan, doesn't mean they won't be developed -

79 unless of course pipeline easements restrict the development.

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Has your farmland been improved with drain tile? If so, please describe whether you are concerned that pipeline construction may damage and impair the drain tile performance and investment.

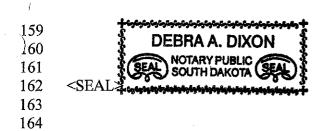
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, 84	Yes, it has been drain tiled and parts of it are clay tile. I am concerned that the tile
85	may crumble by excavating the ground near it, construction equipment going over it
86	or by additional underground pressure from settling afterwards.
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91	Do you believe that the Dakota Access Pipeline will pose a threat of serious injury to
92	the environment or the inhabitants within the siting area? If so, why?
93	Yes, Ruptures, oil leaks, environmental damages in the future.
94	In February, the Wall Street Journal compared oil from 86 locations around the
95	world and found Bakken crude oil to be the most explosive. This was introduced
- 96	December 11, 2014 in the Assembly Resolution No 191 State of New Jersey 216 th
97	Legislature.
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102	Do you believe that the Dakota Access Pipeline will substantially impair the health,
103	safety and welfare of the inhabitants of the siting area? If so, why? Yes,
104	Watershed damage as East Beaver Creek drains the Watershed North and West of
105	Tea and flows through our farm, eventually into the Bis Sioux River and then the
106	Missouri. Will eliminate the potential for future development due to people not
-r07	wanting to reside near an oil pipeline.

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112	Have you been sued by Dakota Access Pipeline to compel court ordered access to
113	your land? If so, (1) Has Dakota Access Pipeline provided you any legal authority
114	(i.e., state statute) supporting its claim that you have no right to exclude Dakota
115	Access from your land at the time of said lawsuit? and (2) Have you incurred legal
116	fees in defending against sais lawsuit?
117	Yes – I have been sued.
118	No – Dakota Access has not provided any legal authority (state stature).
119	Yes – I have incurred legal fees.
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123	Has Dakota Access Pipeline made any statements to you that it is a "common
124	carrier" under South Dakota law? If so, please describe. No
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128	Has any representative of Dakota Access Pipeline made any statements to you or
129	others that you believe are not true? If so, please explain. Yes
130	They have stated they contacted all land owners once by letter and twice in person.

131	My experience, letter delivered 12/24/2014. While I was out-of-state my neighbor
132	left message to call # 605-277-1223 an speak to a Chris Hobbs, supervisor for
133	Dakota Access which I did as requested. I have had no other contact with Dakota
134	Access.
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139	Please state any other concerns you have regarding the Dakota Access Pipeline.
140	Will devalue production ground and subsequent crop production.
141	Will eliminate opportunity for rural residential development.
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146	Would you be available to present testimony and respond to questions during the
147	formal hearing scheduled for September 29 through October 8, 2015?
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1 49	Does that conclude your testimony?
150	Yes.
151 152	Sich A Dot
153 154	Junda Am Manen
155 156	Subscribed and sworn before me this <u>19</u> th day of <u>June</u> , 2015.
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Notary Public – South Dakota My Commission Expires: <u>03-12-</u>2018