

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

IN THE MATTER OF THE)	
APPLICATION OF DAKOTA)	HP14-002
ACCESS, LLC FOR AN ENERGY)	
FACILITY PERMIT TO)	INTERROGATORIES OF
CONSTRUCT THE DAKOTA)	DAKOTA ACCESS LLC TO
ACCESS PIPELINE PROJECT)	ROSEBUD SIOUX TRIBE, SICANGU
)	OYATE LAND OFFICE

TO: ROSEBUD SIOUX TRIBE, SICANGU OYATE LAND OFFICE, AND ITS ATTORNEY MATTHEW L. RAPPOLD

YOU ARE HEREBY REQUESTED to answer the following written interrogatories which are to be answered by you within the time and in the manner required by SDCL § 15-6-33.

These interrogatories are directed to you, but are intended to likewise obtain any information with respect thereto now known by any other agents or representatives you may have in this matter. These interrogatories are to be deemed continuing and if you or said agents or representatives obtain any information with respect to them after making original answers, it is required that supplemental answers 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: Matthew L. Rappold, attorney for the Rosebud Sioux Tribe, Sicangu Oyate Land Office (SOLO) is responsible for answering these questions. His business address is PO Box 873 Rapid City, SD 57709.

INTERROGATORY NO. 2: Provide names of the officers and council members.

ANSWER AND OBJECTION: The question as stated is vague and ambiguous because it does not state with particularity what officers and council members the question is referring to. If the question is asking about the names of the Council Members for the Rosebud Sioux Tribe, the question is objected to further on the grounds that the question is irrelevant as the Rosebud Sioux Tribe is authorized to act only on the official resolution of the Tribal Government as a whole, not individual council members. Without waiving the objection, the Director of the Rosebud Sioux Tribe SOLO is Paula Antoine.

INTERROGATORY NO. 3: 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: At this time the RST SOLO has not identified fact or expert witnesses that it intends to call at the evidentiary hearing on this matter. To the extent that these interrogatories are subject to supplementation consistent with the Rules of Civil Procedure, these answers will be supplemented as that information becomes known and available.

INTERROGATORY NO. 4: Please state with specificity the objections, if any, which Rosebud Sioux Tribe, Sicangu Oyate Land Office 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: At this early stage of the proceedings the RST SOLO is in the process of determining the specific objections that it has with the Dakota Access project. To the extent upon which this interrogatory is deemed to be continuing in nature, this Interrogatory will be supplemented as the information sought becomes available.

Dated this 29th day of April, 2015.

OBJECTIONS

The objections stated to Dakota Access Interrogatories were made by Matthew L. Rappold, attorney for the Rosebud Sioux Tribe, Sicangu Oyate Land Office for the reasons and upon the grounds stated.

Dated this 29th day of April, 2015.

/s/ Matthew L. Rappold
Matthew L. Rappold
Rappold Law Office
PO Box 873
Rapid City, SD 57709
(605) 828-1680
Matt.rappold01@gmail.com

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on the 29th day of April, 2015, he sent a true and correct copy of the following responses to Dakota Access Interrogatories by electronic transmission; to-wit:

MAY, ADAM, GERDES & THOMPSON LLP
BRETT KOENECKE
503 South Pierre Street
P.O. Box 160
Pierre, SD 57501
(605) 224-8803
brett@mayadam.net

/s/ Matthew L. Rappold
Matthew L. Rappold

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

IN THE MATTER OF THE)	
APPLICATION OF DAKOTA)	HP14-002
ACCESS, LLC FOR AN ENERGY)	
FACILITY PERMIT TO)	ROSEBUD SIOUX TRIBE'S
CONSTRUCT THE DAKOTA)	SUPPLEMENTED RESPONSES TO
ACCESS PIPELINE PROJECT)	FIRST SET OF INTERROGATORIES
)	

TO: BRETT KOENECKE, Attorneys for Dakota Access, LLC 503 South Pierre Street
P.O. Box 160, Pierre, SD 57501, (605) 224-8803 brett@mayadam.net

The Rosebud Sioux Tribe, Sicangu Oyate Land Office and the Sicangu Nation Treaty Council submits the following supplemented answers in response to Dakota Access first set of Interrogatories and Request for Production of Documents.

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

ANSWER: The answer previously provided in response to Interrogatory One remains unchanged.

INTERROGATORY NO. 2: Provide names of the officers and council members.

ANSWER: The answer previously provided in response to Interrogatory Two remains unchanged.

INTERROGATORY NO. 3: 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: The answer previously provided in response to Interrogatory Three remains unchanged.

INTERROGATORY NO. 4: Please state with specificity the objections, if any, which Rosebud Sioux Tribe, Sicangu Lakota Treaty Office 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 AND OBJECTION: The Rosebud Sioux Tribe objects to Dakota Access's application for the construction of the Dakota Access pipeline on the grounds, not limited to, by way of this answer, that the Applicant will be unable to satisfy the statutory requirements of SDCL 49-41B and other relevant laws, including but not limited to the Pipeline Safety Act, its associated implementing regulations, application of the PUC Administrative rules, compliance with which is necessary in order to obtain a permit for the construction of an interstate pipeline facility of this nature. Rosebud Objects to subsections (a) and (b) on the grounds that the questions seeks answers that are beyond the scope of the requirements of discovery statutes.

Dated this 15th day of June, 2015.

/s/ Matthew L. Rappold
Matthew L. Rappold
Rappold Law Office
PO Box 873
Rapid City, SD 57709

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on the 15th day of June, 2015, he caused a true and correct copy of the original of the foregoing Rosebud Sioux Tribe's Supplemented Responses to Dakota Accesses First Set of Interrogatories and Request for Production of Documents, by electronic transmission to the following:

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/s/ Matthew L. Rappold