Hilding's Exhibit A,
April 8th, 2015 before the SD Public Utilities Commission Docket HP-14-001

This exhibit contains 3 items that are parts of Nancy Hilding's second discovery response to TransCanada.
These 3 items were part of Hilding's March 10th, 2015 answer to TransCanada's discovery request,

The response itself
a supplemental cover letter with list potential exhibits
and an e-mail summary of sent e-mails.

All are combined into one PDF file, although they were sent separately.

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA
o-o-o-o-o-o-o-o-o-o-o-o-o-o-o-o-o-o-o-o-o-o-o-o-o-o-o-o-o-o-o
IN THE MATTER OF THE
APPLICATION BY TRANSCANADA
KEYSTONE PIPELINE, LP FOR A
PERMIT UNDER THE SOUTH DAKOTA
ENERGY CONVERSION AND
TRANSMISSION FACILITIES ACT TO
CONSTRUCT THE KEYSTONE XL
PROJECT

HP 14-001
HILDING'S SECOND RESPONSE TO KEYSTONE'S
INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
OF TRANSCANADA KEYSTONE PIPELINE, LP

This also includes the CERTIFICATE OF SERVICE
o-o-o-o-o-o-o-o-o-o-o-o-o-o-o-o-o-o-o-o-o-o-o-o-o-o-o-o-o-o-

INTERROGATORIES

Nancy Hilding (Nancy) offers the following answers and objections to the interrogatories that, attorneys for TransCanada Keystone Pipeline, LP ("TransCanada") sent to Nancy. on December 18, 2014. Nancy relies on her knowledge as existing today. Nancy's responses are not intended to be allegations that no other facts or arguments (other than those in her responses) exist. Nancy reserves the right to amend or supplement her responses in accordance with the South Dakota Public Utility Commission ("SDPUC") scheduling order dated December 17, 2014. Nancy's responses and objections are governed by SDCL § 15-6-26(e) and shall not be deemed continuing nor be supplemented except as required by that rule.

Nancy's "General Objection - How does TransCanada's discovery request comply with the order of the SDPUC?"

On October 30th, 2014 TransCanada made a motion to "Define Scope of Discovery Under SDCL § 49-41B-27". They wanted discovery limited to the 50 Amended Permit Conditions from Exhibit A to the Amended Final Permit and Order dated 6/29/2010 and also limited to their proposed changes to Finding of Fact identified in Exhibit C to Keystone's Petition for Order Accepting Certification (2014). In TransCanada's 10/30/14 motion, on page 5 they state that: "Each Discovery Request must identify by number the Amended Permit Condition or Finding to which it is addressed".

The SDPUC agreed that discovery should be limited to not privileged matters relevant to the 50 permit conditions or the proposed changed Findings of Facts in the Decision identified in Keystone's Tracking Table of Changes attached to the Petition as Appendix C and the SDPUC wrote on page 2 of the Dec 17th, 2014 Order that: " ORDERED,....that parties shall identify by number and letter the specific Condition or Finding of Fact addressed". (Emphasis added)

None of TransCanada 's requests for documents or interrogatories given to me identifies by number and letter the specific Condition or Finding of Fact addressed by each interrogatory or document request (emphasis added). I thus question this entire discovery request by TransCanada. Does TransCanada subscribe to a "double standard" & believes interveners and SDPUC staff must comply with SDPUC Dec 17th orders but they themselves are exempt from the SDPUC December 17th Order?
==========

1. State the name, current address, and telephone number of the person answering these interrogatories.

ANSWER: *Nancy Hilding, 6300 West Elm, Black Hawk, SD 57718, 605-787-6779 or 787-6466*

2. State the name, current address, and telephone number of any person, other than your legal counsel, who you talked with about answering these interrogatories, who assisted you in answering these interrogatories, or who provided information that you relied on in answering these interrogatories.

ANSWER: *Nancy objects to this question because it does not state specific Condition or Finding of Fact and & thus violates December 17th, 2014 SDPUC Order (as discussed in the General Objection above).*

Nancy objects to it because it is overly broad, vague, and burdensome. Specifically, identification of all individuals with whom I (Nancy) may have "talked with" about these interrogatories to any degree, including their mere existence, or communicated with individual for clarification about SD laws about discovery or identification by me of any written source that provided information to me about TransCanada or pipelines, since this all started back in 2008, would not lead to the discovery of admissible evidence.

Without waving these objections - some folks, I got information or assistance from are:

Kristen Edwards, Staff Attorney, South Dakota Public Utilities Commission, 500 E. Capitol Avenue, Pierre, SD 57501, 605-773-3201

Paul F. Seamans, 27893 244th Street, Draper, South Dakota, 57531, Home phone: 605-669-2777

Sabrina King, Dakota Rural Action, 518 6th St #6, Rapid City, SD 57001, 605-716-2200.

Paul C. Blackburn, 4145 20th Ave. South, Minneapolis, MN 55407
paul@paulblackburn.net, (612) 599-5568

Ms. Kimberly E. Craven, 3560 Catalpa Way, Boulder, CO 80304
kimecraven@gmail.com, (303) 494-1974

3. State the name, current address, and telephone number of each fact witness you intend to call to offer testimony at the evidentiary hearing in this case set for May 2015.

ANSWER: *Nancy objects to this question because it does not state the specific Condition or Finding of Fact and & thus violates December 17th, 2014 SDPUC Order (As discussed in the General Objection above).*

While not waiving my general objections Nancy has no witnesses planned at this time, but Nancy is investigating a couple of them, and if allowed may add a few later, or not.

4. State the name, current address, and telephone number of each witness whom you intend to call at the evidentiary hearing as an expert witness under SDCL Ch. 19-15, and for each expert, state:

a. the subject matter on which the expert is expected to testify;
b. the substance of each opinion to which the expert is expected to testify;
c. the facts supporting each opinion to which the expert is expected to testify;
d. the expert's profession or occupation, educational background, specialized training, and employment history relevant to the expert's proposed testimony;
e. the expert's previous publications within the preceding 10 years; and
f. all other cases in which the witness has testified as an expert at trial or by deposition within the preceding four years.

ANSWER: *Nancy objects to this question because it does not state specific Condition or Finding of Fact and & thus violates December 17th, 2014 SDPUC Order (as discussed in the General Objection above).*

While not waiving my general objection, Nancy has no witnesses planned at this time

5. Identify by number each condition in Exhibit A to the Amended Final Decision and Order dated June 29, 2010, entered in HP09-001, that you contend Applicant TransCanada Keystone Pipeline, LP, cannot now or in the future meet, and for each condition that you identify, state:

a. the facts on which your contention is based; and

b. the name, current address, and telephone number of each witness who will testify that Applicant is unable to meet the condition.

ANSWER: *Nancy objects to this question because it does not state the specific Condition or Finding of Fact and & thus violates December 17th, 2014 SDPUC Order (as discussed in the General Objection above).*
Nancy believes this question violates "work product doctrine" as TransCanada wants me to disclose my trial strategy.

It seems TransCanada expects respondents to TransCanada discovery requests, to obey the SDPUC Dec 17th Order, instead of TransCanada obeying it and wants us to provide TransCanada with number of Condition or Finding of Fact: i.e.: TransCanada needs me (Nancy) to tell them what I (Nancy) will focus on, perhaps so they can frame a future discovery request on February 20th that will actually be in compliance with the Dec 17th Order. It seems TransCanada got what they asked for (parties must cite Condition or Fact) but maybe they didn't anticipate the unintended consequences to TransCanada themselves, until they sat down to write discovery requests to send to interveners.

Nancy also objects to this interrogatory because it is overly broad, vague and unduly burdensome. Providing a separate list containing each individual fact that I (Nancy) intend to present would be unduly burdensome. TransCanada may also be seeking me to repeat facts already available to them, such as quotes from the FEIS or SEIS on this matter. In addition, the word "fact" is vague and overly broad, making it impossible for Nancy to understand how to define a single fact.

However while not waiving these objections, I (Nancy) don't yet know what I will argue and I am not sure of my answers to question # 5 at this time.

I am also not yet fully sure of what I will focus on, at this time.
While not waiving my objections, I can give some uncertain answers about my possible focus. And I will insert this discussion of potential focus in this spot.

I will likely focus on pipeline during closure and post (after) closure (abandonment issues) and also investigate TransCanada long term financial resources post closure (abandonment). This is at least relevant to Permit Condition # 1 & 2 & 3, & 49 and Appendix C changed fact # 32. But it may be related to others such as Permit Conditions: #9, 12, 13, 14, 15, 16, 17,19, 20,

21,22,23, 24,25,26,27,29,30,31,32, 33,34,35,36, 38,40,41 42, 43, 44, 45, 46, 47, 48, 50. Also may be related to: Appendix C changed facts # 41, 60, 63, 68, 80, 83, 90,

I may focus on wildlife/fish and/or rare plant issues (which would include protection of habitat for species & plant communities), & this at least relates to Permit Condition # 1 & 2 & 3 and also 34, 41, 48, 49, but there may be others Conditions such as #9, 12, 13, 14, 15, 16, 17,19, 20, 21,22,23, 24,25,26,27,29,30,31,32, 33,34,35,36, 38, 40,41 42, 43, 44, 45, 46, 47, 48, 50. This may also be related to Appendix C changed fact # 32, 41, 60, 63, 68, 80, 83, 90,

I may focus on pipeline failures and leaks & this at least relates to Permit Condition #33, 36, 37, 38, but also likely # 1, 2, & 3, 13, 14, 15, 16, 17, 19, 20,21,22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 35, 40, 41,42, 43, 44,45, 46, 47, 50. . This may also be related to Appendix C changed fact # 32, 41, 60, 63, 68, 80, 83, 90,

I may seek to get Permit Condition # 3 & 41 amended to recognize the existence of SEIS, in addition to the FEIS. This is relevant to Permit Condition # 3& 41 and perhaps # 1, & I may discuss the PUC's need to change references in Permit Conditions from FEIS to SEIS.

6. Identify by number each finding of fact in the Amended Final Decision and Order dated June 29, 2010, entered in HP09-001, that you contend is no longer accurate because of a change in facts or circumstances related to the proposed construction and operation of the Keystone XL Pipeline in South Dakota, and for each finding that you identify, state:

a. the facts on which your contention is based; and
b. the name, current address, and telephone number of each witness who will testify that the finding of fact is no longer accurate.

ANSWER: *Nancy objects to this question because it does not state the specific Condition or Finding of Fact and & thus violates December 17th, 2014 SDPUC Order (as discussed in the General Objection above).*

I (Nancy) believe this question violates "work product doctrine" as TransCanada wants me to disclose my trial strategy.

It seems TransCanada expects respondent, not questioner to obey the SDPUC Dec 17th Order by connecting respondent's answer to the number of permit Condition or changed Finding of Fact, rather than TransCanada connecting their questions to a Condition or changed Finding of Fact.

I (Nancy) also object to this interrogatory because it is overly broad, vague and unduly burdensome. Providing a separate list containing each individual fact that I (Nancy) intend to present would be unduly burdensome. TransCanada may be seeking me to repeat facts already available to them. In addition, the word "fact" is vague and overly broad, making it impossible for I (Nancy) to understand how to define a single fact.

However while not waiving these objections, objections, I (Nancy) don't yet know what I will argue and am not sure of my answers to this question at this time. However The Department of State did an SEIS & the PUC should be amending various conditions to add or change FEIS to SEIS.

7. In addition to the facts identified in your responses to interrogatory numbers 5 and 6, identify any other reasons that you contend Applicant cannot continue to meet the conditions on which the Permit granted, and for each reason that you identify, state:

a. the condition in the Amended Final Decision and Order dated June 29, 2010 entered in HP09-001, identified by number;
b. the facts on which your contention is based; and
c. the name, current address, and telephone number of each witness who will testify in support of your contention.

. **ANSWER:** *I (Nancy) believe this question violates "work product doctrine" as TransCanada wants me to disclose my trial strategy.*

Also please refer to my general objection statement at the beginning of this reply. It seems TransCanada expects respondent (not questioner) to obey the SDPUC Dec 17th Order, by TransCanada asking me to tier my answer to the number of permit Condition or changed Finding of Fact, rather than TransCanada tiering their questions to a Condition or changed Finding of Fact (as they were required to do).

TransCanada may be seeking me to repeat facts already available to them.

However while not waiving these objections, I (Nancy) don't yet know what I will argue and am not sure of my answers to this question at this time.

8. In addition to the facts identified in your responses to the preceding interrogatories, identify any other reason why the Public Utilities Commission should not accept Applicant's certification filed September 15, 2014 in HP14-001, and for each reason that you identify, state:

a. the facts on which your contention is based; and

b. the name, current address, and telephone number of each witness who will testify in support of your contention.

ANSWER: *I (Nancy) believe this question violates "work product doctrine" as TransCanada wants me to disclose my trial strategy. Also please refer to my general objection statement at the beginning of this reply; TransCanada's question is not tiered to a Condition or Finding of Fact & thus violates December 17th, 2014 SDPUC Order.*
TransCanada may be seeking me to repeat facts already available to them.

However while not waiving these objections, I (Nancy) am not prepared enough yet and am not sure of my answers to this question at this time.

REQUESTS FOR PRODUCTION OF DOCUMENTS
1. All documents that you intend to offer as exhibits at the evidentiary hearing in this matter.

ANSWER:
Objection: *This question is not tiered to a Condition or Finding of Fact & thus violates December 17th, 2014 SDPUC Order.*

While not waiving my objections, I (Nancy) have only 2 documents at this time, that I am most likely to submit as evidence:

1. Excerpt of Keystone XL SEIS volume 2 at "2.1.13 Proposed Project Decommissioning"
2. DECOMMISSIONING-1: NEB case study shows abandonment pitfalls and..

They will be attached to supplemental e-mail letter.

I have a bunch of documents that I am thinking about using (I may or may not use). I will send all these documents today, under a different cover letter, in separate e-mails, later today.

I am not sure how many e-mail messages will be needed to send all such documents, due to size limit on mega bytes allowed within an e-mail sending. After I send this letter, I will send the second supplemental cover letter once and then begin sending e-mails with PDF & MSW documents attached to them.

I am trying to send you some potential exhibits, but remember I believe the whole Discovery request does not comply with the PUC's order for discovery, thus I am doing it as a courtesy.

2. All documents on which you rely in support of your answer to Interrogatory No. 5.

ANSWER:
Objection: *This question is not tiered to a Condition or Finding of Fact & thus violates December 17th, 2014 SDPUC Order. See also objections and answers to Interrogatory No 5.*

3. All documents on which you rely in support of your answer to Interrogatory No. 6.

ANSWER:
Objection: *This question is not tiered to a Condition or Finding of Fact & thus violates December 17th, 2014 SDPUC Order. See also objections and answers to Interrogatory No 6.*

4. All documents on which you rely in support of your answer to Interrogatory No. 7.

ANSWER:
Objection: *This question is not tiered to a Condition or Finding of Fact, & thus violates December 17th, 2014 SDPUC Order. See also my objections and answers to Interrogatory No. 7.*

5. All documents on which you rely in support of your answer to Interrogatory No. 8.
ANSWER
Objection: *This question is not tiered to a Condition or Finding of Fact & thus violates December 17th, 2014 SDPUC Order. See also my objection and answers to Interrogatory No. 8.*

6. All documents relied on by any expert whose testimony you intend to offer at the evidentiary hearing in this matter.

ANSWER:
Objection: *This question is not tiered to a Condition or Finding of Fact & thus violates December 17th, 2014 SDPUC Order. Information provided to answer this interrogatory may include thought processes and trial strategies and other information that is protected by the work product doctrine.*

Without waiving these objections, I (Nancy) have no witnesses planned at this time, and can't share documents of unknown witness.

7. All documents that you have sent to or received from any expert whose testimony you intend to offer at the evidentiary hearing in this matter.

ANSWER:
Objection: *This question is not tiered to a Condition or Finding of Fact & thus violates*

December 17th, 2014 SDPUC Order. Information responsive to this interrogatory may include thought processes and trial strategies and other information that is protected by the work product doctrine.

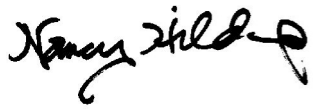
Without waiving these objections, I (Nancy) have no witnesses planned at this time, and can't share documents of unknown witness.

8. A current resume for each expert whose testimony you intend to offer at the evidentiary hearing in this matter.

ANSWER:
Objection: *This question is not tiered to a Condition or Finding of Fact & thus violates December 17th, 2014 SDPUC Order.*

Without waiving these objections, I (Nancy) have no witnesses planned at this time, and can't share resume of unknown witness.

Nancy Hilding
6300 West Elm
Black Hawk, SD 57718
nhilshat@rapidnet.com



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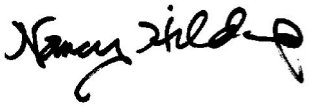
CERTIFICATE OF SERVICE

I hereby certify that just now, on **March 10th, 2015**, I am sending by e-mail a true and correct copy of Nancy Hilding's: " HILDING'S SECOND RESPONSE TO KEYSTONE'S INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS OF TRANSCANADA KEYSTONE PIPELINE, LP" and CERTIFICATE OF SERVICE to the following men, at their e-mail address:

Mr. James E. Moore - Representing: TransCanada Keystone Pipeline, LP Attorney Woods, Fuller, Shultz and Smith P.C. PO Box 5027 Sioux Falls, SD 57117 james.moore@woodsfuller.com (605) 336-3890 - voice (605) 339-3357 - fax

Mr. Bill G. Taylor - Representing: TransCanada Keystone Pipeline, LP Attorney Woods, Fuller, Shultz and Smith P.C. PO Box 5027 Sioux Falls, SD 57117 bill.taylor@woodsfuller.com (605) 336-3890 - voice (605) 339-3357 - fax

I am sending via e-mail now. Thanks for all your work in regards this matter.
Nancy Hilding, 6300 West Elm, Black Hawk, SD 57718



Nancy Hilding
6300 West Elm
Black Hawk, SD 57718
March 10th, 2015

James Moore and Bill Taylor,
TransCanada Keystone Pipeline,
LPAttorney Woods, Fuller, Shultz and Smith P.C.
PO Box 5027
Sioux Falls, SD 57117
james.moore@woodsfuller.com,
bill.taylor@woodsfuller.com
(605) 336-3890 - voice (605) 339-3357 - fax

Supplemental Letter to Second Discovery Answer

Dear Sirs

I allege that your discovery request was improperly written and by giving you this information, in no way to I waive my objections. I have discussed my objections, in my HILDING'S SECOND RESPONSE TO KEYSTONE'S INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS OF TRANSCANADA KEYSTONE PIPELINE, LP

RE: Documents being sent:

LIKELY SUBMITTED

Attached to this letter find various documents I will most likely submit;

1. Keystone XL SEIS volume 2 at "2.1.13 Proposed Project Decommissioning" http://keystonepipeline-xl.state.gov/documents/organization/221154.pdf
2. DECOMMISSIONING-1: NEB case study shows abandonment pitfalls and

MIGHT BE SUBMITTED

Attached to this letter also find various documents I am thinking about using as evidence at the Keystone XL Re- Certification hearing, but I have not decided which to use or not. Thus I send this long set of documents to you, in this informal way, not attached to discovery letter itself, but referenced/cited in the discovery letter & sent on the same day. I may use some or all of these. I may find more potential items to select from.

I may need to send in several e-mails, so the e-mail is not too large:

Wildlife document set
Leaking Pipes set,

Abandonment Pipes set
Laws & inadequate Regulation document set
SEIS set

Sometimes I may give you the file name in the list below - you will have the original PDF or MSW file.

I am also considering trying to figure out a way to have hard copies or CDs of the SEIS at the May Hearing, if you all or PUC won't be submitting it. I hope a CD and an LED projector would work, rather than needing to cart over about 4 feet of NEPA documents.

Thanks,

Nancy Hilding

List of More Potential Exhibits, Hilding

Wildlife Set Documents,

Various documents related to **Northern Long Eared Bat,** The USFW Service proposed to list the northern long-eared bat as endangered under the ESA in October 2013 and is due to make a final decision by April 2, 2015.

`12 Month Finding on Bat, Federal Register (October 2013),
`Proposed Listing Rule, Federal Register (Jan 2015)

This is a new species that may not in the Keystone SEIS , at least as listed species, it is mostly found along rivers in the SD Plains; it needs nests in trees in summer but winters in caves.

Various Documents related to **Sturgeon Chub**. Chub in SD, is substantially dependent on the White River & we believe an "at risk species" - & is listed as "threatened" by the State. We believe given records of pipelines being uncovered and eroded under Rivers, we fear for the Chub's future in the White River and want special attention to this and hope you will work to improve protections of pipes in the White River, to protect Chub. 4 documents

`2001 USFWS map, USFWS (Sturgeon Chub)
`2001 Status Review, USFWS (Sturgeon Chub)
`2001 12-month Finding for a Petition To List the Sicklefin Chub (Macrhybopsis meeki) and the Sturgeon Chub (Macrhybopsis gelida) as Endangered (USFWS)
`Draft SD Wildlife Action Plan, 2014, SDGFP

`Rivers of Life (by The Nature Conservancy)
(note the map of Chubs in Draft SDGFP Wildlife Plan is a confusing - location of chub include old dates/locations where once were, but when revisited recently the fish have not been found again when revisited)

Pallid Sturgeon, Interior Least Tern, Piping Plover

`South Dakota Pallid Sturgeon (Scaphirhynchus albus) Management Plan
`Pallid Sturgeon Recovery Plan , USFWS
`South Dakota Interior Least Tern (Sterna antillarum athalassos) and Piping Plover (Charadrius melodus) Management Plan
`Piping Plover, USFWS

Sage Grouse

`Letter from environmental. groups - "A Checklist for the Bureau of Land Management and the Forest Service for Conserving the Greater Sage-Grouse"
`Comment letter to Wyoming BLM on Sage Grouse Amendments

Climate Change and future of SD Birds

This link to National Audubon Society's web page, will show you lots of SD Birds that may transform to endangered or threatened status over the life of the Keystone Project due to climate change - how will USFWS order TransCanada work to conserve these birds, in future, when threat & causality is climate change?
I provide links rather than documents:
`http://climate.audubon.org
`http://climate.audubon.org/sites/default/files/Audubon-Birds-Climate-Report-v1.2.pdf

<u>Leaking Pipes</u>

Various Google pages, if we submit to PUC, we might refresh download, just before final submission. We are very worried about pipes under rivers being exposed, scoured and then leaking and improving mitigations for this.

`List of pipeline accidents in the United States in the 21st century - Wikipedia, the free encycloped
`yellowstone.oil.spill
`List of oil spills - Wikipedia, the free encyclopedia
`L.A. Spill Case Has Exposed Flaw in Pipeline Safety Oversight | InsideClimate News
`Kalamazoo - Natural Resource Damage Assessment and Restoration 2010 Enbridge Oil Spill in Michigan
`Yellowstone Oil Spills Expose Threat to Pipelines Under Rivers Nationwide | InsideClimate News
`Oil spill cleanups are a myth, change needed now - Bozeman Daily Chronicle/ Guest Columnists
`Ice Hinders Cleanup of Yellowstone Oil Pipeline Spill | InsideClimate News
` Effects of Diluted Bitumen on Crude Oil Transmission Pipelines

Laws & inadequate regulation

We enclose 2 laws. We are especially concerned about regulation of abandoned pipes.

`2012 Federal Law - PUBLIC LAW 112–90—JAN. 3, 2012, ''Pipeline Safety, Regulatory Certainty, and Job Creation Act of 2011''

`2012 Federal Law Conference Report, CONFERENCE REPORT TO ACCOMPANY H.R. 4348

`A brief history of federal pipeline safety laws | Pipeline Safety Trust

`Don't Kill Keystone XL. Regulate It. - NYTimes

Abandoned pipes.

`Decommissioning an Abandoned Oil Pipeline

`Pipeline Abandonment - A Discussion Paper on Technical and Environmental Issues

`DECOMMISSIONING-1: NEB case study shows abandonment pitfalls and

`Inspectors find 2 pipelines leaked oil, gas into Sakakawea tributary

`Leak.oldpipe.ganz_04 (EPA document)- ConocoPhillips Mississippi River Pipeline Release

`EcoHearth - Planet Sludge/ Millions of Abandoned, Leaking Natural Gas and Oil Wells to Foul Our Future

`Identification and assessment of trace contaminants associated with oil and gas pipelines abandoned in place (Roberts-Thorne WE)

` Pipeline Abandonment Assumptions

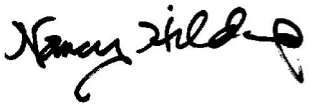
SEIS

I might submit the whole SEIS as evidence or just a subset.

` http://keystonepipeline-xl.state.gov/finalseis/

We very much hope you fix the Permit Conditions on the abandoned Pipe Issue. In existing laws and PUC Permit Conditions, it is just too vague how this will be watched over and environment and people protected. This one issue needs a fix, at least for clarity.

Nancy Hilding



Nancy Hilding
6300 West Elm
Black Hawk, SD 57718
March 10th, 2015

To Woods Fuller Staff,

RE" Keystone XL- Docket HP 14-001

This is to certify that by my computer records show,

- `I sent you an e-mail # 1 at 8:01pm, March 10th, 2015, with my 2nd response to your December Discovery request.
- `I sent you an e-mail # 2 at 8:03 pm, March 10th, 2015 with my cover letter giving an index of potenital exhibits to be sent
- `I sent you an e-mail # 3 at 8:03 pm, March 10th, 2015, with the cover letter and 2 attachments on topic of SEIS and abandoned/decommissioned pipes
- `I sent you an e-mail # 4 at 8:05 pm, March 10th, 2015, with 9 attachments on wildlife topics
- `I sent you an e-mail # 5 at 8:14 pm, March 10th, 2015, with 4 attachments on wildlife topics
- `I sent you an e-mail # 6 at 8:17 pm, March 10th, 2015, with 21 attachments on leaking pipes, abandoned pipes and Laws & inadequate regulation

I sent these e-mails to
"james.moore@woodsfuller.com" <james.moore@woodsfuller.com>,
"bill.taylor@woodsfuller.com" <bill.taylor@woodsfuller.com> and Melissa Sasker.

This e-mail constitutes a summary of all e-mails sent, and please consider it an additional certificate of service for these 6 cumulative e-mails.

As of 8:39 pm, I have gotten no notice of "bounce back" notices.

Please let me know that you got them all.

Thanks

Nancy Hilding