

Listed Exhibit: 18

**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 PROJECT )  
)

**HP14-002  
REPLY TO  
INTERROGATORIES OF  
DAKOTA ACCESS LLC TO  
DAKOTA RURAL ACTION, INC.  
(SECOND SET)**

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](mailto:brett@mayadam.net)

The Dakota Rural Action (DRA) hereby submits the following Answers and Objections to Dakota Access Second Set of Interrogatories.

INTERROGATORY NO. 1: List your members who own land over which the proposed pipeline is currently routed.

OBJECTION. Dakota Rural Action objects to this interrogatory on the grounds that the Interrogatory calls for an answer that is not relevant to the scope of the proceedings, is an invasion of our member's privacy and will not lead to admissible evidence for the applicant's burden of proof under SDCL 49-41B.

INTERROGATORY NO. 2: List your members who own land within one half mile of the proposed pipeline route.

OBJECTION. Dakota Rural Action objects to this interrogatory on the grounds that the Interrogatory calls for an answer that is not relevant to the scope of the proceedings, is an invasion of our member's privacy and will not lead to admissible evidence for the applicant's burden of proof under SDCL 49-41B.

INTERROGATORY NO. 3: Does Dakota Rural Action disagree with or oppose the construction of crude oil transportation pipelines in the State of South Dakota, regardless of where situated within the state?

ANSWER NO. 3: Dakota Rural Action does not have a position on the construction of crude oil transportation pipelines in the State of South Dakota, regardless of where situated within the state.

INTERROGATORY NO. 4: Does Dakota Rural Action have a formal position regarding the construction of crude oil pipelines in the State of South Dakota? If so, what is it and how was that position developed.

ANSWER NO. 4: No.

INTERROGATORY NO. 5: Does Dakota Rural Action have a formal position regarding the proposed Dakota Access pipeline? If so, what is it and how was that position developed.

ANSWER NO. 5: Yes. After discussing the Dakota Access pipeline, the DRA Board of Directors voted to oppose the DA pipeline by a democratic vote at a recent board meeting.

INTERROGATORY NO. 6: If the answer to No. 3 above is “no,” generally state what it is about the proposed Dakota Access pipeline that the Dakota Rural Action finds objectionable.

ANSWER NO. 6: Not applicable. However, the board opposes the Dakota Access pipeline because it is environmentally risky and poses potential health and welfare hazards for the people of South Dakota.

INTERROGATORY NO. 7: If the answer to No. 3 above is “yes,” generally state the organization’s objections to the construction of crude oil transportation pipelines in the State of South Dakota.

ANSWER NO. 7: Not applicable.

REQUEST FOR PRODUCTION OF DOCUMENTS 1: Provide a copy of all documents referenced in any answer above or which supports any answer above.

There are currently no documents available to support DRA's answers. In accordance with SDCL 15-6-26(e), DRA will continue to supplement its answers.

Dated this 22<sup>th</sup> day of June, 2015.

KIMBERLY CRAVEN, ATTORNEY AT LAW

BY: /s/ Kimberly Craven  
KIMBERLY CRAVEN  
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#### CERTIFICATE OF SERVICE

Kimberly Craven hereby certifies that on the 22<sup>nd</sup> day of June, 2015, I electronically sent a true and correct copy of the foregoing in the above captioned action to the following at their last known addresses:

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/s/ Kimberly Craven  
KIMBERLY CRAVEN