

Listed Exhibit: 25

**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)	REPLY TO
FACILITY PERMIT TO)	INTERROGATORIES OF
CONSTRUCT THE DAKOTA)	DAKOTA ACCESS LLC TO
ACCESS PIPELINE PROJECT)	INDIGENOUS ENVIRONMENTAL
)	NETWORK (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

The Indigenous Environmental Network (IEN) hereby submits the following Answers and Objections to Dakota Access Second Set of Interrogatories.

INTERROGATORY NO. 1: Name all tribes with which Indigenous Environmental Network is affiliated in regard to this PUC citing docket.

OBJECTION. The Indigenous Environmental Network objects to this interrogatory on the grounds that the Interrogatory calls for an answer that is not relevant to the scope of the proceedings and the applicants burden of proof under SDCL 49-41B. IEN is not sure what the definition of “affiliated” means in this context but IEN is a long-established Indigenous Environmental organization with a vast membership and has relationships with Indigenous Peoples around the globe.

INTERROGATORY NO. 2: Please list the state of residency of Indigenous Environmental Network’s three board members. Namely: Bineshi Albert, Manual Pino and Sayo’: Kla Kindness.

OBJECTION. The Indigenous Environmental Network objects to this interrogatory on the grounds that the Interrogatory call for an answer that is not relevant to the scope of the proceedings, is an invasion of our board members’ privacy and will not lead to admissible evidence for the applicant’s burden of proof under SDCL 49-41B.

INTERROGATORY NO. 3: Please describe the corporate mechanism by which Tom Goldtooth, Dallas Goldtooth and Kandi Mossett were granted decision making authority as it pertains to the above captioned PUC citing docket.

OBJECTION. The Indigenous Environmental Network objects to this interrogatory on the grounds that the Interrogatory calls for an answer that is not relevant to the scope of the proceedings and the applicant's burden of proof under SDCL 49-41B.

INTERROGATORY NO. 4: Provide the residency address of Tom Goldtooth, Dallas Goldtooth and Kandi Mossett.

OBJECTION. The Indigenous Environmental Network 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 staff member's privacy and will not lead to admissible evidence for the applicant's burden of proof under SDCL 49-41B.

INTERROGATORY NO. 5: When you decide who will appear at the September/October hearing, please state how they are affiliated to Indigenous Environmental Network. In other words, are they members, officers, or otherwise affiliated?

ANSWER NO. 5: This information is not known at this time since the hearing is months away. IEN will supplement its answer as it gets closer to the September/October hearing date.

INTERROGATORY NO. 6: For those tribes listed in response to Interrogatory 1 above, list all linear utility infrastructure currently located on their reservation land. This request is intended to include, but is not limited to: gas pipelines, water pipelines, and electric lines.

OBJECTION. The Indigenous Environmental Network objects to the Interrogatory on the grounds that the Interrogatory calls for an answer that is not relevant to the scope of the proceedings and the applicant's burden of proof under SDCL 49-41B. These proceedings are

governed by SDCL 49-41B. The lineal utility infrastructure located on reservations are not relevant to the applicants burden of proof or information that the PUC would consider in making a determination if the Applicant has complied with SDCL 49-41B.

INTERROGATORY NO 7: For those tribes listed in response to Interrogatory 1 above, what property rights do those tribes have within one half mile of the pipeline's current proposed route?

OJECTION AND ANSWER NO. 7: The Indigenous Environmental Network objects to the Interrogatory on the grounds that the Interrogatory calls for an answer that is not relevant to the scope of the proceedings and the applicant's burden of proof under SDCL 49-41B. Notwithstanding our objection, all nine of the federally recognized Tribes in South Dakota possess federally reserved water rights that at this point in time have not yet been quantified. They may also possess interests in burial or historical sites that are recognized under federal law. There may be off-reservation tracts of allotted lands in some areas that we are still identifying.

INTERROGATORY NO. 8: For those tribes listed in response to Interrogatory 1 above, how far in feet or miles is the proposed pipeline located from their exterior boundary?

ANSWER NO. 8: This information is not known at this time.

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

No such document currently exist. In accordance with SDCL 15-6-26(e), IEN will continue to supplement its responses and provide additional information as it becomes available.

Dated this 22nd day of June, 2015.

KIMBERLY CRAVEN, ATTORNEY AT LAW

BY: /s/ Kimberly Craven
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CERTIFICATE OF SERVICE

Kimberly Craven hereby certifies that on the 22nd 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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