

EXHIBIT 6



FREDERICKS PEEBLES & MORGAN LLP
ATTORNEYS AT LAW

THOMASINA REAL BIRD

1900 Plaza Drive
Louisville, CO 80027
Telephone (303) 673-9600
Fax (303) 673-9155
E-Mail trealbird@ndnlaw.com
www.ndnlaw.com

May 6, 2015

VIA EMAIL

Brett Koenecke
May, Adam, Gerdes & Thompson LLP
P.O. Box 160
Pierre, SD 57501
Brett@magt.com

Re: HP14-002 Dakota Access, LLC

Mr. Koenecke:

We are writing to notify you that your production in response to the Yankton Sioux Tribe's First Interrogatories and Requests for Production of Documents is deficient. We wish to resolve this matter promptly in light of your already-late responses. Please be advised that we find your answers and production to be deficient as follows:

Interrogatory No. 10

You answered Interrogatory No. 10, which requested information regarding persons responsible for conducting surveys, with the word "PENDING" and the following:

2014 – present.
Names

All % of Kara Semmler and Brett Koenecke
May, Adam, Gerdes & Thompson LLP
503 S. Pierre St.
PO Box 160
Pierre, SD 57501
605-224-8803
brett@mayadam.net
kcs@mayadam.net

Counsel for the Tribe has no knowledge of the meaning of "All % of Kara Semmler and Brett Koenecke" and finds it highly unlikely that the contact information for Dakota Access's

attorneys is responsive to Interrogatory No. 10. Your response to Interrogatory No. 10 appears incomplete and deficient. Please provide a full and complete answer responsive to this Interrogatory.

Interrogatory No. 11

With respect to Interrogatory No. 11, we asked whether Dakota Access recognizes the Yankton Sioux Tribe as a "local governmental unit." The statement in the answer you provided is not responsive to the question asked. Please respond to the question asked in this Interrogatory.

Interrogatory Nos. 18 and 40

Your answer to Interrogatory No. 40 appears to directly contradict your answer to Interrogatory No. 18, thus it is unclear which answer is correct and which answer is incorrect. Please provide us with the correct answers to each of these Interrogatories. If for some reason both answers already provided are accurate, please provide an explanation for what appears to be a discrepancy.

Interrogatory No. 19 and Request No. 3

You refused to answer Interrogatory No. 19 and refused to provide documents requested in Request No. 3 on the grounds that the information sought is confidential. However, there is no legal authority cited for this assertion of confidentiality and the information sought is in fact not required by law to be treated as confidential by Dakota Access or the Commission. Please provide the requested information and documents.

Interrogatory Nos. 20, 25, 26

Your answer to each of these Interrogatories contains merely the word "PENDING." You have failed to answer these questions. Please provide full and complete answers responsive to each of these Interrogatories.

Request Nos. 4 and 7

You objected rather than responding to Request Nos. 4 and 7 on the grounds that the Requests were overly broad, burdensome, and outside the scope of discovery. Request No. 4 sought documents relating to permits and permit applications for the Dakota Access Pipeline Project and for any other project constructed by Dakota Access since 2010. Due to the nature of these projects, the number of permits sought over the last 4 ½ years is not likely to be very significant and such documentation is reasonably likely to lead to the discovery of admissible evidence regarding safety, risks, performance, and other aspects of Dakota Access's operations. This information is well within the scope of discovery and is adequately narrow in scope so that it places no undue burden on Dakota Access. Request No. 7 sought all documents related to Interrogatory No. 30 as well as a table to show breeding times of sensitive SD species and a map to show migration pathways of sensitive SD species. You clearly did not find Interrogatory No.

Koenecke
May 6, 2015
Page 3 of 3

30 to be overly broad or outside the scope of discovery, thus it is illogical for you to claim, that documents related to that question are overly broad or outside the scope of discovery. With respect to the table and map requested, these items contain very narrow sets of information and are in no way broad. They are within the scope of discovery because assessing the impact of projects on South Dakota's sensitive species is within the purview of the Commission and the requested documents are likely to lead to admissible evidence relevant to that issue. Please provide full and complete production responsive to these requests.

As we have already noted in our previous correspondence, your production is late and it is now infringing on our right to review the responses to our discovery requests in preparation of for the remainder of these proceedings. Please remedy the above deficiencies in your production and provide us with your full and complete responses no later than 9:00 am (Central) tomorrow, May 7, 2015. You may contact me at the number listed above if you have any questions or wish to discuss these matters further.

Sincerely,



Thomasina Real Bird
Attorney