

**PREFILED REBUTTAL TESTIMONY
OF
CHRIS SAUNSOCI**

Docket No. HP14-002

IN THE MATTER OF THE APPLICATION OF DAKOTA ACCESS, LLC FOR AN ENERGY
FACILITY PERMIT TO CONSTRUCT THE DAKOTA ACCESS PIPELINE PROJECT

1. What is your name and business address?

A. My name is Chris Saunsoci and my business address is PO Box 1153, Wagner, South Dakota 58380.

2. Are you a member of the Yankton Sioux Tribe or any other tribe?

A. I am an enrolled member of the Yankton Sioux Tribe.

3. What is your occupation or what kinds of work do you do?

A. I am the Chief of Police for the Yankton Sioux Tribe.

4. On whose behalf was this testimony prepared?

A. This testimony was prepared on behalf of the Yankton Sioux Tribe.

5. Please state the purpose of your testimony.

A. The purpose of my testimony is to rebut the testimony provided by Dakota Access and PUC Staff witnesses Joey Mahmoud, Todd Stamm, Robert E. McFadden, and David Nickel, as well as the Dakota Access Pipeline Project Application prepared by Perennial Environmental Services, LLC.

6. The pre-filed direct testimony of Mr. Mahmoud states that Dakota Access will proactively work with emergency response agencies to provide pipeline awareness education and other support, to your knowledge, has Dakota Access engaged the Yankton Sioux Tribe's Law Enforcement to provide such education?

A. No, to my knowledge, Dakota Access has not engaged Yankton Sioux Tribe Law Enforcement for such purposes.

7. Mr. Mahmoud also states that approximately 1,448 construction personnel are anticipated for the pipeline construction spreads in South Dakota, given the relative proximity of the proposed route to the reservation, do you have concerns about these projected personnel as Chief of Police?

A. I am concerned that our law enforcement does not have the resources to handle this many workers in the area. In addition, tribal law enforcement may not have jurisdiction over all of these workers should they engage in criminal activity and there has been no coordinated plan initiated by Dakota Access to address law enforcement and jurisdictional concerns.

8. Mr. Mahmoud also states that law enforcement agencies in the communities adjacent to the Project should not experience a significant impact from pipeline workers, do you agree with such a conclusion?

A. No. I believe there is the potential for surrounding communities including the Yankton Sioux Reservation to experience a significant impact from the influx of over 1,400 workers whether they bring their families or not. This is a significant number of persons to be

introduced into the communities along the proposed route even if portions of the route are near larger population areas such as Sioux Falls.

9. The pre-filed direct testimony of Todd Stamm states that Energy Transfer conducts extensive public education outreach programs, including damage prevention programs, that meet or exceed industry concerning public awareness of pipeline and pipeline safety matters, to your knowledge has Energy Transfer conducted such programs or engaged the Yankton Sioux Tribe to discuss the development of such programs?

A. To my knowledge and in my capacity as Chief of Police, there have been no such programs or engagement of Yankton Sioux Law Enforcement to discuss the development of such programs.

10. Mr. Stamm also states that an emergency response plan is being prepared and will be in place prior to conducting transportation of crude oil, to your knowledge, has Dakota Access contacted or engaged Yankton Sioux Law Enforcement concerning the preparation or any aspect of the emergency response plan.

A. Dakota Access has not contacted Yankton Sioux Law Enforcement concerning the preparation or any aspect of the emergency response plan.

11. Has Dakota Access coordinated with Yankton Sioux Law Enforcement in preventing and responding to any pipeline related problems?

A. Dakota Access has not coordinated with Yankton Sioux Law Enforcement for the prevention and response to any pipeline related problems.

12. The pre-filed testimony of David Nickel states that Dakota Access has committed to drafting and implementing a Facility Response Plan and Oil Spill Response Plan, to your knowledge has Dakota Access engaged Yankton Sioux Law Enforcement to discuss the drafting and implementation of these plans?

A. Dakota Access has not engaged Yankton Sioux Law Enforcement to discuss the drafting and implementation of these plans.

13. The pre-filed testimony of Robert E. McFadden states that there are a number of plans and documents that are required to be developed by Dakota Access in accordance with PHMSA regulations including an operating and maintenance procedures manual which must contain emergency procedures; an integrity management program, a damage prevention program, a continuing public education program, and an oil spill response plan, to your knowledge has Dakota Access contacted or engaged Yankton Sioux Law Enforcement regarding any of these plans?

A. Dakota Access has neither contacted nor engaged Yankton Sioux Law Enforcement regarding any of these plans.

14. To your knowledge, did Dakota Access or Energy Transfer consult Yankton Sioux Law Enforcement during the route selection, route evaluation or proposed route process?

A. Yankton Sioux Law Enforcement was not consulted during the route selection, route evaluation, or proposed route process.

15. Do you anticipate the Yankton Sioux Law Enforcement to experience a significant impact from the pipeline workers?

A. In my opinion, it is a reasonable to expect a significant impact because our reservation contains several tourist attractions including the Fort Randall Casino and Hotel, many wildlife and tourist activities, and is adjacent to several access points to the Missouri River that many visitors utilize from areas including the Sioux Falls vicinity. While we do not consider every visitor to require law enforcement involvement, it is reasonable to expect a significant impact relative to our normal incident rates.

16. To your knowledge, has Dakota Access engaged Yankton Sioux Tribe Law Enforcement to coordinate effective emergency response during construction?

A. No, Dakota Access has not engaged Yankton Sioux Tribe Law Enforcement to coordinate effective emergency response during construction.

17. To your knowledge, has Dakota Access proactively worked with Yankton Sioux Tribe Law Enforcement to provide pipeline awareness education and other support including a comprehensive public awareness program?

A. To my knowledge, Dakota Access has not worked at all with Yankton Sioux Law Enforcement to provide pipeline awareness education and other support including a comprehensive public awareness program.

18. Does this conclude your prefiled testimony?

A. I reserve the right to supplement my prefiled testimony as well as to offer additional testimony during the hearing in this case.