

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF SOUTH DAKOTA**

<b>IN THE MATTER OF THE</b>	)	
<b>APPLICATION OF DAKOTA</b>	)	<b>HP14-002</b>
<b>ACCESS, LLC FOR AN ENERGY</b>	)	
<b>FACILITY PERMIT TO</b>	)	<b>ROSEBUD SIOUX TRIBE'S</b>
<b>CONSTRUCT THE DAKOTA</b>	)	<b>SUPPLEMENTED RESPONSES TO</b>
<b>ACCESS PIPELINE PROJECT</b>	)	<b>FIRST SET OF INTERROGATORIES</b>
	)	

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 Rosebud Sioux Tribe, Sicangu Oyate Land Office and the Sicangu Nation Treaty Council submits the following supplemented answers in response to Dakota Access first set of Interrogatories and Request for Production of Documents.

INTERROGATORY NO. 1: State the name of each person answering these interrogatories and include for each person their title and business address.

ANSWER: The answer previously provided in response to Interrogatory One remains unchanged.

INTERROGATORY NO. 2: Provide names of the officers and council members.

ANSWER: The answer previously provided in response to Interrogatory Two remains unchanged.

INTERROGATORY NO. 3: Please identify any witnesses, whether fact or expert, which you intend to call at the evidentiary hearing on the above-captioned matter. For each such witness, state:

- a. Witness name;
- b. Witness contact information;
- c. Whether the witness is expert or fact;
- d. A general statement descriptive of the matters to which each witness will testify;
- e. Whether the witness will submit sworn pre-filed written testimony; and,
- f. For each expert provide a resume or CV.

ANSWER: The answer previously provided in response to Interrogatory Three remains unchanged.

INTERROGATORY NO. 4: Please state with specificity the objections, if any, which Rosebud Sioux Tribe, Sicangu Lakota Treaty Office has to the Dakota Access project. For each such objection:

- a. Outline a complete factual basis, any relevant law, rule or regulation applicable thereto and an expected or desired outcome if any.
- b. For each such objection, state the decision maker responsible for deciding said objection.

ANSWER AND OBJECTION: The Rosebud Sioux Tribe objects to Dakota Access's application for the construction of the Dakota Access pipeline on the grounds, not limited to, by way of this answer, that the Applicant will be unable to satisfy the statutory requirements of SDCL 49-41B and other relevant laws, including but not limited to the Pipeline Safety Act, its associated implementing regulations, application of the PUC Administrative rules, compliance with which is necessary in order to obtain a permit for the construction of an interstate pipeline facility of this nature. Rosebud Objects to subsections (a) and (b) on the grounds that the questions seeks answers that are beyond the scope of the requirements of discovery statutes.

Dated this 15<sup>th</sup> day of June, 2015.

/s/ Matthew L. Rappold  
Matthew L. Rappold  
Rappold Law Office  
PO Box 873  
Rapid City, SD 57709

### **CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that on the 15<sup>th</sup> day of June, 2015, he caused a true and correct copy of the original of the foregoing Rosebud Sioux Tribe's Supplemented Responses to Dakota Accesses First Set of Interrogatories and Request for Production of Documents, by electronic transmission to the following:

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/s/ Matthew L. Rappold