

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

**MOTION FOR APPROVAL OF THIRD
PARTY COMPLIANCE MONITOR**

Applicant moves the Commission for approval of Ryan Coleman as the Project's Third Party Compliance Monitor. Pursuant to Condition 31 of the PUC Permit, Dakota Access shall contract with an "independent third-party" to "monitor compliance" with the PUC permit. Selection of third-party monitor is subject to Commission approval. See Permit Conditions #31, attached as Exhibit A. Also attached please find Mr. Coleman's resume', attached as Exhibit B.


As a result of Mr. Coleman's substantial and well-versed experience he is prepared to effectively serve as a Third Party Compliance Monitor in the Dakota Access Pipeline Project. Specifically, Mr. Coleman has experience in three areas which cause him to be uniquely qualified. First, he understands the regulatory process as a result of his work with utilities from refined pipelines to water pipelines. Second, he has served as an ecological, biological, and water quality monitor on various projects in various parts of the country. Finally, his experience with damage-related issues adds the third effective element of expertise and training that makes Mr. Coleman a good candidate for the role.

For the above stated reasons, which are further detailed in his resume, Mr. Coleman is qualified to aid the Commission in permit condition compliance. Dakota Access respectfully

requests the Commission grant this Motion to approve of Dakota Access' selection of Mr. Coleman as the Third Party Compliance Monitor.

Dated this 18 day of February, 2016.

MAY, ADAM, GERDES & THOMPSON LLP

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CERTIFICATE OF SERVICE

Kara C. Semmler and Brett Koenecke of May, Adam, Gerdes & Thompson LLP hereby certifies that on the 18 day of February, 2016, they either electronically served or mailed via US Mail a true and correct copy of the foregoing in the above captioned action to the Service List in HP 14-002.


KARA C. SEMMLER
BRETT KOENECKE