

**FILED WITH
Executive Secretary**

March 31, 2016

**IOWA UTILITIES BOARD
HLP-2014-0001**

**STATE OF IOWA
DEPARTMENT OF COMMERCE
IOWA UTILITIES BOARD**

**IN RE:
NO. HLP-2014-0001
DAKOTA ACCESS, LLC.
RECONSIDER,**

DOCKET

MOTION TO

APPLY FOR REHEARING

COMES NOW this 30th day of March, 2016, remainderman and tenant in common Erin Riley to eminent domain parcel and Tract Number IA-WA-036.000 in Wapello County, Iowa, and hereby submits a Motion to Reconsider and applies for a rehearing pursuant to Iowa Code §479B.22 and §476.12 specifically regarding but not limited to the "Standard Easement Rights Revised" filed by Dakota Access, LLC, on March 16, 2016.

WHEREFORE Erin Riley hereby submits a Motion to Reconsider the "Standard Easement Rights Revised" filed by Dakota Access, LLC, and asks the Iowa Utilities Board to request an amendment in order to address an indemnity clause, related to damages and liability. Grantors to Easement Agreements, voluntary or otherwise, should not be legally nor financially liable for general negligence claims, and additionally should not be legally nor financially responsible for premises liability.

Thank you.

Erin Riley
IA-WA-036.000