

Before the Nebraska Public Service Commission

In the Matter of the Application

of

**TransCanada Keystone Pipeline LP
For Route Approval of Keystone XL
Pipeline Project, Pursuant to MOPSA**

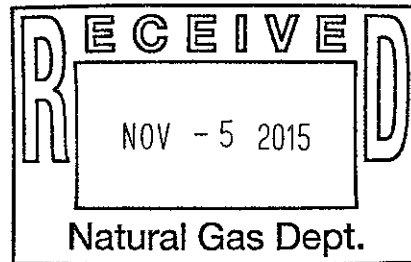
Intervenors:

**Susan Dunavan and William Dunavan,
Bartels Farms, Inc.
Johnnie Bialas and Maxine Bialas,
Bonnie Brauer,
James Carlson and Christine Carlson,
Timothy Choat, Gary Choat Farms LLC,
and Shirley Choat Farms, LLC,
CRC, Inc.,
Daniel A. Graves and Joyce K. Graves,
Patricia A. Grosserode a/k/a Patricia A.
Knust,
Terri Harrington,
Donald C. Loseke and Wanda G. Loseke,
Arla Naber and Bryce Naber,
Mary Jane Nyberg,
Kenneth Prosocki and Karen Prosocki,
Edythe Sayer,
Dan Shotkoski and Clifford Shotkoski,
Leonard Skoglund and Joyce Skoglund,
John F. Small and Ginette M. Small,
Deborah Ann Stieren and Mary Lou Robak,
Jim Tarnick,
Terry J. Van Housen and Rebecca Lynn
Van Housen,
Donald D. Widga,**

**Byron Terry "Stix" Steskal and Diana
Steskal,
Allpress Brothers, LLC,
Germaine G. Berry,
Karen G. Berry,
Cheri G. Blocher and Michael J. Blocher,**

**Application No: OP-002
(Filed 10/6/2015)**

**Petition of Formal Intervention
By
Certain Nebraska Landowners
With
Real Estate on Route
Described In
TransCanada Application**



**L.A. Breiner and Sandra K. Breiner,
Jerry Carpenter and Charlayne Carpenter,
CHP 4 Farms, LLC,
Larry D. Cleary,
Cottonwood Ridge, LLC,
Jeanne Crumly and Ronald C. Crumly,
Ken Dittrich,
Lloyd Z. Hipke and Vencille M. Hipke.
R. Wynn Hipke and Jill Hipke,
Richard Kilmurry,
Rosemary Kilmurry,
Beverly Krutz and Robert Krutz,
LJM Farm, LLC,
Carol Manganaro,
Frankie Maughan and Sandra Maughan,
Beverly Miller and Earl Miller,
Edna Miller and Glen Miller,
Milliron Ranch, LLC,
Frank C. Morrison and Lynn H. Morrison,
Larry D. Mudloff, J.D. Mudloff, and Lori
Mudloff,
Constance Myers a/k/a Constance Ramold,
Nicholas Family Limited Partnership,
Ann A. Pongratz and Richard J. Pongratz,
Donald Rech,
Schultz Brothers Farms, Inc.,
Connie Smith and Verdon Smith,
Joshua R. Stelling,
Richard Stelling and Darlene Stelling,
Todd Stelling and Lisa Stelling,
Arthur R. Tanderup and Helen J.
Tanderup,
TMAG Ranch, LLC,
Tree Corners Farm, LLC,
Dave Troester and Sharyn Troester,
and
Gregory Walmer and Joanne Walmer,**

Intervenors,

1. The Petitioners identified in the Caption, and again by name and number in ¶2 below, are persons who own real estate that TransCanada Keystone Pipeline Co., LP

attempted to condemn in County Court eminent domain proceedings TransCanada commenced in January 2015. TransCanada sought to condemn the real estate for its proposed Keystone XL Pipeline (KXL). These eminent domain proceedings were enjoined by Temporary Injunction Orders, which remain in effect, and were issued by two (2) Nebraska District Courts:

- 1.1. As to Intervenor 1 through 33 as numbered in ¶2, the condemnation proceedings initiated by TransCanada were enjoined by a Temporary Injunction issued by the District Court of York County, Nebraska, in Case No. CI 15-12, *Dunavan et al. v. TransCanada*.
- 1.2. As to Intervenor 34 through 92 as numbered in ¶2, the condemnation proceedings initiated by TransCanada were enjoined by a Temporary Injunction issued by the District Court of Holt County, Nebraska, in Case No. CI 15-6, *Steskal et al. v. TransCanada*.

TransCanada filed a “Voluntary Dismissal” in each County Court case on or about October 1, 2015. However, as of November 2, 2015, the Temporary Injunctions remain in full force and effect. Accordingly, there has been no judicial rendition of a Judgment of Dismissal and no entry, or valid entry has been made on the records of the courts of dismissals in any of the County Courts as of November 2, 2015.

2. Intervenor 1 through 33 are Plaintiffs in the York County Nebraska District Court litigation. They are:

	Name	Address & Email	Telephone
1,2	Susan Dunavan and William Dunavan	c/o DOMINALAW Group pc llo 2425 S. 144 th St. Omaha, NE 68144 ddomina@dominalaw.com bjorde@dominalaw.com	(402) 493-4100
3	Johnnie Bialas and Maxine Bialas	c/o DOMINALAW Group pc llo 2425 S. 144 th St. Omaha, NE 68144 ddomina@dominalaw.com bjorde@dominalaw.com	(402) 493-4100
4	Bonnie Brauer	c/o DOMINALAW Group pc llo 2425 S. 144 th St. Omaha, NE 68144	(402) 493-4100

		ddomina@dominalaw.com bjorde@dominalaw.com	
5, 6	James Carlson and Christine Carlson	c/o DOMINALAW Group pc llo 2425 S. 144 th St. Omaha, NE 68144 ddomina@dominalaw.com bjorde@dominalaw.com	(402) 493-4100
7	Timothy Choat, Gary Choat Farms LLC & Shirley Choat Farms, LLC	c/o DOMINALAW Group pc llo 2425 S. 144 th St. Omaha, NE 68144 ddomina@dominalaw.com bjorde@dominalaw.com	(402) 493-4100
8	CRC, Inc.	c/o DOMINALAW Group pc llo 2425 S. 144 th St. Omaha, NE 68144 ddomina@dominalaw.com bjorde@dominalaw.com	(402) 493-4100
9, 10	Daniel A. Graves and Joyce K. Graves	c/o DOMINALAW Group pc llo 2425 S. 144 th St. Omaha, NE 68144 ddomina@dominalaw.com bjorde@dominalaw.com	(402) 493-4100
11	Patricia A. Grosserode a/k/a Patricia A. Knust	c/o DOMINALAW Group pc llo 2425 S. 144 th St. Omaha, NE 68144 ddomina@dominalaw.com bjorde@dominalaw.com	(402) 493-4100
12	Terri Harrington	c/o DOMINALAW Group pc llo 2425 S. 144 th St. Omaha, NE 68144 ddomina@dominalaw.com bjorde@dominalaw.com	(402) 493-4100
13, 14	Donald C. Loseke and Wanda G. Loseke	c/o DOMINALAW Group pc llo 2425 S. 144 th St. Omaha, NE 68144 ddomina@dominalaw.com bjorde@dominalaw.com	(402) 493-4100
15, 16	Arla Naber and Bryce Naber	c/o DOMINALAW Group pc llo 2425 S. 144 th St. Omaha, NE 68144 ddomina@dominalaw.com bjorde@dominalaw.com	(402) 493-4100
17	Mary Jane Nyberg	c/o DOMINALAW Group pc llo 2425 S. 144 th St. Omaha, NE 68144 ddomina@dominalaw.com bjorde@dominalaw.com	(402) 493-4100

18, 19	Kenneth Prosocki and Karen Prosocki	c/o DOMINALAW Group pc llo 2425 S. 144 th St. Omaha, NE 68144 ddomina@dominalaw.com bjorde@dominalaw.com	(402) 493-4100
20	Edythe Sayer	c/o DOMINALAW Group pc llo 2425 S. 144 th St. Omaha, NE 68144 ddomina@dominalaw.com bjorde@dominalaw.com	(402) 493-4100
21, 22	Dan Shotkoski and Clifford Shotkoski	c/o DOMINALAW Group pc llo 2425 S. 144 th St. Omaha, NE 68144 ddomina@dominalaw.com bjorde@dominalaw.com	(402) 493-4100
23, 34	Leonard Skoglund and Joyce Skoglund	c/o DOMINALAW Group pc llo 2425 S. 144 th St. Omaha, NE 68144 ddomina@dominalaw.com bjorde@dominalaw.com	(402) 493-4100
25, 26	John F. Small and Ginette M. Small	c/o DOMINALAW Group pc llo 2425 S. 144 th St. Omaha, NE 68144 ddomina@dominalaw.com bjorde@dominalaw.com	(402) 493-4100
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29	Jim Tarnick	c/o DOMINALAW Group pc llo 2425 S. 144 th St. Omaha, NE 68144 ddomina@dominalaw.com bjorde@dominalaw.com	(402) 493-4100
30, 31	Terry J. Van Housen and Rebecca Lynn Van Housen	c/o DOMINALAW Group pc llo 2425 S. 144 th St. Omaha, NE 68144 ddomina@dominalaw.com bjorde@dominalaw.com	(402) 493-4100
32	Donald D. Widga	c/o DOMINALAW Group pc llo 2425 S. 144 th St. Omaha, NE 68144 ddomina@dominalaw.com bjorde@dominalaw.com	(402) 493-4100

33	Bartels Farms, Inc.	c/o DOMINALAW Group pc llo 2425 S. 144 th St. Omaha, NE 68144 ddomina@dominalaw.com bjorde@dominalaw.com	(402) 493-4100
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Intervenors 34 through 92 are plaintiffs in the Holt County Nebraska District Court litigation. They are:

	Name	Address & Email	Telephone
34, 35	Byron Terry "Stix" Steskal and Diana Steskal	c/o DOMINALAW Group pc llo 2425 S. 144 th St. Omaha, NE 68144 ddomina@dominalaw.com bjorde@dominalaw.com	(402) 493-4100
36	Allpress Brothers, LLC	c/o DOMINALAW Group pc llo 2425 S. 144 th St. Omaha, NE 68144 ddomina@dominalaw.com bjorde@dominalaw.com	(402) 493-4100
37	Germaine G. Berry	c/o DOMINALAW Group pc llo 2425 S. 144 th St. Omaha, NE 68144 ddomina@dominalaw.com bjorde@dominalaw.com	(402) 493-4100
38	Karen G. Berry	c/o DOMINALAW Group pc llo 2425 S. 144 th St. Omaha, NE 68144 ddomina@dominalaw.com bjorde@dominalaw.com	(402) 493-4100
39, 40	Cheri G. Blocher and Michael J. Blocher	c/o DOMINALAW Group pc llo 2425 S. 144 th St. Omaha, NE 68144 ddomina@dominalaw.com bjorde@dominalaw.com	(402) 493-4100
41, 42	L.A. Breiner and Sandra K. Breiner	c/o DOMINALAW Group pc llo 2425 S. 144 th St. Omaha, NE 68144 ddomina@dominalaw.com bjorde@dominalaw.com	(402) 493-4100
43, 44	Jerry Carpenter and Charlayne Carpenter	c/o DOMINALAW Group pc llo 2425 S. 144 th St. Omaha, NE 68144 ddomina@dominalaw.com bjorde@dominalaw.com	(402) 493-4100

45	CHP 4 Farms, LLC	c/o DOMINALAW Group pc llo 2425 S. 144 th St. Omaha, NE 68144 ddomina@dominalaw.com bjorde@dominalaw.com	(402) 493-4100
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56	Rosemary Kilmurry	c/o DOMINALAW Group pc llo 2425 S. 144 th St. Omaha, NE 68144 ddomina@dominalaw.com bjorde@dominalaw.com	(402) 493-4100

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80	Joshua R. Stelling	c/o DOMINALAW Group pc llo 2425 S. 144 th St. Omaha, NE 68144 ddomina@dominalaw.com bjorde@dominalaw.com	(402) 493-4100
81, 82	Richard Stelling and Darlene Stelling	c/o DOMINALAW Group pc llo 2425 S. 144 th St. Omaha, NE 68144 ddomina@dominalaw.com bjorde@dominalaw.com	(402) 493-4100
83, 84	Todd Stelling and Lisa Stelling	c/o DOMINALAW Group pc llo 2425 S. 144 th St. Omaha, NE 68144 ddomina@dominalaw.com bjorde@dominalaw.com	(402) 493-4100

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88	Tree Corners Farm, LLC	c/o DOMINALAW Group pc llo 2425 S. 144 th St. Omaha, NE 68144 ddomina@dominalaw.com bjorde@dominalaw.com	(402) 493-4100
89, 90	Dave Troester and Sharyn Troester	c/o DOMINALAW Group pc llo 2425 S. 144 th St. Omaha, NE 68144 ddomina@dominalaw.com bjorde@dominalaw.com	(402) 493-4100
91, 92	Gregory Walmer and Joanne Walmer	c/o DOMINALAW Group pc llo 2425 S. 144 th St. Omaha, NE 68144 ddomina@dominalaw.com bjorde@dominalaw.com	(402) 493-4100

Formal Intervention

3. Formal intervention is respectfully requested and leave to do so sought pursuant to 291 *Neb Admin Code* § 015.

4. Communications regarding this Petition, including services of notices and orders of the Nebraska Public Service Commission should be addressed to the Intervenor c/o their lawyers, David A. Domina, NSBA #11043 and Brian E. Jorde, NSBA #23613, Domina Law Group pc llo, 2425 S. 144th Street, Omaha, Nebraska 68144, (402) 493-4100, ddomina@dominalaw.com and bjorde@dominalaw.com.

5. In addition to jurisdictional concerns, Intervenor has both Special Interests and General Interests in the Application. These are mentioned below.

Bases for Intervention

Special Interests

6. Each Intervenor has a special interest in the Application of TransCanada Keystone XL Pipeline LP; the special interests of the Intervenors are unique among Nebraskans. Each Intervenor owns real estate located upon TransCanada's proposed preferred route for construction of its pipeline, to the best of his, her or its knowledge.

7. TransCanada initiated eminent domain proceedings against each Intervenor in County Court in a county where the real estate owned by the Intervenor is located for the purpose of taking property and property rights from each Intervenor pursuant to LB 1161, Laws of Nebraska 2012, for the purpose of acquiring property upon which TransCanada proposed to build the Keystone XL Pipeline. For the Intervenors this is a special interest; it impacts them uniquely.

8. TransCanada's actions raise questions about its fitness as an Applicant. For the Intervenors this is a special interest; it impacts them uniquely.

9. TransCanada's proposed method of compensation to Landowners is not commercially reasonable or constitutionally just. Its easement terms as proposed are also not reasonable or just. Both are unsuitable for common carriage in Nebraska. TransCanada's plan to take fee simple absolute title to easements is not reasonable or lawful and exceeds the needs and duration of the Keystone XL Pipeline it proposes. For the Intervenors this is a special interest; it impacts them uniquely.

10. TransCanada has not demonstrated ability to operate the Keystone XL Pipeline safely, have human, financial and other resources to keep it safe or clean up its releases, and has avoided a commitment to remove the Keystone XL Pipeline at the end of its utility at TransCanada's expense. For the Intervenors this is a special interest; it impacts them uniquely.

General Interests

11. TransCanada has lost industry support for its Keystone XL Pipeline. Major oil companies have abandoned investments and ventures in Tarsands oil mining in

Alberta Canada and no longer support the venture for which TransCanada claims the pipeline capacity is needed. For the Intervenor this, is a general interest.

12. The Keystone XL Pipeline is not in the best interests of Nebraskans or Nebraska and is not consistent with the public necessity, convenience, common carriage needs, or advantages of Nebraskans or Nebraska. For the Intervenor this, is a general interest.

13. The Keystone XL Pipeline will not provide common carriage in Nebraska for Nebraskans. For the Intervenor this, is a general interest.

14. The Keystone XL Pipeline project will be environmentally unsafe, unsound, and deleterious to Nebraska and others. For the Intervenor this, is a general interest.

Jurisdictional Objection

15. Each Intervenor is a Plaintiff in one of the two (2) District Court lawsuits identified above. Each sued to (a) declare LB 1161 unconstitutional and void, (b) enjoin use of the unconstitutional law, and (c) enjoin eminent domain proceedings initiated by TransCanada. Those lawsuits also challenge the lawfulness of actions taken by the Governor of Nebraska in January 2013, when he purported to approve TransCanada's request for a KXL route across the State under LB 1161. The Governor gave his approval to the requested route, and the Intervenor seek a judgment declaring his action null and void. Until a final decision on the merits about the validity of the Governor's actions is rendered, the Nebraska Public Service Commission is without jurisdiction to hear or consider TransCanada's Application. This is because the PSC cannot hear or pass on an application for a route the Governor has approved. *Neb Rev Stat* § 57-1405 precludes consideration of the TransCanada KXL application by the PSC unless and until the Intervenor's lawsuits in Holt and York Counties are resolved with final judgments.

16. PSC jurisdiction is also absent until legal conditions precedent to the KXL Pipeline is to be used have been successfully completed. For this to occur, and international border crossing permit must be issued by the President of the United States

to the applicant. This has not occurred. Until it does occur, there is no actual administrative law or case or controversy for determination by the PSC.

Continuing Description of Basis for Intervention

17. On or about October 1, 2015, TransCanada filed a "Voluntary Dismissal" in each eminent domain proceeding against each Intervenor. On October 19, 2015, TransCanada asked the District Court of Holt County to dismiss Case No. CI 15-6 as moot. The Holt County Plaintiffs resisted, presented evidence in opposition of dismissal, and await a ruling by the District Court.

18. On or about October 9, TransCanada also filed a motion to dismiss Case No. CI 15-12 in York County District Court. No hearing has been held on this motion, but a hearing is scheduled to occur in December 2015.

19. As of November 2, 2015, the Temporary Injunctions remain in place and, accordingly, there has been no judicial rendition of a Judgment of Dismissal and no entry on the records of the courts of a dismissal, or any such valid entry, in any of the County Courts as of November 2, 2015.

20. Intervenors shall raise issues of law and fact, including questions of statutory validity or invalidity, interpretation, and issues concerning the jurisdiction of the Commission to proceed with the Application. These and other issues will be raised.

21. On the foregoing basis, Intervenors respectfully request that:

21.1. The PSC issue an Order authorizing them to intervene.

21.2. Intervenors be permitted to participate in this proceeding as parties who have formally intervened with all rights to participate in all aspects of the proceedings, including other pleadings, hearings, presentation of evidence, and requests for relief.

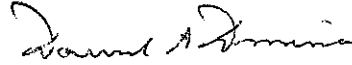
21.3. Leave be granted to file an Amended Petition in Intervention and raise additional issues as necessary.

21.4. Such other relief as may be necessary or appropriate.

November 2, 2015.

Signatures on Next Page

Susan Dunavan, et al., Intervenors,



By: _____

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Certificate of Service

Pursuant to 291 *Neb Admin C* § 015.01(b), a copy of this Petition in Intervention is served upon all parties of record to this proceeding or their attorneys of record as follows:

TransCanada Keystone Pipe, LP
James G. Powers/Patrick D. Pepper
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1601 Dodge Street
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