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GEOG 435-001

30 April 2026

State Government Power and the Clean Water Act: Case Studies and Analysis

Executive Summary

State stakeholders hold the authority to invoke federal laws to protect the environment. However, this power only protects communities, tribes, and water sources when states actively choose to wield it. This paper explores how state governments can use Section 401 of the Clean Water Act to influence pipeline siting and other industrial decisions that affect water quality. It presents an overview of the legal and institutional landscape, highlighting key concepts such as procedural justice, cooperative federalism, and 'Treatment As a State' status. It also expounds on the history of the Clean Water Act and the role of Section 401. It explains the vital power to veto environmental pollution by denying certification or offering conditions on federal licenses and permits. This background is key to contextualizing three case studies. Firstly, the Dakota Access Pipeline, which was opposed by the Standing Rock Sioux Tribe, went uncontested by the states of North Dakota and South Dakota. Secondly, the Atlantic Coast Pipeline from West Virginia to North Carolina. This pipeline was vehemently opposed by these states, who then invoked the Clean Water Act and negated the industrial companies' ability to implement the pipeline. The final case study is the Line 3 Pipeline in Minnesota, which was approved despite tribal opposition but regulated through conditions imposed by the state. These case studies are comparatively analyzed, revealing insights into a state's authority and the implications for tribal communities. The oral history of Krystal Two Bulls, an indigenous organizer, supports this

analysis, highlights procedural justice, and discusses how state governments can support tribal nations. The oral history underscores that federal laws are unstable, segueing into current legislative updates on Section 401. The paper ends with concrete recommendations that tie in the case studies, oral history, and analysis.

Introduction

Legal and Institutional Background

Rather than operating in separate spheres, governance in the United States is structured around a system known as cooperative federalism, where federal, state, and local governments collaborate to solve common issues. (Center for the Study of Federalism, n.d.). The broadest authority is shared between the federal and state governments. After Congress adopts a piece of environmental legislation, the EPA writes national minimum regulatory standards that states and tribes can expand upon and enforce through their own regulatory power. Furthermore, the EPA provides grants for state governments and their environmental programs. This funding can be used for scientific studies, monitoring efforts, and the protection of health and the environment (EPA, 2025).

In addition to state authority, tribal governments hold environmental regulatory power if they are granted “Treatment as a State” (TAS) status by the Environmental Protection Agency. This designation allows eligible, federally recognized tribes to manage environmental programs similarly to state governments, including regulating water and air quality (US EPA, 2017). Formal authority exists to include tribal leadership in regulatory processes. Yet, the existence of Treatment as a State status does not guarantee influence over outcomes regarding environmental policy on tribal lands. Constraints imposed on tribal governments are significant, limiting

administrative capacity and increasing friction between state and tribal governments. Therefore, state governments can support the legislative interests of tribal governments against mounting political and economic pressures. This division of authority intends to balance the consistency of national leadership with the flexibility of micro, local communities. Yet, this system also creates variation in how environmental protections are defined and implemented by individual states.

Many tools allow states to influence environmental outcomes and provide for procedural justice. These include environmental review laws, land-use planning authorities, state-level permitting processes, and public oversight over utilities. These mechanisms operate alongside federal regulations and create multiple points of intervention in decision-making processes for state and tribal leadership. The decision to use these tools can protect ecosystems and communities. However, when states fail to use designated authority, environmental harm and distributive injustice weigh on marginalized communities. For example, Indigenous groups rely on the health of the environment, a core component of survival and cultural practices. Therefore, environmental regulations and their outcomes are not contingent on the existence of federal policies. Instead, they are dependent on the willingness and capacity of state governments to *act*.

Clean Water Act: Overview and History

One legislative tool that exemplifies the ability of state governments to act on federal policy is the Clean Water Act (CWA). This law emerged from mounting frustration with the weak and fragmented water pollution regulation under the Federal Water Pollution Control Act (FWPCA) of 1948. The FWPCA caused water pollution regulations to rely heavily on state enforcement and lacked federal oversight, leaving many communities' pollution issues unresolved. The late 1960s brought visible environmental disasters such as the 1969 Santa

Barbara oil spill, the Cuyahoga River fire, and toxic smog in New York City. These events became symbols of regulatory failure and sparked public demand for stronger environmental protections. Then, in 1972, Congress passed the Federal Water Pollution Control Act Amendments of 1972. This legislation became commonly known today as the Clean Water Act. The primary goal of its installation was “restor[ing] and maintain[ing] the chemical, physical, and biological integrity of the Nation’s waters” (Cornell Law School, 2019). Expanding federal authority, the act preserved states’ influence through cooperative federalist frameworks and allowed for permitting and enforcement. Several mechanisms within the CWA allow states to influence environmental outcomes, but few are as influential and consequential as Section 401. This section has become one of the clearest examples of how states have the power to shape or halt projects that threaten local ecosystems and their communities.

Section 401 as a “Veto Point”

One of the most strategic and significant federal policies for state and tribal governments to invoke is Section 401 of the Clean Water Act (CWA). This section empowers states and authorized tribes to grant, deny, or waive certification for federal licenses or permits that may result in harmful discharge into navigable waters (US EPA, 2019). Under the CWA, compliance with clean water standards is mandated, allowing local authorities to block or condition projects. The authority of Section 401 effectively creates a veto point in the federal permitting process that allows states to reshape or block projects that would otherwise proceed.

Section 401 operates as strategic leverage for approval, delay, or pressure on negotiation efforts. Yet the ultimate effectiveness of the act depends heavily on how it is used. Constraints, such as time limits on review and the ongoing disputes over the scope of state authority, limit the

application of Section 401. The section's formal authority is substantial; however, its practical application and impact vary widely depending on the context in which it is exercised.

Case Studies

If exercised in full breadth, Section 401 of the Clean Water Act provides states and tribes with substantial authority over environmental outcomes. However, authority alone does not determine these outcomes. Examining case studies reveals the complex interplay between the federal, state, and tribal governments and the difference in outcomes depending on how the CWA is invoked.

Case Study 1: The Dakota Access Pipeline (DAPL)

The Dakota Access Pipeline (DAPL) is a 1,722-mile pipeline carrying crude oil from the Bakken shale formation in North Dakota to Patoka, Illinois (U.S. Army Corps of Engineers, Omaha District, 2016). Construction crews completed this massive infrastructure project between 2016 and 2017. Engineers placed the path directly under the Missouri River, the primary water source for the Standing Rock Sioux Tribe (SRST). Due to permitting issues, the final route placed the crossing half a mile upstream from the reservation's boundary. Federal permitting for the river crossing was in the hands of the U.S. Army Corps of Engineers. Although they conducted an Environmental Assessment under the National Environmental Policy Act (NEPA), it did not require a full Environmental Impact Statement (EIS). Final approval arrived in February of 2017, and oil started flowing by June of 2017. Despite local concerns and significant risk to communities, the project ran its course.

In April 2016, the Standing Rock Sioux Tribe filed a lawsuit seeking to stop construction. The tribe opposed the pipeline under the Clean Water Act (CWA) and the National Historic Preservation Act (NHPA). They brought forth three main arguments. Firstly, a leak would contaminate their drinking water source, violating CWA Section 401. Secondly, construction violated cultural sites without following the required tribal consultation process described by the NHPA. And thirdly, the USACE avoided a thorough, cumulative impact analysis by not completing a full Environmental Impact Statement (National Law Review, 2016, September 9; National Law Review, 2016, September 13). Thousands of tribal water protectors gathered near the site, catalyzing the largest indigenous-led environmental mobilization in modern history.

State Government Role

The states, North Dakota and South Dakota, each possessed authority under CWA Section 401 to certify the pipeline's compliance with state water quality standards (U.S. Environmental Protection Agency, 2019). This reflects the model of cooperative federalism, where national and state governments share overlapping functions and bureaucratic agencies jointly carry out governmental programs (Center for the Study of Federalism, n.d.). North Dakota granted certification in early 2016, placing conditions on spill response and monitoring. However, it did not deny certification nor require a reroute away from the Missouri River. South Dakota similarly issued certification. Neither state contested the federal permitting process nor joined the tribe in demanding a full Environmental Impact Statement. When the tribe later petitioned North Dakota to reconsider certification based on newly identified risks, the state declined to do so.

Outcome and Relevance

The pipeline became operational in June 2017 and has since experienced multiple leaks. The tribe continues litigating for the pipeline's shutdown, and in March 2020, a federal court granted partial summary judgment to the tribe. The court ruled that the Corps had violated NEPA by determining that an Environmental Impact Statement was unnecessary, and it ordered the Corps to complete one in full. The D.C Circuit Court of Appeals upheld the district court's vacatur of the mineral lease easement but stayed the injunction that would have forced a shutdown. Consequently, the pipeline has continued to operate without a valid federal easement since 2020 and awaits the completion of the court-ordered EIS to address safety issues. DAPL demonstrates state inaction masquerading as authority: both states possessed the legal power to deny certification or compel a reroute, but neither did so. State approval superseded tribal claims and provided political cover for federal permitting, while North Dakota's fossil fuel entrenchment discouraged aggressive action.

Case Study 2: Atlantic Coast Pipeline (ACP)

The Atlantic Coast Pipeline developers proposed a massive 600-mile natural gas system stretching from West Virginia down to North Carolina. Launched in 2014 by Dominion Energy, Duke Energy, and Southern Company, this \$8 billion project was set to carve through the Appalachian Trail, numerous rivers, including the Roanoke and James rivers, and sensitive ecological zones such as the Monongahela National Forest (Penn State Shale Law, 2019). The project required Section 401 certifications from Virginia and North Carolina, alongside permits from the USACE and the Federal Energy Regulatory Commission (FERC) (Penn State Shale Law, 2019).

State Government Role

Unlike DAPL, the ACP encountered aggressive state-level resistance using Section 401 as the primary legal mechanism. Virginia granted certification in 2018, but imposed stringent conditions on erosion control and stream crossings after construction violations. The state's Department of Environmental Quality reopened the public comment period in April 2018 to address whether the federal Nationwide Permit 12 would adequately protect Virginia waterways (Penn State Shale Law, 2019). North Carolina's Department of Environmental Quality issued a Section 401 certification in January 2018, but the decision was immediately met with political controversy and legal challenges. It came from environmental groups and the Lumbee Tribe, who documented impacts on marginalized communities reliant on local waterways (WTVD ABC11, 2018). Without North Carolina's effective cooperation, the pipeline could not traverse state waters, confronting the project with protracted litigation.

Outcome and Relevance

On July 5, 2020, Dominion and Duke cancelled the pipeline, citing "ongoing delays and increasing cost uncertainty," having already spent \$3.5 billion. The Atlantic Coast Pipeline was hindered by legal work from multiple sides. While the water permits caused delays, the project was also halted by a battle at the Supreme Court concerning crossing the Appalachian Trail. State action can compensate for federal regulatory capture, making FERC's certificates practically worthless when state environmental agencies exercise their authority. Virginia's rigorous conditions compounded North Carolina's decisive denial to terminate the project.

Case Study 3: Line 3 Pipeline in Minnesota

Enbridge Energy's Line 3 replacement project involved replacing 337 miles of aging crude oil pipeline across northern Minnesota, traversing over 200 water bodies and 800 acres of

wetlands (Minnesota House of Representatives, 2020; Minnesota Senate Republicans, 2020).

Approved by Minnesota regulators in 2018 and operational in 2021, the project faced opposition from the Red Lake and White Earth Bands of Chippewa/Ojibwe, climate organizations, and water protection groups (Climate Change Litigation Databases, 2020).

State Government Role

The Minnesota Public Utilities Commission (PUC) retained primary authority over the route under Section 401. In 2020, the Minnesota Pollution Control Agency (MPCA) granted water quality certification only after imposing 35 specific conditions on the project. These included expanded spill response requirements, enhanced groundwater monitoring near wild rice waters (significant to Ojibwe communities), seasonal restrictions, and financial assurance provisions for spill remediation (Minnesota House of Representatives, 2020; Minnesota Senate Republicans, 2020). Tribal opponents and environmental groups litigated, arguing the certification ignored climate impacts and treaty rights. Meanwhile, the courts largely upheld the MPCA's action, finding it acted within its delegated authority.

Outcome and Relevance

Line 3 became operational in October 2021 after construction marked by over 600 arrests of water protectors. A leak occurred in late 2022, consistent with tribal warnings. Unlike the ACP, state action did not terminate the project; in contrast to DAPL, Minnesota's certification was not perfunctory. The conditional certification imposed tangible costs and operational constraints, even though the project ultimately proceeded.

For frontline communities, a new pipeline across treaty territory was indistinguishable from state failure, as the distinction between conditional certification and denial is ultimately whether a project is built or cancelled. Tribal "Treatment as a State" (TAS) status required state support to operationalize. The White Earth and Red Lake Bands hold TAS authority parallel to the MPCA. Yet, state agencies did not defer to tribal water quality standards, revealing that TAS remains politically fragile without enforceable intergovernmental agreements. The fossil fuel industry understands this dynamic acutely. Companies lobby state agencies and threaten litigation precisely because state certification is the most vulnerable point in the permitting chain. When states waive their rights or issue weak certifications, industry prevails. When states take their authority seriously, as North Carolina did, even huge, billion-dollar projects collapse.

Comparative Analysis of Case Studies

Across the Dakota Access Pipeline, Atlantic Coast Pipeline, and Line 3 Pipeline case studies, a clear pattern emerges: state authority only matters if it is used. While each case operates within the legal framework of Section 401 of the CWA, the outcomes diverge significantly based on institutional capacity, political will, economic context, and state enforcement. The biggest difference between the DAPL and ACP is that the DAPL shows how state approval can function as inaction. North Dakota and South Dakota granted certification but did not challenge the project despite clear risks and tribal opposition. The ACP, on the other hand, shows how states can use the same authority to stop a project. North Carolina's denial of certification, along with Virginia's strict conditions, rendered the pipeline untenable. This is an example of how Section 401 can work when states actually enforce it. Line 3 fell into a gray area; Minnesota imposed conditions for safety but still approved the project, so the environmental risks remained.

Oral History Case Study

The analysis of these case studies must also take into perspective the lived experience of indigenous organizers fighting against water pollution and environmental degradation. One oral history that highlights the importance of the state and tribal certification process over water pollutants is the experience of Krystal Two Bulls. An Oglala Lakota and Northern Cheyenne organizer, Two Bulls leads a non-profit and has advocated against the Dakota Access Pipeline (Two Bulls). Her environmental justice work is shaped by her connection to her native lands and influenced by the legacy of her ancestors' fight (EJOHP). The Northern Cheyenne Reservation in southeast Montana is situated on a substantial amount of coal, leading many companies to seek leasing permits to gain access. The numerous coal mines and coal plants are a threat to the health and welfare of the North Cheyenne Nation due to their contamination of the water and soil. Krystal Two Bull describes that "We're really fortunate here in our homelands... we still have natural springs that we can drink water directly from, and that's extremely rare (EJOHP). She cites the coal beds as the reason for such clean and drinkable water. Both the indigenous people and 'animal relatives' depend on this water source that provides for hunting practices, wild plants, medicines, and food(EJOHP). Yet, the state and federal governments have allowed leasing permits for industries, which pollute the resource that sustains the community.

In 1966, 1969, and 1971, the Northern Cheyenne allegedly permitted three coal permits and the leasing of over half of their lands to energy companies and speculators (MOPI, 5). Yet, according to Earth Justice, an environmental justice non-profit, the Bureau of Indian Affairs had permitted these leases without the 'full tribal consent' of the Northern Cheyenne. Furthermore, the land had been leased below market value at approximately 12 to 17 cents per ton (Hanson). In 1974, the Northern Cheyenne petitioned the Department of the Interior to withdraw approval.

Yet, this was denied, leaving the option of a costly and arduous legal battle, which may not remedy the prolonged exposure to toxins and the effect on water quality. (Indian Affairs)

Currently, the Northern Cheyenne are still involved in battles against new coal leasing amid the recent Trump Administration policy that proposes expanding current mines and plans for new ones.

The leasing permit process on the Northern Cheyenne reservation reveals the lack of transparency behind issues that could affect water quality. The permit process perpetuated a procedural injustice against the indigenous community due to the lack of a fair decision-making process. Industrial companies capitalize on leases that were granted over 50 years ago to continue extracting resources at the cost of the welfare of indigenous nations. Krystal Two Bulls observes that “They do not choose to go to the root of matters. They actually will invest in just transition mining – “just” transition mining – or green energy mining, and are willing to sacrifice Indigenous communities (Fleming).” This case study highlights the imperative to receive full tribal consent through full knowledge of what the lease entails, and how it can pollute the environment or taint water. State governments must support tribal nations in their efforts to withdraw approval for leases or introduce laws relating to the intermittent renewal of leases.

Recently, Two Bulls advocated against the Dakota Access Pipeline and became a legal target. She played a critical role as a media liaison, raising awareness within the broader public about the pipeline’s effect on the Standing Rock Sioux Tribe (ERI). The energy company responsible for the pipeline, Energy Transfer Partners, had alleged that her advocacy was an instance of “racketeering,” or illegal business for profit, under the Racketeer Influenced and Corrupt Organizations Act (ERIC). This demonstrated how industries may threaten legal action to intimidate indigenous organizers. Industrial companies may have extensive funds and legal

resources at their disposal to pursue court action against environmental movements and non-profits. Meanwhile, the expenses of litigation could cause small organizations to shut down or activists to silence themselves. Therefore, state governments must support the organizing efforts of tribal nations and individuals.

The company has previously sued other environmental movements under the “racketeering” charge, yet courts have dismissed their case. Similarly, the case against Krystal Two Bulls was dismissed in 2019 by the U.S. District Court of North Dakota (ERI). When asked about the case’s dismissal, Krystal Two Bulls remarked, “[Energy Transfer lost the case against me]. It’s the power of organizing collectively... My rights as an Indigenous woman to steward this land are being upheld by this decision... I have to be able to speak the truth to do my work.” (Protect the Protest). Krystal Two Bulls' history demonstrates the power of collective efforts against legislation, especially amid an unstable political climate. She believes that organizers should fight for protections, but even if a policy is passed, “one pen, one signature just erases generations of work and organizing efforts to get one policy passed” (EJOHP). Since laws can be undone or fail to be upheld, she believes that organizers should push where they can and work together.

Current Legislation

As the oral history has shown, it is important to take a multifaceted approach to environmental pollution because the Clean Water Act is precarious. In 2020, under the first Trump Administration, the EPA passed a Section 401 Certification Rule that limited state authority over water quality certification and restricted the scope of state review. The new rule barred states from invoking the CWA over “...air quality or transportation concerns, public access to waters, energy policy, or other multi-media or non-water quality impacts...” (EELP)

Furthermore, the EPA was allowed to impose a ‘reasonable period of time’ on the state’s decision over certification, in addition to the strict one-year deadline. If a state exceeded its time limit, the federal agency could determine if it had waived its right to make the decision (EELP). Under the following Biden Administration of 2021, this Certification Rule was revisited and remanded by many district courts, reverting to the 1971 version of the Clean Water Act. Yet, soon, eight states and industry groups appealed this decision, and the Supreme Court reinstated the 2020 decision limiting state and tribal power. Now, under the second Trump Administration, the EPA proposes narrowing certification from a 2023 rule that allows “activity as a whole” to a standard of “discharge-only” (EELP). Furthermore, states and tribal certifying authorities are constrained when obtaining additional project information from those seeking approval under Section 401. This continued debate over the scope of state and tribal authority and the implementation of Section 401 highlights the fact that laws are subject to political will and industry influence.

Recommendations

To address these challenges, state governments and partner institutions must move beyond passive compliance with federal rules and toward active and strategic use of their authority. Below is a list of steps that can be taken to strengthen environmental policies under the current legal framework:

1. Full utilization of the authority provided by Section 401 of the Clean Water Act

State agencies must thoroughly review projects and fully consider waiving their ability to invoke Section 401. States must take an active participatory role, beginning with allocating dedicated funding for environmental review processes. The process must include environmental

impact statements, research into the impact on water quality, and assessment of long-term effects. States can invest in government staff who can fully review environmental projects that could introduce pollutants into the water supply. After the review process is complete, a state must demonstrate that there is no threat to the water supply to grant certification. If there are risks, a state must impose conditions that mitigate the discharge of environmental pollutants into water sources. Yet, if the proposed project will harm communities, states must invoke their right under Section 401 and deny certification. Furthermore, if harm has already occurred, states must make meaningful steps towards assessing current damage, restoring the environment, compensating communities, and removing the pipeline.

2. Support of tribal governments

States must begin to work closely with tribal governments to promote collaborative decision-making. This includes respecting tribal water quality standards and aligning state decisions with the needs and desires of tribal environmental policies. When tribes don't have Treatment as a State status, states can take action to help protect tribes through thoughtful environmental decision-making. They can encourage joint decision-making by putting known indigenous environmental justice advocates on state committees. States can also pass Anti-SLAPP (Strategic Litigation Against Public Participation) laws that target meritless suits to protect indigenous organizations and individuals such as Krystal Two Bulls.

3. Increased public participation and transparency

Public engagement plays a critical role in shaping political will. States must expand opportunities for meaningful participation, including implementing community hearings that are accessible to the public. They must clearly communicate project impacts and changes, and most

importantly, be open and responsive to community input and feedback. This will ensure that environmental decisions reflect the ideals of the community, rather than the economic and political interests of industries and governments. This will also restore the relationship between the local communities and the state government when it comes to environmental decisions, providing an opportunity to build up public trust and ensuring future success. Furthermore, public participation can impede industries and advocate for the rights of states and tribal nations to protect their waters.

4. Inter-state collaboration

Collaboration amongst states can boost their combined regulatory powers. States must engage in joint review processes and align their standards to promote greater accountability and prevent companies from exploiting projects and holding power over project conditions. Many projects, such as the ACP, which runs from West Virginia to North Carolina, are impacted by diverse state policies. Therefore, interstate collaboration will encourage the full abilities of the Clean Water Act. Some states, like California, North Carolina, and Virginia, have already begun to take part in this through the governmental organization, the National Environmental Policy Act (NEPA). NEPA directly collaborates with local, state, and federal jurisdictions to conduct environmental review policies that achieve common goals and aim to avoid conflict (NEPA.GOV, n.d)

5. Federal support

The federal government, through agencies such as the Environmental Protection Agency, can support a state and tribal government's right to utilize Section 401. The EPA should readopt the 1972 version of the Clean Water Act, which allows for a broader scope of state review than

the current process. Furthermore, the EPA should not enforce the 'reasonable period of time' deadline, which shortens the review time to less than one year. Instead, the federal government should support the state in thoroughly researching impacts by providing funding and extended timelines. This will effectively promote thoughtful decision-making and curtail industry power.

Conclusion

Even while the power of Section 401 is being curtailed, states must act upon it and set aside the resources to do so before the deadlines. The uneven application of state authority has significant consequences for environmental protection, governance, and equity. The case studies discussed in this paper highlight the immense ramifications for the communities that exist around pipelines and must suffer from environmental pollution. In most cases, it heavily impacts marginalized communities whose voices are overpowered by governmental and corporate decision-making. As evidenced in the DAPL case study, when states fail to exercise their full authority, the burden falls on indigenous communities like the Standing Rock Sioux Tribe, whose water sources and livelihoods are put at risk. Even with tools like Treatment as a State status, tribal authority can be overridden without state support. This significantly limits the effectiveness of a tribe's legal power and marginalizes tribal voices. Therefore, states must do their due diligence, which includes researching and conducting studies on how the construction of a pipeline will affect nearby communities and water sources. When states waive, underutilize, or fail to enforce measures, federal protections become procedural rather than substantive. Federal agencies like the Environmental Protection Agency must support these efforts with funding and reasonable timelines. State stakeholders can uplift tribal and local actors, who best understand their communities. These changes must be implemented as soon as possible, as environmental pollutants increasingly harm community health and well-being.

Team Member Contributions

Lily: I researched the legal and institutional background behind the history of federal and state governmental interactions, looking into how interactions have evolved to include laws that allow state governments and their associated communities (indigenous groups, etc.) to exercise the right to protect their native lands from ecologically destructive practices. I perfected communicating the Clean Water Act as representative of historic shifts between state and federal governments—and ultimately how its evolution has caused deep progressive ramifications for communities looking to effectively advocate for themselves and their local environments.

Rokaya: My contributions in this paper include researching, drafting, and finalizing each of the three case studies- the Atlantic Coast Pipeline, Dakota Access Pipeline, and the Line 3 Pipeline. Within these case studies, I discussed the State Government's role as well as its relevance to the overarching thesis of this paper.

Lauren: My contributions to the paper include drafting the comparative insights section, where I analyzed key differences and similarities across the case studies. I also wrote the implications section, highlighting the broader significance of the findings, as well as the recommendations section, where I proposed actionable steps based on the analysis.

Saavi: My contributions include writing the executive summary, the oral history case study, the current legislation, and the conclusion. I tied in essential course concepts like procedural and distributive justice. I also heavily edited the paper and revised other sections, such as adding to the recommendations.

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