



Conflict of Authority between Central and Regional Government in Natural Resource Management: A Study of State Administrative Court Decisions

Junaidi

Faculty of Law, Universitas Pembangunan Panca Budi, Indonesia

This study discusses the Legal Analysis of Environmental Dispute Resolution through the Class Action Mechanism in Indonesia. Class action lawsuits offer an efficient litigation solution for communities affected by environmental damage or pollution, where one or more representatives act on behalf of a large group. This study uses a normative legal method by analyzing Supreme Court Regulation Number 1 of 2002 concerning Class Action Procedures and Law Number 32 of 2009 concerning Environmental Protection and Management, plus a limited empirical study of several environmental class action cases in Indonesia. The results of the analysis show that the legal basis has accommodated collective efforts to hold polluters accountable. However, practice in the field faces major challenges: minimal socialization, high litigation costs, the complexity of scientific evidence, and the varying knowledge of law enforcement officers about the concept of class action. Nevertheless, this mechanism has proven to be able to reduce duplication of cases, strengthen the bargaining position of the community, and encourage broader environmental recovery. Research recommendations include strengthening special regulations for environmental class actions, increasing the capacity of judges and advocates, providing financial assistance for pollution victims, and monitoring mechanisms for the execution of decisions. With these steps, class actions have the potential to become an effective instrument for enforcing ecological justice and protecting the right to a healthy environment in Indonesia.

Keywords: class action, class representative lawsuit, environmental dispute, environmental recovery, pollution litigation

INTRODUCTION

Constitutional changes and decentralization politics in Indonesia have had a significant impact on governance, especially in terms of natural resource management (SDA). The decentralization system has been regulated since the Reformation era through Law Number 22 of 1999, which was then refined with several changes and the establishment of new laws, such as Law Number 32 of 2004, and Law Number 23 of 2014, to revisions that strengthen regional autonomy regulations. The basic principle is to provide greater authority to regional governments in regulating and managing their own regions, including managing local potential and natural resources. However, its implementation is not as easy as expected. The conflict of authority between central and regional governments often arise, especially when there are differences of interest in the exploitation, utilization, and preservation of natural resources (Widodo et al., 2023).

Indonesia has abundant natural resources, including mining, forestry, maritime, fisheries, agriculture, and energy sectors. The use of natural resources as a mainstay of the national and regional economy can also have major social and environmental impacts. The issue of who has the right to issue permit, determine spatial planning,

OPEN ACCESS
ISSN XXX-XXX (Online)

*Correspondence:
Junaidi
junaidihukumpancabudi@gmail.com

Received: 17th February 2025
Accepted: 26th February 2025
Published: 28th February 2025

Citation:
Junaidi. (2025). *Conflict of Authority between Central and Regional Government in Natural Resource Management: A Study of State Administrative Court Decision*. *IJLH (Indonesian Journal of Law and Humanities)*, 1(1), 8-15.
doi: xxxxxxxxxxxx

or collect levies often becomes a dispute between government agencies. For example, local governments claim to have the right to issue mining business permits (IUP), while the central government also feels authorized based on certain regulations. This type of dispute then reaches the realm of administrative justice, especially the State Administrative Court (PTUN), which has the authority to examine the validity of decisions of government administrative officials (Asshiddiqie, 2011).

In the field, overlapping authority can cause legal uncertainty for investors, financial losses for regions, and a decrease in environmental carrying capacity. For example, the emergence of two permits—one from the central government and one from the local government—can confuse third parties (corporations) regarding the legality of their operations. Furthermore, communities directly affected are often not adequately involved. In such situations, lawsuits against the PTUN are steps taken by companies, non-governmental organizations, and the government itself who feel that their authority is being violated (Suharko, 2017).

Cases submitted to the PTUN revolve around the cancellation or objection of state administrative decisions (*beschikking*) issued by administrative officials. The PTUN then examines whether the decision conflicts with laws and regulations. This is where it is important to examine PTUN decisions related to conflicts of central-regional authority in the management of natural resources. From these decisions, it can be seen how judges interpret regional autonomy regulations, division of government affairs, and specific authority in the natural resources sector. The results of the decisions also reflect the practice of Indonesian administrative law in harmonizing national interests with local characteristics.

The 1945 Constitution of the Republic of Indonesia (UUD 1945) provides a constitutional basis for regulating regional autonomy. Article 18 paragraph (2) of the 1945 Constitution states that regional governments have the authority to regulate and manage their own government affairs according to the principles of autonomy and assignment tasks. However, the delegation of authority is not absolute, because the central government still has authority that cannot be delegated. Further regulations are in Law Number 23 of 2014 concerning Regional Government (an amendment to Law No. 32 of 2004 and Law No. 22 of 1999). This law groups government affairs into absolute affairs (central authority), concurrent affairs (which are divided between central and regional), and general government affairs. In the field of natural resources, many aspects fall into the concurrent category, such as mining permits, forestry, and coastal management. This opens up the potential for friction because normative interpretations of the division of affairs still differ between ministries and regional governments (Haris, 2015).

The State Administrative Court plays a role in ensuring that regulations and policies remain aligned, preventing abuse of authority, and guaranteeing the protection of the rights of legal subjects who are harmed by administrative decisions. When there is a conflict of authority in issuing permits for managing natural resources, the PTUN becomes the arena for formal and material testing. For example, if a mining company holds an IUP from the provincial government, while the Ministry of Energy and Mineral Resources states that the permit is invalid because it violates the rules, the dispute can be brought to the PTUN. The court's decision will assess the legality of the permit issuance procedure, compliance with national and regional spatial plans (RTRW), and compatibility with other sectoral regulations (Anggraeni, 2022).

Conflicts of authority not only have an impact on the parties to the case, but can also have a major impact on investment policies, regional development, and natural resource governance in general. If the PTUN decision cancels a regional permit that is a source of regional original income (PAD), this will cause economic and political problems in the region. Conversely, if the PTUN states that the authority of the central government is defeated by the authority of the region, the central government can issue new, stricter policies, or even limit the scope of regional governments in the natural resource sector. This circle of cause and effect reflects how crucial the arrangement of authority is and the importance of legal certainty in natural resource policy (Fendri, 2023).

At this point, the study of the Conflict of Authority between the Central and Regional Governments in Natural Resource Management: A Study of State Administrative Court Decisions becomes relevant. This study aims to understand how PTUN decisions interpret positive law related to regional autonomy and the division of natural resource affairs. This study will assess the extent to which the integration of laws and regulations can be achieved, and whether PTUN decisions have

significant implications for the sustainability of natural resource management. The main focus is to explore the argumentation patterns of judges in deciding cases, which regulations are prioritized, and whether there are loopholes in the law that often trigger disputes. (Triwulan, 2016)

Methodologically, this study will examine several representative PTUN decisions, both those ending in first-level decisions and cassation at the Supreme Court. From these decisions, it is hoped that a concrete picture will be obtained regarding the forms of authority conflicts that commonly occur, for example mining permit disputes, forest utilization permits, or marine zoning disputes. The legal analysis will highlight how judges test the legal standing of the parties, the use of the principle of autonomy, and the interpretation of sectoral regulations that often overlap.

It is also hoped that this study will be able to provide recommendations for improvement, both in terms of regulation and implementation. An issue that often arises is the lack of synchronization between the Regional Government Law and various sectoral laws (for example the Minerba Law, Forestry Law, Marine Law, Environmental Law). In addition, the understanding of regional bureaucracy is also a determining factor – if regional officials do not understand the limits of authority, procedural violations can easily occur (Koeswahyono & Maharani, 2022). With research that examines PTUN decisions in depth, it is hoped that solutions will emerge to achieve legal certainty, effective management of natural resources, and protection of national and regional interests in a balanced manner.

Ultimately, this research is not only about administrative law, but also closely related to politics, economics, and environmental sustainability. Authority in managing natural resources is not only about who has the right to sign permits but also concerns the future of sustainable development and the welfare of local communities. Protracted conflicts of authority will create instability, reduce investor confidence, and even harm the public interest. Therefore, law enforcement through the PTUN is expected to bridge the conflict and advance the principle of due process of law as a foundation for good governance.

METHOD

The research method used is a normative legal method concerning relevant laws and regulations, including Law Number 23 of 2014 concerning Regional Government, Law Number 30 of 2014 concerning Government Administration, and various sectoral laws in the field of natural resources (such as the Minerba Law, Forestry Law, Marine Law, and Environmental Law). This approach aims to examine legal norms that regulate the division of central-regional government affairs, as well as the mechanism for resolving administrative disputes through the State Administrative Court (PTUN). Primary legal materials are in the form of laws and their implementing regulations, while secondary legal materials include scientific literature, law journals, and previous research results related to conflicts of authority in the natural resources sector (Syarif, 2014).

In addition, this study uses a case approach by analyzing several PTUN decisions that reflect the conflict of authority between the central and regional governments. These decisions are studied descriptively-qualitatively to understand the background of the dispute, the judge's arguments, the legal basis used, and the impact of the decision on natural resource management policies. With a combination of normative legal methods and case studies, it is hoped that this study will produce a comprehensive picture of the practice and challenges of the division of authority between the center and regions, as well as provide recommendations for future improvements.

RESULTS AND DISCUSSION

Theoretical Basis and Legal Framework of Authority Division in Natural Resources Management

The theoretical basis for the division of authority between the central and regional governments is rooted in the concept of decentralization and regional autonomy. In general, decentralization aims to bring public services closer to the community, provide space for regions to innovate, and encourage local community participation in development. In Indonesia, the main legal instrument that is the basis is the 1945 Constitution of the Republic of Indonesia, especially Article 18 which regulates regional government. A more detailed explanation is contained in Law Number 23 of 2014

concerning Regional Government (and its amendments) (Nurjannah & Muin, 2016). The law divides government affairs into three categories: absolute affairs (managed entirely by the center), concurrent affairs (divided between the center and regions), and general government affairs (central-regional coordination).

Natural resources, such as mining, forestry, maritime affairs, and agriculture, are generally included in concurrent affairs because of their vital nature for state revenue and public welfare. The central government has the authority to set macro policies, national standards, and the obligation to protect national interests. Regional governments are tasked with adjusting national policies to local conditions, as well as implementing supervision or licensing at a certain level. However, problems arise when sectoral laws specifically regulate the types of authority, which sometimes conflict with the spirit of decentralization or, conversely, create overlapping authority. For example, Law Number 4 of 2009 concerning Mineral and Coal Mining (which has been amended through the Job Creation Law) once gave a certain portion to districts/cities in issuing people's mining permits. Then, the revision of the regulations after the Job Creation Law actually withdrew some of this authority to the central or provincial governments.

When there is a lack of synchronization between the Regional Government Law and sectoral laws, bureaucratic apparatus in the regions and the center are often confused. As a result, there may be overlapping permit issuance: one party believes it has the authority, while the other party thinks otherwise. This situation is exacerbated by weak coordination between institutions, for example between technical ministries at the center (Ministry of Energy and Mineral Resources, Ministry of Environment and Forestry, Ministry of Marine Affairs and Fisheries) and agencies in the regions. In decision-making, national policies are often not balanced with strengthening capacity and resources at the regional level. As a result, policies that were originally intended to accelerate services actually cause conflict, even lawsuits to the State Administrative Court (Harjiyatni & Anthony, 2022).

In the framework of government administration, this authority dispute can be approached through Law Number 30 of 2014 concerning Government Administration which regulates the general principles of good governance (AUPB). Administrative officials must adhere to the principles of legality, professionalism, proportionality, and transparency. If a state administrative decision (*beschikking*) conflicts with these principles, then the party who feels aggrieved has the right to sue at the PTUN. In the case of natural resources, for example, if the regional government issues a mining permit without considering the spatial plan or without obtaining the central government's approval required by law, then the decision can be annulled by the court (Syahrizal, 2013). Conversely, if the central government takes authority that should be the right of the region, the regional government can sue back to maintain its authority. Although cases like this are relatively rare, because regional governments are usually reluctant to have a frontal dispute with the center, in principle it is still legally possible.

Article 21 paragraph (1) of Law Number 30 of 2014 states:

Government officials have the authority to determine and/or carry out decisions and/or actions that are within the scope of their duties and functions.

This provision confirms that an administrative official may only make decisions within the limits of authority stipulated by statutory regulations. Had they exceeded the limits of authority (*detournement de pouvoir*), the decision might be annulled by the PTUN. This concept is the basis for the court to assess disputes over central-regional authority. The panel of judges will examine whether the official who issued the decision has complied with the duties and functions mandated by the Regional Government Law and sectoral laws.

Other legal frameworks include Law Number 5 of 1960 concerning Basic Agrarian Regulations, Law Number 41 of 1999 concerning Forestry, Law Number 27 of 2007 concerning Management of Coastal Areas and Small Islands (partially amended by Law Number 1 of 2014), and Law Number 32 of 2009 concerning Environmental Protection and Management. Each law places certain authorities on the central and regional governments, but often without cross-sector coordination. This is where the "tangled thread" that requires regulatory harmonization lies. The task of the PTUN is to interpret these regulations when there is a dispute. The results of this interpretation affect the dynamics of public administration, especially in maintaining a balance between national interests and regional autonomy rights.

In short, the theoretical basis and legal framework for the division of authority over natural

resources in Indonesia seek to achieve a combination of central authority (to safeguard national interests and strategic policies) and regional authority (to fulfill local interests, optimize potential, and shorten the bureaucratic chain). However, differences in interpretation of the law, lack of synchronization, and weak coordination often trigger disputes that end up in court. The following discussion will highlight the extent to which PTUN decisions shape jurisprudence or influence the practice of division of authority, and what the implications are for sustainable management of natural resources.

PTUN Decision and its Implications on the Conflict of Central-Regional Authority in Management of Natural Resources

Administrative law enforcement in Indonesia, especially through the State Administrative Court (PTUN), has a strategic role in resolving authority disputes between the central and regional governments. The PTUN has the authority to examine, decide, and resolve disputes arising from State Administrative Decisions (KTUN) issued by government administration officials. When a permit, approval, or policy related to natural resources is challenged, the court will examine whether the decision is in accordance with applicable regulations and does not exceed the authority of the issuing official. The following is an analysis of several decisions (hypothetical and actual) that have occurred or been reviewed in various sources, where the decisions show the pattern of judges' arguments in assessing central-regional authority conflicts.

Firstly, have a look at the case of “Issuance of Mining Business Permits (IUP)” in a mineral-rich area. The regional government (district/city) felt that it had the right to issue IUPs based on the interpretation of the Regional Autonomy Law which gives authority to manage certain natural resources. However, the Ministry of Energy and Mineral Resources argued that this matter had been withdrawn to the provincial government level through the latest laws and government regulations. As a result, the IUPs issued by the regional government were considered legally flawed by the provincial/central government. The corporation holding the IUP then faced uncertainty, so it filed a lawsuit with the PTUN to test the validity of the regional government's decision. In court, the judge examines the hierarchy of regulations: the newer law, implementing government regulations, and ministerial regulations. The judge also examines whether the regional government has met the prerequisites, such as having legitimate authority, compliance with the regional spatial plan, and consultation with higher agencies. If it turns out that the regional government issued the IUP without a clear basis for authority, the PTUN can cancel the permit. This decision has a major impact because it confirms that regional governments cannot issue permits carelessly, especially if the latest regulations require permits to be managed by the province or central government. From the regional government's perspective, this has caused disappointment because it weakens regional original income. However, the judge is of the view that legal certainty and harmony of authority must be prioritized (Jaelani, 2019).

Secondly, the “Production Forest Utilization Permit” dispute between the provincial government and the Ministry of Environment and Forestry (KLHK). The province argued that it had met the formal requirements according to the Regional Government Law to issue a timber utilization permit for a local cooperative. However, the KLHK stated that the forest area was a protected forest area, so that licensing was under the authority of the central government. This case went to the PTUN, and the corporation receiving the permit was also a defendant because it had cut down trees under the pretext of a valid permit from the province. The judge then dissected the Forestry Law, the Regional Government Law, and their derivative regulations, including the national spatial map versus the provincial spatial map. If inconsistencies are found – for example, the provincial map designates land as “production forest” when the national map states “protected forest” – then the judge tends to prioritize national policy because it has a higher hierarchy. The PTUN decision to annul the provincial permit confirms the supremacy of central regulations in the forestry sector. Consequently, if forest utilization has already started, corporations can be subject to environmental restoration obligations (Sihaloho et al., 2023).

Thirdly, the dispute over the authority of “Coastal Area Management” after the issuance of Law Number 27 of 2007 (revised by Law Number 1 of 2014) concerning the Management of Coastal Areas and Small Islands. Several district/city governments in coastal areas issued reclamation permits for tourism projects, while the relevant ministry (Ministry of Maritime Affairs and Fisheries) claimed to have the authority to approve or reject the project. When local communities rejected the

reclamation for environmental reasons, they sued the regent/mayor's decision at the PTUN. In the trial, the regent/mayor's legal team argued that the Regional Autonomy Law allows local governments to regulate coastal areas up to 12 miles from the coastline. However, the Ministry argued that the decision must be coordinated because it concerns a wider marine ecosystem. The judge considered the need for synchronization between the regional RTRW, the coastal area zoning plan (RZWP3K) prepared by the province, and central authority for national strategic interests. If it turns out that the local government issued a permit without considering the zoning plan that must be consulted with the center, the PTUN decision will cancel the permit. These results often cause reclamation projects to stop and become a precedent for other regions to be more careful (Bilaldzy & Ariani, 2022).

From the case examples above (both factual and hypothetical), the main pattern that is the basis for the PTUN's considerations is visible:

1. **Regulation Hierarchy:** Judges assess the conformity of state administrative decisions with general regulations (Regional Government Law, State Administration Law) to more specific sectoral regulations (Minerba Law, Forestry Law, Marine Law). Inconsistency with higher regulations is a reason for cancellation.
2. **Limits of Authority:** The court investigates whether the official who issued the KTUN actually has formal authority. If authority has been transferred to the central or provincial government through law, then district/city officials are not authorized to issue related permits.
3. **Procedure and Substance:** PTUN decisions are not only about authority, but also concern whether administrative procedures (preparation of AMDAL, public consultation, spatial planning compliance) have been fulfilled. Even though a regional government has authority, if procedures are violated, permits can be revoked.
4. **General Principles of Good Governance (AUPB):** Judges look at the principles of prudence, transparency, and proportionality. Violations of these principles can be a reason to consider a decision to be administratively flawed.

The impact of PTUN decisions can be very broad. On the one hand, the cancellation of regional government decisions can restore central government authority while creating legal certainty for other business actors. On the other hand, it also raises the perception that regional autonomy is being eroded. Sometimes, regional governments feel that the cancellation of permits does not understand the region's need for income and development. In addition, the community, who initially hoped that development projects would open up employment opportunities, actually suffer losses if the project is suddenly stopped. A domino effect emerges—corporations demand compensation, regional governments are confused about facing financial deficits. This shows that PTUN decisions not only have a legal dimension, but also have social and economic implications.

From a legal reform perspective, recurring disputes demonstrate the need for regulatory harmonization. This includes harmonizing the Regional Government Law, the State Administration Law, and various sectoral laws in the field of natural resources. Coordination between agencies needs to be improved, so that regional or central officials do not interpret each other's regulations unilaterally. Training and socialization on authority are also important, so that local governments understand the limits of what is allowed and what is not. After all, decentralization is designed so that local governments can regulate regional potential, not just issue permits without reference.

Another recommendation that emerged was the establishment of a non-litigation mechanism to reduce authority conflicts before they proceed to the PTUN. For example, a forum for harmonization of SDA policies across ministries and regional governments, where parties can debate technical regulations, map zoning, and determine standard licensing procedures. With such a mechanism, the potential for disputes can be reduced, and court decisions are only the last solution. The one-stop service system must also be improved so that administrative coordination runs smoothly.

Overall, the analysis of PTUN decisions shows that the conflict of central-regional authority in managing natural resources stems from regulatory inconsistencies, lack of understanding of officials, and demands for regional development. PTUN plays a role in examining the legality of administrative decisions, but handling the root of the problem requires ongoing synergy at the regulatory and governance levels. If systemic improvements occur in the future, it is hoped that the frequency of

disputes will decrease, natural resource development will run more effectively, and public interests will be served more optimally. PTUN remains the last line of defense for enforcing administrative law, but the system will be more efficient if the conflict of authority can be managed well from the start.

CONCLUSION AND SUGGESTION

Based on the discussion above, the conflict of authority between the central and regional governments in managing natural resources stems from different interpretations of laws and regulations, especially the Regional Government Law and sectoral laws in the field of natural resources. The State Administrative Court (PTUN) plays an important role in examining the validity of administrative decisions that are suspected of exceeding the limits of authority. PTUN decisions create a precedent that permit issuing officials must adhere to the hierarchy of rules and principles of good government administration. However, recurring disputes indicate the need for regulatory harmonization to avoid overlapping authority.

The implications of the PTUN decision can have a broad impact on the governance of natural resources, local economic dynamics, and central-regional political relations. The cancellation of permits by the PTUN can provide legal certainty as well as cause further conflicts related to regional income and investment. Therefore, improving the system through synchronization of laws, increasing the competence of the apparatus, and cross-sector coordination mechanisms are crucial. Thus, handling conflicts of authority does not solely depend on court decisions, but also on prevention efforts and mature administrative legal arrangements.

REFERENCES

- Anggraeni, R. M. (2022). Konflik Agraria Pembangunan Bendungan Bener Purworejo: Perspektif Yuridis Normatif. *El-Dusturie*, 1(1), 1-22. <https://doi.org/10.21154/eldusturie.v1i1.4197>
- Asshididqie, J. (2011). *Pengantar Ilmu Hukum Tata Negara*. Rajawali Pers.
- Bilaldzy, A., & Ariani, R. S. (2022). Tinjauan Kritis Urgensi Pembentukan Pengadilan Agraria: Upaya Menangani Inefektivitas Penyelesaian Konflik Agraria pada Peradilan Tata Usaha Negara dan Peradilan Umum. *Jurnal Hukum Lex Generalis*, 3(9), 688-711. <https://doi.org/10.56370/jhlg.v3i9.311>
- Fendri, A. (2023). *Pengaturan Kewenangan Pemerintah dan Pemerintah Daerah dalam Pemanfaatan Sumber Daya Mineral dan Batu Bara*. PT. RajaGrafindo Persada-Rajawali Pers.
- Haris, O. K. (2015). Pembedaan Prinsip Kepemerintahan yang Baik (Good Governance) dalam Penerbitan Izin Usaha Pertambangan (IUP) (Studi Kasus di Sulawesi Tenggara). *Perspektif Hukum*, 15(2), 129–146. <https://doi.org/10.30649/ph.v15i2.32>
- Harjiyatni, F. R., & Anthony, M. C. (2022). Studi Komparatif Penyelesaian Sengketa Lingkungan di Pengadilan Tata Usaha Negara Indonesia dan Thailand. *Jurnal Hukum Ius Quia Iustum*, 29(2), 371-391. <https://doi.org/10.20885/iustum.vol29.iss2.art7>
- Jaelani, A. K. (2019). Implementasi Daluarsa Gugatan Dalam Putusan Peradilan Tata Usaha Negara di Indonesia. *Pena Justisia: Media Komunikasi dan Kajian Hukum*, 18(2), 56-70. <https://doi.org/10.31941/pj.v18i2.1090>
- Koeswahyono, I., & Maharani, D. P. (2022). Rasionalisasi Pengadilan Agraria di Indonesia Sebagai Solusi Penyelesaian Sengketa Agraria Berkeadilan. *Arena Hukum*, 15(1), 1-19. <https://doi.org/10.21776/ub.arenahukum.2022.01501.1>
- Nurjannah, T., & Muin, F. (2016). Penyelesaian Sengketa Sertifikat Ganda Hak atas Tanah (Studi Kasus pada Pengadilan Tata Usaha Negara Makassar). *Jurnal Hukum*, 3(2), 131-145.
- Sihaloho, E. E., Istiqomah, M. N., & Adelia, Y. (2023). Penegakan Sanksi Administratif dalam Perlindungan dan Pengelolaan Lingkungan Hidup pada Daerah Pertambangan (Studi Kasus Putusan Pengadilan Tata Usaha Negara Kendari No. 67/G/LH/2022/PTUN.KDI). *YUSTISI*, 10(1), 210-223. <https://ejournal.uika-bogor.ac.id/index.php/YUSTISI/article/view/17258>
- Suharko. (2017). Masyarakat Adat versus Korporasi: Konflik Sosial Rencana Pembangunan Pabrik Semen di Kabupaten Pati Jawa Tengah Periode 2013-2016. *Jurnal Ilmu Sosial dan Ilmu Politik*, 20(2), 97-116. <https://doi.org/10.22146/jsp.24776>
- Syahrizal, D. (2013). *Hukum Administrasi Negara & Pengadilan Tata Usaha Negara*.

MediaPressindo.

Syarief, E. (2014). *Menuntaskan Sengketa Tanah melalui Pengadilan Khusus Pertanahan*.
Kepustakaan Populer Gramedia.

Triwulan, T. (2016). *Hukum Tata Usaha Negara Dan Hukum Acara Peradilan Tata Usaha Negara
Indonesia*. Prenada Media.

Widodo, I. S., Muhtar, M. H., Suhariyanto, D., Permana, D. Y., Bariah, C., Widodo, M. F. S., ... &
Susmayanti, R. (2023). *Hukum Tata Negara*. Sada Kurnia Pustaka.