

Dispute Resolution Through an Administrative Approach in the Closure of National Strategic Project

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Abstract

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This study examines the legal conflict arising from the closure of a National Strategic Project (PSN) operated by PT Pertamina EP within Sustainable Food Agricultural Land (LP2B) in Indramayu Regency, Indonesia. The background highlights the tension between national energy security and food sovereignty, both of which are protected under distinct regulatory frameworks. The objective of this research is to analyze the legality of the project closure and to identify an effective administrative dispute resolution mechanism. The study employs a normative juridical method with a descriptive-analytical approach, utilizing secondary data from legislation, legal doctrines, and academic literature. The findings reveal that the closure of the six drilling wells by the regional government is legally justified due to noncompliance with LP2B land-conversion requirements, including the absence of feasibility studies, permits, and replacement-land provisions. Furthermore, the study identifies that administrative dispute resolution through conciliation, facilitated by the State Attorney (Jaksa Pengacara Negara), offers a viable and efficient solution. In conclusion, resolving such disputes requires balancing legal certainty, public welfare, and national interests through an administrative approach that ensures compliance while avoiding prolonged litigation.

INTRODUCTION

The flexibility of public administration refers to the outcome of human collaboration carried out rationally, efficiently, and effectively. This flexibility implies that public administration can be applied without being constrained by time, place, task, or individual, thereby fulfilling human needs and promoting overall welfare (Basuki, 2018; Hery, 2023; Makmur & Thahier, 2017). As an archipelagic nation with an extensive territory and growing urban areas, Indonesia must ensure a sufficient energy supply to support population growth and regional development (Mertokusumo, 2020; Soerjati Priowirjanto, 2021; Supramono, 2016). This study aims to address the energy deficit resulting from limited conventional oil and gas resources. Strengthening national energy security requires the development of conventional energy sources, particularly shale gas and coalbed methane (CBM), supported by new policy frameworks that classify them as part of new energy resources, as well as the adoption of alternative financing mechanisms for their development (Andhyka

Taufiqurrohman et al., 2022; Chaireni et al., 2020; Gunawan et al., 2020; Karenina et al., 2016).

Land serves as a vital social, economic, and agricultural resource essential for sustainable development, particularly in economies reliant on land-based farming. As demand continues to rise while supply remains fixed, land is increasingly scarce (Muhammad Rasyid et al., 2022; Nugraha et al., 2016; Rachman Salasa, 2021). Ensuring food availability and accessibility is fundamental to food security, with rice, consumed by about 97% of Indonesia's population, being the most strategic staple commodity consistently safeguarded by the government. Oil and natural gas are strategic natural resources that play a vital role in industrial supply and national development (Sasongko, 2022; Sujadi, 2018; Sunarjanto & Kusumantoro, 2015). As nonrenewable resources, they hold significant political and economic value and serve as strategic instruments for achieving national prosperity in accordance with the 1945 Constitution. Indonesia, endowed with abundant natural resources in the mining and energy sectors, utilizes mining activities to extract primary energy sources such as petroleum (Tirta Adiyaksa & Iskandar Prasetyo, 2023; Tirta Tulangow et al., 2021; Wicaksono, 2020).

Food security remains a central challenge in Indonesia's national development agenda. As the primary food-producing sector, agriculture plays a vital role in meeting the nation's nutritional needs. Given the projected population growth from 267 million to 319 million by 2045, strengthening food security is essential to ensure sustainable national development (BPS, 2020). Enhancing food security requires a comprehensive national policy that ensures adequate food availability, quality, and accessibility. Food security is closely tied to a nation's capacity to produce sufficient food at reasonable costs and the government's ability to regulate prices. As emphasized by Timmer, sustainable economic progress is unattainable without first addressing food security challenges (Rozaki et al., 2021).

The Regional Regulation of West Java Province No. 27 of 2010 concerning the Protection of Sustainable Food Agricultural Land (Lahan Pertanian Pangan Berkelanjutan "LP2B") reflects the strong commitment of the regional government to maintaining food availability and strengthening community food security in West Java. This effort is implemented through controlling land-use conversion and expanding agricultural areas. Article 3 of this regulation explicitly states that the purpose of LP2B protection is to supervise, monitor, and manage agricultural land conversion to ensure the sustainable preservation of agricultural areas. This is pursued by providing incentives to farmers and imposing disincentives on parties that engage in land-use conversion.

In practice, not all state-owned enterprises are aware of regulations regarding LP2B land-use conversion. For instance, PT Pertamina EP, headquartered in Cirebon City and operating within Indramayu Regency, conducted a conversion of LP2B land designated by the Regent of Indramayu under Decree No. 520/Kep.417-DKPP/2022, dated November 3, 2022, concerning LP2B in Indramayu Regency, without following the procedures mandated by Law No. 41 of 2009 on LP2B Protection.

As a result, the Regent of Indramayu, through the Indramayu Regency Civil Service Police Unit (Satpol PP), ordered the closure of the EAC 001 exploration well (Contract No. 46500114334) owned by PT Pertamina EP and executed by PT Tiwika in Pondoh Village, Juntinyuat District, Indramayu Regency, on June 19, 2023. This action also halted operations

at the JTB-INT1 well (30% completed) and three other wells due to the absence of a proper LP2B conversion assessment and approval from the Minister of Agriculture. The suspension caused financial losses to PT Pertamina EP amounting to IDR 1.1 billion per day over the past six months. Such conditions cannot persist, as they result in wasted state funds due to ongoing contractual obligations with PT Tiwika and other drilling contractors.

From a positivist legal perspective, both parties—the regional government and PT Pertamina EP—possess legal certainty supported by existing legislation: Law No. 41 of 2009 on LP2B Protection and its implementing regulation, Government Regulation (PP) No. 1 of 2011 on LP2B Designation and Conversion, which uphold food sovereignty; and Law No. 6 of 2023 concerning the enactment of Government Regulation in Lieu of Law (Perppu) No. 2 of 2022 on Job Creation (the Omnibus Law), along with PP No. 42 of 2021 on the Facilitation of National Strategic Projects (PP PSN), which supports national strategic interests. Both frameworks thus provide clear legal certainty. If PT Pertamina EP fails to comply with the requirements for land-use conversion, Articles 72 and 73 of the LP2B Law stipulate criminal sanctions for any party violating these provisions. However, corporate criminal liability may not be immediately applied, as PP PSN provides specific administrative remedies for strategic projects. Ultimately, this conflict represents a legal tension between the norms governing food sovereignty and those advancing national strategic projects. Neither interest can be dismissed: both the food sovereignty pursued by the Indramayu Regency Government and the strategic objectives of PT Pertamina EP in Cirebon Region 3 hold legitimate importance.

Therefore, it is essential to identify effective mechanisms to reconcile these conflicting interests and determine which institution can serve as an intermediary within the context of Dispute Resolution Through an Administrative Approach in the Closure of National Strategic Project. One possible instrument is conciliation facilitated by the State Attorney (Jaksa Pengacara Negara, JPN). Although the term “State Attorney” is not explicitly mentioned in Law No. 16 of 2004 on the Attorney General’s Office of the Republic of Indonesia, its functions are elaborated in the Attorney General’s Regulation No. PER-025/A/JA/11/2015 concerning Guidelines for Legal Enforcement, Legal Assistance, Legal Opinion, Other Legal Actions, and Legal Services in Civil and Administrative Affairs. Furthermore, Article 24 of Presidential Regulation No. 38 of 2010 on the Organizational Structure and Work Procedures of the Attorney General’s Office outlines the duties and authorities of the Deputy Attorney General for Civil and Administrative Affairs. These include upholding the law, providing legal assistance and advice, and undertaking other legal actions on behalf of the state and government. Such authority extends to state institutions, central and regional government agencies, and state- or region-owned enterprises (BUMN/BUMD), particularly in civil and administrative law, with the aim of safeguarding and restoring state assets, upholding governmental integrity, and delivering legal services to the public.

This study employs a descriptive–analytical method to examine legal phenomena through critical interpretation of relevant laws, regulations, and governmental actions. Using a normative juridical approach, it relies on secondary legal sources, such as legislation, doctrines, and academic commentaries, to assess conformity with existing legal frameworks.

The analysis is conducted qualitatively, emphasizing logical reasoning and contextual interpretation to ensure juridically sound conclusions.

RESEARCH METHODS

This study employed a normative legal research method, which was used to examine law as a system of norms, focusing on statutory regulations, legal principles, and doctrines relevant to dispute resolution through an administrative approach in the closure of national strategic projects. The study primarily investigated the consistency and synchronization of legal rules to address the issues at hand.

The research was descriptive-analytical in nature. It was descriptive in that it provided a systematic overview of the prevailing legal framework regarding dispute resolution through an administrative approach in the closure of national strategic projects. It was analytical because it went beyond description to evaluate, interpret, and critique the adequacy and application of these legal norms in relation to the identified legal issues.

RESULTS AND DISCUSSION

Legal Review of the Closure of PT Pertamina EP's National Strategic Project Located within Sustainable Food Agricultural Land (LP2B) by the Regional Government of Indramayu Regency

Law enforcement encompasses two main functions: preventive and repressive measures. Each serves distinct purposes and employs different methods, with their execution depending on the authority and discretion of the enforcing legal institutions. Regional macroeconomic growth is closely linked to the provision and development of infrastructure. Enhancing the equity and quality of both physical and non-physical infrastructure can stimulate regional economic competitiveness through a multiplier effect. Regional development and local governance are interdependent, each influencing the other. Therefore, development initiatives must produce tangible impacts and visibility beyond the efforts of government institutions and state-owned enterprises (BUMN).

National Strategic Projects (PSN) refer to government, regional, or state-/region-owned enterprise (BUMN/BUMD) initiatives aimed at promoting equitable development, job creation, and public welfare. These projects are granted regulatory and administrative facilitation to accelerate implementation, ensure smooth progress, and optimize financing mechanisms.

The government deems it necessary to accelerate the implementation of National Strategic Projects (PSN) to meet fundamental needs and enhance public welfare, as stipulated in Presidential Regulation (Perpres) No. 3 of 2016 concerning the Acceleration of National Strategic Project Implementation, signed by President Joko Widodo on January 8, 2016. The regulation provides a formal definition of PSN: "National Strategic Project (PSN) refers to the implementation of programs or projects by the central government, regional governments, or state-/region-owned enterprises (BUMN/BUMD) that focus on promoting equitable and sustainable development aimed at job creation and improving public welfare." Article 3 of the regulation stipulates that ministers or heads of agencies, governors, and regents/mayors are authorized to issue the necessary permits or non-permit approvals for the implementation of National Strategic Projects (PSN), which include: a. Location Determination; b.

Environmental Permit; c. Forest Area Utilization Permit; and/or d. Building Construction Permit.

Under Article 6 paragraph (1) of the Presidential Regulation, business entities responsible for National Strategic Projects (PSN) are required to apply for a principal permit to the Head of the Investment Coordinating Board (BKPM) through the Central One-Stop Integrated Service (PTSP). This permit must be issued within one working day after the complete application is received, as stipulated in Article 6 (2). Upon obtaining the principal permit, the business entity must process all necessary permits and non-permit approvals through the Central PTSP, including location, environmental, forest utilization, and building permits, as well as fiscal and non-fiscal facilities. Specific time limits are set for permit issuance: environmental permits within 60 working days, forest utilization permits within 30 working days, and tax-related facilities within 28 working days, unless otherwise regulated by law or government regulation. In practice, three main challenges hinder PSN implementation land acquisition issues, spatial planning alignment, and financial constraints exceeding four trillion rupiah.

The 1996 World Food Summit defined food security as universal access to sufficient, safe, and nutritious food for an active and healthy life. Jarosz (2014) frames it as a fundamental human right, noting that poverty remains the main cause of hunger due to unequal access and resource depletion. Trade and technological cooperation are viewed as key strategies within sustainable development to address food insecurity. However, national food sovereignty is often limited by structural adjustment policies and neoliberal trade under the WTO. Research underscores that good governance is essential to improving food availability and accessibility through international trade and agricultural investment that enhances productivity. The Indramayu Regency consists of 31 (thirty-one) districts, 309 (three hundred and nine) villages, and 8 (eight) urban wards, with a total area of 207,606 hectares, comprising: Total irrigated rice field area: 125,442 hectares; Protected rice field area: 112,965.84 hectares; and Sustainable Food Agricultural Land (LP2B) area: 84,684 hectares.

Indramayu Regency is a leading rice-producing region in West Java, with an average annual output of 1,780,000 tons (GKG) between 2020 and 2023, produced by 311 farmer groups and 2,824 farming units. The regency also contains Sustainable Food Agricultural Land (LP2B), designated to be preserved and managed sustainably to support national food sovereignty, security, and self-sufficiency (Law No. 41 of 2009). Furthermore, Article 35 of Government Regulation No. 1 of 2011 concerning the Designation and Conversion of Sustainable Food Agricultural Land (LP2B) stipulates that land designated as LP2B is protected and prohibited from being converted, except for public interest purposes or in the event of a disaster. However, Article 44 paragraphs (2) and (3) of the LP2B Law, as amended by Article 124 of the Job Creation Law, essentially stipulate that LP2B land may be converted for the implementation of national strategic projects (PSN), in accordance with statutory regulations. The requirements for land conversion include:

- 1) Conducting a strategic feasibility study;
- 2) Preparing a land conversion plan;
- 3) Releasing ownership rights from the landowners; and
- 4) Providing replacement land for the converted LP2B area.

In practice, however, the conversion of Sustainable Food Agricultural Land (LP2B) in several locations within Indramayu Regency has not complied with Article 44(3) of Law No. 41 of 2009 on LP2B. Specifically, the converted areas include: 3.33 hectares in Pondoh Village (EAC 001 well, Juntinyuat District), 2.32 hectares in Tenajar Village (JTB INT1 well, Kertasmaya District), 1.96 hectares in Manggungan Village (CMR STO A3 well, Terisi District), 2.78 hectares in Kendayakan Village (CMR STO B well, Terisi District), 2.85 hectares in Gunung Sari and Cadangpinggan Villages (BDA-D1 well, Sukagumiwang District), and additional land in Sukaperna, Pagedangan, and Sukagumiwang Villages (BDA-B to BDA-A5 to SP BDA wells). These conversions were conducted without adhering to the legal procedures required under the LP2B Law.

The LP2B areas located within the six wells owned by PT Pertamina EP underwent land conversion without conducting a “strategic feasibility study”, which, at a minimum, should include the following components:

1. The area and location to be converted;
2. The potential loss of agricultural yield;
3. The risk of investment losses; and
4. The economic, environmental, social, and cultural impacts.

In addition to the required strategic feasibility study, PT Pertamina EP has not yet fulfilled the obligation to provide replacement land for the converted LP2B areas. Such replacement land must meet suitability criteria, be ready for cultivation, and take into account the following factors:

1. The total area of the land;
2. The level of land productivity; and
3. The condition of basic infrastructure.

According to Article 43(2) of Government Regulation No. 1 of 2011 on the Designation and Conversion of LP2B, replacement land may be obtained through new land development, conversion of non-agricultural land into LP2B, or the designation of new LP2B areas. The establishment of new LP2B land must comply with the criteria and requirements set forth in Article 22 of the same regulation. Based on the applicable legal framework and field findings, the closure of six wells by the Indramayu Regency Government is deemed consistent with its legal authority. This is because PT Pertamina EP has not fulfilled the mandatory requirements for land conversion as stipulated in Article 124 of the Job Creation Law (Article 44(3) of the LP2B Law). Moreover, PT Pertamina EP has not formally submitted a land conversion proposal to the Regent of Indramayu (Article 46, PP No. 1/2011), the proposal has not been verified by the Regent (Article 47(3)(c)), nor approved by the Minister of Agriculture (Article 46(2)).

Resolution of Disputes Between National Food Sovereignty Interests and National Strategic Project Interests

The goal of problem-solving—whether in social or natural sciences—is to answer the questions of “what,” “why,” and “how.” In legal studies, one is constantly faced with real-world cases and disputes requiring legal resolution. Legal rules, systems, and reasoning serve as essential tools for addressing such conflicts. Moreover, legal practitioners should avoid a conservative and formalistic mindset, instead seeking juridical justification that aligns with societal developments. Litigation refers to dispute resolution conducted through the

court system, where conflicts between parties are settled by a judge or judicial panel. The outcome of this process is a binding court decision that applies not only to the disputing parties but also to the state. Litigation is typically pursued when a case is highly complex, involves multiple parties or the state, when one or both parties act in bad faith, or when not mutually beneficial (win-win) solution can be achieved.

The development of academic disciplines can be traced through paradigm shifts since the era of Woodrow Wilson. A paradigm, as previously defined, refers to a perspective, set of values, methodological principles, or fundamental approach to problem-solving that is collectively accepted and upheld by a society. A legal entity (*rechtspersoon*) is an organization or association of such nature. One way to define a legal entity is as a body that possesses rights and obligations equivalent to those of a natural person and can perform legal acts. A legal entity attains legal status upon authorization by law and ceases to exist when declared bankrupt by a court.

In a state governed by law, all actions by citizens, the government, and state-owned enterprises must be carried out in accordance with legal provisions. In this context, PT Pertamina EP's drilling activities at six well sites cannot yet be considered legally valid, as previously discussed. This situation constitutes an unlawful act, giving rise to legal consequences. What initially falls within the company's business domain thus intersects with public law, encompassing not only administrative law but also criminal law, which governs acts prohibited and punishable by the state.

Article 72 of Law of the Republic of Indonesia No. 41 of 2009 concerning Sustainable Food Agricultural Land (LP2B) stipulates that:

1. Any individual who personally converts LP2B, as referred to in Article 44 paragraph (1), may be subject to imprisonment for up to five (5) years and a maximum fine of Rp1,000,000,000.00 (one billion rupiah).
2. Any individual who fails to restore the LP2B to its original condition, as stipulated in Article 50 paragraph (2) and Article 51, may be subject to imprisonment for up to three years and a maximum fine of Rp3,000,000,000.00 (three billion rupiah).
3. If the violations referred to in the preceding paragraphs are committed by a government official, the criminal penalty shall be increased by one-third of the prescribed sentence.

Article 73 of Law of the Republic of Indonesia No. 41 of 2009 concerning Sustainable Food Agricultural Land (LP2B) stipulates that:

Government officials authorized to issue permits for the conversion of sustainable food agricultural land who act in violation of the provisions of Article 44 paragraph (1) may be subject to criminal sanctions. The penalties include imprisonment for a minimum of one (1) year and a maximum of five (5) years and/or a fine ranging from Rp1,000,000,000.00 (one billion rupiah) to Rp5,000,000,000.00 (five billion rupiah).

Article 74 of Law of the Republic of Indonesia No. 41 of 2009 concerning Sustainable Food Agricultural Land (LP2B) provides the following stipulations:

- 1) If the criminal acts referred to in Article 72 paragraphs (1) and (2) are committed by a corporation, the corporate management may be subject to imprisonment for a minimum of two (2) years and a maximum of seven (7) years, along with a fine ranging from Rp2,000,000,000.00 (two billion rupiah) to Rp7,000,000,000.00 (seven billion rupiah).

- 2) In addition to monetary fines, the corporation may also be subject to supplementary penalties, including.
- a. confiscation of assets or property obtained from the criminal act;
 - b. termination of contracts involving the government;
 - c. dismissal of corporate management; and/or
 - d. prohibition for the management from establishing another corporation in a similar line of business.

If the offense regulated in this chapter results in losses, the perpetrator shall also be required to pay compensation as part of the imposed penalty. Doctrinally, the actions undertaken by PT Pertamina EP constitute a criminal offense as stipulated and sanctioned under Articles 72 and 74 of Law No. 41 of 2009 concerning Sustainable Food Agricultural Land (LP2B). Likewise, the Regional Government may also be subject to criminal liability under Article 73 of the same law should it permit Pertamina EP to continue drilling at the five designated wells. Consequently, both the Indramayu Regency Government and Pertamina EP have expressed concern regarding the potential criminal implications under the LP2B Law. Furthermore, the approval letter for land-use conversion, which should have been issued by the Minister of Agriculture, remains unsigned to date. Therefore, resolving this national strategic project issue requires an accelerated, coordinated effort among all relevant stakeholders.

National agricultural production may decline due to several factors affecting food output, including the reduction of agricultural land caused by land-use conversion, insufficient infrastructure development, and the limited number of studies related to agriculture. The SWOT methodology—an acronym for strengths, weaknesses, opportunities, and threats—serves as a tool for analyzing both internal and external conditions. According to Ferrel and Harline (2005), the purpose of SWOT analysis is to gather information and categorize it into external factors (opportunities and threats) and internal factors (strengths and weaknesses). This analysis aims to minimize threats and weaknesses while maximizing opportunities and strengths. As Rangkuti (2007) notes, the formulation of missions, strategies, objectives, and policies within this framework is closely tied to strategic decision-making processes.

In this context, the parties may resolve the dispute through conciliation with the assistance of a third party—the State Attorney (Jaksa Pengacara Negara)—acting as a conciliator (see Chapter VI, Other Legal Actions, Point 1(a)(1) of the Attorney General Regulation No. 7 of 2021 on Guidelines for the Implementation of Law Enforcement, Legal Assistance, Legal Consideration, Other Legal Actions, and Legal Services in Civil and Administrative Matters). The State Attorney serves as an intermediary between the Indramayu Regency Government, PT Pertamina EP, and the Minister of Agriculture. Given the urgent nature of this issue—where each party seeks to promote public welfare from different perspectives—the State Attorney can facilitate resolution professionally, objectively, and impartially between the interests of food security and those of the national strategic project.

The implementation of legal functions by the State Attorney (JPN) serves three main purposes: as a Tool of Engineering, a Tool of Social Control, and an Integrator. According to Joseph Raz, JPN holds the authority to exercise core legal functions, including resolving

disputes outside regular judicial processes to ensure legal certainty. The principles of justice, certainty, and utility align with John Rawls' view that the goal of law is to achieve "the greatest happiness of the greatest number." Similarly, Jeremy Bentham's utilitarian school emphasizes that all actions should promote happiness, satisfaction, and welfare. In this regard, JPN's authority formally ensures legal certainty, justice, and public benefit for the state and its institutions in resolving civil and inter-agency disputes. Optimizing JPN's role enhances the Attorney General's Office's institutional performance and contributes to state revenue and budget efficiency through effective civil case resolution. The diverse positions of prosecutorial institutions worldwide indicate that there is no universal agreement on which branch of government—the executive, legislative, or judicial—the Prosecutor's Office should belong to. The establishment of a fourth, independent branch of power, separate from the traditional three, represents a recent and significant constitutional development. This fourth branch serves as an external control mechanism over the other three branches, encompassing institutions such as the Prosecutor's Office, the Judicial Commission, and the Ombudsman.

Based on Article 124 of Law Number 6 of 2023 concerning the Stipulation of Government Regulation in Lieu of Law Number 2 of 2022 on Job Creation into Law (in particular Article 44 paragraphs (2) and (3)), Sustainable Food Agricultural Land (LP2B) may in principle be converted for the purposes of National Strategic Projects (PSN) in accordance with prevailing laws and regulations, provided that a strategic feasibility study is conducted, a land conversion plan is prepared, ownership rights are released by the landowners, and substitute land is provided in compliance with suitability and sustainability criteria. The obligation of regional heads and deputy regional heads to implement national strategic programs is also affirmed in Article 67 of Law Number 23 of 2014 on Regional Government. Furthermore, spatial planning for the implementation of PSN is regulated under Article 8 of Government Regulation Number 42 of 2021, which essentially requires conformity with spatial plans and/or marine spatial planning, while still allowing the utilization of areas that are not yet in conformity, as long as a suitability recommendation is obtained from the relevant minister.

With regard to land acquisition, Article 9 of Government Regulation Number 42 of 2021 stipulates the role of the minister responsible for land affairs in identifying land requirements, the submission of land acquisition plans by the Project Cooperation Responsible Party (PJPK) to the Minister of Finance, and the allocation of funding that may be sourced from ministries/agencies or local governments, in accordance with applicable laws and regulations. Meanwhile, the resolution of issues arising from PSN implementation is governed by Article 46 of Government Regulation Number 42 of 2021, which prioritizes administrative mechanisms for handling public reports or complaints, examination by the competent authorities, audits by the Government Internal Supervisory Apparatus in cases of suspected abuse of authority, and the classification of examination results into administrative errors without state losses, administrative errors causing state losses, or non-administrative criminal acts, each of which entails corresponding corrective actions, restitution of losses, or referral to law enforcement agencies in accordance with prevailing legal provisions.

CONCLUSION

The closure of six wells by the Indramayu Regency Government was consistent with its authority and applicable laws, as PT Pertamina EP had not fulfilled the legal requirements for land conversion in the LP2B area, including submitting and obtaining verification and approval from the Regent and the Minister of Agriculture as required under the relevant regulations. To resolve the conflict between food security interests and national strategic project objectives, conciliation through a State Attorney acting as a neutral third party offers a viable administrative approach, facilitating coordination among the regional government, PT Pertamina EP, and the Ministry of Agriculture. This mechanism allows for a balanced resolution, provided that all parties act in good faith and without unlawful intent (*mens rea*). Future research should explore the effectiveness of administrative dispute resolution mechanisms in similar conflicts, particularly by assessing their practical implementation and impact on balancing competing public interests.

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