



WBI ENERGY TRANSMISSION, INC.

Wahpeton Expansion Project

**Resource Report 4
Cultural Resources**

Draft

**Docket No.
PF21-4-000**

March 2022

**WBI ENERGY TRANSMISSION, INC.
WAHPETON EXPANSION PROJECT
RESOURCE REPORT 4—CULTURAL RESOURCES**

Minimum Filing Requirements for Environmental Reports:	Addressed In:
<p>1. Resource Report 4 must contain:</p> <ul style="list-style-type: none"> i. Documentation of the applicant's initial cultural resources consultation, including consultations with Native Americans and other interested persons (if appropriate); ii. Overview and Survey Reports, as appropriate; iii. Evaluation Report, as appropriate; iv. Treatment Plan, as appropriate; and v. Written comments from State Historic Preservation Officer(s) (SHPO), Tribal Historic Preservation Officers (THPO), as appropriate, and applicable land-managing agencies on the reports in paragraphs (f)(1)(i)-(iv) of this section. <p>– 18 CFR § 380.12 (f)(1)</p>	<p>Sections 4.3 and 4.5; tables 4.5-1 and 4.5-2; appendices 4B, 4D, 4E, and 4F</p>
<p>2. Initial filing requirements. The initial application must include the documentation of initial cultural resource consultation, the Overview and Survey Reports, if required, and written comments from SHPOs, THPOs and land-managing agencies, if available. The initial cultural resources consultations should establish the need for surveys. If surveys are deemed necessary by the consultation with the SHPO/THPO, the survey report must be filed with the application.</p> <ul style="list-style-type: none"> i. If the comments of the SHPOs, THPOs, or land-management agencies are not available at the time the application is filed, they may be filed separately, but they must be filed before a final certificate is issued. ii. If landowners deny access to private property and certain areas are not surveyed, the unsurveyed area must be identified by mileposts, and supplemental surveys or evaluations shall be conducted after access is granted. In such circumstances, reports, and treatment plans, if necessary, for those inaccessible lands may be filed after a certificate is issued. <p>– 18 CFR § 380.12 (f)(2)</p>	<p>Sections 4.3 and 4.5; tables 4.5-1 and 4.5-2; appendices 4B, 4D, 4E, and 4F</p>
<p>3. The Evaluation Report and Treatment Plan, if required, for the entire project must be filed before a final certificate is issued.</p> <ul style="list-style-type: none"> i. The Evaluation Report may be combined in a single synthetic report with the Overview and Survey Reports if the SHPOs, THPOs, and land-management agencies allow and if it is available at the time the application is filed. ii. In preparing the Treatment Plan, the applicant must consult with the Commission staff, the SHPO, and any applicable THPO and land-management agencies. iii. Authorization to implement the Treatment Plan will occur only after the final certificate is issued. <p>– 18 CFR § 380.12 (f)(3)</p>	<p>Noted</p>
<p>4. Applicant must request privileged treatment for all material filed with the Commission containing location, character, and ownership information about cultural resources in accordance with §388.112 of this chapter. The cover and relevant pages or portions of the report should be clearly labeled in bold lettering: "CONTAINS PRIVILEGED INFORMATION—DO NOT RELEASE." – 18 CFR § 380.12 (f)(4)</p>	<p>Noted</p>
<p>5. Except as specified in a final Commission order, or by the Director of the Office of Energy Projects, construction may not begin until all cultural resource reports and plans have been approved. – 18 CFR § 380.12 (f)(5)</p>	<p>Noted</p>
Additional Information:	
<p>1. Identify the project area and the project's impacts in terms of direct and indirect effects on cultural resources.</p>	<p>Sections 4.1 and 4.3; appendices 4B and 4D</p>
<p>2. Provide a project map with mileposts clearly showing boundaries of all survey areas (right-of-way, extra work areas, access roads, etc.); ensure that you mark mileposts, clearly specify survey corridor widths, and clearly indicate where you have not completed surveys.</p>	<p>Appendices 4B, 4C, and 4D</p>
<p>3. Provide documentation of consultation with applicable SHPOs, THPOs, and land-managing agencies regarding the need for and required extent of cultural resource surveys.</p>	<p>Section 4.5; tables 4.5-1 and 4.5-2; appendices 4E and 4F</p>

4.	Provide a narrative summary of overview results, cultural resource surveys completed, identified cultural resources, and any cultural resource issues.	Section 4.3; appendices 4B and 4D
5.	Provide a project-specific Ethnographic Analysis (can be part of Overview/Survey Report).	Appendix 4B
6.	Identify by mileposts any areas requiring survey where the landowner denied access.	Tables 4.3-1 and 4.3-2
7.	Provide written comments on the Overview and Survey Reports from the applicable SHPOs, THPOs, and land-managing agencies, if available.	Section 4.5; tables 4.5-1 and 4.5-2; appendices 4E and 4F
8.	Provide a Summary Table of completion status of cultural resource surveys, and SHPO or THPO and land-managing agency comments on the reports.	Tables 4.3-1 and 4.3-2
9.	Provide a Summary Table of identified cultural resources, and SHPO or THPO and land managing agency comments on the eligibility recommendations for those resources.	Tables 4.3-3 and 4.3-4
10.	Provide a brief summary of the status of contact with federally recognized Indian tribes, including copies of all related correspondence and records of verbal communications.	Section 4.5.2; appendix 4F
11.	Provide a brief summary of comments received from stakeholders regarding cultural resources.	Section 4.5.3
12.	Provide a schedule for completing any outstanding cultural resource studies.	Section 4.4
13.	Provide an Unanticipated Discoveries Plan for the project area, referencing appropriate state statutes.	Section 4.6; appendix 4G

**WBI ENERGY TRANSMISSION, INC.
WAHPETON EXPANSION PROJECT
RESOURCE REPORT 4—CULTURAL RESOURCES**

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APPENDICES

Appendix 4A	Previously Recorded Cultural Resource Surveys
Appendix 4B	Class III Archaeology Reports (<i>to be filed as a supplement; will be filed under separate cover as Controlled Unclassified Information / Privileged and Confidential</i>)
Appendix 4C	Cultural Resources Survey Coverage Overview Maps (<i>filed under separate cover as Controlled Unclassified Information / Privileged and Confidential</i>)
Appendix 4D	Class III Historic Structures Survey Report (<i>to be filed as a supplement</i>)
Appendix 4E	Copies of Correspondence with State Historical Society of North Dakota
Appendix 4F	Copies of Correspondence with Federally Recognized Indian Tribes
Appendix 4G	Plan for Unanticipated Discovery of Historic Properties or Human Remains during Construction

ACRONYMS AND ABBREVIATIONS

APE	area of potential effects
CFR	Code of Federal Regulations
FERC	Federal Energy Regulatory Commission
MDU	Montana-Dakota Utilities Company
MP	milepost
NDDOT	North Dakota Department of Transportation
NRHP	National Register of Historic Places
Project	Wahpeton Expansion Project
RFFA	reasonably foreseeable future action
SHPO	State Historic Preservation Officer
SHSND	State Historical Society of North Dakota
THPO	Tribal Historic Preservation Officer
UDP	Unanticipated Discovery of Historic Properties or Human Remains during Construction
WBI Energy	WBI Energy Transmission, Inc.

**WBI ENERGY TRANSMISSION, INC.
WAHPETON EXPANSION PROJECT**

4.0 RESOURCE REPORT 4—CULTURAL RESOURCES

WBI Energy Transmission, Inc. (WBI Energy) proposes to construct, modify, and operate the Wahpeton Expansion Project (Project). The Project will involve the construction of approximately 60.6 miles of 12-inch-diameter natural gas pipeline from WBI Energy's existing Mapleton Compressor Station near Mapleton, North Dakota to a new Montana-Dakota Utilities Company (MDU)—Wahpeton Border Station near Wahpeton, North Dakota. The Project will also include minor modifications at the Mapleton Compressor Station; a new MDU—Kindred Border Station near Kindred, North Dakota; new block valve settings; and new pig launcher/receiver settings. The Project may also include newly constructed farm taps along the pipeline route. The proposed Project facilities will be located in Cass and Richland Counties, North Dakota. Figure 1.1-1 of Resource Report 1 provides an overview of the proposed pipeline and associated facilities.

In accordance with Title 18 of the Code of Federal Regulations (CFR) Part 380.12(f), Resource Report 4 describes the extent and types of cultural resources—including any historic properties, which may be affected by the construction and operation of the proposed Project. Section 106 of the National Historic Preservation Act of 1966, as amended, requires federal agencies to take into account the effects of their undertakings on historic properties, which are prehistoric or historic districts, sites, buildings, structures, or objects listed in or eligible for listing in the National Register of Historic Places (NRHP). To assist the Federal Energy Regulatory Commission (FERC) in meeting this obligation and in accordance with 36 CFR 800.2(c)(4), WBI Energy is coordinating with agencies and tribes and conducting surveys to identify historic properties that may be affected by the Project.

4.1 Area of Potential Effects

As defined by 36 CFR 800.16(d), the area of potential effects (APE) is the “geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties.” This includes the construction footprint, the direct APE, and/or the indirect APE that could be affected by the introduction of visual or atmospheric and, in some cases, physical elements that would alter a property's setting and feeling.

The Project's APE for direct effects is limited to the area where ground disturbance will, or could, take place—including the proposed pipeline corridor, associated workspace, and the footprints of aboveground facility sites, access roads, and other work areas.

The Project's APE for indirect effects includes areas within line-of-sight of potential Project changes derived from construction or clearing of vegetation, extending up to a maximum of 0.5 mile from the pipeline corridor and each proposed facility. The APE for indirect (visual) effects from changes to the setting resulting from the proposed Project varies along the extent of the Project according to the topography, the nature of the proposed facilities, and whether tree cover is present that would be removed for construction.

4.2 Background Research

WBI Energy conducted a Class I literature search at the State Historical Society of North Dakota (SHSND) within a study area encompassing a 4-mile-wide corridor (2 miles on either side of the Project centerline) and within 1 mile of Project facilities (e.g., staging areas) outside this corridor. This literature search identified previously recorded archaeological sites and isolated finds, historic structures, and site leads¹ and identified previous inventories within the study area.

4.2.1 Previously Recorded Cultural Resource Surveys

The background research identified 90 previously conducted surveys within 2 miles of the Project. Appendix 4A includes the list of these previously recorded surveys.

4.2.2 Previously Recorded Archaeological Sites

The background research identified 21 previously recorded archaeological sites, 30 site leads, and 11 isolated finds within 2 miles of the Project. Table 4.2-1 lists these previously recorded sites.

Site Number	Description	NRHP Eligibility
32CS4560	Historic features and artifacts	Unevaluated
32CS4676	Prehistoric artifact scatter	Unevaluated
32CS4677	Prehistoric artifact scatter	Unevaluated
32CS5052	Prehistoric artifact scatter	Unevaluated
32CS5114	Historic artifact scatter	Unevaluated
32CS5130	Historic and prehistoric artifact scatter	Unevaluated
32CS5131	Prehistoric artifact scatter	Unevaluated
32CS5132	Historic and prehistoric artifact scatter	Unevaluated
32CS5133	Historic artifact scatter	Unevaluated
32CS5135	Prehistoric artifact scatter (Horsehead Site)	Unevaluated
32CS5145	Historic artifact scatter	Unevaluated
32CS5148	Prehistoric artifact scatter	Unevaluated
32CS5172	Human remains	Unevaluated
32CS5192	Historic feature	Unevaluated
32CS5261	Historic artifact scatter	Unevaluated
32CS5345	Historic artifact scatter	Unevaluated
32CSX10	Historic site lead	Unevaluated
32CSX181	Isolated find	Ineligible
32CSX209	Historic site lead	Unevaluated
32CSX211	Prehistoric site lead	Unevaluated
32CSX341	Isolated find	Ineligible
32CSX35	Historic site lead	Unevaluated

¹ Site leads are defined by the state of North Dakota as areas containing cultural resources identified by a landowner or another non-professional; an area with five or less artifacts visible on the surface that may have intact subsurface cultural deposits; or architectural sites that have not been fully recorded due to being located outside of a given project area or where property access has been denied (SHSND, 2020).

TABLE 4.2-1

**Wahpeton Expansion Project
Previously Recorded Archaeological Sites within 2 miles of the Project**

Site Number	Description	NRHP Eligibility
32CSX353	Isolated find	Ineligible
32CSX359	Isolated find	Ineligible
32CSX36	Historic site lead	Unevaluated
32CSX361	Isolated find	Ineligible
32CSX401	Isolated find	Ineligible
32CSX6	Historic site lead	Unevaluated
32CSX7	Historic site lead	Unevaluated
32CSX70	Historic site lead	Unevaluated
32CSX71	Historic site lead	Unevaluated
32CSX72	Historic site lead	Unevaluated
32CSX73	Historic site lead	Unevaluated
32CSX74	Historic site lead	Unevaluated
32CSX8	Historic site lead	Unevaluated
32CSX9	Historic site lead	Unevaluated
32CSX97	Historic site lead	Unevaluated
32CSX98	Historic site lead	Unevaluated
32RI720	Chicago Milwaukee St. Paul Railroad; Great Northern Railroad; Minneapolis St. Paul and Sault Ste. Marie Railroad; Northern Pacific Railroad	Unevaluated
32RI722	Mound site	Unevaluated
32RI780	Prehistoric artifact scatter	Unevaluated
32RI781	Prehistoric artifact scatter	Unevaluated
32RI808	Historic site and possible burial	Unevaluated
32RIX104	Isolated find	Ineligible
32RIX364	Isolated find	Ineligible
32RIX387	Isolated find	Ineligible
32RIX43	Historic site lead	Unevaluated
32RIX45	Historic site lead	Unevaluated
32RIX46	Historic site lead	Unevaluated
32RIX56	Historic site lead	Unevaluated
32RIX58	Historic site lead	Unevaluated
32RIX59	Historic site lead	Unevaluated
32RIX60	Historic site lead	Unevaluated
32RIX61	Historic site lead	Unevaluated
32RIX62	Historic site lead	Unevaluated
32RIX65	Historic site lead	Unevaluated
32RIX66	Historic site lead	Unevaluated
32RIX74	Historic site lead	Unevaluated
32RIX75	Historic site lead	Unevaluated
32RIX78	Historic site lead	Unevaluated
32RIX90	Isolated find	Ineligible
32RIX93	Isolated find	Ineligible

4.2.3 Previously Recorded Historic Architectural Resources

The literature search identified 52 previously recorded historic architectural sites and 1 historic structure site lead within 2 miles of the Project. Table 4.2-2 lists these previously recorded historic architectural resources.

TABLE 4.2-2		
Wahpeton Expansion Project Previously Recorded Historic Architectural Resources within 2 miles of the Project		
Site Number	Description	NRHP Eligibility
32CS109	Immanuel German Lutheran Church and Cemetery	Unevaluated
32CS110	Kindred Lutheran Church	Unevaluated
32CS111	Calvary United Methodist Church	Unevaluated
32CS112	Norman Evangelical Church	Unevaluated
32CS120	First Presbyterian Church	Unevaluated
32CS4463	Bridge	Unevaluated
32CS4465	Bridge	Unevaluated
32CS47	Burlington Northern Railroad; Burlington Northern Santa Fe Railroad; Northern Pacific Railroad	Unevaluated
32CS4971	St. Maurice's Catholic Church	Unevaluated
32CS4984	Bonanza Pioneer Village; St. John's Lutheran Church	Unevaluated
32CS5113	Historic canal segments	Unevaluated
32CS5119	McKinnon House	Unevaluated
32CS5190	Burlington Northern Santa Fe Railway	Unevaluated
32CS5249	Bridge	Unevaluated
32CS5259	Bridge	Unevaluated
32CS5260	Wood shed	Unevaluated
32CS5278	Water tower and associated buildings	Unevaluated
32CS5283	Utility building	Unevaluated
32CS5284	Historic house	Unevaluated
32CS5285	Historic house	Unevaluated
32CS5303	Drainage ditch	Unevaluated
32CS5322	Mapleton Water Tower	Unevaluated
32CSX388	Kindred Farmers Elevator Co.	Unevaluated
32CSX416	Historic house	Unevaluated
32CSX417	Historic house	Unevaluated
32CSX418	Historic house	Unevaluated
32CSX419	Historic house	Unevaluated
32RI669	Walcott Lutheran Church	Unevaluated
32RI672	Our Savior Lutheran Church	Unevaluated
32RI684	Galchutt Lutheran Church	Unevaluated
32RI685	Bethany Lutheran Church and Cemetery	Unevaluated
32RI7	St. John's Lutheran Church / South Wild Rice Church and Cemetery	Listed
32RI717	Bridge	Unevaluated
32RI742	Bridge	Unevaluated
32RI744	Bridge	Unevaluated
32RI755	Bridge	Unevaluated
32RI756	Bridge	Unevaluated
32RI758	Bridge	Unevaluated
32RI760	Bridge	Unevaluated
32RI763	Bridge	Unevaluated

TABLE 4.2-2

Wahpeton Expansion Project Previously Recorded Historic Architectural Resources within 2 miles of the Project		
Site Number	Description	NRHP Eligibility
32RI767	Bridge	Unevaluated
32RI768	Bridge	Unevaluated
32RI769	Bridge	Unevaluated
32RI789	Bridge	Unevaluated
32RI813	Bridge	Unevaluated
32RI814	Bridge	Unevaluated
32RI841	Bridge	Unevaluated
32RI843	Bridge	Unevaluated
32RI850	Bridge	Unevaluated
32RI851	Bridge	Unevaluated
32RI852	Walcott Bank	Unevaluated
32RI854	Walcott Mercantile	Unevaluated
32RIX368	Historic resource site lead (Walcott Gymnasium)	Unevaluated

4.2.4 Previously Recorded Cemeteries

The literature search identified 3 previously recorded cemeteries associated with churches (32CS109, 32RI685, and 32RI7) within 2 miles of the Project (see table 4.2-2), but they are not located within the APE.

4.3 Cultural Resource Surveys

4.3.1 Methodology

The cultural resources survey methodology follows the SHSND's *North Dakota SHPO Guidelines Manual for Cultural Resource Inventory Projects (2020)* and is described in the North Dakota State Historic Preservation Officer (SHPO) approved Class III Archaeological and Historic Architectural Inventory Work Plan.

4.3.1.1 Archaeological Survey Methodology

For the archaeological survey, WBI Energy examined a 300-foot-wide corridor along the pipeline route, a 50-foot-wide corridor along access roads, and the construction footprints for other facilities and staging areas. Field methods consisted of a combination of pedestrian reconnaissance and shovel testing. Pedestrian reconnaissance was conducted in all survey areas on survey transects spaced 15 meters apart. In previously disturbed areas with poor surface visibility, shovel tests were excavated at every 100 meters along 2 survey transects and supplemented by judgmental and/or systematic shovel testing on high probability landforms. In locations where ground surface visibility exceeded 25 percent, shovel tests were excavated judgmentally or along systematic transects at the discretion of the crew.

Geomorphology

A desktop geomorphological assessment of the APE for archaeological resources was completed in 2021. If required, a follow-up field assessment that includes testing in areas with the potential to contain deeply buried archaeological sites will be conducted in the spring of 2022.

4.3.1.2 Historic Architectural Resources Survey Methodology

Teams of architectural historians surveyed the indirect APE for the historic structures survey. Field methods consisted of a combination of windshield and pedestrian survey to document historic structures along, and near, the Project pipeline route and facilities. If access to a property was not granted, observations were limited to what could be obtained from the nearest public road. Sufficient information was gathered on resources to determine eligibility for listing on the NRHP and what effect the proposed undertaking might have on a resource determined to be eligible.

Architectural historians recorded properties determined to be 50 years or older including buildings, engineering structures like bridges and railroads, cemeteries, monuments, and other sites that meet National Park Service guidelines. A resource was defined by its architectural components and was defined to encompass the buildings and structures themselves and other elements of the built environment in the immediate vicinity.

4.3.2 Cultural Resource Survey Status

4.3.2.1 Archaeological Resources Survey Status

As of this filing, 54.4 of 60.6 miles (90 percent) of the pipeline, the Mapleton Compressor Station, 5 construction yards, and 57 access roads have been surveyed for archaeological resources. Due to reroutes and workspaces incorporated after the 2021 field season, 6.2 miles (10 percent) of the pipeline, a portion of the MDU—Kindred Border Station, the MDU—Wahpeton Border Station, and 8 access roads have not yet been surveyed for archaeological resources. The Project archaeological survey status is summarized in table 4.3-1.

TABLE 4.3-1 Wahpeton Expansion Project Archaeological Resources Survey Status			
Facility/County	Milepost (MP)		Survey Status
	Start	End	
Pipeline Facilities			
Cass County	0.0	9.9	Surveyed
	9.9	10.1	Pending
	10.1	10.7	Surveyed
	10.7	11.7	Pending
	11.7	14.7	Surveyed
	14.7	14.8	Pending
	14.8	21.8	Surveyed
	21.8	23.3	Pending
	23.3	24.7	Surveyed

TABLE 4.3-1			
Wahpeton Expansion Project Archaeological Resources Survey Status			
Facility/County	Milepost (MP)		Survey Status
	Start	End	
Richland County	24.7	26.9	Surveyed
	26.9	27.3	Pending
	27.3	27.6	Surveyed
	27.6	28.3	Pending
	28.3	30.3	Surveyed
	30.3	30.4	Pending
	30.4	30.8	Surveyed
	30.8	30.9	Pending
	30.9	50.8	Surveyed
	50.8	50.9	Pending
	50.9	56.9	Surveyed
	56.9	57.0	Pending
	57.0	58.7	Surveyed
	58.7	60.6	Pending
Aboveground Facilities			
Mapleton Compressor Station	0.0	0.0	Surveyed
MDU—Kindred Border Station	23.4	23.4	Pending
MDU—Wahpeton Border Station	60.6	60.6	Pending
Kost Yard	N/A	N/A	Surveyed
Kindred Yard	N/A	N/A	Surveyed
Wahpeton Yard	N/A	N/A	Surveyed
Comstock Yard	N/A	N/A	Surveyed
Wahpeton City Yard	N/A	N/A	Pending
Access Roads	N/A	N/A	57 surveyed, 8 pending
Note: N/A = not applicable			

4.3.2.2 Historic Architectural Resources Survey Status

As of this filing, 100 percent of the pipeline and extra workspace, Mapleton Compressor Station, MDU—Kindred Border Station, MDU—Wahpeton Border Station, 5 construction yards, and 65 access roads have been surveyed for historic structures. Table 4.3-2 summarizes the Project historic structures survey status.

TABLE 4.3-2			
Wahpeton Expansion Project Historic Architectural Resources Survey Status			
Facility/County	Milepost (MP)		Survey Status
	Start	End	
Pipeline Facilities			
Cass County	0.0	24.7	Surveyed
Richland County	24.7	60.6	Surveyed
Aboveground Facilities			
Mapleton Compressor Station	0.0	0.0	Surveyed
MDU—Kindred Border Station	23.4	23.4	Surveyed
MDU—Wahpeton Border Station	60.6	60.6	Surveyed
Kost Yard	N/A	N/A	Surveyed
Kindred Yard	N/A	N/A	Surveyed
Wahpeton Yard	N/A	N/A	Surveyed
Comstock Yard	N/A	N/A	Surveyed
Wahpeton City Yard	N/A	N/A	Pending
Access Roads	N/A	N/A	65 surveyed
Note: N/A = not applicable			

4.3.3 Survey Results

4.3.3.1 Archaeological Resources

As of this filing, 10 archaeological sites, 9 isolated finds, and no resources associated with site leads have been documented during surveys for the Project. Of these, one archaeological site contains prehistoric materials, eight archaeological sites contain historic materials, and one archaeological site contains both prehistoric and historic materials. Table 4.3-3 provides a summary information on the sites.

The 9 isolated finds are recommended as not eligible for listing on the NRHP and the eligibility of the 10 archaeological sites is undetermined. Following the identification of these 10 sites, WBI Energy adopted route and/or workspace adjustments so that all 10 unevaluated sites are now located 50 feet or more from the construction footprint for the Project. Because these sites will not be affected by Project construction activities, no additional work at the sites is recommended.

Appendix 4B [to be submitted to SHPO and filed with FERC when complete] provides a Class III report describing the results of the archaeological survey. Appendix 4C provides the survey coverage maps. Because appendices 4B and 4C contain location, character, and ownership information for archaeological sites, they have been filed separately as Controlled Unclassified Information/Privileged and Confidential [CUI//PRIV] and are marked "CUI//PRIV – DO NOT RELEASE".

TABLE 4.3-3 Wahpeton Expansion Project Archaeological Resources Identified				
Site/Temporary Field Number	Resource Type	Applicant NRHP Assessment	Applicant Recommendation	SHPO Comment
32CS4676	Prehistoric artifact scatter	Unevaluated	Avoid	Pending
32RI912	Prehistoric/historic artifact scatter	Unevaluated	Avoid	Pending
32RI907	Historic artifact scatter	Unevaluated	Avoid	Pending
32RI908	Historic artifact scatter and feature	Unevaluated	Avoid	Pending
32RI909	Historic artifact scatter and feature	Unevaluated	Avoid	Pending
32CS5350	Historic artifact scatter	Unevaluated	Avoid (Pipe Yard)	Pending
32CS5351	Historic artifact scatter	Unevaluated	Avoid	Pending
32RI910	Historic artifact scatter	Unevaluated	Avoid	Pending
32RI911	Historic artifact scatter	Unevaluated	Avoid	Pending
32CS5352	Historic artifact scatter	Unevaluated	Avoid	Pending
32RIX390	Prehistoric/historic isolated find	Not eligible	No further action	Pending
32RIX391	Prehistoric isolated find	Not eligible	No further action	Pending
32RIX392	Prehistoric isolated find	Not eligible	No further action	Pending
32CSX424	Prehistoric isolated find	Not eligible	No further action	Pending
32CSX393	Prehistoric isolated find	Not eligible	No further action	Pending
32CSX394	Prehistoric isolated find	Not eligible	No further action	Pending
32CSX395	Prehistoric isolated find	Not eligible	No further action	Pending
32CSX396	Prehistoric isolated find	Not eligible	No further action	Pending
32RIX397	Prehistoric isolated find	Not eligible	No further action	Pending

4.3.3.2 Historic Architectural Resources

Twenty-three historic structures and other architectural resources were documented during the historic architectural resources survey for the Project. Of these, 17 newly recorded resources and 2 previously recorded structures remain unevaluated for listing in the NRHP pending additional background research; recommendations will be included in the historic structures survey report. Four previously recorded structures are recommended as not eligible for listing on the NRHP and no additional work at the structures is recommended. Table 4.3-4 provides summary information on these resources. Appendix 4D provides a Class III report describing the results of the historic structures survey [to be submitted to SHPO and filed with FERC when complete]. Appendix 4C provides survey coverage maps.

TABLE 4.3-4 Wahpeton Expansion Project Historic Architectural Resources Identified					
Site/Temporary Field Number	Date of Construction	Resource Type/Name	Applicant NRHP Assessment	Applicant Recommendation	SHPO Comment
32CS5283	circa 1960	Animal shelter and corral	Not eligible	No further action	Pending
32CS5119	circa 1930	Outbuilding	Unevaluated	No further action	Pending
32RI813	1936	Bridge	Not eligible	No further action	Pending
32RI814	1948	Bridge	Not eligible	No further action	Pending

TABLE 4.3-4

**Wahpeton Expansion Project
Historic Architectural Resources Identified**

Site/Temporary Field Number	Date of Construction	Resource Type/Name	Applicant NRHP Assessment	Applicant Recommendation	SHPO Comment
32RI756	1915	Bridge	Not eligible (not extant)	No further action	Pending
32RI851	1937	Bridge	Unevaluated	No further action	Pending
ED-WBI-1	circa 1960	Bridge	Unevaluated	No further action	Pending
ED-WBI-5	circa 1910	Granary and grain bins	Unevaluated	No further action	Pending
ED-WBI-7	circa 1910	Vernacular dwelling and farmstead	Unevaluated	No further action	Pending
ED-WBI-9	circa 1930	Ranch dwelling and farmstead	Unevaluated	No further action	Pending
ED-WBI-10	circa 1960	Hunt Compressor Station	Unevaluated	No further action	Pending
ED-WBI-11	circa 1960	Oil tanks and associated machinery	Unevaluated	No further action	Pending
ED-WBI-13	circa 1910	Vernacular dwelling and farmstead	Unevaluated	No further action	Pending
ED-WBI-14	circa 1880–1920	Plain Residential-style dwelling and farmstead—no longer extant	Unevaluated	No further action	Pending
ED-WBI-15	circa 1930	Vernacular dwelling and farmstead	Unevaluated	No further action	Pending
ED-WBI-21	1908	Minimal Traditional dwelling and outbuildings	Unevaluated	No further action	Pending
ED-WBI-23	circa 1960	Minimal Traditional dwelling and farmstead	Unevaluated	No further action	Pending
ED-WBI-25	circa 1940	Vernacular dwelling and farmstead	Unevaluated	No further action	Pending
ED-WBI-27	1911	Vernacular dwelling with farmstead	Unevaluated	No further action	Pending
ED-WBI-29	circa 1960	Minimal Traditional dwelling and farmstead	Unevaluated	No further action	Pending
ED-WBI-31	circa 1960	Hage Farm; Residence and farmstead	Unevaluated	No further action	Pending
ED-WBI-32	circa 1960	Minimal Traditional dwelling and farmstead	Unevaluated	No further action	Pending
ED-WBI-38	circa 1960	Vernacular dwelling with outbuildings	Unevaluated	No further action	Pending

4.4 Schedule for Completing Outstanding Studies

WBI Energy anticipates completing an archaeological survey of pipeline route revisions that were adopted after the conclusion of the 2021 survey season in 2022. Addendum reports describing the results of these surveys will be prepared, filed with FERC, and submitted to the SHPO when complete.

4.5 Status of Consultations and Communications

4.5.1 State Historic Preservation Office

The SHSND is the agency within North Dakota responsible for protecting historic properties and the North Dakota SHPO, within the Archaeology and Historic Preservation Division of the SHSND, reviews federal projects under Section 106 of the NHPA.

WBI Energy’s communications to date with the SHPO are summarized below and included in table 4.5-1. Appendix 4E provides copies of correspondence between WBI Energy and the SHPO. Future correspondence with the SHPO will be submitted to FERC when received.

- WBI Energy sent a survey work plan to the SHPO for review and comment on September 8, 2021.
- WBI Energy sent an introductory Project letter to the SHPO on September 13, 2021. The letter included a Project description and overview map.
- WBI Energy and the SHPO discussed modifications to the survey work plan in phone calls and emails between September 21 and 30, 2021.
- WBI Energy provided a revised survey work plan to the SHPO on September 30, 2021. The SHPO concurred with the work plan in an email to WBI Energy dated October 1, 2021.
- WBI Energy sent a draft Plan for Unanticipated Discovery of Historic Properties or Human Remains during Construction (UDP) to the SHPO for review and comment on February 10, 2022.

TABLE 4.5-1 Wahpeton Expansion Project Communications with the State Historical Preservation Office	
Date	Summary
9-8-21	Letter from WBI Energy to the SHPO transmitting a survey work plan for review.
9-13-21	Introductory Project letter from WBI Energy to the SHPO.
9-21-21	Email correspondence between WBI Energy and the SHPO discussing the status of review of the survey work plan.
9-23-21	Phone call from the SHPO to WBI Energy to discuss the survey work plan.
9-23-21	Email from the SHPO to WBI Energy providing comments on the survey work plan.
9-24-21	Phone call from the SHPO to WBI Energy to discuss edits to the survey work plan.
9-24-21	Phone call from WBI Energy to the SHPO to discuss edits to the survey work plan.
9-29-21	Phone call from the SHPO to WBI Energy to discuss edits to the revised survey work plan and provide contact information for the curation agreement point of contact.
9-30-21	Phone call from WBI Energy to the SHPO to discuss the curation agreement.
9-30-21	Upload of revised survey work plan to the SHPO.
10-1-21	Email from the SHPO to WBI Energy approving the survey work plan.
2-10-22	Letter from WBI Energy to the SHPO transmitting the UDP for review.

4.5.2 Federally Recognized Indian Tribes

WBI Energy identified the following 15 federally recognized Indian tribes for communications on the Project:

- Assiniboine and Sioux Tribes of the Fort Peck Reservation
- Cheyenne River Sioux Tribe
- Fort Belknap Indian Community
- Northern Arapaho Tribe
- Northern Cheyenne Tribe
- Oglala Sioux Tribe
- Red Lake Band of Chippewa Indians of Minnesota
- Rosebud Sioux Tribe
- Sisseton-Wahpeton Oyate of the Lake Traverse Reservation
- Spirit Lake Sioux Tribe
- Standing Rock Sioux Tribe
- Three Affiliated Tribes of the Fort Berthold Reservation
- Turtle Mountain Band of Chippewa Indians
- Upper Sioux Community of Minnesota
- Yankton Sioux Tribe

WBI Energy's communications to date with federally recognized Indian tribes is summarized below and included in table 4.5-2. Appendix 4F provides copies of correspondence between WBI Energy and each tribe. Future communications with tribes will be submitted to FERC upon receipt.

- WBI Energy sent introductory Project letters to 13 tribes on September 13, 2021, and to 2 additional tribes on September 15, 2021. The letters included a Project description and map and requested comments on the Project's potential to affect cultural resource sites.
- WBI Energy contacted 15 tribes by telephone and/or email between September 24 and 30, 2021, in an effort to confirm each tribe's receipt of the Project introduction letter. The Rosebud Sioux Tribe, Three Affiliated Tribes of the Fort Berthold

Reservation, and Turtle Mountain Band of Chippewa Indians requested an additional copy of the letter, which WBI Energy provided by email.

- In an email dated September 28, 2021, the Northern Cheyenne Tribe requested to be involved with the Project and to participate in cultural resources surveys. On September 28 and October 11, 2021, WBI Energy emailed the Northern Cheyenne Tribe to coordinate tribal participation in survey efforts. On October 21, 2021, WBI Energy contacted the Northern Cheyenne Tribe by telephone to follow up on the previous emails. No response has been received to date.
- In an email dated October 27, 2021, the Northern Arapaho Tribe requested previous cultural resources for review. WBI Energy sent a copy of the background research in a reply email on November 4, 2021. On November 5, 2021, the Northern Arapaho Tribe emailed a letter of determination to WBI Energy indicating there will be an effect on properties of religious and cultural significance, expressing interest in participating in the cultural resource inventory, and requesting to be notified of unanticipated discoveries. In a telephone call on November 29, 2021, the Northern Arapaho Tribe indicated there were sites of concern within the APE; WBI Energy informed the Northern Arapaho Tribe that all identified sites are avoided by the Project. The Northern Arapaho Tribe also requested to be notified of any unanticipated finds, to possibly participate in future surveys, and to receive a copy of the survey reports when complete.

TABLE 4.5-2

**Wahpeton Expansion Project
Communications with Federally Recognized Indian Tribes**

Tribe	Date	Summary
Assiniboine and Sioux Tribes of the Fort Peck Reservation	9-13-21	Project introduction letter sent to the Tribal Historic Preservation Officer (THPO) including request for comment on the Project.
	9-24-21	Follow-up phone call to the THPO—left a voicemail message.
Cheyenne River Sioux Tribe	9-13-21	Project introduction letter sent to the THPO including request for comment on the Project.
	9-28-21	Follow-up phone call to the THPO.
Fort Belknap Indian Community	9-13-21	Project introduction letter sent to the THPO including request for comment on the Project.
	9-24-21	Follow-up phone call to the THPO—unable to leave voicemail message.
Northern Arapaho Tribe	9-13-21	Project introduction letter sent to the THPO including request for comment on the Project.
	9-28-21	Follow-up phone call to the THPO.
	10-27-21	Email from the Northern Arapaho Tribe to WBI Energy requesting previous cultural resource inventory.
	11-4-21	Email from WBI Energy to the Northern Arapaho Tribe transmitting a copy of the cultural resource inventory background research.
	11-5-21	Email from the Northern Arapaho Tribe to WBI Energy transmitting a letter of determination indicating there will be an effect on properties of religious and cultural significance, expressing interest in participating in the cultural resource inventory, and requesting notification of unanticipated discoveries.
	11-29-21	Call with the Northern Arapaho Tribe to discuss sites of concern and their request to be added to UDP and participation in future surveys.

TABLE 4.5-2

**Wahpeton Expansion Project
Communications with Federally Recognized Indian Tribes**

Tribe	Date	Summary
Northern Cheyenne Tribe	9-13-21	Project introduction letter sent to the THPO including request for comment on the Project.
	9-28-21	Follow-up phone call to the THPO.
	9-28-21	Email from the Northern Cheyenne Tribe to WBI Energy requesting participation in cultural resource surveys.
	9-28-21	Email from WBI Energy to the Northern Cheyenne Tribe to coordinate participation in cultural resource surveys.
	10-11-21	Email from WBI Energy to the Northern Cheyenne Tribe to follow up on coordinating participation in cultural resource surveys.
	10-21-21	Follow-up phone call and message left in the THPO office regarding participation in cultural resource surveys.
Oglala Sioux Tribe	9-13-21	Project introduction letter sent to the THPO including request for comment on the Project.
	9-28-21	Follow-up phone call to the THPO.
Red Lake Band of Chippewa Indians of Minnesota	9-15-21	Project introduction letter sent to the THPO including request for comment on the Project.
	9-30-21	Follow-up phone call to the THPO.
Rosebud Sioux Tribe	9-13-21	Project introduction letter sent to the THPO including request for comment on the Project.
	9-27-21	Follow-up phone call to the THPO.
	9-28-21	Email from WBI Energy to the Rosebud Sioux Tribe transmitting the Project introduction letter.
Sisseton-Wahpeton Oyate of the Lake Traverse Reservation	9-13-21	Project introduction letter sent to the THPO including request for comment on the Project.
	9-24-21	Follow-up phone call to the THPO—unable to leave voicemail message.
Spirit Lake Sioux Tribe	9-13-21	Project introduction letter sent to the THPO including request for comment on the Project.
	9-24-21	Follow-up phone call to the THPO—left a voicemail message.
Standing Sioux Tribe	9-13-21	Project introduction letter sent to the THPO including request for comment on the Project.
	9-24-21	Follow-up phone call to the THPO—left a voicemail message.
Three Affiliated Tribes of the Fort Berthold Reservation	9-13-21	Project introduction letter sent to the THPO including request for comment on the Project.
	9-24-21	Follow-up phone call to the THPO.
	9-24-21	Email from WBI Energy to the Three Affiliated Tribes of the Fort Berthold Reservation transmitting the Project introduction letter.
Turtle Mountain Band of Chippewa Indians	9-13-21	Project introduction letter sent to the THPO including request for comment on the Project.
	9-24-21	Follow-up phone call to the THPO.
	9-24-21	Email from WBI Energy to the Turtle Mountain Band of Chippewa Indians transmitting the Project introduction letter.
Upper Sioux Community of Minnesota	9-15-21	Project introduction letter sent to the THPO including request for comment on the Project.
	9-30-21	Follow-up phone call to the THPO.

TABLE 4.5-2 Wahpeton Expansion Project Communications with Federally Recognized Indian Tribes		
Tribe	Date	Summary
Yankton Sioux Tribe	9-13-21	Project introduction letter sent to the THPO including request for comment on the Project.
	9-27-21	Follow-up phone call to the THPO.

4.5.3 Other Stakeholders

The SHPO recommends consultation with Certified Local Governments for projects subject to review under Section 106 of the National Historic Preservation Act. None of the communities or counties in the Project area are listed as Certified Local Governments.

4.6 Unanticipated Discoveries Plan

WBI Energy prepared a draft UDP for lands crossed by the Project. Appendix 4G provides a copy of the plan. A copy of the UDP was provided to the SHPO for review and comment.

4.7 Cumulative Impacts

Section 1.10 of Resource Report 1 defines a cumulative impact and describes the general scope of the cumulative impact analysis. This section describes the potential cumulative impacts on cultural resources from the Project combined with the reasonably foreseeable future actions (RFFA) identified in appendix 1H and figure 1.10-1 of Resource Report 1. Appendix 1H provides the location, proposed schedule, and a description of each RFFA.

As described in table 1.10-1 of Resource Report 1, the geographic scope for potential direct cumulative impacts on cultural resources includes areas subject to ground disturbance, while the APE for indirect effects (visual or audible) includes aboveground ancillary facilities or other Project elements that are visible from historic properties in which the setting contributes to their NRHP eligibility. Cumulative impacts on cultural resources would only occur if RFFAs affect the same historic properties as the Project.

There are two past projects and six RFFAs that could affect archaeological sites or historic structures within the APEs for cumulative impacts for the Project. An assessment of the potential for cumulative effects on historic properties from these RFFAs is provided below.

- **MDU Distribution System for Kindred:** A distribution system will be built to provide natural gas to industrial, commercial, and residential customers in Kindred. The area of overlap between the distribution system and the APE for the Project would be anticipated to occur within the workspace required to construct the MDU—Kindred Border Station and no archaeological sites or historic structures are located within the area of overlap. Therefore, there is no potential for cumulative impacts on cultural resources in this area.

- MDU Distribution System for Wahpeton: A distribution system will be built to provide natural gas to industrial, commercial, and residential customers in Wahpeton. The area of overlap between the distribution system and the APE for the Project would be anticipated to occur within the workspace required to construct the MDU—Wahpeton Border Station and no archaeological sites or historic structures are located within the area of overlap. Therefore, there is no potential for cumulative impacts on cultural resources in this area.
- MDU Distribution—Farm Tap Service: The locations of any farm taps that would be built off the mainline are still unknown and it is possible that cumulative impacts could occur. However, the service lines would likely result in a similar, minimal impact on the affected archaeological site or historic structure and the cumulative impact of both the Project and the MDU Distribution—Farm Tap Service is expected to be less than significant.
- Power lines: Power lines are anticipated to be built to serve non-jurisdictional facilities at the proposed MDU—Kindred Border Station and the MDU—Wahpeton Border Station. The area of overlap between the power lines and the Project would be limited to the workspace used for construction of the MDU—Kindred Border Station and the MDU—Wahpeton Border Station and no archaeological sites or historic structures are located within the areas of overlap. Therefore, there is no potential for cumulative impacts on cultural resources in this area.
- Ongoing agricultural activities: Agricultural activities are expected to continue throughout the life of the Project. There are no archaeological sites or historic structures located within the direct APE. Therefore, there is no potential for cumulative impacts on cultural resources in this area.
- North Dakota Department of Transportation (NDDOT) 9, NDDOT 10, and NDDOT 19: These NDDOT highway construction and maintenance projects cross the Project—NDDOT 9 crosses the Project at milepost (MP) 6.0, NDDOT 10 crosses the Project at MP 0.7, and NDDOT crosses the Project at MP 5.9. NDDOT 9 and NDDOT 10 have already been completed and NDDOT 19 is scheduled to be completed in 2022, prior to the start of work on the Project. There are no archaeological sites or historic structures located within the areas of overlap between these highway projects and the proposed Project. Therefore, there is no potential for cumulative impacts on cultural resources in this area.

Based on the above discussion, adverse cumulative impacts on cultural resources are not anticipated.

4.8 References

State Historical Society of North Dakota, Archaeology and Historic Preservation Division (SHSND). 2020. *North Dakota SHPO Guidelines Manual for Cultural Resource Inventory Projects*. Available online: <https://www.history.nd.gov/hp/hpforms.html>. Accessed: September 2021.

**APPENDIX 4A PREVIOUSLY RECORDED CULTURAL RESOURCE
SURVEYS**

Appendix 4A

**Wahpeton Expansion Project
Previously Recorded Cultural Resource Surveys within 2 miles of the Project**

Survey Manuscript Number	Year	Manuscript Title
MS 635	1979	Archaeological Reconnaissance in Reed Township, Cass County, North Dakota
MS 4295	1986	Archaeological Survey and Test Excavations in Cass County, North Dakota
MS 4504	1988	Final Report of the Phase I Cultural Resources Investigation of a Proposed Flood Control Project Along the Sheyenne River at West Fargo, Cass County, North Dakota.
MS 5322	1990	In the Footsteps of T.H. Lewis: Retracing of the Northwestern Archaeological Survey in Oliver, Benson, Grand Forks, Pembina, Ransom, Richland, LaMoure, Morton, Stutsman, and Barnes Counties, North Dakota
MS 5347	1990	Class III Cultural Resource Inventory for the Williston Basin 8-inch Natural Gas Pipeline in Barnes and Cass Counties, North Dakota UW #1381
MS 5443	1990	Cenex Pipeline Company Fargo Extension, Steele, Griggs, Foster, Cass, Barnes, Eddy, Wells, Pierce, McHenry, and Ward Counties, North Dakota Class III Cultural Resource Survey (also see MS 5591)
MS 5920	1992	Historic Bridges in North Dakota
MS 5994	1993	Jardine Bridge Replacement, a Class III Cultural Resource Inventory Cass County, North Dakota
MS 6249	1994	Bridge Replacements, Archeological Sites, and Archeological Site Surveys in North Dakota
MS 6375	1994	Richland County Soil Conservation Service Borrow Area Class III Survey
MS 6432	1995	Evergreen Lane Emergency Watershed Protection (Cass 17-001A) Class III Cultural Resources Survey Cass County, North Dakota
MS 6449	1995	North Dakota Department of Transportation Safety Project Cultural Resource Review 1992–1994
MS 6462	1995	Richland County Road Improvement Project: Results of the Class II and III Cultural Resources Inventories Conducted for Kadmas, Lee, and Jackson, P.C. and Richland County, North Dakota UW#1777
MS 6500	1995	R.S.R. Electrics 1995–1998 Construction Plan: A Class II and Class III Cultural Resource Inventory in Ransom, Richland, and Sargent Counties, North Dakota
MS 6534	1995	Kidder-Progold Transmission Line Cultural Resources Inventory, Richland County, North Dakota
MS 6565	1995	Log Piles of Cass, McHenry, Ransom, and Walsh Counties, North Dakota, Cultural Resources Inventory
MS 6606	1995	ProGold's Corn Processing Plant: A Class III Cultural Resources Inventory in Richland County, North Dakota
MS 6775	1996	Interstate Engineering's Pitcairn Creek Bridge Replacement: A Class III Cultural Resource Inventory in Richland County, North Dakota
MS 6781	1996	Two Bridges in Richland County, North Dakota: A Class III Cultural Resource Inventory
MS 6970	1997	Gutzmer-1 Borrow Area: A Class III Cultural Resource Inventory, Richland County, North Dakota
MS 7018	1997	Class III Cultural Resource Inventory for the Proposed Replacement of Cass County Bridge Number 130.23.0. North Dakota Department of Transportation (NDDOT) Project Number BRC-093(54)
MS 7129	1998	Mapleton and Cass Counties, North Dakota Dike Alignment (Flood Control Project 98-1), A Class III Cultural Resource Inventory Report
MS 7223	1998	Report 1 for the 1998 Field Season: Cultural Resource Inventories for the Cass Rural Water System, Cass County, North Dakota
MS 7334	1999	Richland County Bridge Replacement Project NDDOT Number BRO-39(15). Class III Cultural Resource Inventory Report
MS 7410	1999	Cultural Resources Survey of the Kindred-Davenport Regional Airport, Cass County, North Dakota
MS 7435	1999	Archaeological Testing at 32CS4677: Kindred-Davenport Regional Airport
MS 7677	2000	Cultural Resources Inventory of Sioux Falls Tower Specialists Inc.'s Communication Towers in BA, BI, BL, CS, GV, KD, SK, SN, and MO Counties, North Dakota

Appendix 4A

**Wahpeton Expansion Project
Previously Recorded Cultural Resource Surveys within 2 miles of the Project**

Survey Manuscript Number	Year	Manuscript Title
MS 7788	2000	Cultural Resources Inventory for a Proposed Cell Phone Tower in Colfax Township Richland County, North Dakota Section 34, T135N, R49W Project Number SAC-5017
MS 8028	2001	Cultural Resource Survey Western Area Power Administration Fiber Optic Cable Installation, Cass County, Fargo, North Dakota
MS 8100	2001	A Preliminary Cultural Resources Inventory of the Colfax Emergency Watershed Protection Project, Richland County, North Dakota
MS 8166	2002	Class III Cultural Resource Inventory for Richland County, North Dakota Bridge Replacement Project Number BRO-39(031)
MS 8376	2002	West Fargo Bridge Replacement: A Class III Cultural Resource Inventory, Cass County, North Dakota
MS 8409	2002	A Cultural Resources Inventory of the County Drain Number 2 Project Richland County, North Dakota
MS 8474	2003	Railroad Approach Grade Raise: A Cultural Resource Inventory in Cass County, North Dakota
MS 8751	2003	Highway 46: A Class III Cultural Resource Inventory, Cass, Ransom, and Richland Counties, North Dakota
MS 8848	2004	CCEC 2004: A Class III Cultural Resource Inventory in Barnes, Cass, and Richland Counties, North Dakota
MS 9246	2005	County Highway 8 East, Richland County, North Dakota: A Class III Cultural Resource Inventory
MS 9247	2005	County Highway 8 West, Richland County, North Dakota: A Class III Cultural Resource Inventory
MS 9488	2005	West Fargo Highway 10: A Class III Cultural Resource Inventory in Cass County, North Dakota
MS 9676	2006	A Class III Cultural Resources Inventory for Vantage Point-Red River Rural Telephone Association—Buried Cable, Richland County, North Dakota
MS 9871	2006	Bridge Number 124-12.0: A Class III Cultural Resource Inventory in Richland County, North Dakota
MS 9872	2006	Bridge Number 123-14.0: A Class III Cultural Resource Inventory in Richland County, North Dakota
MS 9965	2006	Bridge Number 124-11: A Class III Cultural Resource Inventory for a Proposed Bridge Replacement Project in Richland County, North Dakota
MS 10185	2007	Cass Rural Water Contract 2007-1 (effluent line): Class I and Class III Cultural Resource Inventory in Cass County, North Dakota
MS 10747	2008	North Dakota Forest Service 2008–2009 Community Transportation Enhancement Grant Tree-276 Project: A Class III Cultural Resource Inventory in Cass County, North Dakota
MS 11184	2009	Casselton to Kindred Main Transmission Line: Class II and III Cultural Resource Inventory, Cass and Richland Counties, North Dakota
MS 11731	2010	Richland County Road Realignment Borrow Areas for NDDOT Project Number BRC-SC-3912(054); (PCN-18586). A Class III Cultural Resource Inventory Report & Addendum
MS 11908	2010	Cass County Highway 16 Project: A Class III Cultural Resource Inventory in Cass County, North Dakota
MS 12685	2011	Driveway Permit North Dakota Highway 46 RP 111.67 S: A Class III Cultural Resource Inventory
MS 12800	2011	Class I Literature Search and Class III Intensive Archaeological Investigation of the CapX2020 Fargo to St. Cloud Project: Cass County, North Dakota
MS 12878	2012	West Fargo Main17—426—Material Waste Area West of Speedway—A Class III Cultural Resource Inventory in Cass County
MS 13221	2012	Class III Cultural Resources Inventory North Dakota 03 Walfax, 168th Avenue Southeast, Walcott, Richland County, North Dakota, Section 18, T135N, R49W
MS 13899	2013	Class I Literature Search and Class III Intensive Archaeological Investigation of the CapX2020 Fargo to St. Cloud 345-kilovolt Transmission Line Project, Cass County, North Dakota Addendum I

Appendix 4A		
Wahpeton Expansion Project Previously Recorded Cultural Resource Surveys within 2 miles of the Project		
Survey Manuscript Number	Year	Manuscript Title
MS 14009	2012	The Fargo-Moorhead Flood Risk Management Project, Cass County, North Dakota and Clay County, Minnesota: Results of Phase I Cultural Resources Investigations, 2010–2011
MS 14111	2013	CapX2020 Fargo to St. Cloud 345-kilovolt Transmission Line Project—Class III Archaeological Investigation Report Submittal Addendum II
MS 14324	2013	Final Report: The Fargo-Moorhead Flood Risk Management Project, Cass County, North Dakota and Clay County, Minnesota: Results of 2012 Phase I Cultural Resources Investigations
MS 14342	2013	12th Avenue North, 45th Street to County Road 19: Class III Cultural Resource Inventory, Cass County, North Dakota
MS 14385	2013	Class I and III Cultural Resources Inventory of the Red River Rural Telephone Association Colfax Exchange T3.0 BER Buried Cables Project T135N, R49W, Sections 29 & 32 Richland County, North Dakota
MS 14963	2014	Class III: Cultural Resources Inventory, Big Iron, Main Avenue West, West Fargo, Cass County, North Dakota
MS 15141	2014	Class III Intensive Archaeological Investigation of the CAPX2020 Fargo to St. Cloud 345-kilovolt Transmission Line Project, Cass County, North Dakota Addendum III
MS 16028	2015	A Class I and Class III Cultural Resource Inventory of the Laurel Interconnect Pipeline, Cass County, North Dakota
MS 16078	2015	Addendum to A Class I and Class III Cultural Resource Inventory of the Laurel Interconnect Pipeline, Cass County, North Dakota, for Additional Workspace
MS 16184	2015	County Road 17 Improvements Project: A Class III Intensive Cultural Resource Inventory in Cass County, North Dakota
MS 16585	2016	Class III: Cultural Resources Inventory, FARC Kindred DT, 165th Avenue South East, Kindred, Cass County, North Dakota
MS 16634	2016	Western Alignment of the Fargo Moorhead Flood Diversion Survey: A Class III Intensive Cultural Resources Inventory in Cass County, North Dakota
MS 16734	2016	A Class I and Class III Cultural Resource Inventory of the Cenex Mapleton Terminal, Cass County, North Dakota
MS 17072	2016	I-29 Reconstruction Project; 8-029(168)033, PCN 21494; 8-029(169)033, PCN 21495; 8-029(170)033, PCN 21496: A Class III Cultural Resource Inventory in Richland County, North Dakota
MS 17193	2014	Spelhaug, Overboe, and Odegaard Material Source Areas: Class III Intensive Cultural Resource Inventories in Richland and Cass Counties, North Dakota
MS 17220	2017	South East Water User District System Wide Expansion Project: Class II and Class III Cultural Resource Inventory, Dickey, LaMoure, Logan, Ransom, Richland, and Sargent Counties, North Dakota
MS 17241	2015	A Class III Cultural Resource Inventory of the Kindred Airport in Cass County, North Dakota
MS 17273	2017	2016 WBI Energy Transmission, Inc. (WBI Energy) Valley Expansion Project, North Dakota Class III Archaeological Resources Inventory in Cass, Barnes, Stutsman, and Burleigh Counties, North Dakota
MS 17274	2017	Class III Intensive Architectural History Survey of the Proposed WBI Energy Valley Expansion Project in Cass County, Regulator Station Upgrades in Barnes County, and Town Border Station Upgrades in Stutsman and Burleigh Counties, North Dakota
MS 17353	2017	2017 Addendum to: 2016 WBI Energy Valley Expansion Project, North Dakota Class III Archaeological Resources Inventory, Cass, Stutsman, Barnes, and Burleigh Counties, North Dakota
MS 17391	2017	Kindred Water Tower Project: A Class III Cultural Resource Inventory, Cass County, North Dakota
MS 17401	2017	Cass County Electric Cooperative's Kindred Service Center KI301 Electric Line: A Class III Cultural Resource Inventory in Cass County, North Dakota
MS 17669	2017	2017 Addendum 2: 2016 WBI Energy Valley Expansion Project, North Dakota Class III Cultural Resources Inventory, Burleigh, Barnes, and Cass Counties, North Dakota

Appendix 4A		
Wahpeton Expansion Project Previously Recorded Cultural Resource Surveys within 2 miles of the Project		
Survey Manuscript Number	Year	Manuscript Title
MS 17688	2017	A Class III Intensive Cultural Resource Inventory of the Cass County Intersections Improvements Project in Cass County, North Dakota
MS 17939	2018	Valley Express Geothermal Building 2018 Class III Cultural Resources Inventory at West Fargo, Cass County, North Dakota
MS 18031	2018	Class III: Cultural Resources Inventory FAR Kindred DT—A 165th Avenue South East Kindred, Cass County, North Dakota
MS 18143	2018	Warren Substation: A Class III Cultural Resource Inventory, Cass County, North Dakota
MS 18394	2019	Sheyenne Street Road Diet Project in West Fargo, North Dakota, NDDOT Project UGP-8-992(041), PCN 22277: A Class III Cultural Resource Inventory, Cass County, North Dakota
MS 18631	2019	NDDOT Projects 8-094(099)337, 8-094(100)337, 8-094(034)009; PCN 22318, 22319, 22544; Bridge Replacements Class III Cultural Resource Inventory
MS 18673	2019	NDDOT PCN#22203: A Class III Cultural Resource Inventory for Project #8-094(098)342, Cass County, North Dakota
MS 18722	2020	A Class III Intensive Cultural Resource Inventory for the Kindred Lagoon Expansion Project in Cass County, North Dakota
MS 18849	2020	A Class I and Class III Cultural Resource Inventory for the NuStar North System Pipeline Relocation, Cass County, North Dakota
MS 18888	2020	Cass County Electric Cooperative: A Class III Cultural Resource Inventory for WO #73841 Cass Electric Line in Cass County, North Dakota
MS 18937	2020	Dynamic Environmental Associates, Inc. KFNW-AM Towers: A Class III Cultural Resource Inventory and Visual Impact Assessment in Cass County, North Dakota
MS 18942	2020	Cass County Electric Cooperative: A Class III Cultural Resource Inventory for WO #73881 Richland Electric Line in Cass and Richland Counties, North Dakota
MS 19107	2021	Final Report for the Fargo-Moorhead Flood Diversion Project, Cass County, North Dakota: Results of 2020 Class III Cultural Resources Investigations for the Southern Embankment I and Red River Structure
MS 19140	2021	A Class III Cultural Resource Inventory of the OIN 9752-9755 (Neil Thompson) Project in Cass County, North Dakota

**APPENDIX 4B CLASS III ARCHAEOLOGY REPORTS (TO BE FILED
AS A SUPPLEMENT; WILL BE FILED UNDER
SEPARATE COVER AS CONTROLLED
UNCLASSIFIED INFORMATION / PRIVILEGED AND
CONFIDENTIAL)**

**APPENDIX 4C CULTURAL RESOURCES SURVEY COVERAGE
OVERVIEW MAPS (*FILED UNDER SEPARATE COVER
AS CONTROLLED UNCLASSIFIED INFORMATION /
PRIVILEGED AND CONFIDENTIAL*)**

**APPENDIX 4D CLASS III HISTORIC STRUCTURES SURVEY REPORT
(*TO BE FILED AS A SUPPLEMENT*)**

**APPENDIX 4E COPIES OF CORRESPONDENCE WITH STATE
HISTORICAL SOCIETY OF NORTH DAKOTA**

September 8, 2021

Lisa Steckler
State Historic Society of North Dakota
North Dakota Heritage Center
612 East Boulevard Avenue
Bismarck, ND 58505-0830



Subject: WBI Energy Transmission, Inc.
Wahpeton Expansion Project – Work Plan
Cass and Richland Counties, North Dakota

Dear Ms. Steckler:

Please find enclosed a work plan for archaeological and architectural surveys being submitted on behalf of WBI Energy Transmission, Inc.'s (WBI Energy) in preparation of their upcoming Wahpeton Expansion Project, located in Cass and Richland Counties, North Dakota.

WBI Energy would appreciate your comments on the attached work plan. If you have any questions or comments, please contact me at 906-285-0361 or kevin.malloy@erm.com. Please direct written correspondence to Dr. Malloy's attention at:

Environmental Resources Management
222 South 9th Street
Suite 2900
Minneapolis, MN 55402

Sincerely,

Kevin Malloy
Senior Consultant

Enclosures: Work Plan

cc: Jill Linn, WBI Energy
Justin Moffett, ERM
Bill Stanyard, ERM
Emily Laird, ERM



September 8, 2021

Andrew Clark, State Archaeologist
State Historic Society of North Dakota
North Dakota Heritage Center
612 East Boulevard Avenue
Bismarck, ND 58505-0830

Subject: WBI Energy Transmission, Inc.
Wahpeton Expansion Project – Work Plan
Cass and Richland Counties, North Dakota

Dear Dr. Clark:

Please find enclosed a work plan for archaeological and architectural surveys being submitted on behalf of WBI Energy Transmission, Inc.'s (WBI Energy) in preparation of their upcoming Wahpeton Expansion Project, located in Cass and Richland Counties, North Dakota.

WBI Energy would appreciate your comments on the attached work plan. If you have any questions or comments, please contact me at 906-285-0361 or kevin.malloy@erm.com. Please direct written correspondence to Dr. Malloy's attention at:

Environmental Resources Management
222 South 9th Street
Suite 2900
Minneapolis, MN 55402

Sincerely,

Kevin Malloy
Senior Consultant

Enclosures: Work Plan

cc: Jill Linn, WBI Energy
Justin Moffett, ERM
Bill Stanyard, ERM
Emily Laird, ERM



WBI ENERGY TRANSMISSION, INC.
2010 Montana Avenue
Glendive, MT 59330
(406) 359-7200
www.wbienergy.com

September 13, 2021

State Historic Preservation Officer
North Dakota Heritage Center
612 East Boulevard Avenue
Bismarck, ND 58505-0830
(701) 328-2666
history@nd.gov

Subject: WBI Energy Transmission, Inc.
Proposed Wahpeton Expansion Project
Cass and Richland Counties, North Dakota

To Whom it may Concern:

WBI Energy Transmission, Inc. (WBI Energy) operates a natural gas transmission pipeline system in the Northern Plains and is proposing to expand its system in southeastern North Dakota. The Wahpeton Expansion Project will involve constructing approximately 60 miles of 12-inch diameter natural gas pipeline from WBI Energy's existing Mapleton Compressor Station near Mapleton, North Dakota, to a new delivery station near Wahpeton, North Dakota. The project will include minor modifications at the Mapleton Compressor Station and a new delivery station near Kindred, North Dakota. The enclosed map shows the preliminary proposed pipeline route and locations of project facilities.

This project will allow WBI Energy to transport an additional 20.6 million cubic feet of natural gas per day to help meet growing demand for natural gas in southeastern North Dakota. Montana-Dakota Utilities Co., a local distribution company, has engaged WBI Energy to construct this project to fulfill Wahpeton customers' needs for additional uninterrupted natural gas supply and to extend natural gas service to Kindred, at the request of city officials and residents.

The project is regulated by the Federal Energy Regulatory Commission (FERC) under Section 7(c) of the Natural Gas Act. Under the Energy Policy Act of 2005, FERC is the lead agency for coordinating federal authorizations and complying with the National Environmental Policy Act (NEPA) on natural gas pipeline projects subject to its jurisdiction. WBI Energy plans to submit an application with

the FERC in May 2022 for a Certificate of Public Convenience and Necessity to construct and operate the proposed pipeline and associated facilities. Applications for other federal or state authorizations will be submitted prior to or at approximately the same time as the FERC application, or on timelines defined by the appropriate federal or state regulations. Pending regulatory approvals, WBI Energy anticipates beginning construction in early 2024, with the new facilities in service by November 2024.

WBI Energy plans to file a request with the FERC to use the FERC's pre-filing process for the project. This process will provide agencies, landowners, and other stakeholders the opportunity to work with WBI Energy and the FERC to identify and resolve environmental issues prior to the filing of the Certificate application, which will result in a more efficient regulatory review process. WBI Energy plans to submit its request to use the pre-filing process in late September 2021 and anticipates receiving FERC's approval to use the process in early October 2021. Pending FERC's approval, WBI Energy will also hire and fund a third-party environmental consultant to assist FERC in the preparation of the NEPA document for the project.

WBI Energy has retained Environmental Resources Management (ERM) to provide environmental support services for the project. An ERM representative and/or FERC staff will be in touch with you in the near future to gauge your interest in participating in the pre-filing process, provide additional information, and discuss specific permitting and/or consultation requirements. In the meantime, if you have questions about the project, please contact me at 406-359-7332 or Maggie Suter of ERM at 410-972-4125.

Thank you for your time and assistance with this project.

Sincerely,



Jill Linn
Environmental Affairs
WBI Energy Transmission, Inc.

Enclosures: Project Overview Map

cc: Robbyn Reukauf, WBI Energy Transmission, Inc.
Maggie Suter, ERM

Kevin Malloy

From: Kevin Malloy
Sent: Tuesday, September 21, 2021 1:17 PM
To: Clark, Andrew
Subject: RE: Rejected email for data request

Thank you Andy! That is not a problem. We are hoping to begin survey October 4th. So there is still some time.

Best,
Kevin

Kevin Malloy, Ph.D.
Senior Consultant/Archaeologist

ERM
222 South 9th Street | Suite 2900 | Minneapolis, MN 55402
M 906.285.0361
E Kevin.Malloy@erm.com | **W** www.erm.com



From: Clark, Andrew <andrewclark@nd.gov>
Sent: Tuesday, September 21, 2021 1:16 PM
To: Kevin Malloy <Kevin.Malloy@erm.com>
Subject: RE: Rejected email for data request

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I have not, but it is on the list. Unfortunately, I won't be able to get to it today. So it will be later this week.

Andy

From: Kevin Malloy <Kevin.Malloy@erm.com>
Sent: Tuesday, September 21, 2021 1:14 PM
To: Clark, Andrew <andrewclark@nd.gov>; Reed, Timothy A. <treed@nd.gov>
Subject: RE: Rejected email for data request

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Andy,

Thanks for getting back to me! I appreciate it. I will upload it via the FTP site.

On another note, have you had a chance to review the workplan I submitted a couple weeks back? Does it look acceptable to you?

Thanks!
Kevin

Kevin Malloy, Ph.D.
Senior Consultant/Archaeologist

ERM
222 South 9th Street | Suite 2900 | Minneapolis, MN 55402
M 906.285.0361
E Kevin.Malloy@erm.com | **W** www.erm.com



From: Clark, Andrew <andrewclark@nd.gov>
Sent: Tuesday, September 21, 2021 1:11 PM
To: Kevin Malloy <Kevin.Malloy@erm.com>; Reed, Timothy A. <treed@nd.gov>
Subject: RE: Rejected email for data request

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Kevin,

Tim is out of the office for the week.

I suspect you're correct. Unfortunately, our email servers don't like some attachments, especially .zip files. So the best way to get us the files is through the FTP server.

Best,

Andy

Andrew Clark, PhD
Chief Archaeologist
Archaeology and Historic Preservation Division
State Historical Society of North Dakota
612 East Boulevard Avenue
Bismarck, North Dakota 58505-0830
701-328-3574

From: Kevin Malloy <Kevin.Malloy@erm.com>
Sent: Tuesday, September 21, 2021 10:30 AM
To: Reed, Timothy A. <treed@nd.gov>
Cc: Clark, Andrew <andrewclark@nd.gov>
Subject: Rejected email for data request

******* CAUTION:** This email originated from an outside source. Do not click links or open attachments unless you know they are safe. *********

Good morning Tim,

I have been trying to send an email for a data request for a new project in North Dakota, but it keeps getting rejected. I wonder if it's because I had attached the shapefiles to the email. Will it work if I upload the files to the FTP site?

Thank you!
Kevin

Kevin Malloy, Ph.D.
Senior Consultant/Archaeologist

ERM
222 South 9th Street | Suite 2900 | Minneapolis, MN 55402
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E Kevin.Malloy@erm.com | **W** www.erm.com



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ERM's web site: <http://www.erm.com>. To find out how ERM manages personal data, please review our [Privacy Policy](#)

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Kevin Malloy

From: Kevin Malloy
Sent: Friday, September 24, 2021 11:18 AM
To: Clark, Andrew
Cc: Steckler, Lisa L.
Subject: RE: Wahpeton Expansion Project Class III Work Plan
Attachments: WBI - MWP -Scope of Work_Draft 9-24-21_KM - Rev 1.pdf

Hi Andy,

Thank you for your comments and discussing them over the phone with me this morning. Please find attached the revised work plan. As I mentioned over the phone, we're aiming to go to survey on October 4th.

Let me know if you have any additional questions or comments.

Thanks again and have a good weekend!

Best,
Kevin

Kevin Malloy, Ph.D.
Senior Consultant/Archaeologist

ERM
222 South 9th Street | Suite 2900 | Minneapolis, MN 55402
M 906.285.0361
E Kevin.Malloy@erm.com | **W** www.erm.com



From: Clark, Andrew <andrewclark@nd.gov>
Sent: Thursday, September 23, 2021 4:22 PM
To: Kevin Malloy <Kevin.Malloy@erm.com>
Cc: Steckler, Lisa L. <lsteckler@nd.gov>
Subject: Wahpeton Expansion Project Class III Work Plan

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Hi Kevin,

Thank you for submitting WBI Energy Transmission's *Wahpeton Expansion Project: Class III Archaeological and Historic Architectural Inventory Work Plan*. We have reviewed the document, and overall the plan looks good. However, we do have a few comments. See below:

1. **2.1 Literature and Records Search:** There have been numerous studies in the Sheyenne Bend Area. Expand the background research to include relevant National Register nominations and peer-reviewed book chapters and journal articles. Look in journals such as the North Dakota Archaeological Association, Plains Anthropologist, and Minnesota Archaeologist.
2. **2.3.1 Shovel Testing** (page 4, second to last paragraph): Collect artifacts for laboratory analysis.
3. **2.3.2 Unit Excavation:** The methodology presented is generally acceptable, but it is difficult to account for all NRHP evaluation methods in a preliminary work plan. Proposed methods could include, but are not limited to: screening feature materials through a fine screen mesh, water screening when applicable, bulk soil samples for flotation analysis, and carbon samples, but will depend on context. The ND SHPO requests a specific testing plan, after the pedestrian survey and report review, on a site-by-site basis.
4. **2.3.4 Reporting:** We should discuss specific details on report format, site form submission, etc.
5. **Curation:** Include brief section on curation plan.

If you have any questions, please feel free to reach out. We look forward to hearing more about the project.

Best regards,

Andy

Andrew Clark, PhD
Chief Archaeologist
Archaeology and Historic Preservation Division
State Historical Society of North Dakota
612 East Boulevard Avenue
Bismarck, North Dakota 58505-0830
701-328-3574

Call Log

Log of Telephone Conversation



Call To/From Whom	Andrew Clark (SHSND)
Phone number	701.328.3574
Company	SHSND
ERM Contact	Kevin Malloy
Phone number	906-285-0361
Date	9/23/2021
Time of Conversation	3:33 pm
Reference	WBI Transmission, Inc. – Wahpeton Expansion Project (Project)

Signature

LOG OF CONVERSATION

Dr. Andy Clark (State Archaeologist SHSND) called Dr. Kevin Malloy (ERM) called to discuss the recently submitted work plan. Dr. Clark stated that overall the work plan looked acceptable. Nevertheless, he had a few edits that he wanted to see made to the document that included discussion of curation, an edit to the methodology for excavation of features, and in additional information about the background research to be conducted. He requested these edits before he signed off on the work plan. He stated that he would send a follow-up email detailing these edits further. Dr. Malloy thanked him.

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80 South Eighth Street
Minneapolis, MN 55402Telephone: +1 612 347 6789
Fax: +1 612 347 6780

www.erm.com

Call Log

Log of Telephone Conversation



Call To/From Whom	Andrew Clark (SHSND)
Phone number	701.328.3574
Company	SHSND
ERM Contact	Kevin Malloy
Phone number	906-285-0361
Date	9/24/2021
Time of Conversation	9:30 am
Reference	North Bakken Expansion Project (Project)
Signature	

LOG OF CONVERSATION

Dr. Andy Clark (State Archaeologist SHSND) called Dr. Kevin Malloy (ERM) to discuss the proposed work plan for the upcoming WBI Wahpeton Expansion Project. He stated that overall it looked good but preferred a few changes, including a discussion of curation.

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Call Log

Log of Telephone Conversation



Call To/From Whom	Andrew Clark (SHSND)
Phone number	701.328.3574
Company	SHSND
ERM Contact	Kevin Malloy
Phone number	906-285-0361
Date	9/24/2021
Time of Conversation	10:04; 10:36; 10:51 am
Reference	WBI Transmission, Inc. – Wahpeton Expansion Project (Project)
Signature	

LOG OF CONVERSATION

10:04 am

Dr. Kevin Malloy (ERM) called Dr. Andy Clark (State Archaeologist SHSND) called to further discuss the edits Dr. Clark had sent via email on 09/23/2021. Specifically, Dr. Malloy requested clarification about the Unit excavation and the process the state wanted ERM to follow. Dr. Clark clarified that he would prefer a site testing plan to be presented to the SHPO before any units were excavated.

10:36

Dr. Malloy called Dr. Clark back with another follow up question but did not reach him and left a message.

10:51

Dr. Clark returned Dr. Malloy's call. Dr. Malloy asked about the reporting comment and whether there were actually any specific details Dr. Clark wanted added to the workplan. Dr. Clark stated there were not but that he would like to discuss a protocol that would maximize efficiency and accuracy all around when submitting site forms. His hope was to limit the number of corrections that needed to be made to them.

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80 South Eighth Street
Minneapolis, MN 55402Telephone: +1 612 347 6789
Fax: +1 612 347 6780

www.erm.com

Call Log

Log of Telephone Conversation



Call To/From Whom	Andrew Clark (SHSND)
Phone number	701.328.3574
Company	SHSND
ERM Contact	Kevin Malloy
Phone number	906-285-0361
Date	9/29/2021
Time of Conversation	9:30 am
Reference	North Bakken Expansion Project (Project)
Signature	

LOG OF CONVERSATION

Dr. Andy Clark (State Archaeologist SHSND) called Dr. Kevin Malloy (ERM) to discuss the revised work plan for the upcoming WBI Wahpeton Expansion Project. He asked that I touch base with Ashenafi Zena about the curation agreement. He provided his phone number.

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Call Log

Log of Telephone Conversation



Call To/From Whom	Ashenafi Zena (SHSND)
Phone number	701.328.3506
Company	SHSND
ERM Contact	Kevin Malloy
Phone number	906-285-0361
Date	9/30/2021
Time of Conversation	10:00 am
Reference	North Bakken Expansion Project (Project)
Signature	

LOG OF CONVERSATION

Dr. Kevin Malloy (ERM) called Dr. Ashenafi Zena (SHSND) discuss the revised work plan for the upcoming WBI Wahpeton Expansion Project. They discussed the SHSND's needs for curation agreements how we would handle any artifacts that were collected during the survey. He provided notes to Dr. Malloy and sent them in an email.

DeAnn Thyse

From: Clark, Andrew <andrewclark@nd.gov>
Sent: Friday, October 1, 2021 8:17 AM
To: Zena, Ashenafi; Kevin Malloy
Subject: RE: Wahpeton Expansion Project Class III Work Plan

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Hi Kevin,

Thank you for your hard work on the plan. The work plan is acceptable. If you need anything, please let me know. Good luck with your fieldwork next week!

Andy

Andrew Clark, PhD
Chief Archaeologist
Archaeology and Historic Preservation Division
State Historical Society of North Dakota
612 East Boulevard Avenue
Bismarck, North Dakota 58505-0830
701-328-3574

From: Zena, Ashenafi <azena@nd.gov>
Sent: Friday, October 1, 2021 8:05 AM
To: Kevin Malloy <Kevin.Malloy@erm.com>
Cc: Clark, Andrew <andrewclark@nd.gov>
Subject: RE: Wahpeton Expansion Project Class III Work Plan

Kevin,
It sounds good to me.
Thanks,
Ashenafi

From: Kevin Malloy <Kevin.Malloy@erm.com>
Sent: Thursday, September 30, 2021 8:26 PM
To: Zena, Ashenafi <azena@nd.gov>
Cc: Clark, Andrew <andrewclark@nd.gov>
Subject: RE: Wahpeton Expansion Project Class III Work Plan

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Thank you Ashenafi!

I've revised the work plan again to reflect your notes. Please let me know if you both approve of the changes. We are set to start our survey on Monday morning. Thank you for your help!

Best,
Kevin

Kevin Malloy, Ph.D.
Senior Consultant/Archaeologist

ERM

222 South 9th Street | Suite 2900 | Minneapolis, MN 55402

M 906.285.0361

E Kevin.Malloy@erm.com | W www.erm.com



From: Zena, Ashenafi <azena@nd.gov>
Sent: Thursday, September 30, 2021 5:09 PM
To: Kevin Malloy <Kevin.Malloy@erm.com>
Cc: Clark, Andrew <andrewclark@nd.gov>
Subject: RE: Wahpeton Expansion Project Class III Work Plan

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Kevin,

Here are a couple of notes:

- 1) Artifacts recovered from testing on private land by archaeologists or archaeological research firms, will not be curated at the SHSND unless accompanied by a **Gift Agreement form** signed by the landowner, which conveys legal title of the collection, without condition or restriction, to the Society.
- 2) We require depositors to submit a **complete collection** for long-term curation. A complete collection includes:

- All three-dimensional objects/artifacts
- Survey forms and/or excavation records
- Field logs and notes
- Maps depicting locations and boundaries
- Photographs, negatives, and/or slides
- Analysis records
- Conservation records
- Artifact catalog (hard copy and digital copy)
- Correspondence records

See our guidelines for submitting archaeological collections for details.
Let me know if you have questions.

Best,
Ashenafi Zena, Ph.D., RPA 18024
Archaeology Collections Manager
Archaeology and Historic Preservation
State Historical Society of North Dakota
Bismarck, ND 58505
azena@nd.gov

From: Kevin Malloy <Kevin.Malloy@erm.com>
Sent: Thursday, September 30, 2021 4:35 PM
To: Clark, Andrew <andrewclark@nd.gov>
Cc: Zena, Ashenafi <azena@nd.gov>
Subject: RE: Wahpeton Expansion Project Class III Work Plan

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Hi Andy,

Thanks for chatting with me earlier. I spoke with Ashenafi and he detailed the curation procedure. Per our conversation, I updated the curation information in the Work Plan. Please let me know if you have any other questions.

Best,
Kevin

Kevin Malloy, Ph.D.
Senior Consultant/Archaeologist

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222 South 9th Street | Suite 2900 | Minneapolis, MN 55402
M 906.285.0361
E Kevin.Malloy@erm.com | **W** www.erm.com



From: Clark, Andrew <andrewclark@nd.gov>
Sent: Thursday, September 30, 2021 1:48 PM
To: Kevin Malloy <Kevin.Malloy@erm.com>
Cc: Zena, Ashenafi <azena@nd.gov>
Subject: RE: Wahpeton Expansion Project Class III Work Plan

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Hi Kevin,

Ashenafi Zena is our head of collections and is the point of contact for curation agreements. I've Cc'd him on this email, and his number is (701) 328-3506.

Thanks!

Andy

Andrew Clark, PhD
Chief Archaeologist
Archaeology and Historic Preservation Division
State Historical Society of North Dakota
612 East Boulevard Avenue
Bismarck, North Dakota 58505-0830
701-328-3574

From: Kevin Malloy <Kevin.Malloy@erm.com>
Sent: Friday, September 24, 2021 11:18 AM
To: Clark, Andrew <andrewclark@nd.gov>
Cc: Steckler, Lisa L. <lsteckler@nd.gov>
Subject: RE: Wahpeton Expansion Project Class III Work Plan

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Hi Andy,

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Let me know if you have any additional questions or comments.

Thanks again and have a good weekend!

Best,
Kevin

Kevin Malloy, Ph.D.
Senior Consultant/Archaeologist

ERM

222 South 9th Street | Suite 2900 | Minneapolis, MN 55402

M 906.285.0361

E Kevin.Malloy@erm.com | W www.erm.com



From: Clark, Andrew <andrewclark@nd.gov>
Sent: Thursday, September 23, 2021 4:22 PM
To: Kevin Malloy <Kevin.Malloy@erm.com>
Cc: Steckler, Lisa L. <lsteckler@nd.gov>
Subject: Wahpeton Expansion Project Class III Work Plan

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Hi Kevin,

Thank you for submitting WBI Energy Transmission's *Wahpeton Expansion Project: Class III Archaeological and Historic Architectural Inventory Work Plan*. We have reviewed the document, and overall the plan looks good. However, we do have a few comments. See below:

1. **2.1 Literature and Records Search:** There have been numerous studies in the Sheyenne Bend Area. Expand the background research to include relevant National Register nominations and peer-reviewed book chapters and journal articles. Look in journals such as the North Dakota Archaeological Association, Plains Anthropologist, and Minnesota Archaeologist.
2. **2.3.1 Shovel Testing** (page 4, second to last paragraph): Collect artifacts for laboratory analysis.
3. **2.3.2 Unit Excavation:** The methodology presented is generally acceptable, but it is difficult to account for all NRHP evaluation methods in a preliminary work plan. Proposed methods could include, but are not limited to: screening feature materials through a fine screen mesh, water screening when applicable, bulk soil samples for flotation analysis, and carbon samples, but will depend on context. The ND SHPO requests a specific testing plan, after the pedestrian survey and report review, on a site-by-site basis.
4. **2.3.4 Reporting:** We should discuss specific details on report format, site form submission, etc.

5. **Curation:** Include brief section on curation plan.

If you have any questions, please feel free to reach out. We look forward to hearing more about the project.

Best regards,

Andy

Andrew Clark, PhD
Chief Archaeologist
Archaeology and Historic Preservation Division
State Historical Society of North Dakota
612 East Boulevard Avenue
Bismarck, North Dakota 58505-0830
701-328-3574

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Please visit:
ERM's web site: <http://www.erm.com>. To find out how ERM manages personal data, please review our [Privacy Policy](#)

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February 8, 2022

Dr. Bill Peterson
Director and State Historic Preservation Officer
State Historical Society of North Dakota
612 East Boulevard Ave.
Bismarck, North Dakota 58505

Subject: WBI Energy Transmission, Inc.
Proposed Wahpeton Expansion Project
Cass and Richland Counties, North Dakota
Project No.: 0611161

Dear Dr. Peterson:

On September 13, 2021, WBI Energy Transmission, Inc. (WBI Energy) sent your office a project introduction letter. The Wahpeton Expansion Project (Project) will involve constructing approximately 60.6 miles of 12-inch diameter natural gas pipeline from WBI Energy's existing Mapleton Compressor Station near Mapleton, North Dakota, to a new delivery station near Wahpeton, North Dakota. The Project will also include minor modifications at the Mapleton Compressor Station and a new delivery station near Kindred, North Dakota.

Cultural resource surveys have been completed for a majority of the Project in accordance with the Scope of Work approved by the State Historical Society of North Dakota, with the remainder anticipated to be completed during the 2022 field season.

The intent of this letter is to request your comments on the enclosed Unanticipated Discovery Plan that outlines the protocols to be implemented during construction of the Project if an unanticipated cultural resources discovery is found.

On September 27, 2021, the Federal Energy Regulatory Commission (FERC) granted a request by WBI Energy to use the FERC's pre-filing process for the project. This process allows for coordination in the planning phases of a project, prior to the submittal of an application to the FERC for the Project. Any comments or information that you provide will be sent to FERC to assist in the review of the Project.

If you have any questions, comments, or concerns about the enclosed *Unanticipated Discovery Plan*, please contact me at 406-359-7332 or Maggie Suter of Environmental Resources Management, Inc. at 410-972-4125.

Thank you for your time and assistance with this project.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jill Linn".

Jill Linn
Environmental Affairs
WBI Energy Transmission, Inc.

Enclosure: Unanticipated Discovery Plan

cc: Robbyn Reukauf, WBI Energy Transmission, Inc.
Maggie Suter, Environmental Resources Management, Inc.
Fern Swenson, State Historical Society of North Dakota

DeAnn Thyse

From: TrackingUpdates@fedex.com
Sent: Monday, February 14, 2022 9:40 AM
To: DeAnn Thyse
Subject: FedEx Shipment 776010712854 Delivered

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

This tracking update has been requested by:

Company Name: ERM
Name: DeAnn Thyse
E-mail: deann.thyse@erm.com

Our records indicate that the following shipment has been delivered:

Reference: 0611161/73/04
Ship date: Feb 10, 2022
Signed for by: Z.UNTERSCHER
Delivery location: BISMARCK, ND
Delivered to: Shipping/Receiving
Delivery date: Mon, 2/14/2022 9:38 am
Service type: FedEx Standard Overnight®
Packaging type: FedEx® Envelope
Number of pieces: 1
Weight: 0.50 lb.
Special handling/Services: Deliver Weekday
Standard transit: 2/11/2022 by 4:30 pm

Tracking number: 776010712854

Shipper Information	Recipient Information
DeAnn Thyse	Dr. Bill Peterson
ERM	SHSND
222 South 9th Street	612 East Boulevard Ave
Suite 2900	BISMARCK
MINNEAPOLIS	ND
MN	US
US	58505
55402	

February 8, 2022

Dr. Bill Peterson
Director and State Historic Preservation Officer
State Historical Society of North Dakota
612 East Boulevard Ave.
Bismarck, North Dakota 58505

Subject: WBI Energy Transmission, Inc.
Proposed Wahpeton Expansion Project
Cass and Richland Counties, North Dakota
Project No.: 0611161

Dear Dr. Peterson:

On September 13, 2021, WBI Energy Transmission, Inc. (WBI Energy) sent your office a project introduction letter. The Wahpeton Expansion Project (Project) will involve constructing approximately 60.6 miles of 12-inch diameter natural gas pipeline from WBI Energy's existing Mapleton Compressor Station near Mapleton, North Dakota, to a new delivery station near Wahpeton, North Dakota. The Project will also include minor modifications at the Mapleton Compressor Station and a new delivery station near Kindred, North Dakota.

Cultural resource surveys have been completed for a majority of the Project in accordance with the Scope of Work approved by the State Historical Society of North Dakota, with the remainder anticipated to be completed during the 2022 field season.

The intent of this letter is to request your comments on the enclosed Unanticipated Discovery Plan that outlines the protocols to be implemented during construction of the Project if an unanticipated cultural resources discovery is found.

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If you have any questions, comments, or concerns about the enclosed *Unanticipated Discovery Plan*, please contact me at 406-359-7332 or Maggie Suter of Environmental Resources Management, Inc. at 410-972-4125.

Thank you for your time and assistance with this project.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jill Linn".

Jill Linn
Environmental Affairs
WBI Energy Transmission, Inc.

Enclosure: Unanticipated Discovery Plan

cc: Robbyn Reukauf, WBI Energy Transmission, Inc.
Maggie Suter, Environmental Resources Management, Inc.
✓ Fern Swenson, State Historical Society of North Dakota

DeAnn Thyse

From: TrackingUpdates@fedex.com
Sent: Monday, February 14, 2022 9:40 AM
To: DeAnn Thyse
Subject: FedEx Shipment 776010760709 Delivered

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

This tracking update has been requested by:

Company Name: ERM
Name: DeAnn Thyse
E-mail: deann.thyse@erm.com

Our records indicate that the following shipment has been delivered:

Reference: 0611161/73/04
Ship date: Feb 10, 2022
Signed for by: Z.UNTERSCHER
Delivery location: BISMARCK, ND
Delivered to: Shipping/Receiving
Delivery date: Mon, 2/14/2022 9:38 am
Service type: FedEx Standard Overnight®
Packaging type: FedEx® Envelope
Number of pieces: 1
Weight: 0.50 lb.
Special handling/Services: Deliver Weekday
Standard transit: 2/11/2022 by 4:30 pm

Tracking number: 776010760709

Shipper Information	Recipient Information
DeAnn Thyse	Fern Swenson, Deputy SHPO
ERM	SHSND
222 South 9th Street	612 East Boulevard Ave
Suite 2900	BISMARCK
MINNEAPOLIS	ND
MN	US
US	58505
55402	

**APPENDIX 4F COPIES OF CORRESPONDENCE WITH FEDERALLY
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September 13, 2021

Assiniboine and Sioux Tribes of the Fort Peck Reservation
Tribal Historic Preservation Office
PO Box 1027
Poplar, MT 59255-1027
Phone: (406) 768-2382

Subject: WBI Energy Transmission, Inc.
Proposed Wahpeton Expansion Project – Project Introduction Letter
Cass and Richland Counties, North Dakota

Dear THPO Officer:

WBI Energy Transmission, Inc. (WBI Energy) operates a natural gas transmission pipeline system in the Northern Plains and is proposing to expand its system in southeastern North Dakota. The Wahpeton Expansion Project will involve constructing approximately 60 miles of 12-inch diameter natural gas pipeline from WBI Energy's existing Mapleton Compressor Station near Mapleton, North Dakota, to a new delivery station near Wahpeton, North Dakota. The project will include minor modifications at the Mapleton Compressor Station and a new delivery station near Kindred, North Dakota. The enclosed map shows the preliminary proposed pipeline route and locations of project facilities.

This project will allow WBI Energy to transport an additional 20.6 million cubic feet of natural gas per day to help meet growing demand for natural gas in southeastern North Dakota. Montana-Dakota Utilities Co., a local distribution company, has engaged WBI Energy to construct this project to fulfill Wahpeton customers' needs for additional uninterrupted natural gas supply and to extend natural gas service to Kindred, at the request of city officials and residents.

The project will be regulated by the Federal Energy Regulatory Commission (FERC) under Section 7(c) of the Natural Gas Act. Under the Energy Policy Act of 2005, FERC is the lead agency for coordinating federal authorizations and complying with the National Environmental Policy Act (NEPA) on natural gas pipeline projects subject to its jurisdiction. WBI Energy plans to submit an application with the FERC in May 2022 for a Certificate of Public Convenience and Necessity to construct and operate the proposed pipeline and associated facilities. Applications for other federal or state authorizations will be submitted prior to or at approximately the same time as the FERC application, or on timelines defined by the appropriate federal or state regulations. Pending regulatory approvals, WBI Energy anticipates beginning construction in early 2024, with the new facilities in service by November 2024.

In addition to NEPA, the project is subject to review by the FERC under Section 106 of the National Historic Preservation Act (NHPA). Section 106 requires federal agencies like the FERC to consider impacts on historic properties in agency decision making. To facilitate the FERC's review of the project, WBI Energy is gathering information on the locations of cultural resource sites that may be affected by construction of the pipeline and associated facilities. WBI Energy respectfully requests your input regarding the potential of the project to affect archaeological sites, burials, and traditional cultural properties of concern to the Assiniboine and Sioux Tribes of the Fort Peck Reservation. WBI Energy also is requesting information on cultural resource sites from the State Historical Society of North Dakota. Additionally, WBI Energy plans to conduct an archaeological field survey this fall to identify sites along the pipeline route and would like to extend an invitation to Assiniboine and Sioux Tribes of the Fort Peck Reservation to participate in the survey effort.

While the regulations for implementing Section 106 (36 Code of Federal Regulations 800) allow companies like WBI Energy (and their consultants) to gather information, the FERC is responsible for complying with the NHPA. Additionally, the FERC, not WBI Energy, is responsible for government-to-government consultations with Indian Tribes. After the initiation of the FERC's involvement in the project (e.g., through the pre-filing process), the FERC will contact you through a notice and/or an individual project letter.

WBI Energy has retained Environmental Resources Management (ERM) to provide environmental support services for the Wahpeton Expansion Project. If you would like to participate in upcoming survey efforts, have questions, comments, or concerns about the project, or have information on the locations of cultural resource sites along the proposed pipeline route, please contact me at 406-359-7332 or jill.linn@wbienergy.com or contact Kevin Malloy of ERM at 906-285-0361 or kevin.malloy@erm.com. Any comments or information you provide will be sent to the FERC. If you would like to communicate directly with the FERC's natural gas archaeological staff to discuss its cultural resource review and consultation processes, please contact Eric Howard, Tribal Coordinator, at 202-502-6263 or eric.howard@ferc.gov.

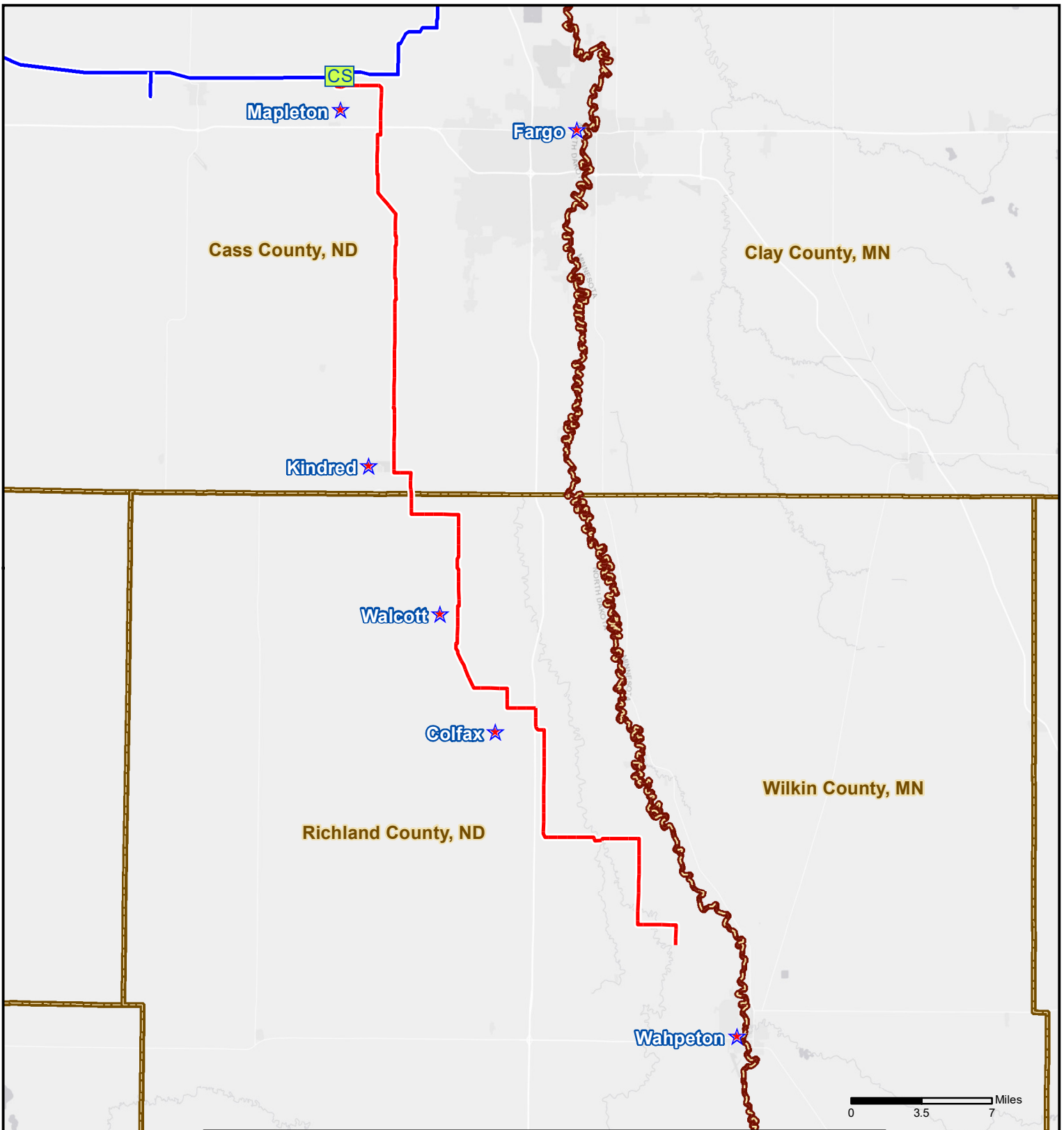
Thank you for your time and assistance with this project.

Sincerely,

Jill Linn
Environmental Affairs
WBI Energy Transmission, Inc.

Enclosures: Project Overview Map

cc: Robbyn Reukauf, WBI Energy Transmission, Inc.
 Maggie Suter, ERM
 Kevin Malloy, ERM



WBI ENERGY
TRANSMISSION
An AEP/ExxonMobil Group Company

N

1 in = 35,000 feet

Wahpeton Expansion Project

Project Overview Map

Legend

CS Mapleton Compressor Station	State Boundaries
Proposed Pipeline	County Boundaries
Existing WBI Pipeline	

Cass & Richland Counties, ND

PROJECT AREA OVERVIEW

Mapleton
Wahpeton

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September 13, 2021

Cheyenne River Sioux Tribe
Tribal Historic Preservation Office
PO Box 590
Eagle Butte, SD 57625-0590
Phone: (605) 964-7554

Subject: WBI Energy Transmission, Inc.
Proposed Wahpeton Expansion Project – Project Introduction Letter
Cass and Richland Counties, North Dakota

Dear THPO Officer:

WBI Energy Transmission, Inc. (WBI Energy) operates a natural gas transmission pipeline system in the Northern Plains and is proposing to expand its system in southeastern North Dakota. The Wahpeton Expansion Project will involve constructing approximately 60 miles of 12-inch diameter natural gas pipeline from WBI Energy's existing Mapleton Compressor Station near Mapleton, North Dakota, to a new delivery station near Wahpeton, North Dakota. The project will include minor modifications at the Mapleton Compressor Station and a new delivery station near Kindred, North Dakota. The enclosed map shows the preliminary proposed pipeline route and locations of project facilities.

This project will allow WBI Energy to transport an additional 20.6 million cubic feet of natural gas per day to help meet growing demand for natural gas in southeastern North Dakota. Montana-Dakota Utilities Co., a local distribution company, has engaged WBI Energy to construct this project to fulfill Wahpeton customers' needs for additional uninterrupted natural gas supply and to extend natural gas service to Kindred, at the request of city officials and residents.

The project will be regulated by the Federal Energy Regulatory Commission (FERC) under Section 7(c) of the Natural Gas Act. Under the Energy Policy Act of 2005, FERC is the lead agency for coordinating federal authorizations and complying with the National Environmental Policy Act (NEPA) on natural gas pipeline projects subject to its jurisdiction. WBI Energy plans to submit an application with the FERC in May 2022 for a Certificate of Public Convenience and Necessity to construct and operate the proposed pipeline and associated facilities. Applications for other federal or state authorizations will be submitted prior to or at approximately the same time as the FERC application, or on timelines defined by the appropriate federal or state regulations. Pending regulatory approvals, WBI Energy anticipates beginning construction in early 2024, with the new facilities in service by November 2024.

In addition to NEPA, the project is subject to review by the FERC under Section 106 of the National Historic Preservation Act (NHPA). Section 106 requires federal agencies like the FERC to consider impacts on historic properties in agency decision making. To facilitate the FERC's review of the project, WBI Energy is gathering information on the locations of cultural resource sites that may be affected by construction of the pipeline and associated facilities. WBI Energy respectfully requests your input regarding the potential of the project to affect archaeological sites, burials, and traditional cultural properties of concern to the Cheyenne River Sioux Tribe. WBI Energy also is requesting information on cultural resource sites from the State Historical Society of North Dakota. Additionally, WBI Energy plans to conduct an archaeological field survey this fall to identify sites along the pipeline route and would like to extend an invitation to Cheyenne River Sioux Tribe to participate in the survey effort.

While the regulations for implementing Section 106 (36 Code of Federal Regulations 800) allow companies like WBI Energy (and their consultants) to gather information, the FERC is responsible for complying with the NHPA. Additionally, the FERC, not WBI Energy, is responsible for government-to-government consultations with Indian Tribes. After the initiation of the FERC's involvement in the project (e.g., through the pre-filing process), the FERC will contact you through a notice and/or an individual project letter.

WBI Energy has retained Environmental Resources Management (ERM) to provide environmental support services for the Wahpeton Expansion Project. If you would like to participate in upcoming survey efforts, have questions, comments, or concerns about the project, or have information on the locations of cultural resource sites along the proposed pipeline route, please contact me at 406-359-7332 or jill.linn@wbienergy.com or contact Kevin Malloy of ERM at 906-285-0361 or kevin.malloy@erm.com. Any comments or information you provide will be sent to the FERC. If you would like to communicate directly with the FERC's natural gas archaeological staff to discuss its cultural resource review and consultation processes, please contact Eric Howard, Tribal Coordinator, at 202-502-6263 or eric.howard@ferc.gov.

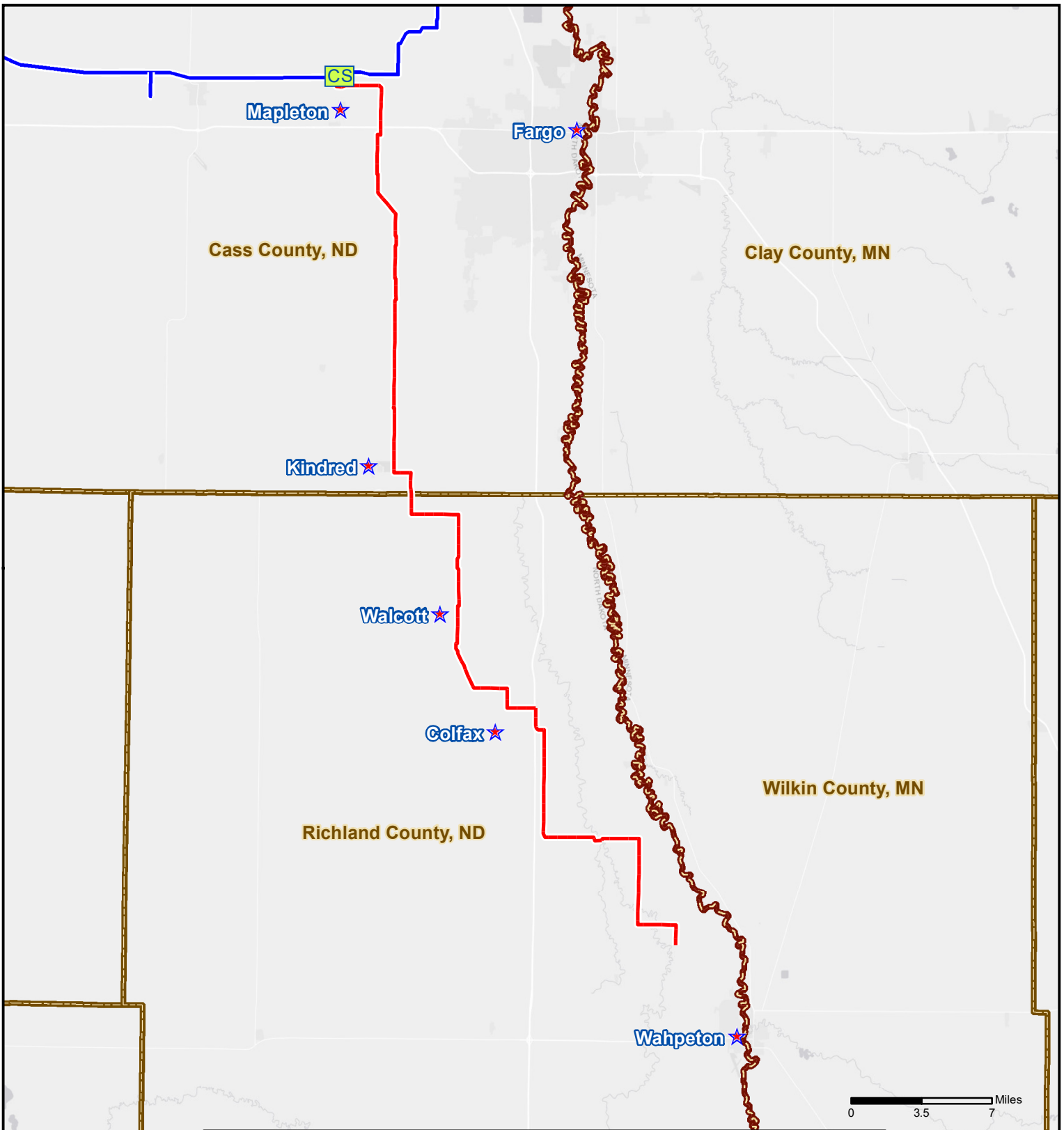
Thank you for your time and assistance with this project.

Sincerely,

Jill Linn
Environmental Affairs
WBI Energy Transmission, Inc.

Enclosures: Project Overview Map

cc: Robbyn Reukauf, WBI Energy Transmission, Inc.
Maggie Suter, ERM
Kevin Malloy, ERM



WBI ENERGY
TRANSMISSION
An AEP/ExxonMobil Group Company

N
↑

1 in = 35,000 feet

Wahpeton Expansion Project Project Overview Map

Legend

CS Mapleton Compressor Station	State Boundaries
Proposed Pipeline	County Boundaries
Existing WBI Pipeline	

**Cass & Richland
Counties, ND**

PROJECT AREA OVERVIEW

Mapleton
Wahpeton

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September 17, 2021 at 9:12 am
EAGLE BUTTE, SD 57625

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September 13, 2021

Fort Belknap Indian Community
Tribal Historic Preservation Officer
656 Agency Main, Harlem, MT 59526
Phone: (406) 353-2205

Subject: WBI Energy Transmission, Inc.
Proposed Wahpeton Expansion Project – Project Introduction Letter
Cass and Richland Counties, North Dakota

Dear THPO Officer:

WBI Energy Transmission, Inc. (WBI Energy) operates a natural gas transmission pipeline system in the Northern Plains and is proposing to expand its system in southeastern North Dakota. The Wahpeton Expansion Project will involve constructing approximately 60 miles of 12-inch diameter natural gas pipeline from WBI Energy's existing Mapleton Compressor Station near Mapleton, North Dakota, to a new delivery station near Wahpeton, North Dakota. The project will include minor modifications at the Mapleton Compressor Station and a new delivery station near Kindred, North Dakota. The enclosed map shows the preliminary proposed pipeline route and locations of project facilities.

This project will allow WBI Energy to transport an additional 20.6 million cubic feet of natural gas per day to help meet growing demand for natural gas in southeastern North Dakota. Montana-Dakota Utilities Co., a local distribution company, has engaged WBI Energy to construct this project to fulfill Wahpeton customers' needs for additional uninterrupted natural gas supply and to extend natural gas service to Kindred, at the request of city officials and residents.

The project will be regulated by the Federal Energy Regulatory Commission (FERC) under Section 7(c) of the Natural Gas Act. Under the Energy Policy Act of 2005, FERC is the lead agency for coordinating federal authorizations and complying with the National Environmental Policy Act (NEPA) on natural gas pipeline projects subject to its jurisdiction. WBI Energy plans to submit an application with the FERC in May 2022 for a Certificate of Public Convenience and Necessity to construct and operate the proposed pipeline and associated facilities. Applications for other federal or state authorizations will be submitted prior to or at approximately the same time as the FERC application, or on timelines defined by the appropriate federal or state regulations. Pending regulatory approvals, WBI Energy anticipates beginning construction in early 2024, with the new facilities in service by November 2024.

In addition to NEPA, the project is subject to review by the FERC under Section 106 of the National Historic Preservation Act (NHPA). Section 106 requires federal agencies like the FERC to consider impacts on historic properties in agency decision making. To facilitate the FERC's review of the project, WBI Energy is gathering information on the locations of cultural resource sites that may be affected by construction of the pipeline and associated facilities. WBI Energy respectfully requests your input regarding the potential of the project to affect archaeological sites, burials, and traditional cultural properties of concern to the Fort Belknap Indian Community. WBI Energy also is requesting information on cultural resource sites from the State Historical Society of North Dakota. Additionally, WBI Energy plans to conduct an archaeological field survey this fall to identify sites along the pipeline route and would like to extend an invitation to Fort Belknap Indian Community to participate in the survey effort.

While the regulations for implementing Section 106 (36 Code of Federal Regulations 800) allow companies like WBI Energy (and their consultants) to gather information, the FERC is responsible for complying with the NHPA. Additionally, the FERC, not WBI Energy, is responsible for government-to-government consultations with Indian Tribes. After the initiation of the FERC's involvement in the project (e.g., through the pre-filing process), the FERC will contact you through a notice and/or an individual project letter.

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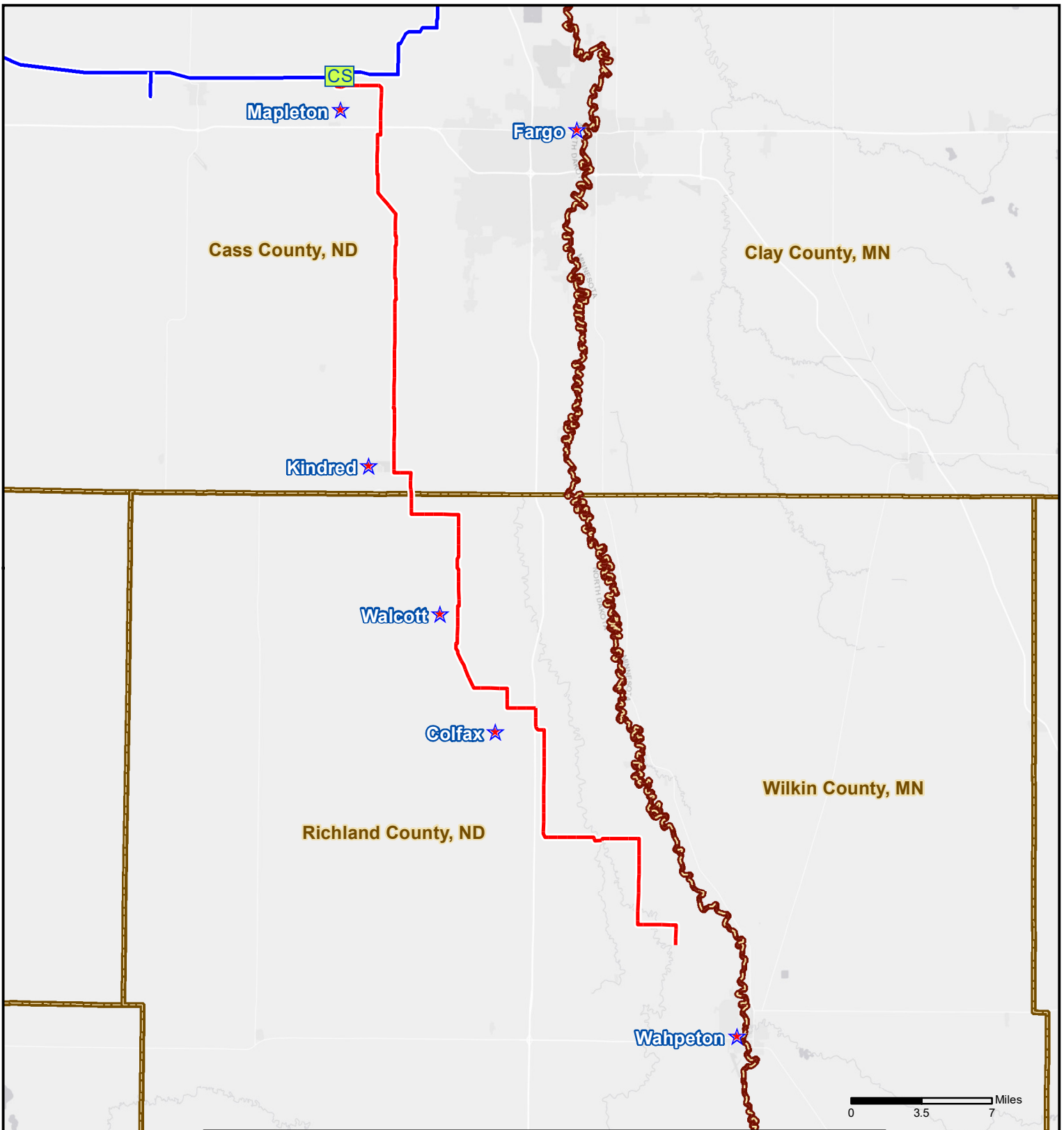
Thank you for your time and assistance with this project.

Sincerely,

Jill Linn
Environmental Affairs
WBI Energy Transmission, Inc.

Enclosures: Project Overview Map

cc: Robbyn Reukauf, WBI Energy Transmission, Inc.
 Maggie Suter, ERM
 Kevin Malloy, ERM



WBI ENERGY
TRANSMISSION
An AEP/ExxonMobil Group Company

N

1 in = 35,000 feet

Wahpeton Expansion Project

Project Overview Map

Legend

CS Mapleton Compressor Station	State Boundaries
Proposed Pipeline	County Boundaries
Existing WBI Pipeline	

Cass & Richland Counties, ND

PROJECT AREA OVERVIEW

Mapleton
Wahpeton

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HARLEM, MT 59526

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WBI ENERGY TRANSMISSION, INC.
2010 Montana Avenue
Glendive, MT 59330
(406) 359-7200
www.wbienergy.com

September 13, 2021

Northern Arapaho Nation
Tribal Historic Preservation Office
PO Box 396
Fort Washakie, WY 82514-0396
Phone: (307) 856-1628

Subject: WBI Energy Transmission, Inc.
Proposed Wahpeton Expansion Project – Project Introduction Letter
Cass and Richland Counties, North Dakota

Dear THPO Officer:

WBI Energy Transmission, Inc. (WBI Energy) operates a natural gas transmission pipeline system in the Northern Plains and is proposing to expand its system in southeastern North Dakota. The Wahpeton Expansion Project will involve constructing approximately 60 miles of 12-inch diameter natural gas pipeline from WBI Energy's existing Mapleton Compressor Station near Mapleton, North Dakota, to a new delivery station near Wahpeton, North Dakota. The project will include minor modifications at the Mapleton Compressor Station and a new delivery station near Kindred, North Dakota. The enclosed map shows the preliminary proposed pipeline route and locations of project facilities.

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The project will be regulated by the Federal Energy Regulatory Commission (FERC) under Section 7(c) of the Natural Gas Act. Under the Energy Policy Act of 2005, FERC is the lead agency for coordinating federal authorizations and complying with the National Environmental Policy Act (NEPA) on natural gas pipeline projects subject to its jurisdiction. WBI Energy plans to submit an application with the FERC in May 2022 for a Certificate of Public Convenience and Necessity to construct and operate the proposed pipeline and associated facilities. Applications for other federal or state authorizations will be submitted prior to or at approximately the same time as the FERC application, or on timelines defined by the appropriate federal or state regulations. Pending regulatory approvals, WBI Energy anticipates beginning construction in early 2024, with the new facilities in service by November 2024.

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While the regulations for implementing Section 106 (36 Code of Federal Regulations 800) allow companies like WBI Energy (and their consultants) to gather information, the FERC is responsible for complying with the NHPA. Additionally, the FERC, not WBI Energy, is responsible for government-to-government consultations with Indian Tribes. After the initiation of the FERC's involvement in the project (e.g., through the pre-filing process), the FERC will contact you through a notice and/or an individual project letter.

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Thank you for your time and assistance with this project.

Sincerely,

Jill Linn
Environmental Affairs
WBI Energy Transmission, Inc.

Enclosures: Project Overview Map

cc: Robbyn Reukauf, WBI Energy Transmission, Inc.
Maggie Suter, ERM
Kevin Malloy, ERM

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Tracking Number: 9405509202121054810761

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September 13, 2021

Northern Cheyenne Tribe
Tribal Historic Preservation Office
PO Box 128
Lame Deer, MT 59043-0128
Phone: (406) 477-4839

Subject: WBI Energy Transmission, Inc.
Proposed Wahpeton Expansion Project – Project Introduction Letter
Cass and Richland Counties, North Dakota

Dear THPO Officer:

WBI Energy Transmission, Inc. (WBI Energy) operates a natural gas transmission pipeline system in the Northern Plains and is proposing to expand its system in southeastern North Dakota. The Wahpeton Expansion Project will involve constructing approximately 60 miles of 12-inch diameter natural gas pipeline from WBI Energy's existing Mapleton Compressor Station near Mapleton, North Dakota, to a new delivery station near Wahpeton, North Dakota. The project will include minor modifications at the Mapleton Compressor Station and a new delivery station near Kindred, North Dakota. The enclosed map shows the preliminary proposed pipeline route and locations of project facilities.

This project will allow WBI Energy to transport an additional 20.6 million cubic feet of natural gas per day to help meet growing demand for natural gas in southeastern North Dakota. Montana-Dakota Utilities Co., a local distribution company, has engaged WBI Energy to construct this project to fulfill Wahpeton customers' needs for additional uninterrupted natural gas supply and to extend natural gas service to Kindred, at the request of city officials and residents.

The project will be regulated by the Federal Energy Regulatory Commission (FERC) under Section 7(c) of the Natural Gas Act. Under the Energy Policy Act of 2005, FERC is the lead agency for coordinating federal authorizations and complying with the National Environmental Policy Act (NEPA) on natural gas pipeline projects subject to its jurisdiction. WBI Energy plans to submit an application with the FERC in May 2022 for a Certificate of Public Convenience and Necessity to construct and operate the proposed pipeline and associated facilities. Applications for other federal or state authorizations will be submitted prior to or at approximately the same time as the FERC application, or on timelines defined by the appropriate federal or state regulations. Pending regulatory approvals, WBI Energy anticipates beginning construction in early 2024, with the new facilities in service by November 2024.

In addition to NEPA, the project is subject to review by the FERC under Section 106 of the National Historic Preservation Act (NHPA). Section 106 requires federal agencies like the FERC to consider impacts on historic properties in agency decision making. To facilitate the FERC's review of the project, WBI Energy is gathering information on the locations of cultural resource sites that may be affected by construction of the pipeline and associated facilities. WBI Energy respectfully requests your input regarding the potential of the project to affect archaeological sites, burials, and traditional cultural properties of concern to the Northern Cheyenne Tribe. WBI Energy also is requesting information on cultural resource sites from the State Historical Society of North Dakota. Additionally, WBI Energy plans to conduct an archaeological field survey this fall to identify sites along the pipeline route and would like to extend an invitation to Northern Cheyenne Tribe to participate in the survey effort.

While the regulations for implementing Section 106 (36 Code of Federal Regulations 800) allow companies like WBI Energy (and their consultants) to gather information, the FERC is responsible for complying with the NHPA. Additionally, the FERC, not WBI Energy, is responsible for government-to-government consultations with Indian Tribes. After the initiation of the FERC's involvement in the project (e.g., through the pre-filing process), the FERC will contact you through a notice and/or an individual project letter.

WBI Energy has retained Environmental Resources Management (ERM) to provide environmental support services for the Wahpeton Expansion Project. If you would like to participate in upcoming survey efforts, have questions, comments, or concerns about the project, or have information on the locations of cultural resource sites along the proposed pipeline route, please contact me at 406-359-7332 or jill.linn@wbienergy.com or contact Kevin Malloy of ERM at 906-285-0361 or kevin.malloy@erm.com. Any comments or information you provide will be sent to the FERC. If you would like to communicate directly with the FERC's natural gas archaeological staff to discuss its cultural resource review and consultation processes, please contact Eric Howard, Tribal Coordinator, at 202-502-6263 or eric.howard@ferc.gov.

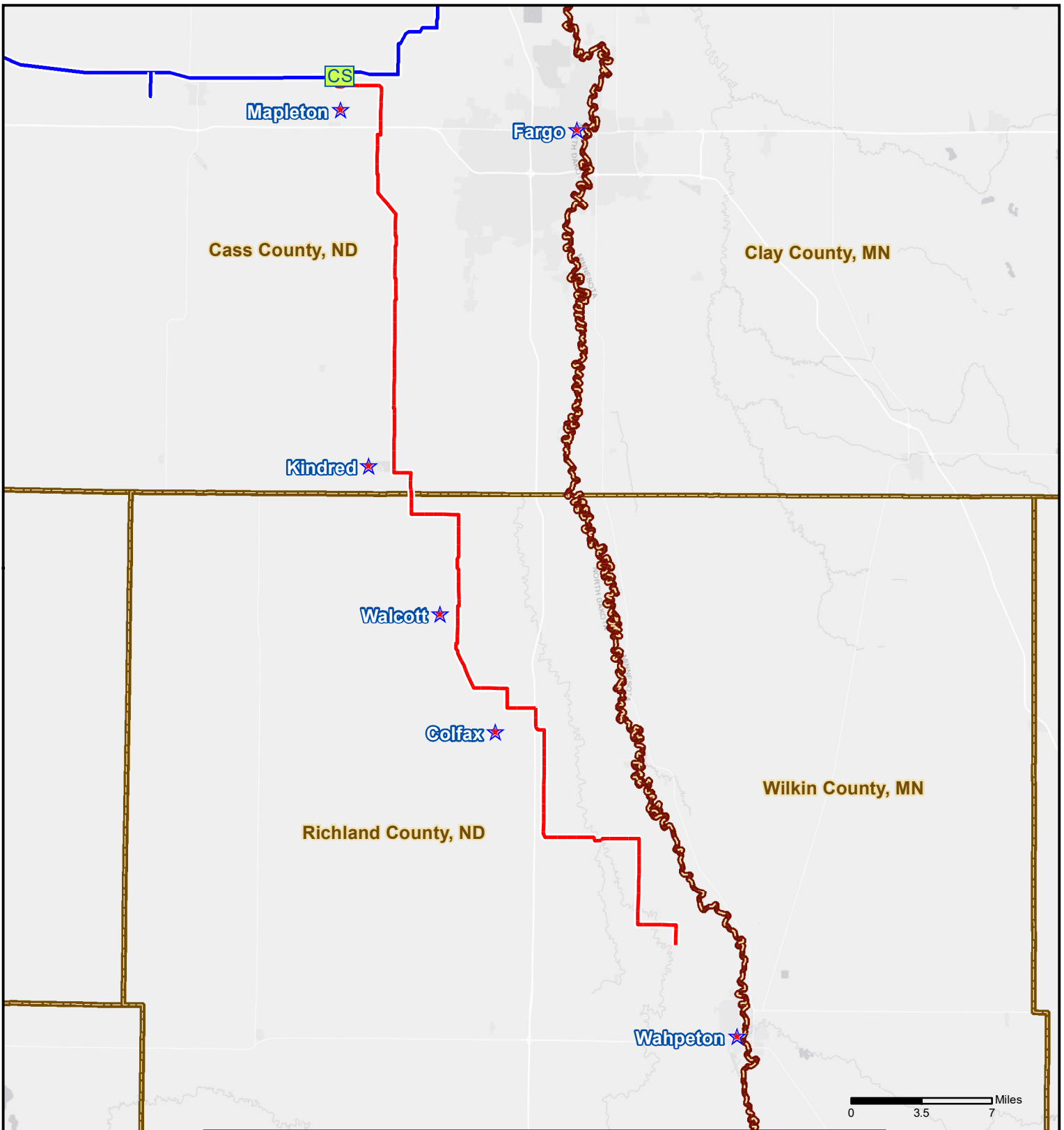
Thank you for your time and assistance with this project.

Sincerely,

Jill Linn
Environmental Affairs
WBI Energy Transmission, Inc.

Enclosures: Project Overview Map

cc: Robbyn Reukauf, WBI Energy Transmission, Inc.
Maggie Suter, ERM
Kevin Malloy, ERM



WBI ENERGY
TRANSMISSION
An AEP/ExxonMobil Group Company

N

1 in = 35,000 feet

Wahpeton Expansion Project

Project Overview Map

Legend

CS Mapleton Compressor Station	State Boundaries
Proposed Pipeline	County Boundaries
Existing WBI Pipeline	

Cass & Richland Counties, ND

PROJECT AREA OVERVIEW

Mapleton
Wahpeton

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September 13, 2021

Oglala Sioux Tribe
Tribal Historic Preservation Office
PO Box 2070
Pine Ridge, SD 57770-2070
Phone: 605-867-5624

Subject: WBI Energy Transmission, Inc.
Proposed Wahpeton Expansion Project – Project Introduction Letter
Cass and Richland Counties, North Dakota

Dear THPO Officer:

WBI Energy Transmission, Inc. (WBI Energy) operates a natural gas transmission pipeline system in the Northern Plains and is proposing to expand its system in southeastern North Dakota. The Wahpeton Expansion Project will involve constructing approximately 60 miles of 12-inch diameter natural gas pipeline from WBI Energy's existing Mapleton Compressor Station near Mapleton, North Dakota, to a new delivery station near Wahpeton, North Dakota. The project will include minor modifications at the Mapleton Compressor Station and a new delivery station near Kindred, North Dakota. The enclosed map shows the preliminary proposed pipeline route and locations of project facilities.

This project will allow WBI Energy to transport an additional 20.6 million cubic feet of natural gas per day to help meet growing demand for natural gas in southeastern North Dakota. Montana-Dakota Utilities Co., a local distribution company, has engaged WBI Energy to construct this project to fulfill Wahpeton customers' needs for additional uninterrupted natural gas supply and to extend natural gas service to Kindred, at the request of city officials and residents.

The project will be regulated by the Federal Energy Regulatory Commission (FERC) under Section 7(c) of the Natural Gas Act. Under the Energy Policy Act of 2005, FERC is the lead agency for coordinating federal authorizations and complying with the National Environmental Policy Act (NEPA) on natural gas pipeline projects subject to its jurisdiction. WBI Energy plans to submit an application with the FERC in May 2022 for a Certificate of Public Convenience and Necessity to construct and operate the proposed pipeline and associated facilities. Applications for other federal or state authorizations will be submitted prior to or at approximately the same time as the FERC application, or on timelines defined by the appropriate federal or state regulations. Pending regulatory approvals, WBI Energy anticipates beginning construction in early 2024, with the new facilities in service by November 2024.

In addition to NEPA, the project is subject to review by the FERC under Section 106 of the National Historic Preservation Act (NHPA). Section 106 requires federal agencies like the FERC to consider impacts on historic properties in agency decision making. To facilitate the FERC's review of the project, WBI Energy is gathering information on the locations of cultural resource sites that may be affected by construction of the pipeline and associated facilities. WBI Energy respectfully requests your input regarding the potential of the project to affect archaeological sites, burials, and traditional cultural properties of concern to the Oglala Sioux Tribe. WBI Energy also is requesting information on cultural resource sites from the State Historical Society of North Dakota. Additionally, WBI Energy plans to conduct an archaeological field survey this fall to identify sites along the pipeline route and would like to extend an invitation to Oglala Sioux Tribe to participate in the survey effort.

While the regulations for implementing Section 106 (36 Code of Federal Regulations 800) allow companies like WBI Energy (and their consultants) to gather information, the FERC is responsible for complying with the NHPA. Additionally, the FERC, not WBI Energy, is responsible for government-to-government consultations with Indian Tribes. After the initiation of the FERC's involvement in the project (e.g., through the pre-filing process), the FERC will contact you through a notice and/or an individual project letter.

WBI Energy has retained Environmental Resources Management (ERM) to provide environmental support services for the Wahpeton Expansion Project. If you would like to participate in upcoming survey efforts, have questions, comments, or concerns about the project, or have information on the locations of cultural resource sites along the proposed pipeline route, please contact me at 406-359-7332 or jill.linn@wbienergy.com or contact Kevin Malloy of ERM at 906-285-0361 or kevin.malloy@erm.com. Any comments or information you provide will be sent to the FERC. If you would like to communicate directly with the FERC's natural gas archaeological staff to discuss its cultural resource review and consultation processes, please contact Eric Howard, Tribal Coordinator, at 202-502-6263 or eric.howard@ferc.gov.

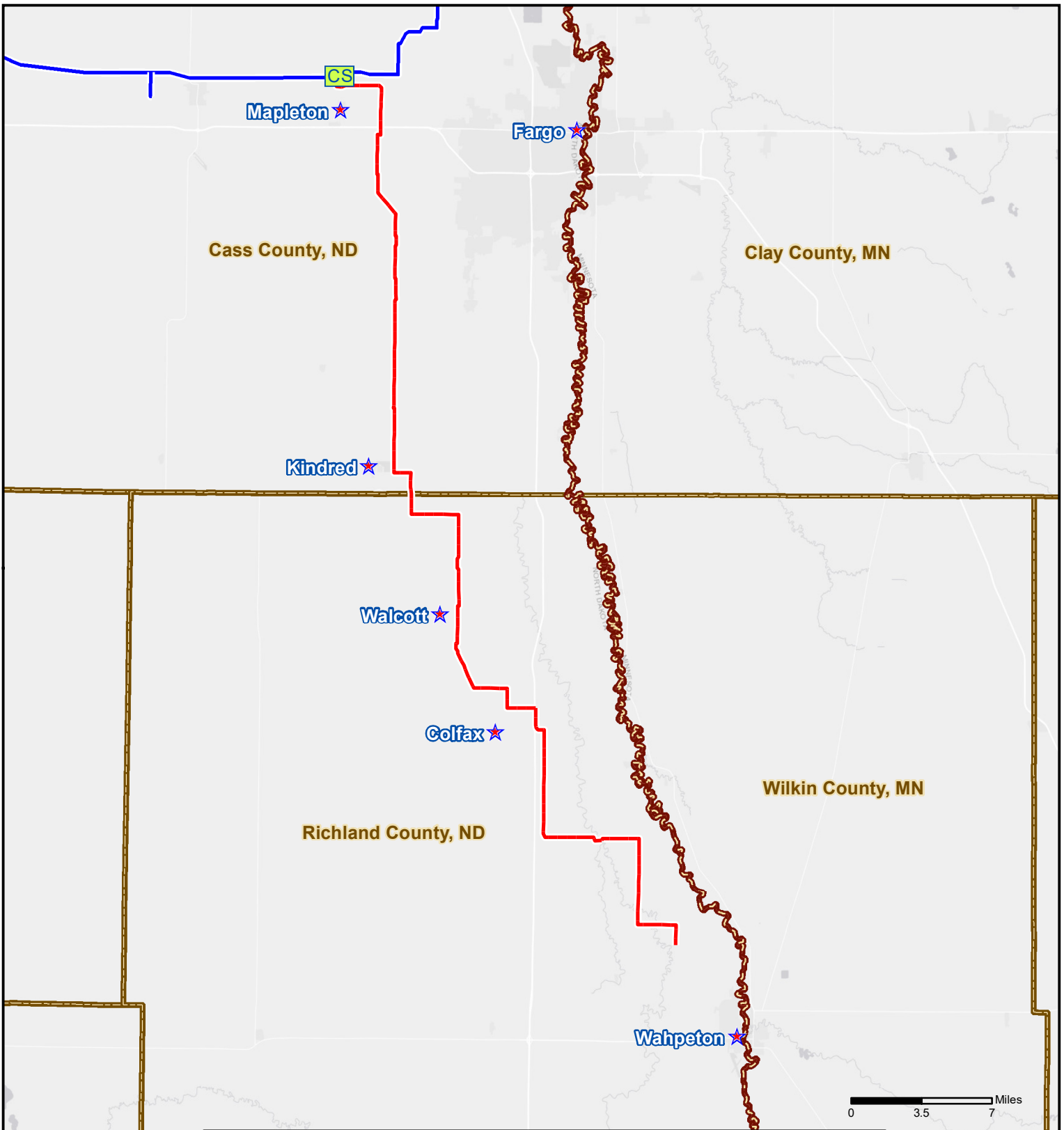
Thank you for your time and assistance with this project.

Sincerely,

Jill Linn
Environmental Affairs
WBI Energy Transmission, Inc.

Enclosures: Project Overview Map

cc: Robbyn Reukauf, WBI Energy Transmission, Inc.
 Maggie Suter, ERM
 Kevin Malloy, ERM



WBI ENERGY
TRANSMISSION
An AES/Resolute Group Company

N

1 in = 35,000 feet

Wahpeton Expansion Project

Project Overview Map

Legend

CS Mapleton Compressor Station	State Boundaries
Proposed Pipeline	County Boundaries
Existing WBI Pipeline	

Cass & Richland Counties, ND

PROJECT AREA OVERVIEW

Mapleton
Wahpeton

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September 13, 2021

Rosebud Sioux Tribe
Tribal Historic Preservation Office
PO Box 430
Rosebud, SD 57570-0430
Phone: (605) 747-4255

Subject: WBI Energy Transmission, Inc.
Proposed Wahpeton Expansion Project – Project Introduction Letter
Cass and Richland Counties, North Dakota

Dear THPO Officer:

WBI Energy Transmission, Inc. (WBI Energy) operates a natural gas transmission pipeline system in the Northern Plains and is proposing to expand its system in southeastern North Dakota. The Wahpeton Expansion Project will involve constructing approximately 60 miles of 12-inch diameter natural gas pipeline from WBI Energy's existing Mapleton Compressor Station near Mapleton, North Dakota, to a new delivery station near Wahpeton, North Dakota. The project will include minor modifications at the Mapleton Compressor Station and a new delivery station near Kindred, North Dakota. The enclosed map shows the preliminary proposed pipeline route and locations of project facilities.

This project will allow WBI Energy to transport an additional 20.6 million cubic feet of natural gas per day to help meet growing demand for natural gas in southeastern North Dakota. Montana-Dakota Utilities Co., a local distribution company, has engaged WBI Energy to construct this project to fulfill Wahpeton customers' needs for additional uninterrupted natural gas supply and to extend natural gas service to Kindred, at the request of city officials and residents.

The project will be regulated by the Federal Energy Regulatory Commission (FERC) under Section 7(c) of the Natural Gas Act. Under the Energy Policy Act of 2005, FERC is the lead agency for coordinating federal authorizations and complying with the National Environmental Policy Act (NEPA) on natural gas pipeline projects subject to its jurisdiction. WBI Energy plans to submit an application with the FERC in May 2022 for a Certificate of Public Convenience and Necessity to construct and operate the proposed pipeline and associated facilities. Applications for other federal or state authorizations will be submitted prior to or at approximately the same time as the FERC application, or on timelines defined by the appropriate federal or state regulations. Pending regulatory approvals, WBI Energy anticipates beginning construction in early 2024, with the new facilities in service by November 2024.

In addition to NEPA, the project is subject to review by the FERC under Section 106 of the National Historic Preservation Act (NHPA). Section 106 requires federal agencies like the FERC to consider impacts on historic properties in agency decision making. To facilitate the FERC's review of the project, WBI Energy is gathering information on the locations of cultural resource sites that may be affected by construction of the pipeline and associated facilities. WBI Energy respectfully requests your input regarding the potential of the project to affect archaeological sites, burials, and traditional cultural properties of concern to the Rosebud Sioux Tribe. WBI Energy also is requesting information on cultural resource sites from the State Historical Society of North Dakota. Additionally, WBI Energy plans to conduct an archaeological field survey this fall to identify sites along the pipeline route and would like to extend an invitation to Rosebud Sioux Tribe to participate in the survey effort.

While the regulations for implementing Section 106 (36 Code of Federal Regulations 800) allow companies like WBI Energy (and their consultants) to gather information, the FERC is responsible for complying with the NHPA. Additionally, the FERC, not WBI Energy, is responsible for government-to-government consultations with Indian Tribes. After the initiation of the FERC's involvement in the project (e.g., through the pre-filing process), the FERC will contact you through a notice and/or an individual project letter.

WBI Energy has retained Environmental Resources Management (ERM) to provide environmental support services for the Wahpeton Expansion Project. If you would like to participate in upcoming survey efforts, have questions, comments, or concerns about the project, or have information on the locations of cultural resource sites along the proposed pipeline route, please contact me at 406-359-7332 or jill.linn@wbienergy.com or contact Kevin Malloy of ERM at 906-285-0361 or kevin.malloy@erm.com. Any comments or information you provide will be sent to the FERC. If you would like to communicate directly with the FERC's natural gas archaeological staff to discuss its cultural resource review and consultation processes, please contact Eric Howard, Tribal Coordinator, at 202-502-6263 or eric.howard@ferc.gov.

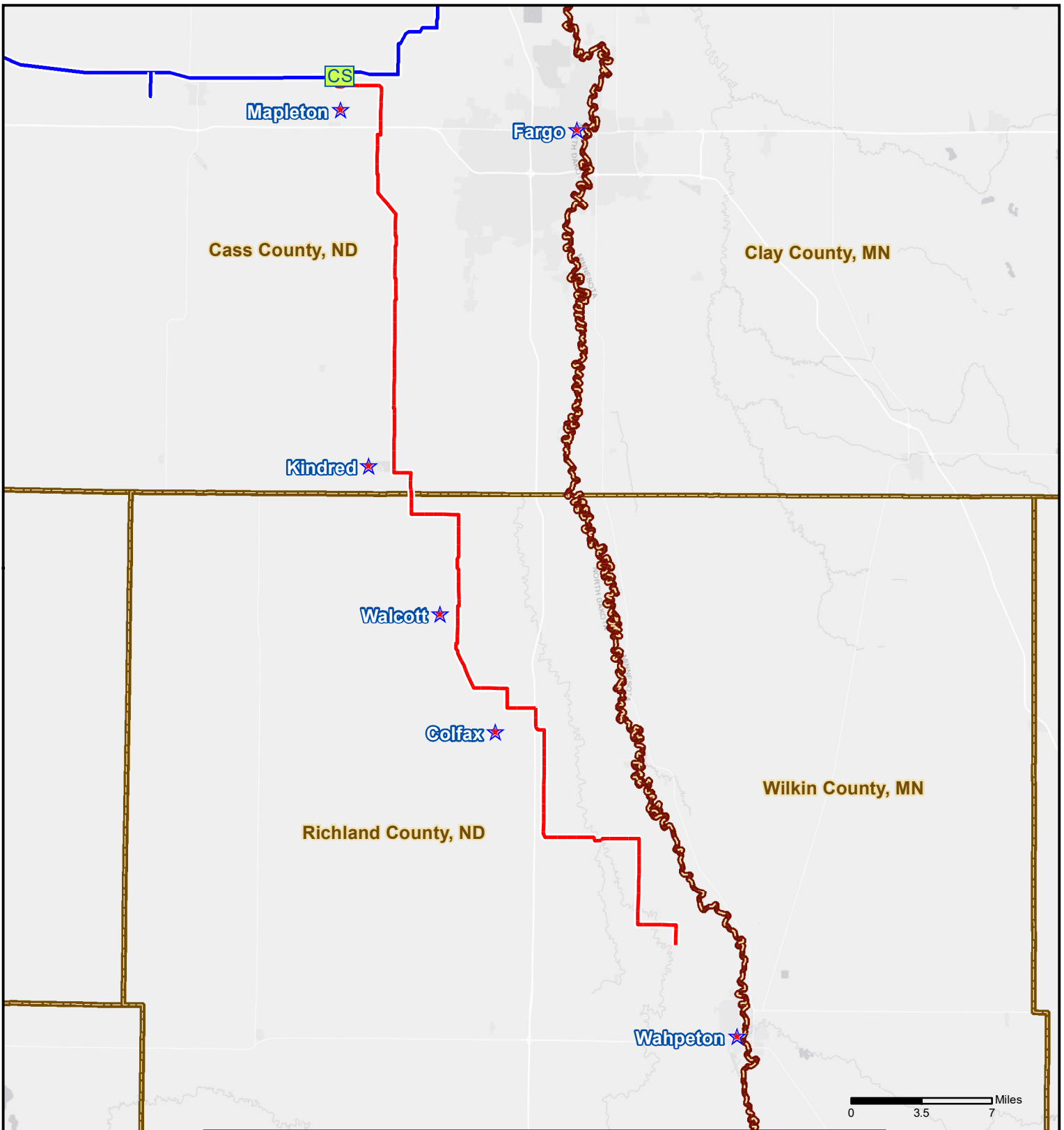
Thank you for your time and assistance with this project.

Sincerely,

Jill Linn
Environmental Affairs
WBI Energy Transmission, Inc.

Enclosures: Project Overview Map

cc: Robbyn Reukauf, WBI Energy Transmission, Inc.
 Maggie Suter, ERM
 Kevin Malloy, ERM



WBI ENERGY
TRANSMISSION
An AES/Resolute Group Company

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1 in = 35,000 feet

Wahpeton Expansion Project

Project Overview Map

Legend

CS Mapleton Compressor Station	State Boundaries
Proposed Pipeline	County Boundaries
Existing WBI Pipeline	

Cass & Richland Counties, ND

PROJECT AREA OVERVIEW

Mapleton
Wahpeton

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September 13, 2021

Sisseton-Wahpeton Oyate of the Lake Traverse Reservation
Tribal Historic Preservation Office
PO Box 907
Sisseton, SD 57262-0907
Phone: (605) 698-3584

Subject: WBI Energy Transmission, Inc.
Proposed Wahpeton Expansion Project – Project Introduction Letter
Cass and Richland Counties, North Dakota

Dear THPO Officer:

WBI Energy Transmission, Inc. (WBI Energy) operates a natural gas transmission pipeline system in the Northern Plains and is proposing to expand its system in southeastern North Dakota. The Wahpeton Expansion Project will involve constructing approximately 60 miles of 12-inch diameter natural gas pipeline from WBI Energy's existing Mapleton Compressor Station near Mapleton, North Dakota, to a new delivery station near Wahpeton, North Dakota. The project will include minor modifications at the Mapleton Compressor Station and a new delivery station near Kindred, North Dakota. The enclosed map shows the preliminary proposed pipeline route and locations of project facilities.

This project will allow WBI Energy to transport an additional 20.6 million cubic feet of natural gas per day to help meet growing demand for natural gas in southeastern North Dakota. Montana-Dakota Utilities Co., a local distribution company, has engaged WBI Energy to construct this project to fulfill Wahpeton customers' needs for additional uninterrupted natural gas supply and to extend natural gas service to Kindred, at the request of city officials and residents.

The project will be regulated by the Federal Energy Regulatory Commission (FERC) under Section 7(c) of the Natural Gas Act. Under the Energy Policy Act of 2005, FERC is the lead agency for coordinating federal authorizations and complying with the National Environmental Policy Act (NEPA) on natural gas pipeline projects subject to its jurisdiction. WBI Energy plans to submit an application with the FERC in May 2022 for a Certificate of Public Convenience and Necessity to construct and operate the proposed pipeline and associated facilities. Applications for other federal or state authorizations will be submitted prior to or at approximately the same time as the FERC application, or on timelines defined by the appropriate federal or state regulations. Pending regulatory approvals, WBI Energy anticipates beginning construction in early 2024, with the new facilities in service by November 2024.

In addition to NEPA, the project is subject to review by the FERC under Section 106 of the National Historic Preservation Act (NHPA). Section 106 requires federal agencies like the FERC to consider impacts on historic properties in agency decision making. To facilitate the FERC's review of the project, WBI Energy is gathering information on the locations of cultural resource sites that may be affected by construction of the pipeline and associated facilities. WBI Energy respectfully requests your input regarding the potential of the project to affect archaeological sites, burials, and traditional cultural properties of concern to the Sisseton-Wahpeton Oyate of the Lake Traverse Reservation. WBI Energy also is requesting information on cultural resource sites from the State Historical Society of North Dakota. Additionally, WBI Energy plans to conduct an archaeological field survey this fall to identify sites along the pipeline route and would like to extend an invitation to Sisseton-Wahpeton Oyate of the Lake Traverse Reservation to participate in the survey effort.

While the regulations for implementing Section 106 (36 Code of Federal Regulations 800) allow companies like WBI Energy (and their consultants) to gather information, the FERC is responsible for complying with the NHPA. Additionally, the FERC, not WBI Energy, is responsible for government-to-government consultations with Indian Tribes. After the initiation of the FERC's involvement in the project (e.g., through the pre-filing process), the FERC will contact you through a notice and/or an individual project letter.

WBI Energy has retained Environmental Resources Management (ERM) to provide environmental support services for the Wahpeton Expansion Project. If you would like to participate in upcoming survey efforts, have questions, comments, or concerns about the project, or have information on the locations of cultural resource sites along the proposed pipeline route, please contact me at 406-359-7332 or jill.linn@wbienergy.com or contact Kevin Malloy of ERM at 906-285-0361 or kevin.malloy@erm.com. Any comments or information you provide will be sent to the FERC. If you would like to communicate directly with the FERC's natural gas archaeological staff to discuss its cultural resource review and consultation processes, please contact Eric Howard, Tribal Coordinator, at 202-502-6263 or eric.howard@ferc.gov.

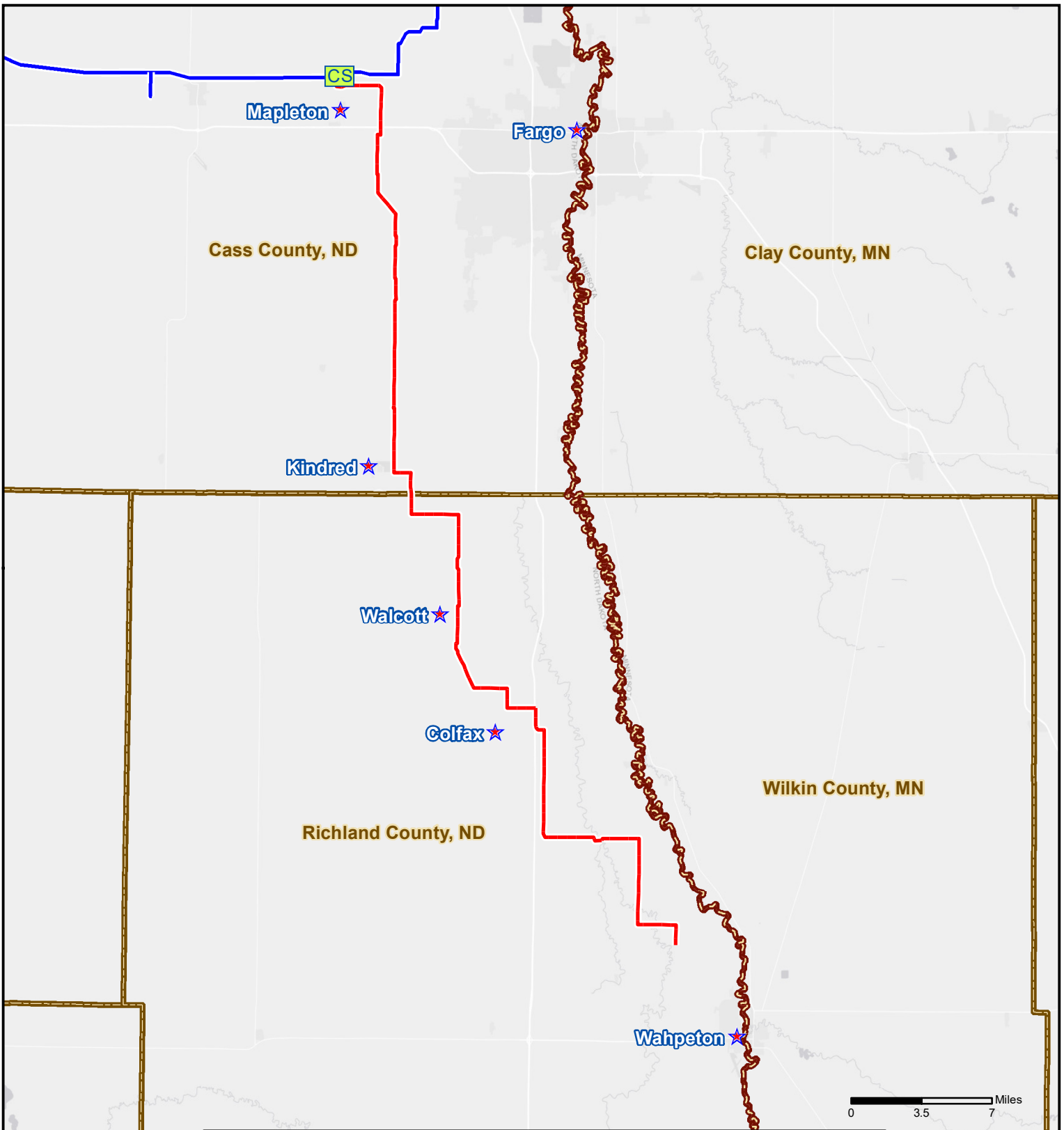
Thank you for your time and assistance with this project.

Sincerely,

Jill Linn
Environmental Affairs
WBI Energy Transmission, Inc.

Enclosures: Project Overview Map

cc: Robbyn Reukauf, WBI Energy Transmission, Inc.
 Maggie Suter, ERM
 Kevin Malloy, ERM



WBI ENERGY
TRANSMISSION
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Wahpeton Expansion Project Project Overview Map

Legend

CS Mapleton Compressor Station	State Boundaries
Proposed Pipeline	County Boundaries
Existing WBI Pipeline	

**Cass & Richland
Counties, ND**

PROJECT AREA OVERVIEW

Mapleton
Wahpeton

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WBI ENERGY TRANSMISSION, INC.
2010 Montana Avenue
Glendive, MT 59330
(406) 359-7200
www.wbienergy.com

September 13, 2021

Spirit Lake Sioux Tribe
Tribal Historic Preservation Office
PO Box 359
Fort Totten, ND 58335-0359
Phone: (701) 766-4032

Subject: WBI Energy Transmission, Inc.
Proposed Wahpeton Expansion Project – Project Introduction Letter
Cass and Richland Counties, North Dakota

Dear THPO Officer:

WBI Energy Transmission, Inc. (WBI Energy) operates a natural gas transmission pipeline system in the Northern Plains and is proposing to expand its system in southeastern North Dakota. The Wahpeton Expansion Project will involve constructing approximately 60 miles of 12-inch diameter natural gas pipeline from WBI Energy's existing Mapleton Compressor Station near Mapleton, North Dakota, to a new delivery station near Wahpeton, North Dakota. The project will include minor modifications at the Mapleton Compressor Station and a new delivery station near Kindred, North Dakota. The enclosed map shows the preliminary proposed pipeline route and locations of project facilities.

This project will allow WBI Energy to transport an additional 20.6 million cubic feet of natural gas per day to help meet growing demand for natural gas in southeastern North Dakota. Montana-Dakota Utilities Co., a local distribution company, has engaged WBI Energy to construct this project to fulfill Wahpeton customers' needs for additional uninterrupted natural gas supply and to extend natural gas service to Kindred, at the request of city officials and residents.

The project will be regulated by the Federal Energy Regulatory Commission (FERC) under Section 7(c) of the Natural Gas Act. Under the Energy Policy Act of 2005, FERC is the lead agency for coordinating federal authorizations and complying with the National Environmental Policy Act (NEPA) on natural gas pipeline projects subject to its jurisdiction. WBI Energy plans to submit an application with the FERC in May 2022 for a Certificate of Public Convenience and Necessity to construct and operate the proposed pipeline and associated facilities. Applications for other federal or state authorizations will be submitted prior to or at approximately the same time as the FERC application, or on timelines defined by the appropriate federal or state regulations. Pending regulatory approvals, WBI Energy anticipates beginning construction in early 2024, with the new facilities in service by November 2024.

In addition to NEPA, the project is subject to review by the FERC under Section 106 of the National Historic Preservation Act (NHPA). Section 106 requires federal agencies like the FERC to consider impacts on historic properties in agency decision making. To facilitate the FERC's review of the project, WBI Energy is gathering information on the locations of cultural resource sites that may be affected by construction of the pipeline and associated facilities. WBI Energy respectfully requests your input regarding the potential of the project to affect archaeological sites, burials, and traditional cultural properties of concern to the Spirit Lake Sioux Tribe. WBI Energy also is requesting information on cultural resource sites from the State Historical Society of North Dakota. Additionally, WBI Energy plans to conduct an archaeological field survey this fall to identify sites along the pipeline route and would like to extend an invitation to Spirit Lake Sioux Tribe to participate in the survey effort.

While the regulations for implementing Section 106 (36 Code of Federal Regulations 800) allow companies like WBI Energy (and their consultants) to gather information, the FERC is responsible for complying with the NHPA. Additionally, the FERC, not WBI Energy, is responsible for government-to-government consultations with Indian Tribes. After the initiation of the FERC's involvement in the project (e.g., through the pre-filing process), the FERC will contact you through a notice and/or an individual project letter.

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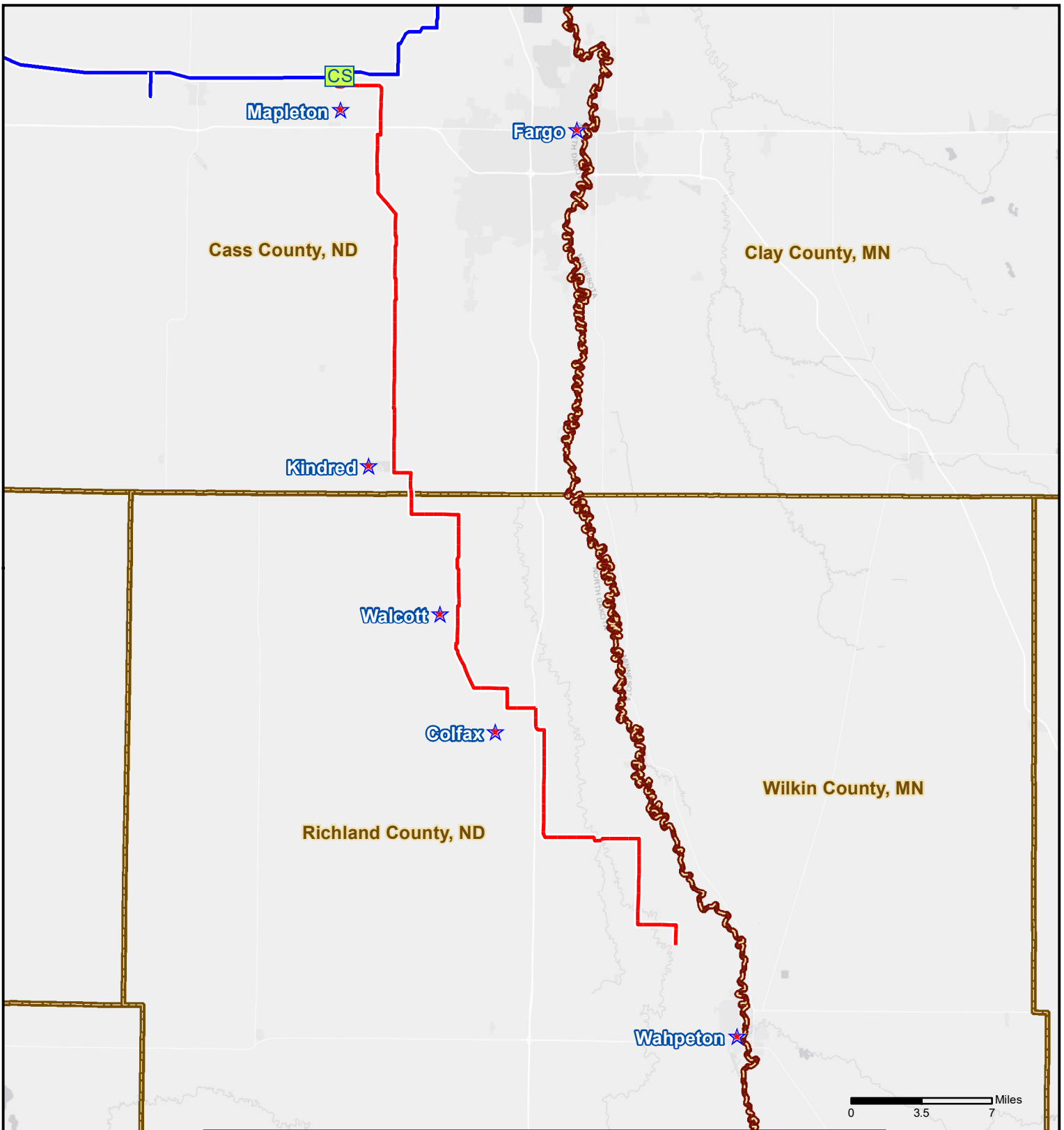
Thank you for your time and assistance with this project.

Sincerely,

Jill Linn
Environmental Affairs
WBI Energy Transmission, Inc.

Enclosures: Project Overview Map

cc: Robbyn Reukauf, WBI Energy Transmission, Inc.
 Maggie Suter, ERM
 Kevin Malloy, ERM



WBI ENERGY
TRANSMISSION
An AES/Resolute Group Company

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1 in = 35,000 feet

Wahpeton Expansion Project

Project Overview Map

Legend

CS Mapleton Compressor Station	State Boundaries
Proposed Pipeline	County Boundaries
Existing WBI Pipeline	

Cass & Richland Counties, ND

PROJECT AREA OVERVIEW

Mapleton
Wahpeton

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September 13, 2021

Standing Rock Sioux Tribe
Tribal Historic Preservation Officer
PO Box D
Fort Yates, ND 58538-0522
Phone: (701) 854-8645

Subject: WBI Energy Transmission, Inc.
Proposed Wahpeton Expansion Project – Project Introduction Letter
Cass and Richland Counties, North Dakota

Dear THPO Officer:

WBI Energy Transmission, Inc. (WBI Energy) operates a natural gas transmission pipeline system in the Northern Plains and is proposing to expand its system in southeastern North Dakota. The Wahpeton Expansion Project will involve constructing approximately 60 miles of 12-inch diameter natural gas pipeline from WBI Energy's existing Mapleton Compressor Station near Mapleton, North Dakota, to a new delivery station near Wahpeton, North Dakota. The project will include minor modifications at the Mapleton Compressor Station and a new delivery station near Kindred, North Dakota. The enclosed map shows the preliminary proposed pipeline route and locations of project facilities.

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The project will be regulated by the Federal Energy Regulatory Commission (FERC) under Section 7(c) of the Natural Gas Act. Under the Energy Policy Act of 2005, FERC is the lead agency for coordinating federal authorizations and complying with the National Environmental Policy Act (NEPA) on natural gas pipeline projects subject to its jurisdiction. WBI Energy plans to submit an application with the FERC in May 2022 for a Certificate of Public Convenience and Necessity to construct and operate the proposed pipeline and associated facilities. Applications for other federal or state authorizations will be submitted prior to or at approximately the same time as the FERC application, or on timelines defined by the appropriate federal or state regulations. Pending regulatory approvals, WBI Energy anticipates beginning construction in early 2024, with the new facilities in service by November 2024.

In addition to NEPA, the project is subject to review by the FERC under Section 106 of the National Historic Preservation Act (NHPA). Section 106 requires federal agencies like the FERC to consider impacts on historic properties in agency decision making. To facilitate the FERC's review of the project, WBI Energy is gathering information on the locations of cultural resource sites that may be affected by construction of the pipeline and associated facilities. WBI Energy respectfully requests your input regarding the potential of the project to affect archaeological sites, burials, and traditional cultural properties of concern to the Standing Rock Sioux Tribe. WBI Energy also is requesting information on cultural resource sites from the State Historical Society of North Dakota. Additionally, WBI Energy plans to conduct an archaeological field survey this fall to identify sites along the pipeline route and would like to extend an invitation to Standing Rock Sioux Tribe to participate in the survey effort.

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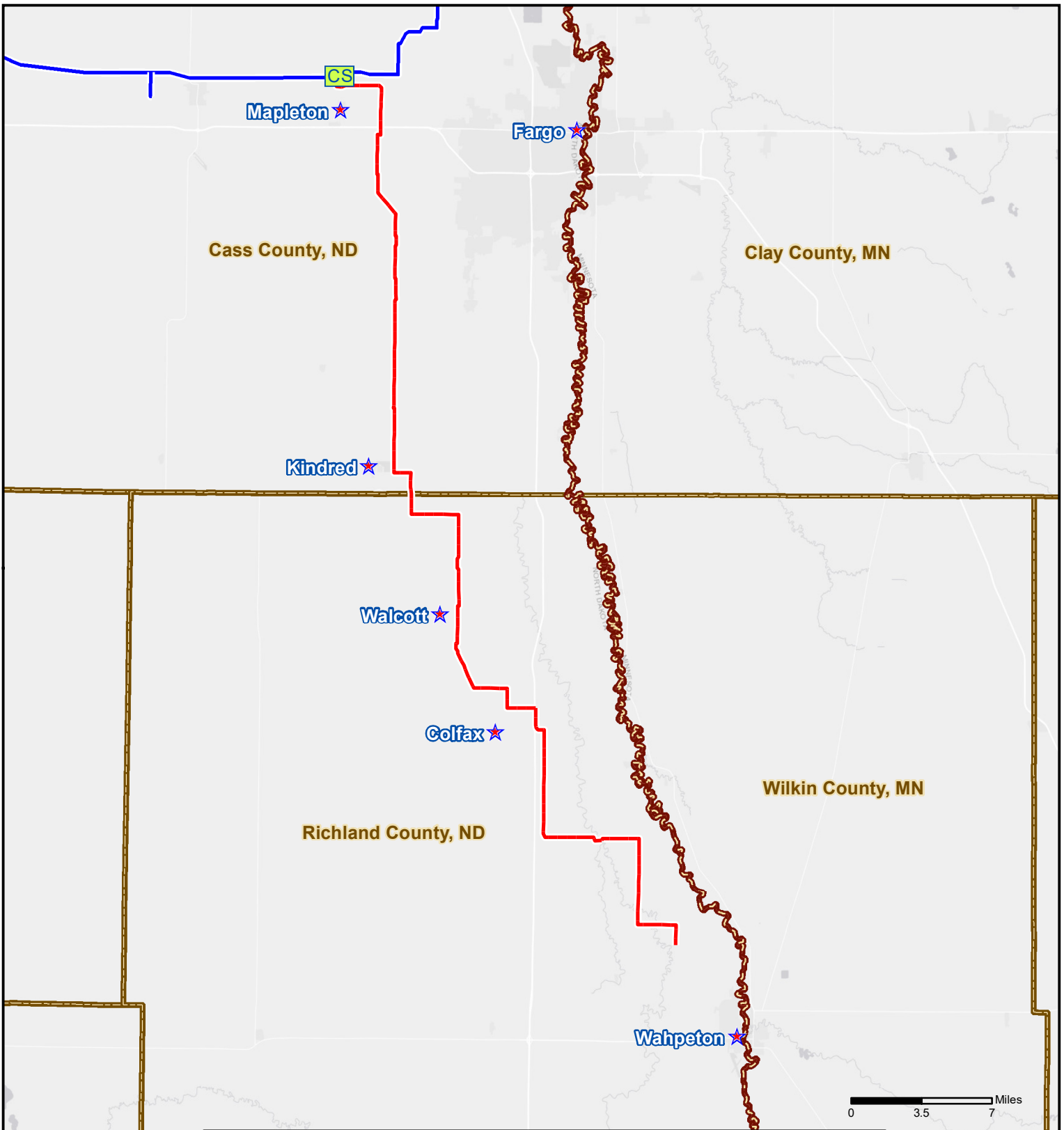
Thank you for your time and assistance with this project.

Sincerely,

Jill Linn
Environmental Affairs
WBI Energy Transmission, Inc.

Enclosures: Project Overview Map

cc: Robbyn Reukauf, WBI Energy Transmission, Inc.
Maggie Suter, ERM
Kevin Malloy, ERM



WBI ENERGY
TRANSMISSION
An AES/Resolute Group Company

N

1 in = 35,000 feet

Wahpeton Expansion Project

Project Overview Map

Legend

CS Mapleton Compressor Station	State Boundaries
Proposed Pipeline	County Boundaries
Existing WBI Pipeline	

Cass & Richland Counties, ND

PROJECT AREA OVERVIEW

Mapleton
Wahpeton

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WBI ENERGY TRANSMISSION, INC.
2010 Montana Avenue
Glendive, MT 59330
(406) 359-7200
www.wbienergy.com

September 13, 2021

Elgin Crows Breast
Tribal Historic Preservation Office
Three Affiliated Tribes of the Fort Berthold Reservation
404 Frontage Road
New Town, ND 58763-9404

Subject: WBI Energy Transmission, Inc.
Proposed Wahpeton Expansion Project – Project Introduction Letter
Cass and Richland Counties, North Dakota

Dear Ms. Crows Breast:

WBI Energy Transmission, Inc. (WBI Energy) operates a natural gas transmission pipeline system in the Northern Plains and is proposing to expand its system in southeastern North Dakota. The Wahpeton Expansion Project will involve constructing approximately 60 miles of 12-inch diameter natural gas pipeline from WBI Energy's existing Mapleton Compressor Station near Mapleton, North Dakota, to a new delivery station near Wahpeton, North Dakota. The project will include minor modifications at the Mapleton Compressor Station and a new delivery station near Kindred, North Dakota. The enclosed map shows the preliminary proposed pipeline route and locations of project facilities.

This project will allow WBI Energy to transport an additional 20.6 million cubic feet of natural gas per day to help meet growing demand for natural gas in southeastern North Dakota. Montana-Dakota Utilities Co., a local distribution company, has engaged WBI Energy to construct this project to fulfill Wahpeton customers' needs for additional uninterrupted natural gas supply and to extend natural gas service to Kindred, at the request of city officials and residents.

The project will be regulated by the Federal Energy Regulatory Commission (FERC) under Section 7(c) of the Natural Gas Act. Under the Energy Policy Act of 2005, FERC is the lead agency for coordinating federal authorizations and complying with the National Environmental Policy Act (NEPA) on natural gas pipeline projects subject to its jurisdiction. WBI Energy plans to submit an application with the FERC in May 2022 for a Certificate of Public Convenience and Necessity to construct and operate the proposed pipeline and associated facilities. Applications for other federal or state authorizations will be submitted prior to or at approximately the same time as the FERC application, or on timelines defined by the appropriate federal or state regulations. Pending regulatory approvals, WBI Energy anticipates beginning construction in early 2024, with the new facilities in service by November 2024.

In addition to NEPA, the project is subject to review by the FERC under Section 106 of the National Historic Preservation Act (NHPA). Section 106 requires federal agencies like the FERC to consider impacts on historic properties in agency decision making. To facilitate the FERC's review of the project, WBI Energy is gathering information on the locations of cultural resource sites that may be affected by construction of the pipeline and associated facilities. WBI Energy respectfully requests your input regarding the potential of the project to affect archaeological sites, burials, and traditional cultural properties of concern to the Three Affiliated Tribes. WBI Energy also is requesting information on cultural resource sites from the State Historical Society of North Dakota. Additionally, WBI Energy plans to conduct an archaeological field survey this fall to identify sites along the pipeline route and would like to extend an invitation to Three Affiliated Tribes to participate in the survey effort.

While the regulations for implementing Section 106 (36 Code of Federal Regulations 800) allow companies like WBI Energy (and their consultants) to gather information, the FERC is responsible for complying with the NHPA. Additionally, the FERC, not WBI Energy, is responsible for government-to-government consultations with Indian Tribes. After the initiation of the FERC's involvement in the project (e.g., through the pre-filing process), the FERC will contact you through a notice and/or an individual project letter.

WBI Energy has retained Environmental Resources Management (ERM) to provide environmental support services for the Wahpeton Expansion Project. If you would like to participate in upcoming survey efforts, have questions, comments, or concerns about the project, or have information on the locations of cultural resource sites along the proposed pipeline route, please contact me at 406-359-7332 or jill.linn@wbienergy.com or contact Kevin Malloy of ERM at 906-285-0361 or kevin.malloy@erm.com. Any comments or information you provide will be sent to the FERC. If you would like to communicate directly with the FERC's natural gas archaeological staff to discuss its cultural resource review and consultation processes, please contact Eric Howard, Tribal Coordinator, at 202-502-6263 or eric.howard@ferc.gov.

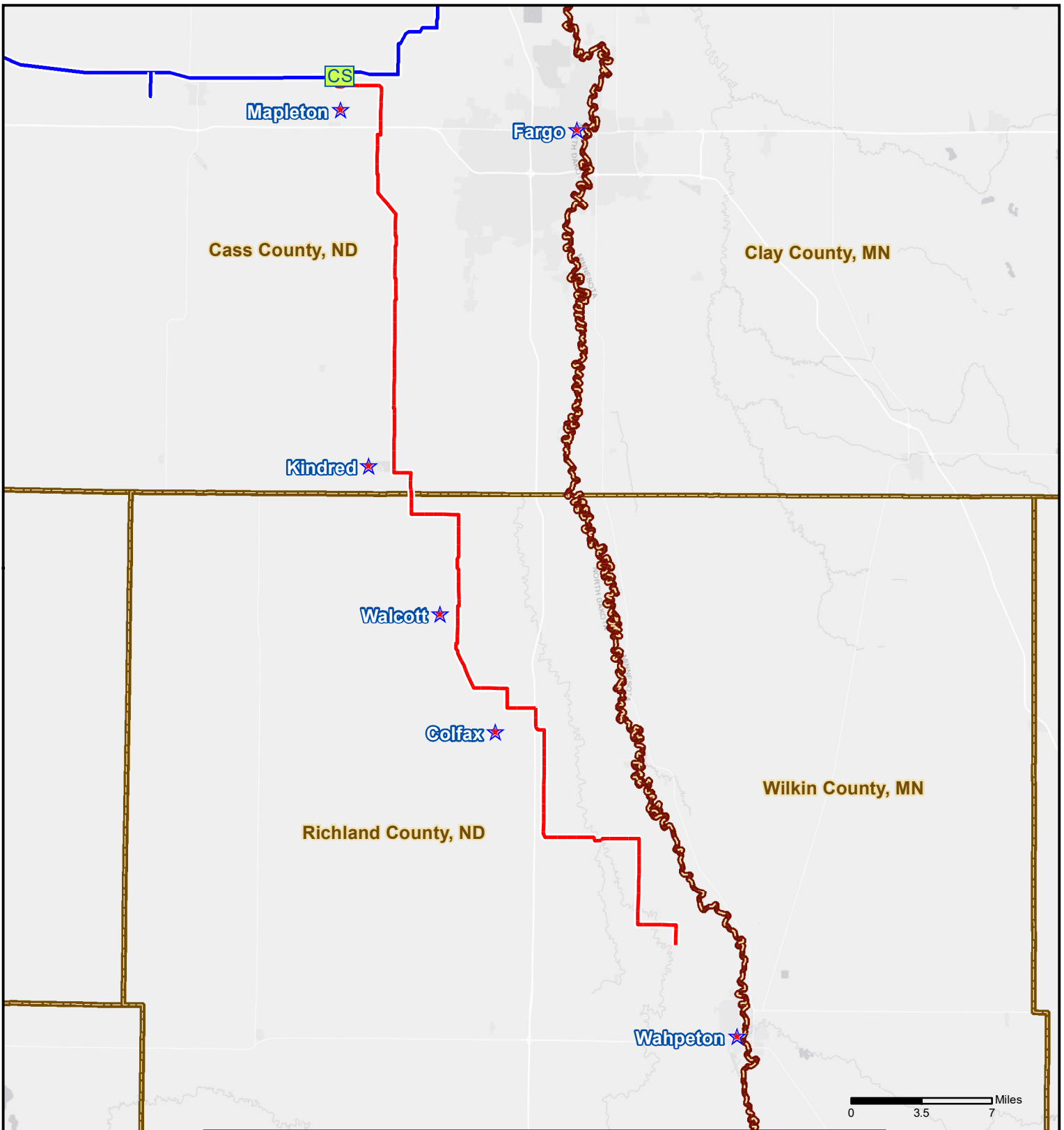
Thank you for your time and assistance with this project.

Sincerely,

Jill Linn
Environmental Affairs
WBI Energy Transmission, Inc.

Enclosures: Project Overview Map

cc: Robbyn Reukauf, WBI Energy Transmission, Inc.
Maggie Suter, ERM
Kevin Malloy, ERM



WBI ENERGY
TRANSMISSION
An AEP/ExxonMobil Group Company

N

1 in = 35,000 feet

Wahpeton Expansion Project

Project Overview Map

Legend

CS Mapleton Compressor Station	State Boundaries
Proposed Pipeline	County Boundaries
Existing WBI Pipeline	

Cass & Richland Counties, ND

PROJECT AREA OVERVIEW

Mapleton
Wahpeton

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Product Information



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September 13, 2021

Turtle Mountain Band of Chippewa Indians
P.O. Box 900
Belcourt, ND 58316
Phone (701) 477-2600

Subject: WBI Energy Transmission, Inc.
Proposed Wahpeton Expansion Project – Project Introduction Letter
Cass and Richland Counties, North Dakota

Dear THPO Officer:

WBI Energy Transmission, Inc. (WBI Energy) operates a natural gas transmission pipeline system in the Northern Plains and is proposing to expand its system in southeastern North Dakota. The Wahpeton Expansion Project will involve constructing approximately 60 miles of 12-inch diameter natural gas pipeline from WBI Energy's existing Mapleton Compressor Station near Mapleton, North Dakota, to a new delivery station near Wahpeton, North Dakota. The project will include minor modifications at the Mapleton Compressor Station and a new delivery station near Kindred, North Dakota. The enclosed map shows the preliminary proposed pipeline route and locations of project facilities.

This project will allow WBI Energy to transport an additional 20.6 million cubic feet of natural gas per day to help meet growing demand for natural gas in southeastern North Dakota. Montana-Dakota Utilities Co., a local distribution company, has engaged WBI Energy to construct this project to fulfill Wahpeton customers' needs for additional uninterrupted natural gas supply and to extend natural gas service to Kindred, at the request of city officials and residents.

The project will be regulated by the Federal Energy Regulatory Commission (FERC) under Section 7(c) of the Natural Gas Act. Under the Energy Policy Act of 2005, FERC is the lead agency for coordinating federal authorizations and complying with the National Environmental Policy Act (NEPA) on natural gas pipeline projects subject to its jurisdiction. WBI Energy plans to submit an application with the FERC in May 2022 for a Certificate of Public Convenience and Necessity to construct and operate the proposed pipeline and associated facilities. Applications for other federal or state authorizations will be submitted prior to or at approximately the same time as the FERC application, or on timelines defined by the appropriate federal or state regulations. Pending regulatory approvals, WBI Energy anticipates beginning construction in early 2024, with the new facilities in service by November 2024.

In addition to NEPA, the project is subject to review by the FERC under Section 106 of the National Historic Preservation Act (NHPA). Section 106 requires federal agencies like the FERC to consider impacts on historic properties in agency decision making. To facilitate the FERC's review of the project, WBI Energy is gathering information on the locations of cultural resource sites that may be affected by construction of the pipeline and associated facilities. WBI Energy respectfully requests your input regarding the potential of the project to affect archaeological sites, burials, and traditional cultural properties of concern to the Turtle Mountain Band of Chippewa Indians. WBI Energy also is requesting information on cultural resource sites from the State Historical Society of North Dakota. Additionally, WBI Energy plans to conduct an archaeological field survey this fall to identify sites along the pipeline route and would like to extend an invitation to Turtle Mountain Band of Chippewa Indians to participate in the survey effort.

While the regulations for implementing Section 106 (36 Code of Federal Regulations 800) allow companies like WBI Energy (and their consultants) to gather information, the FERC is responsible for complying with the NHPA. Additionally, the FERC, not WBI Energy, is responsible for government-to-government consultations with Indian Tribes. After the initiation of the FERC's involvement in the project (e.g., through the pre-filing process), the FERC will contact you through a notice and/or an individual project letter.

WBI Energy has retained Environmental Resources Management (ERM) to provide environmental support services for the Wahpeton Expansion Project. If you would like to participate in upcoming survey efforts, have questions, comments, or concerns about the project, or have information on the locations of cultural resource sites along the proposed pipeline route, please contact me at 406-359-7332 or jill.linn@wbienergy.com or contact Kevin Malloy of ERM at 906-285-0361 or kevin.malloy@erm.com. Any comments or information you provide will be sent to the FERC. If you would like to communicate directly with the FERC's natural gas archaeological staff to discuss its cultural resource review and consultation processes, please contact Eric Howard, Tribal Coordinator, at 202-502-6263 or eric.howard@ferc.gov.

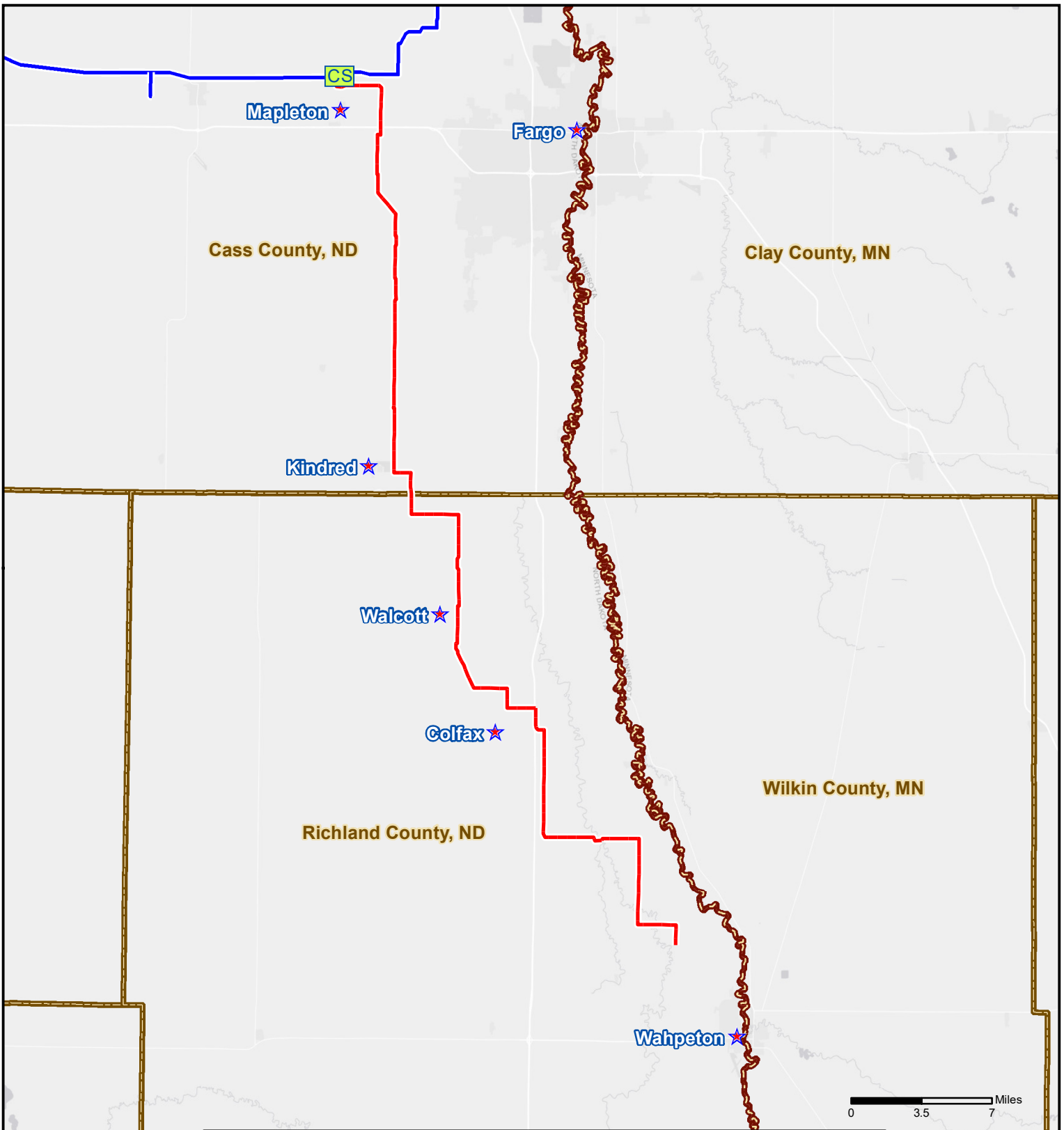
Thank you for your time and assistance with this project.

Sincerely,

Jill Linn
Environmental Affairs
WBI Energy Transmission, Inc.

Enclosures: Project Overview Map

cc: Robbyn Reukauf, WBI Energy Transmission, Inc.
Maggie Suter, ERM
Kevin Malloy, ERM



WBI ENERGY
TRANSMISSION
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1 in = 35,000 feet

Wahpeton Expansion Project Project Overview Map

Legend

CS Mapleton Compressor Station	State Boundaries
Proposed Pipeline	County Boundaries
Existing WBI Pipeline	

**Cass & Richland
Counties, ND**

PROJECT AREA OVERVIEW

Mapleton
Wahpeton

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September 13, 2021

Yankton Sioux Tribe
Tribal Historic Preservation Office
PO Box 1153
Wagner, SD 57380-1153
(605) 384-3641

Subject: WBI Energy Transmission, Inc.
Proposed Wahpeton Expansion Project – Project Introduction Letter
Cass and Richland Counties, North Dakota

Dear THPO Officer:

WBI Energy Transmission, Inc. (WBI Energy) operates a natural gas transmission pipeline system in the Northern Plains and is proposing to expand its system in southeastern North Dakota. The Wahpeton Expansion Project will involve constructing approximately 60 miles of 12-inch diameter natural gas pipeline from WBI Energy's existing Mapleton Compressor Station near Mapleton, North Dakota, to a new delivery station near Wahpeton, North Dakota. The project will include minor modifications at the Mapleton Compressor Station and a new delivery station near Kindred, North Dakota. The enclosed map shows the preliminary proposed pipeline route and locations of project facilities.

This project will allow WBI Energy to transport an additional 20.6 million cubic feet of natural gas per day to help meet growing demand for natural gas in southeastern North Dakota. Montana-Dakota Utilities Co., a local distribution company, has engaged WBI Energy to construct this project to fulfill Wahpeton customers' needs for additional uninterrupted natural gas supply and to extend natural gas service to Kindred, at the request of city officials and residents.

The project will be regulated by the Federal Energy Regulatory Commission (FERC) under Section 7(c) of the Natural Gas Act. Under the Energy Policy Act of 2005, FERC is the lead agency for coordinating federal authorizations and complying with the National Environmental Policy Act (NEPA) on natural gas pipeline projects subject to its jurisdiction. WBI Energy plans to submit an application with the FERC in May 2022 for a Certificate of Public Convenience and Necessity to construct and operate the proposed pipeline and associated facilities. Applications for other federal or state authorizations will be submitted prior to or at approximately the same time as the FERC application, or on timelines defined by the appropriate federal or state regulations. Pending regulatory approvals, WBI Energy anticipates beginning construction in early 2024, with the new facilities in service by November 2024.

In addition to NEPA, the project is subject to review by the FERC under Section 106 of the National Historic Preservation Act (NHPA). Section 106 requires federal agencies like the FERC to consider impacts on historic properties in agency decision making. To facilitate the FERC's review of the project, WBI Energy is gathering information on the locations of cultural resource sites that may be affected by construction of the pipeline and associated facilities. WBI Energy respectfully requests your input regarding the potential of the project to affect archaeological sites, burials, and traditional cultural properties of concern to the Yankton Sioux Tribe. WBI Energy also is requesting information on cultural resource sites from the State Historical Society of North Dakota. Additionally, WBI Energy plans to conduct an archaeological field survey this fall to identify sites along the pipeline route and would like to extend an invitation to Yankton Sioux Tribe to participate in the survey effort.

While the regulations for implementing Section 106 (36 Code of Federal Regulations 800) allow companies like WBI Energy (and their consultants) to gather information, the FERC is responsible for complying with the NHPA. Additionally, the FERC, not WBI Energy, is responsible for government-to-government consultations with Indian Tribes. After the initiation of the FERC's involvement in the project (e.g., through the pre-filing process), the FERC will contact you through a notice and/or an individual project letter.

WBI Energy has retained Environmental Resources Management (ERM) to provide environmental support services for the Wahpeton Expansion Project. If you would like to participate in upcoming survey efforts, have questions, comments, or concerns about the project, or have information on the locations of cultural resource sites along the proposed pipeline route, please contact me at 406-359-7332 or jill.linn@wbienergy.com or contact Kevin Malloy of ERM at 906-285-0361 or kevin.malloy@erm.com. Any comments or information you provide will be sent to the FERC. If you would like to communicate directly with the FERC's natural gas archaeological staff to discuss its cultural resource review and consultation processes, please contact Eric Howard, Tribal Coordinator, at 202-502-6263 or eric.howard@ferc.gov.

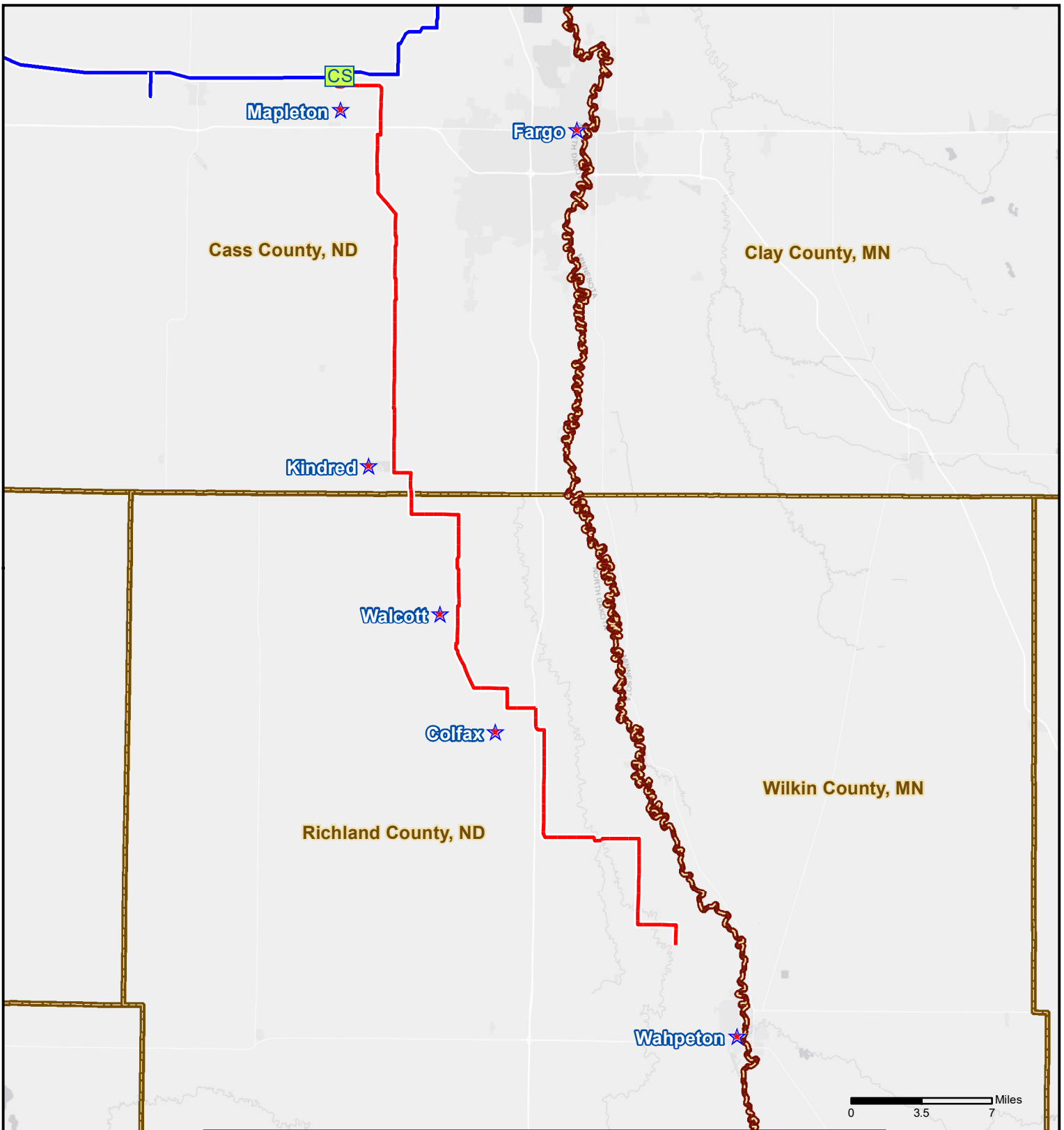
Thank you for your time and assistance with this project.

Sincerely,

Jill Linn
Environmental Affairs
WBI Energy Transmission, Inc.

Enclosures: Project Overview Map

cc: Robbyn Reukauf, WBI Energy Transmission, Inc.
 Maggie Suter, ERM
 Kevin Malloy, ERM



WBI ENERGY
TRANSMISSION
An AES/Resolute Group Company

N

1 in = 35,000 feet

Wahpeton Expansion Project

Project Overview Map

Legend

CS Mapleton Compressor Station	State Boundaries
Proposed Pipeline	County Boundaries
Existing WBI Pipeline	

Cass & Richland Counties, ND

PROJECT AREA OVERVIEW

Mapleton
Wahpeton

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September 15, 2021

Red Lake Band of Chippewa Indians of Minnesota
Kade M. Ferris, THPO/Tribal Archaeologist
PO Box: 274
Red Lake, MN 56671-0274

Subject: WBI Energy Transmission, Inc.
Proposed Wahpeton Expansion Project – Project Introduction Letter
Cass and Richland Counties, North Dakota

Dear THPO Officer:

WBI Energy Transmission, Inc. (WBI Energy) operates a natural gas transmission pipeline system in the Northern Plains and is proposing to expand its system in southeastern North Dakota. The Wahpeton Expansion Project will involve constructing approximately 60 miles of 12-inch diameter natural gas pipeline from WBI Energy's existing Mapleton Compressor Station near Mapleton, North Dakota, to a new delivery station near Wahpeton, North Dakota. The project will include minor modifications at the Mapleton Compressor Station and a new delivery station near Kindred, North Dakota. The enclosed map shows the preliminary proposed pipeline route and locations of project facilities.

This project will allow WBI Energy to transport an additional 20.6 million cubic feet of natural gas per day to help meet growing demand for natural gas in southeastern North Dakota. Montana-Dakota Utilities Co., a local distribution company, has engaged WBI Energy to construct this project to fulfill Wahpeton customers' needs for additional uninterrupted natural gas supply and to extend natural gas service to Kindred, at the request of city officials and residents.

The project will be regulated by the Federal Energy Regulatory Commission (FERC) under Section 7(c) of the Natural Gas Act. Under the Energy Policy Act of 2005, FERC is the lead agency for coordinating federal authorizations and complying with the National Environmental Policy Act (NEPA) on natural gas pipeline projects subject to its jurisdiction. WBI Energy plans to submit an application with the FERC in May 2022 for a Certificate of Public Convenience and Necessity to construct and operate the proposed pipeline and associated facilities. Applications for other federal or state authorizations will be submitted prior to or at approximately the same time as the FERC application, or on timelines defined by the appropriate federal or state regulations. Pending regulatory approvals, WBI Energy anticipates beginning construction in early 2024, with the new facilities in service by November 2024.

In addition to NEPA, the project is subject to review by the FERC under Section 106 of the National Historic Preservation Act (NHPA). Section 106 requires federal agencies like the FERC to consider impacts on historic properties in agency decision making. To facilitate the FERC's review of the project, WBI Energy is gathering information on the locations of cultural resource sites that may be affected by construction of the pipeline and associated facilities. WBI Energy respectfully requests your input regarding the potential of the project to affect archaeological sites, burials, and traditional cultural properties of concern to the Red Lake Band of Chippewa Indians of Minnesota. WBI Energy also is requesting information on cultural resource sites from the State Historical Society of North Dakota. Additionally, WBI Energy plans to conduct an archaeological field survey this fall to identify sites along the pipeline route and would like to extend an invitation to Red Lake Band of Chippewa Indians of Minnesota to participate in the survey effort.

While the regulations for implementing Section 106 (36 Code of Federal Regulations 800) allow companies like WBI Energy (and their consultants) to gather information, the FERC is responsible for complying with the NHPA. Additionally, the FERC, not WBI Energy, is responsible for government-to-government consultations with Indian Tribes. After the initiation of the FERC's involvement in the project (e.g., through the pre-filing process), the FERC will contact you through a notice and/or an individual project letter.

WBI Energy has retained Environmental Resources Management (ERM) to provide environmental support services for the Wahpeton Expansion Project. If you would like to participate in upcoming survey efforts, have questions, comments, or concerns about the project, or have information on the locations of cultural resource sites along the proposed pipeline route, please contact me at 406-359-7332 or jill.linn@wbienergy.com or contact Kevin Malloy of ERM at 906-285-0361 or kevin.malloy@erm.com. Any comments or information you provide will be sent to the FERC. If you would like to communicate directly with the FERC's natural gas archaeological staff to discuss its cultural resource review and consultation processes, please contact Eric Howard, Tribal Coordinator, at 202-502-6263 or eric.howard@ferc.gov.

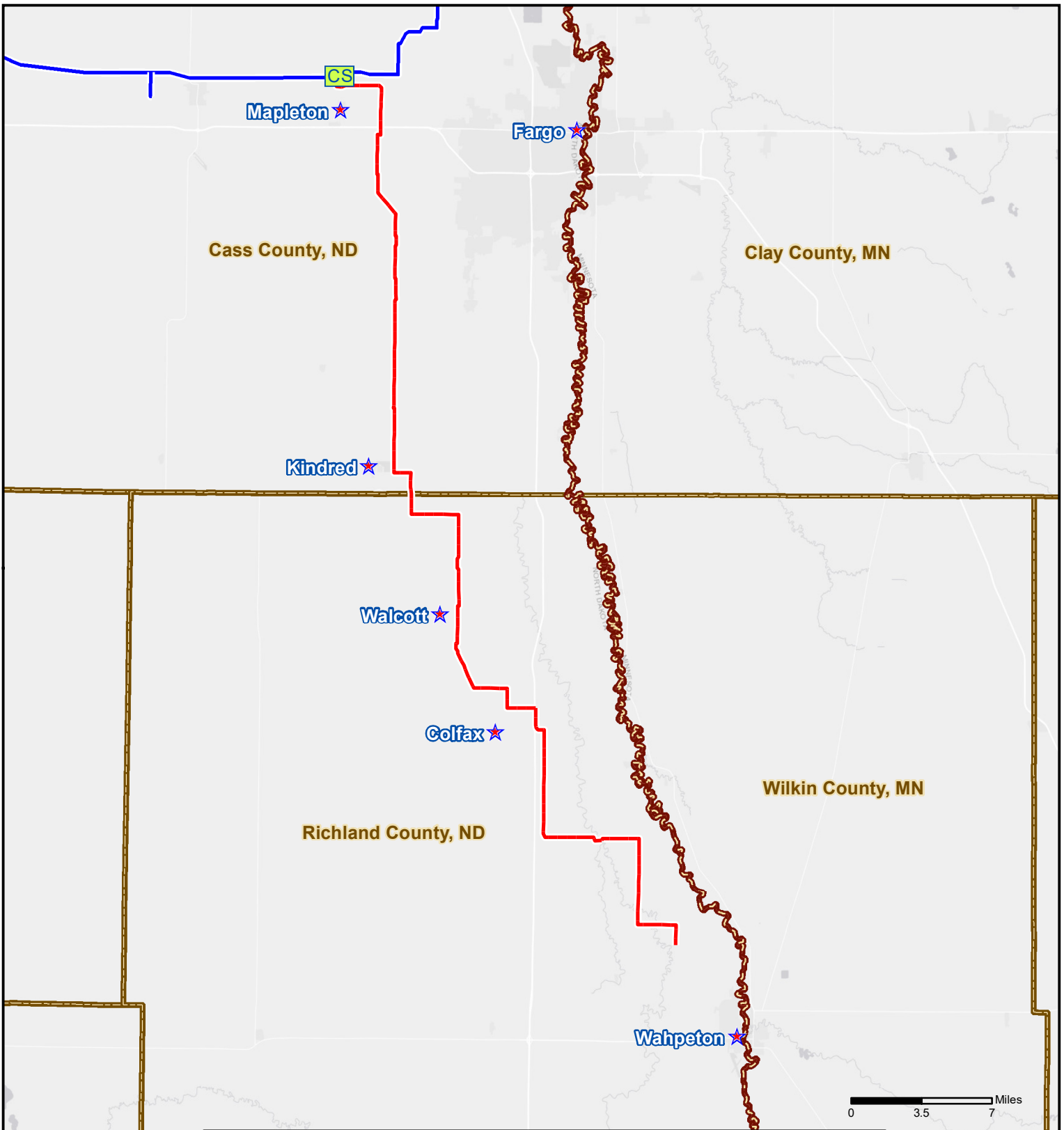
Thank you for your time and assistance with this project.

Sincerely,

Jill Linn
Environmental Affairs
WBI Energy Transmission, Inc.

Enclosures: Project Overview Map

cc: Robbyn Reukauf, WBI Energy Transmission, Inc.
 Maggie Suter, ERM
 Kevin Malloy, ERM



WBI ENERGY
TRANSMISSION
An AES/Resolute Group Company

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1 in = 35,000 feet

Wahpeton Expansion Project

Project Overview Map

Legend

CS Mapleton Compressor Station	State Boundaries
Proposed Pipeline	County Boundaries
Existing WBI Pipeline	

Cass & Richland Counties, ND

PROJECT AREA OVERVIEW

Mapleton
Wahpeton

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WBI ENERGY TRANSMISSION, INC.
2010 Montana Avenue
Glendive, MT 59330
(406) 359-7200
www.wbienergy.com

September 15, 2021

Upper Sioux Community of Minnesota
Samantha Odegard, THPO
5722 Travers Lane (PO Box: 147)
Granite Falls, MN 56241-5000

Subject: WBI Energy Transmission, Inc.
Proposed Wahpeton Expansion Project – Project Introduction Letter
Cass and Richland Counties, North Dakota

Dear THPO Officer:

WBI Energy Transmission, Inc. (WBI Energy) operates a natural gas transmission pipeline system in the Northern Plains and is proposing to expand its system in southeastern North Dakota. The Wahpeton Expansion Project will involve constructing approximately 60 miles of 12-inch diameter natural gas pipeline from WBI Energy's existing Mapleton Compressor Station near Mapleton, North Dakota, to a new delivery station near Wahpeton, North Dakota. The project will include minor modifications at the Mapleton Compressor Station and a new delivery station near Kindred, North Dakota. The enclosed map shows the preliminary proposed pipeline route and locations of project facilities.

This project will allow WBI Energy to transport an additional 20.6 million cubic feet of natural gas per day to help meet growing demand for natural gas in southeastern North Dakota. Montana-Dakota Utilities Co., a local distribution company, has engaged WBI Energy to construct this project to fulfill Wahpeton customers' needs for additional uninterrupted natural gas supply and to extend natural gas service to Kindred, at the request of city officials and residents.

The project will be regulated by the Federal Energy Regulatory Commission (FERC) under Section 7(c) of the Natural Gas Act. Under the Energy Policy Act of 2005, FERC is the lead agency for coordinating federal authorizations and complying with the National Environmental Policy Act (NEPA) on natural gas pipeline projects subject to its jurisdiction. WBI Energy plans to submit an application with the FERC in May 2022 for a Certificate of Public Convenience and Necessity to construct and operate the proposed pipeline and associated facilities. Applications for other federal or state authorizations will be submitted prior to or at approximately the same time as the FERC application, or on timelines defined by the appropriate federal or state regulations. Pending regulatory approvals, WBI Energy anticipates beginning construction in early 2024, with the new facilities in service by November 2024.

In addition to NEPA, the project is subject to review by the FERC under Section 106 of the National Historic Preservation Act (NHPA). Section 106 requires federal agencies like the FERC to consider impacts on historic properties in agency decision making. To facilitate the FERC's review of the project, WBI Energy is gathering information on the locations of cultural resource sites that may be affected by construction of the pipeline and associated facilities. WBI Energy respectfully requests your input regarding the potential of the project to affect archaeological sites, burials, and traditional cultural properties of concern to the Upper Sioux Community of Minnesota. WBI Energy also is requesting information on cultural resource sites from the State Historical Society of North Dakota. Additionally, WBI Energy plans to conduct an archaeological field survey this fall to identify sites along the pipeline route and would like to extend an invitation to Upper Sioux Community of Minnesota to participate in the survey effort.

While the regulations for implementing Section 106 (36 Code of Federal Regulations 800) allow companies like WBI Energy (and their consultants) to gather information, the FERC is responsible for complying with the NHPA. Additionally, the FERC, not WBI Energy, is responsible for government-to-government consultations with Indian Tribes. After the initiation of the FERC's involvement in the project (e.g., through the pre-filing process), the FERC will contact you through a notice and/or an individual project letter.

WBI Energy has retained Environmental Resources Management (ERM) to provide environmental support services for the Wahpeton Expansion Project. If you would like to participate in upcoming survey efforts, have questions, comments, or concerns about the project, or have information on the locations of cultural resource sites along the proposed pipeline route, please contact me at 406-359-7332 or jill.linn@wbienergy.com or contact Kevin Malloy of ERM at 906-285-0361 or kevin.malloy@erm.com. Any comments or information you provide will be sent to the FERC. If you would like to communicate directly with the FERC's natural gas archaeological staff to discuss its cultural resource review and consultation processes, please contact Eric Howard, Tribal Coordinator, at 202-502-6263 or eric.howard@ferc.gov.

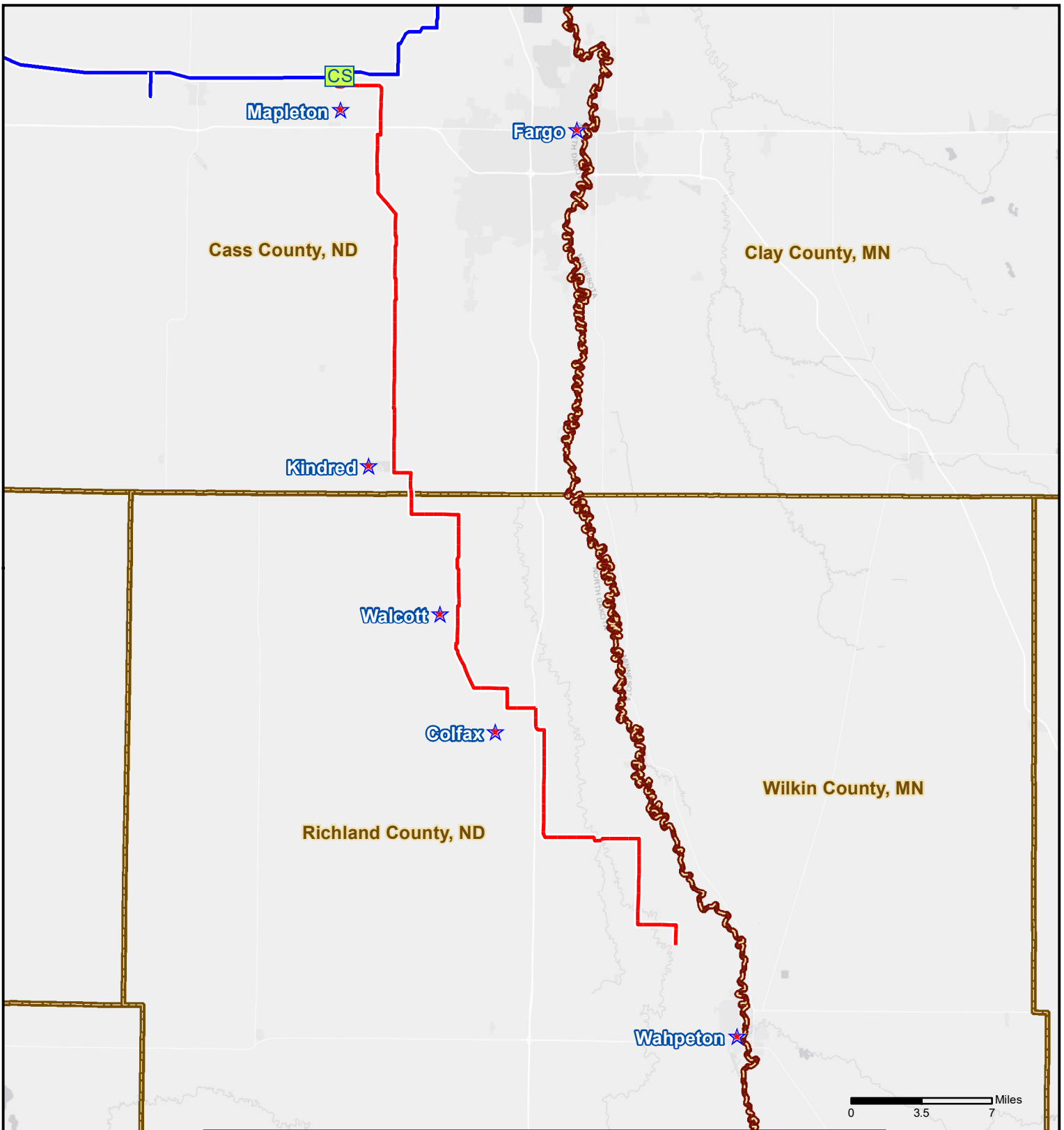
Thank you for your time and assistance with this project.

Sincerely,

Jill Linn
Environmental Affairs
WBI Energy Transmission, Inc.

Enclosures: Project Overview Map

cc: Robbyn Reukauf, WBI Energy Transmission, Inc.
Maggie Suter, ERM
Kevin Malloy, ERM



WBI ENERGY
TRANSMISSION
An AEP/ExxonMobil Group Company

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1 in = 35,000 feet

Wahpeton Expansion Project

Project Overview Map

Legend

CS Mapleton Compressor Station	State Boundaries
Proposed Pipeline	County Boundaries
Existing WBI Pipeline	

Cass & Richland Counties, ND

PROJECT AREA OVERVIEW

Mapleton
Wahpeton

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GRANITE FALLS, MN 56241

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PHONE CONVERSATION RECORD

Talked/Mes
 sage with Dyan Youpee, THPO Date 9/24/21 Time 1106am a.m.
 Of Fort Peck Assiniboine Tribe Phone 406-768-2382 p.m.
 Re: _____

I placed call Party called I returned call Party returned call Conference Call

I called Ms. Youpee and left a message to see if she received the letter sent to her for the WBI energy Transmission pipeline project in North Dakota. I left her Kevin Malloy's name and phone number in case she has any questions on the project.

Refer to _____

File

Signed Helena Burkey



PHONE CONVERSATION RECORD

Talked/Mes
sage with Fort Belknap Indian Community Date 9/24/21 Time 11:17 am a.m.
Of _____ Phone 406-353-8741 p.m.
406-353-2205

Re: _____

I placed call Party called I returned call Party returned call Conference Call

I called both numbers and a generic message came on. It had an option to leave a voice mail for the tribal government,

However the voice mail was full so I was unable to leave a message. This was on the 353-2205 number.

Refer to _____

File

Signed Helena Burkey



PHONE CONVERSATION RECORD

Talked/Mes sage with Sisseton-Wahpeton Oyate of the Lake Date 9/24/21 Time 11:12 a a.m.
Of Traverse Reservation Phone 605-698-3584
605-698-3911

Re: _____

- I placed call Party called I returned call Party returned call Conference Call

I called both numbers and it just rang and then stopped- no voicemail came on to leave a message

Refer to _____

File

Signed Helena Burkey



PHONE CONVERSATION RECORD

Talked/Mes
sage with Spirit Lake Sioux Tribe Date 9/24/21 Time 11: 24 am a.m.
Of _____ Phone 701-766-4031 p.m.
Re: _____

I placed call Party called I returned call Party returned call Conference Call

I called the # listed in the word document and it was disconnected. I was able to find another number for the tribe.

Left a message to see if she received the letter sent to her for the WBI energy Transmission pipeline project in North Dakota. I left her Kevin Malloy's name and phone number in case she has any questions on the project.

Refer to _____

File

Signed Helena Burkey



PHONE CONVERSATION RECORD

Talked/Mes
sage with Jon Eagle Sr. Standing Rock Sioux Tribe Date 9/24/21 Time 11: 26 am a.m.
Of _____ Phone _____ p.m.
Re: _____

I placed call Party called I returned call Party returned call Conference Call

Left a message to see if Mr. Eagle Jr. received the letter sent to for the WBI energy Transmission pipeline project in North Dakota. I left him Kevin Malloy's name and phone number in case he has any questions on the project.

Refer to _____

File

Signed Helena Burkey



PHONE CONVERSATION RECORD

Talked/Mes
 sage with Three Affiliated Tribes of the Fort Berthold Reservation Date 9/24/21 Time 11:26 am a.m.
 Of (Mandan, Hidatsa & Arikara Nation) Phone 701-627-6135
 Re: _____

I placed call Party called I returned call Party returned call Conference Call

Spoke with Melissa Krueger - she was on leave and is going to go through the mail. In the interim I have her email and will email her the tracking information and the documents that were sent to her tribe.

701-627-6135 Tribal Office

Melissa Krueger
 Mkrueger@mhanation.com

Refer to _____

File

Signed Helena Burkey

Helena Burkey

From: Helena Burkey
Sent: Friday, September 24, 2021 11:43 AM
To: Mkrueger@mhanation.com
Cc: Kevin Malloy
Subject: WBI Energy Transmission
Attachments: ThreeAffiliatedTribes_Tracking.pdf; ThreeAffiliatedTribes_Tribal_091321_WBI.pdf

Hi Melissa,

It was a pleasure to speak to you this morning. Attached, please find the tracking information and the letter in regards to the WBI Energy Transmission pipeline project. Should you have any questions or concerns, please reach out to Kevin Malloy who is copied here.

Thank you!

Helena Burkey
Consultant II, Scientist

ERM
235 Magrath Darby Blvd | Suite 130 | Mount Pleasant, SC 29464
T: (832) 924-5060 **W** www.erm.com **E** Helena.Burkey@erm.com |





PHONE CONVERSATION RECORD

Talked/Mes
sage with Turtle Mountain Band of Chippewa Date 9/24/21 Time 11:44 am a.m.
Of _____ Phone 701-477-2640 p.m.
Re: _____

I placed call Party called I returned call Party returned call Conference Call

Spoke with Jeff and he has asked that we email him the documents.

Desjarlaisjr.Jeffrey@yahoo.com

Refer to _____

File

Signed Helena Burkey

Helena Burkey

From: Helena Burkey
Sent: Friday, September 24, 2021 11:58 AM
To: desjarlaisjr.jeffrey@yahoo.com
Cc: Kevin Malloy
Subject: WBI Transmission Letter for ERM (Turtle Mountain Band of Chippewa Indians)
Attachments: TurtleMountain_Tribal_091321_WBI.pdf; Tribal_Tracking.pdf

Mr. Desjarlais Jr.,

It was a pleasure to speak with you this morning. Please see the attached letter in regards to the WBI Energy Transmission project along with the tracking information for the package that was mailed to your office.

If you have any questions or concerns, please feel free to reach out to Kevin Malloy. He is copied on the email.

Thank you and have a great weekend!

Helena Burkey
Consultant II, Scientist

ERM
235 Magrath Darby Blvd | Suite 130 | Mount Pleasant, SC 29464
T: (832) 924-5060 **W** www.erm.com **E** Helena.Burkey@erm.com |



Call Log

Log of Telephone Conversation



Call To/From Whom	To: Rosebud Sioux Tribe & Tribal Historic Preservation Office – Lone Quigley
Phone number	605.747.4255 (office), 605.319.6001
Company	WBI Energy Transmission Inc.
ERM Contact	Kevin Malloy
Phone number	906-285-0361
Date	September 27, 2021
Time of Conversation	5:20pm EST
Reference	North Bakken Expansion Project

Signature

LOG OF CONVERSATION

Emily Dodson contacted Ms. Lone Quigley at the Rosebud Sioux Tribes THPO to confirm receipt of WBI's Project update letter that was emailed on September 13th, 2021 to discuss any questions or comments they might have about the reports that were sent out, and participation in the upcoming field surveys. Ms. Quigley stated she had not received the letter and requested a new copy via email. I notified her that the field survey was set to begin this coming week, October 4th, 2021 and that I would get Dr. Malloy her contact information and a new letter as soon as possible.

ERM1000 IDS Center
80 South Eighth Street
Minneapolis, MN 55402Telephone: +1 612 347 6789
Fax: +1 612 347 6780
www.erm.com

Call Log

Log of Telephone Conversation



Call To/From Whom	To: Yankton Sioux Tribe
Phone number	605.384.3641
Company	WBI Energy Transmission Inc.
ERM Contact	Kevin Malloy
Phone number	906-285-0361
Date	September 27, 2021
Time of Conversation	5:09pm EST
Reference	North Bakken Expansion Project
Signature	

LOG OF CONVERSATION

Emily Dodson contacted the Tribal Historic Preservation Office, but it is currently closed. She left a voicemail regarding the WBI update letter along with instructions to please reach out to Kevin Malloy as soon as possible.

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Minneapolis, MN 55402Telephone: +1 612 347 6789
Fax: +1 612 347 6780
www.erm.com

Call Log

Log of Telephone Conversation



Call To/From Whom	To: Cheyenne River Sioux Tribe & THPO- Tashina Dupris
Phone number	605.964.7554
Company	WBI Energy Transmission Inc.
ERM Contact	Kevin Malloy
Phone number	906-285-0361
Date	September 28, 2021
Time of Conversation	12: 28pm EST
Reference	North Bakken Expansion Project

Signature**LOG OF CONVERSATION**

Emily Dodson contacted the Cheyenne River Sioux Tribe & THPO and they could not confirm receipt of the update letter. The receptionist was given Dr. Malloy's contact information and the information of the letter, and they stated they will look for it and contact Dr. Malloy as soon as possible.

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www.erm.com

Call Log

Log of Telephone Conversation



Call To/From Whom	To: Northern Arapaho Nation & THPO-
Phone number	307.856.1628
Company	WBI Energy Transmission Inc.
ERM Contact	Kevin Malloy
Phone number	906-285-0361
Date	September 28, 2021
Time of Conversation	12: 30pm EST
Reference	North Bakken Expansion Project
Signature	

LOG OF CONVERSATION

Emily Dodson contacted the Northern Arapaho Nation Tribal Historic Preservation Office and they could not confirm receipt of the update letter. The receptionist was given Dr. Malloy's contact information and the information of the letter, and they stated they will look for it and contact Dr. Malloy as soon as possible.

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Minneapolis, MN 55402Telephone: +1 612 347 6789
Fax: +1 612 347 6780
www.erm.com

Call Log

Log of Telephone Conversation



Call To/From Whom	To: Northern Cheyenne Tribe & THPO-
Phone number	406.477.4839
Company	WBI Energy Transmission Inc.
ERM Contact	Kevin Malloy
Phone number	906-285-0361
Date	September 28, 2021
Time of Conversation	12: 40pm EST
Reference	North Bakken Expansion Project
Signature	

LOG OF CONVERSATION

Emily Dodson contacted the Northern Cheyenne Tribe & THPO and they confirmed that their coordinator had received the letter. When asked, they did not report any questions or concerns at the time of the call.

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DeAnn Thyse

From: Linn, Jill <Jill.Linn@wbienergy.com>
Sent: Tuesday, September 28, 2021 5:34 PM
To: teanna.limpy@cheyennenation.com
Cc: Gary
Subject: FW: Proposed Wahpeton Expansion Project.
Attachments: Independent Contractor Agreement - TEMPLATE.docx

Importance: High

Good afternoon,

I am reaching out to coordinate survey efforts for WBI Energy's Wahpeton Expansion Project. Per the correspondence below, Northern Cheyenne is requesting to have TCS surveyors on site when survey begins. In order to accommodate this request, please provide current rates for TCS's and other requested terms and conditions of work.

I have attached a draft contractor agreement that will outline the rates, terms, and conditions agreed upon. The terms in the agreement are negotiable so please review and let me know if any of the terms need adjustment.

As I mentioned to Gary, our archaeological consultant, ERM, is planning to begin surveys next week. Currently there is limited access to the survey corridor due to crops being on the field yet so there will likely be a couple mobilizations to complete the work.

Please let me know if you have any questions or require additional information on the project in order to prepare for survey. We look forward to working with you on this project.

Thank you,

Jill Linn
Environmental Manager

WBIENERGY
TRANSMISSION

Office: 406-359-7332
Mobile: 406-939-5437

From: Gary <gary.lafranier@cheyennenation.com>
Sent: Tuesday, September 28, 2021 3:00 PM
To: eric.howard@ferc.gov
Cc: Linn, Jill <Jill.linn@wbienergy.com>
Subject: Proposed Wahpeton Expansion Project.
Importance: High

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Good Afternoon,

After looking over the invitation letter, Northern Cheyenne is requesting to be involved with the Proposed Wahpeton Expansion Project.

Also, Northern Cheyenne requesting to have TCS (surveyors) on site when survey begins.

If you have any questions, please don't hesitate to contact me.

Thank You,

Gary LaFranier

FCC/ Section 106 Coordinator

(406) 477-8114

Lame Deer, MT. 59043

ERM1000 IDS Center
80 South Eighth Street
Minneapolis, MN 55402Telephone: +1 612 347 6789
Fax: +1 612 347 6780
www.erm.com

Call Log

Log of Telephone Conversation



Call To/From Whom	To: Oglala Sioux Tribe & THPO
Phone number	605.867.5624
Company	WBI Energy Transmission Inc.
ERM Contact	Kevin Malloy
Phone number	906-285-0361
Date	September 28, 2021
Time of Conversation	12: 48pm EST
Reference	North Bakken Expansion Project
Signature	

LOG OF CONVERSATION

Emily Dodson contacted the Oglala Sioux Tribe & THPO and their contact is on leave for today. Mrs. Dodson left a message for their contact to reach out to Dr. Malloy as soon as they return about confirming receipt of the letter.

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DeAnn Thyse

From: Kevin Malloy
Sent: Tuesday, September 28, 2021 4:06 PM
To: lone.quigley@rst-msn.gov
Subject: WBI Energy Wahpeton Expansion Project
Attachments: Rosebud_Tribal_091321_WBI.docx

Good afternoon lone,

I hope this email finds you well. I'm writing on behalf of WBI Energy Transmission, Inc. regarding their upcoming Wahpeton Expansion Project in Eastern North Dakota. I believe you spoke with my colleague Emily earlier today and requested that we email you the original contact letter that was mailed on September 13. Please find attached that letter, and please feel free to reach out to me with any questions, comments, or concerns.

Thank you and kind regards,

Kevin

Kevin Malloy, Ph.D.
Senior Consultant/Archaeologist

ERM
222 South 9th Street | Suite 2900 | Minneapolis, MN 55402
M 906.285.0361
E Kevin.Malloy@erm.com | **W** www.erm.com



ERM1000 IDS Center
80 South Eighth Street
Minneapolis, MN 55402Telephone: +1 612 347 6789
Fax: +1 612 347 6780
www.erm.com

Call Log

Log of Telephone Conversation



Call To/From Whom	To: Upper Sioux Community of Minnesota & THPO
Phone number	320.564.6334
Company	WBI Energy Transmission Inc.
ERM Contact	Kevin Malloy
Phone number	906-285-0361
Date	September 30, 2021
Time of Conversation	11:31am EST
Reference	North Bakken Expansion Project
Signature	

LOG OF CONVERSATION

Emily Dodson contacted the Tribal Historic Preservation Office, but it is currently closed. She left a voicemail regarding the WBI update letter along with instructions to please reach out to Kevin Malloy as soon as possible.

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Fax: +1 612 347 6780
www.erm.com

Call Log

Log of Telephone Conversation



Call To/From Whom	To: Upper Sioux Community of Minnesota & THPO
Phone number	320.564.6334
Company	WBI Energy Transmission Inc.
ERM Contact	Kevin Malloy
Phone number	906-285-0361
Date	September 30, 2021
Time of Conversation	11:31am EST
Reference	North Bakken Expansion Project
Signature	

LOG OF CONVERSATION

Emily Dodson contacted the Tribal Historic Preservation Office, but it is currently closed. She left a voicemail regarding the WBI update letter along with instructions to please reach out to Kevin Malloy as soon as possible.

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DeAnn Thyse

From: Linn, Jill <Jill.Linn@wbienergy.com>
Sent: Monday, October 11, 2021 12:00 PM
To: teanna.limpy@cheyennenation.com
Cc: Gary
Subject: FW: Proposed Wahpeton Expansion Project.
Attachments: Independent Contractor Agreement - TEMPLATE.docx

Importance: High

Good morning,

I am following up on my previous email regarding cultural resource surveys for WBI Energy's Wahpeton Expansion Project. I am in the office all week if you would like to have a call to discuss the project and participation in surveys.

Thank you,
Jill

Jill Linn
Environmental Manager

WBIENERGY
TRANSMISSION

Office: 406-359-7332
Mobile: 406-939-5437

From: Linn, Jill
Sent: Tuesday, September 28, 2021 4:34 PM
To: teanna.limpy@cheyennenation.com
Cc: Gary <gary.lafranier@cheyennenation.com>
Subject: FW: Proposed Wahpeton Expansion Project.
Importance: High

Good afternoon,

I am reaching out to coordinate survey efforts for WBI Energy's Wahpeton Expansion Project. Per the correspondence below, Northern Cheyenne is requesting to have TCS surveyors on site when survey begins. In order to accommodate this request, please provide current rates for TCS's and other requested terms and conditions of work.

I have attached a draft contractor agreement that will outline the rates, terms, and conditions agreed upon. The terms in the agreement are negotiable so please review and let me know if any of the terms need adjustment.

As I mentioned to Gary, our archaeological consultant, ERM, is planning to begin surveys next week. Currently there is limited access to the survey corridor due to crops being on the field yet so there will likely be a couple mobilizations to complete the work.

Please let me know if you have any questions or require additional information on the project in order to prepare for survey. We look forward to working with you on this project.

Thank you,

Jill Linn

Environmental Manager

WBIENERGY

TRANSMISSION

Office: 406-359-7332

Mobile: 406-939-5437

From: Gary <gary.lafranier@cheyennenation.com>

Sent: Tuesday, September 28, 2021 3:00 PM

To: eric.howard@ferc.gov

Cc: Linn, Jill <Jill.linn@wbienergy.com>

Subject: Proposed Wahpeton Expansion Project.

Importance: High

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Good Afternoon,

After looking over the invitation letter, Northern Cheyenne is requesting to be involved with the Proposed Wahpeton Expansion Project.

Also, Northern Cheyenne requesting to have TCS (surveyors) on site when survey begins.

If you have any questions, please don't hesitate to contact me.

Thank You,

Gary La Franier

FCC/ Section 106 Coordinator

(406) 477-8114

Lame Deer, MT. 59043

Call Log

Log of Telephone Conversation

Call To	Teanna Limpy – Tribal Historic Preservation Office
Company	Northern Cheyenne Tribal Historic Preservation Office
Phone #	406-477-4838
Call From	Jill Linn
Company	WBI Energy Transmission, Inc.
Phone #	406-359-7332
Date	October 21, 2021
Time	3:30 p.m.
Subject	Coordinating Cultural Resource Surveys

Called and left a message with the Tribal Historic Preservation Office - Office Manager and explained I have sent a couple e-mails regarding WBI Energy's Wahpeton Expansion Project and the Northern Cheyenne's interest in participating in survey. Requested a call back to coordinate the survey effort.

DeAnn Thyse

From: Crystal Reynolds <crystal.reynolds@northernarapaho.com>
Sent: Wednesday, October 27, 2021 3:10 PM
To: jill.linn@wbienergy.com; Kevin Malloy; eric.howard@ferc.gov
Subject: WBI Energy Wahpeton Natural Gas Line Expansion
Attachments: Wahpeton Natural Gas Line Expansion Project.docx

Categories: Red Category - DON'T FORGET!!!

WARNING: The sender of this email could not be validated and may not match the person in the "From" field.

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

We would like to request the previous cultural resource inventory if it is available.

--

Thank you,
Crystal Reynolds
Tribal Archaeologist
Northern Arapaho Tribe
Tribal Historic Preservation Office

P.O. Box 67
St. Stephens, Wy 82524

Office: 307-856-1628
Cell: 307-851-0962
Fax: 307-856-1974

DeAnn Thyse

From: Linn, Jill <Jill.Linn@wbienergy.com>
Sent: Thursday, November 4, 2021 3:54 PM
To: Crystal Reynolds; Kevin Malloy; eric.howard@ferc.gov
Subject: RE: WBI Energy Wahpeton Natural Gas Line Expansion
Attachments: WBI cultural resources table_edited.docx

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Ms. Reynolds,

Please find attached a table detailing the results of the cultural resource inventory background research. This background research details all of the previously identified cultural resources within a two mile corridor (four miles total) of the project centerline.

Please feel free to reach out to me with questions or if you would like additional information regarding the project.

Regards,

Jill Linn
Environmental Manager

WBIENERGY
TRANSMISSION

Office: 406-359-7332
Mobile: 406-939-5437

From: Crystal Reynolds <crystal.reynolds@northernarapaho.com>
Sent: Wednesday, October 27, 2021 2:10 PM
To: Linn, Jill <jill.linn@wbienergy.com>; kevin.malloy@erm.com; eric.howard@ferc.gov
Subject: WBI Energy Wahpeton Natural Gas Line Expansion

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We would like to request the previous cultural resource inventory if it is available.

--

Thank you,
Crystal Reynolds
Tribal Archaeologist
Northern Arapaho Tribe
Tribal Historic Preservation Office

P.O. Box 67
St. Stephens, Wy 82524

Office: 307-856-1628

Cell: 307-851-0962

Fax: 307-856-1974

DeAnn Thyse

From: Crystal Reynolds <crystal.reynolds@northernarapaho.com>
Sent: Friday, November 5, 2021 11:06 AM
To: jill.linn@wbienergy.com; Kevin Malloy; eric.howard@ferc.gov
Subject: Re: WBI Energy Wahpeton Natural Gas Line Expansion
Attachments: Wahpeton Natural Gas Line Expansion Project.docx

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CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Here is an updated letter of determination based on the cultural resource inventory that was shared with us.

On Wed, Oct 27, 2021 at 2:10 PM Crystal Reynolds <crystal.reynolds@northernarapaho.com> wrote:

We would like to request the previous cultural resource inventory if it is available.

--

Thank you,
Crystal Reynolds
Tribal Archaeologist
Northern Arapaho Tribe
Tribal Historic Preservation Office

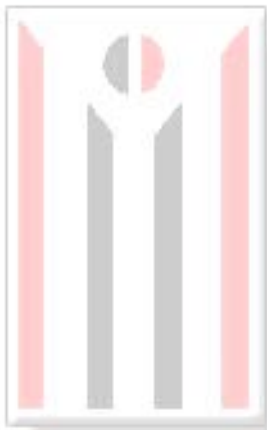
P.O. Box 67
St. Stephens, Wy 82524

Office: 307-856-1628
Cell: 307-851-0962
Fax: 307-856-1974

--

Thank you,
Crystal Reynolds
Tribal Archaeologist
Northern Arapaho Tribe
Tribal Historic Preservation Office

P.O. Box 67
St. Stephens, Wy 82524



Hinon'ainino'

Northern Arapaho Tribe

TRIBAL HISTORIC PRESERVATION OFFICE

P.O. Box 67 - St. Stephens, Wyoming 82524 - PH: 307.856.1628 -

Creynolds.thpo@gmail.com



November 5, 2021

WBI Energy
2010 Montana Ave, Glendive MT 59330
406-359-7200

RE: Wahpeton Natural Gas Line Expansion Project

After reviewing your request under the Section 106 process of the NHPA, and NEPA, our office would like to comment on the proposed project: Wahpeton Natural Gas Line Expansion Project. Due to the area being previously disturbed the Northern Arapaho Tribal Historic Preservation Office makes the following determination:

Determination of Effect: "Adverse Effect on one or more Historic Properties" in the Direct and Visual APE.

*Also expressing interest in participation of the Cultural Resource Inventory; unless a more local tribe expresses interest in participating

Our office has come to this determination by drawing conclusions from the survey and file search from maps depicting provenience of sites in regards to the Direct and Visual APE. There are one or more cultural resources and no eligible historic properties within the APE. Currently, there are properties of religious and cultural significance to the Northern Arapaho within the area of potential effect. However, if traditional cultural properties, rock features, or human remains are found during excavation with any new ground disturbance, we request to be contacted and a report provided.

Thank you for consulting with the Northern Arapaho THPO.

Sincerely,


Crystal Reynolds

Crystal Reynolds
NATHPO Tribal Archaeologist
Creynolds.thpo@gmail.com
307-856-1628 Office
307-856-4974 FAX

Call Log

Log of Telephone Conversation



Call To/From Whom	Crystal C'Bearing Northern Arapaho THPO Deputy Director
Phone number	307.856.1628
Company	WBI Energy Transmission Inc
ERM Contact	Kevin Malloy
Phone number	906.285.0361
Date	November 29, 2021
Time of Conversation	10:00 AM CDT
Reference	Wahpeton Expansion Project
Signature	

LOG OF CONVERSATION

We first discussed the letter that the Northern Arapaho had provided to WBI on 11-5-21. Ms. C'Bearing clarified that there were actually sites in the APE that they were concerned about, and if additional sites were identified they would also like to be notified. They also would like a copy of our report when it is completed. Ms. C'Bearing said that they were very interested in participating in the survey if no other tribe was present to participate that was more locally based. Following this, we discussed the table of sites we had sent them that had been identified during background research. Since their letter didn't specify which sites they were concerned about, we asked if one of them was 32CS4676, the one that was identified that first week. Mr. Malloy stated that WBI has already committed to avoid that site and alternative routes have already been explored. Furthermore, he provided a quick summary of our findings to her and stated that we had not encountered any stone feature sites. I also explained that, as far as participation in the survey went, we had been contacted by another tribe early on, but the coordination never came together to get TCS on the ground with us. Mr. Malloy did state that we have a little bit more to complete in the spring and they would be welcome to join us then. I also said that the effort needed to be coordinated by WBI directly. I did not go so far as to offer visits to the project area or the other sites, but was wondering if that might be a possible avenue to help assuage their concerns.

**APPENDIX 4G PLAN FOR UNANTICIPATED DISCOVERY OF
HISTORIC PROPERTIES OR HUMAN REMAINS
DURING CONSTRUCTION**



WBI ENERGY TRANSMISSION, INC.

Wahpeton Expansion Project

Appendix 4G

**Plan for Unanticipated Discovery of Historic Properties or
Human Remains During Construction**

Draft

**Docket No.
PF21-4-000**

March 2022

**WBI ENERGY TRANSMISSION, INC.
WAHPETON EXPANSION PROJECT
PLAN FOR UNANTICIPATED DISCOVERY OF HISTORIC PROPERTIES
OR HUMAN REMAINS DURING CONSTRUCTION**

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ACRONYMS AND ABBREVIATIONS

EI	Environmental Inspector
FERC	Federal Energy Regulatory Commission
Project	Wahpeton Expansion Project
SHSND	State Historical Society of North Dakota
WBI Energy	WBI Energy Transmission, Inc.

1.0 INTRODUCTION

This plan identifies procedures to be implemented in the event that previously unreported and unanticipated cultural materials or human remains are found during construction of WBI Energy Transmission, Inc.'s (WBI Energy) Wahpeton Expansion Project (or Project).

2.0 TRAINING

Prior to the start of construction, WBI Energy will conduct environmental training, including instruction on the identification of cultural materials, unmarked burials, and human remains, for Company and Contractor personnel. WBI Energy also will provide large-group training sessions before each work crew commences construction with periodic follow-up training for groups of newly assigned personnel.

3.0 UNANTICIPATED DISCOVERY OF CULTURAL MATERIALS OR HUMAN REMAINS

The following measures will be implemented if known or suspected cultural materials, unmarked burials, or human remains are discovered during construction.

1. The Contractor will stop work in the area of the find (i.e., within 100 feet of the find or the outer perimeter of a group of finds) to protect the integrity of the find.
2. The Contractor will notify a WBI Energy Environmental Inspector (EI) of the find and will not restart work in the area of the find until approved by an EI.
3. The EI will notify WBI Energy's Designated Representative, who will coordinate with WBI Energy's Archaeological Consultant to conduct a preliminary assessment of the find.
4. Following the investigation, the Archaeological Consultant will notify WBI Energy's Designated Representative by telephone regarding the preliminary assessment of the find.
5. WBI Energy's Designated Representative will notify the Federal Energy Regulatory Commission (FERC), State Historical Society of North Dakota (SHSND), and federally recognized Indian tribes (as appropriate) by telephone regarding the preliminary evaluation of the find.
6. If the materials found are cultural materials (e.g., artifacts or archaeological features), the procedures in section 4.0 will be implemented. If the materials found are human remains, the procedures in section 5.0 will be implemented.

4.0 DISCOVERY OF CULTURAL MATERIALS

1. The EI will flag or fence off the site (including the area within 100 feet of the find or the outer perimeter of a group of finds).

Plan for Unanticipated Discovery of Historic Properties or Human Remains During Construction

2. WBI Energy's Designated Representative will direct the Archaeological Consultant to begin an assessment of the significance of the find and the potential effect of construction on the site.
3. The Archaeological Consultant will assess and document the find within 2 days of its discovery.
4. If the Archaeological Consultant determines the find is not significant, and the FERC, SHSND, and any consulting federally recognized Indian tribes concur, the Archaeological Consultant will notify WBI Energy's Designated Representative that construction may proceed across the find without additional action. The Archaeological Consultant will prepare a brief report on the find for submittal to the FERC, SHSND, and any consulting federally recognized Indian tribes within 7 days of discovery of the find.
5. If the Archaeological Consultant determines that the find may be significant, and the FERC, SHSND, and any consulting federally recognized Indian tribes concur, then the following additional steps will be implemented.
 - a. WBI Energy's Designated Representative will notify other parties of the find as directed by the FERC and SHSND.
 - b. If the find is determined to be significant and continuing construction may damage more of the find, WBI Energy's Designated Representative will request recommendations from the FERC, SHSND, and any consulting federally recognized Indian tribes regarding measures for site treatment. These measures may include:
 - i. a variance request to re-route the pipeline around the site;
 - ii. archaeological evaluation of the site;
 - iii. site visits by the FERC, SHSND, and any consulting federally recognized Indian tribes;
 - iv. preparation of a mitigation plan by WBI Energy for approval by the FERC, SHSND, and any consulting federally recognized Indian tribes;
 - v. implementation of the mitigation plan; and
 - vi. approval to resume construction following completion of the fieldwork component of the mitigation plan.
 - c. If, upon further analysis by the Archaeological Consultant, the find is determined to lack significance, WBI Energy's Designated Representative will consult with the FERC, SHSND, and any consulting federally recognized Indian tribes and will request approval to resume construction subject, as warranted, to further mitigation required by the FERC.

- d. WBI Energy's Designated Representative will notify the EI who will grant clearance to the Contractor to start work.

5.0 DISCOVERY OF UNMARKED BURIALS OR HUMAN REMAINS

1. If an unmarked human burial or skeletal remains are encountered during construction activities, WBI Energy will comply with North Dakota's "Protection of human remains and burial goods – Unlawful acts – Penalties - Exceptions" law (North Dakota Century Code [NDCC] 23-06-27) and its accompanying administrative rules (North Dakota Administrative Code [NDAC] 40-02-03).
2. WBI Energy's Designated Representative will direct the EI to flag or fence off the find (including the area within 100 feet of the find or the outer perimeter of a group of finds) and will notify the appropriate local law enforcement agency as required by NDCC 23-06-27.
3. WBI Energy's Designated Representative will notify the FERC, SHSND, and any consulting federally recognized Indian tribes of the find.
4. If the local law enforcement agency determines that the remains are not modern or do not reflect a crime scene and/or if they otherwise relinquish their jurisdiction over the remains, the FERC will consult appropriate parties (e.g., WBI Energy, SHSND, federally recognized Indian tribes, and the landowner) regarding additional steps to be followed.
5. If it can be determined that the identified human remains have affinity to federally recognized Native American tribes, a reasonable effort will be made to identify, locate, and notify these tribes.
6. The parties will make a good faith effort to exclude the public from viewing Native American burial sites or associated funerary artifacts and ensure that no photographs of Native American burial sites or associated funerary artifacts are released to the press or public.
7. The measures to protect the remains and associated artifacts will remain in effect until they have been fully evaluated, appropriate treatment of the discovery (if applicable) has been completed, and WBI Energy has received written notice from the FERC to proceed with construction at the discovery site. These treatment measures may include:
 - a. a variance request to re-route the pipeline around the site;
 - b. site visits by the FERC, SHSND, and any consulting federally recognized Indian tribes;
 - c. preparation of a treatment plan by WBI Energy for approval by the FERC, SHSND, and any consulting federally recognized Indian tribes;
 - d. implementation of the treatment plan; and

e. approval to resume construction following completion of the fieldwork component of the treatment plan.

8. WBI Energy's Designated Representative will notify the EI who will grant clearance to the Contractor to resume work at the discovery site.

6.0 CONTACTS FOR UNANTICIPATED DISCOVERIES

WBI ENERGY CONTACTS:

Lead Environmental Inspector

Name: To be determined
Cell: To be determined
Email: To be determined

Environmental Inspector

Name: To be determined
Cell: To be determined
Email: To be determined

WBI Energy Designated Representative

Name: Jill Linn
Address: 2010 Montana Avenue, Glendive, MT 59330
Phone: 406-359-7332
Cell: 406-939-5437
Email: Jill.Linn@WBIEnergy.com

Archaeological Consultant

Name: Kevin Malloy, ERM
Address: 222 South 9th Street, Minneapolis, MN 55402
Phone: 612-347-7138
Cell: 906-285-0361
Email: Kevin.Malloy@erm.com

FEDERAL CONTACTS:

FERC Project Manager

Name: David Hanobic
Address: 888 1st St NE, Washington, DC 20426
Phone: 202-502-8312
Email: David.Hanobic@ferc.gov

FERC Project Archaeologist

Name: Dawn Ramsey
Address: 888 1st St NE, Washington, DC 20426
Phone: 202-502-8729
Email: Dawn.Ramsey@ferc.gov

STATE CONTACTS:

State Historical Society of North Dakota, Director

Name: Bill Peterson
Address: 612 East Boulevard Avenue, Bismarck, ND 58505
Phone: 701-328-2666
Email: billpeterson@nd.gov

TRIBAL CONTACTS:

Northern Arapaho Tribe, Tribal Historic Preservation Officer (THPO)

Name: Crystal Reynolds
Address: P.O. Box 67, St. Stephens, Wyoming 82524
Phone: (307) 856-1628
Email: creynolds.thpo@gmail.com

LOCAL LAW ENFORCEMENT CONTACTS:

Cass County Sheriff

Name: Jesse Jahner
Address: 1612 23rd Ave N, Fargo, ND 58107
Phone: 701-241-5800

Richland County Sheriff

Name: Larry Leshovsky
Address: 413 3rd Ave N, Wahpeton, ND 58075
Phone: 701-642-7711