

RESOURCE REPORT NO. 4
CULTURAL RESOURCES



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Cultural Resources

Northern Lights 2025 Expansion Project

FERC Docket No. CP24- 000

February 2024

RESOURCE REPORT 4 – CULTURAL RESOURCES SUMMARY OF FILING INFORMATION

	Found in Section
1. Initial cultural resources consultation and documentation, and documentation of consultation with Native Americans. (§ 380.12(f)(1)(i)&(2))	Appendices 4B and 4C
<ul style="list-style-type: none"> See § 380.14 for specific procedures. 	
2. Overview/Survey Report(s). (§§ 380.12(f)(1)(ii) and 380.12(f)(2))	Appendix 4A (filed as P&C)
<ul style="list-style-type: none"> See § 380.14 for specific procedures. For the offshore area this will usually require completion of geophysical and other underwater surveys before filing. 	
Additional Information Often Missing and Resulting in Data Requests	
<ul style="list-style-type: none"> Identify the project APE in terms of direct or indirect effects to known cultural resources. 	Section 4.1, and Appendix 4A (filed as P&C)
<ul style="list-style-type: none"> Provide a project map with mileposts, clearly showing boundaries of all areas surveyed (ROW, extra work areas, access roads, etc.) and to be surveyed with corridor widths clearly specified. 	Appendix 4A (filed as P&C)
<ul style="list-style-type: none"> Provide documentation of consultation with SHPOs, THPOs and applicable land-managing agencies regarding the need for and required extent of cultural resource surveys. 	Appendices 4B and 4C, comments from SHPO and THPO consultation will be forthcoming
<ul style="list-style-type: none"> Provide a narrative summary of overview results, cultural resource surveys completed, identified cultural resources and any cultural resource issues. 	Sections 4.3 and 4.4 and Appendix 4A (filed as P&C)
<ul style="list-style-type: none"> Provide a project specific Ethnographic Analysis (can be part of Overview/Survey Report). 	Section 4.2 and Appendix 4A (filed as P&C)
<ul style="list-style-type: none"> Identify by mileposts any areas requiring survey for which the landowner denied access. 	Table 4.4-1
<ul style="list-style-type: none"> Provide written comments on the Overview and Survey Reports, if available, from the SHPOs or THPOs, as appropriate, and applicable land-managing agencies. 	Table 4.5-1; Appendix 4B; comments from the SHPOs and THPOs will be forthcoming
<ul style="list-style-type: none"> Provide a Summary Table of completion status of cultural resource surveys, and SHPO or THPO and land-managing agency comments on the reports. 	Table 4.5-1 and Sections 4.5 and 4.6, comments from the SHPOs and THPOs will be forthcoming
<ul style="list-style-type: none"> Provide a Summary Table of identified cultural resources, and SHPO or THPO and land-managing agency comments on the eligibility recommendations for those resources. 	No eligible resources identified
<ul style="list-style-type: none"> Provide a brief summary of the status of Native American consultation, including copies of all related correspondence and records of verbal communications. 	Table 4.5-1 and Appendix 4B
<ul style="list-style-type: none"> Provide a schedule for completing any outstanding cultural resource studies. 	Section 4.4
<ul style="list-style-type: none"> Provide an Unanticipated Discoveries Plan for the project area, referencing appropriate state statutes. 	Section 4.7 and Appendix 4D

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- Appendix 4A-3 Reconnaissance Cultural Resources Survey of the Proposed Farmington to Hugo C-line Project, Washington County, Minnesota; draft cultural resources report (filed under separate cover marked “CUI//PRIV – DO NOT RELEASE”)
- Appendix 4A-4 Phase I Cultural Resources Investigation Results for the Tomah Branch Line Loop Project, Rural Sparta Township, Monroe County, Wisconsin; draft cultural resources report (filed under separate cover marked “CUI//PRIV – DO NOT RELEASE”)
- Appendix 4A-5 Reconnaissance Cultural Resources Survey of the Proposed La Crescent Compressor Station Modifications Project, Houston County Minnesota; draft cultural resources report (filed under separate cover marked “CUI//PRIV – DO NOT RELEASE”)
- Appendix 4B Native American Tribal Correspondence
- Appendix 4C SHPO Consultation Documentation
- Appendix 4D Unanticipated Discoveries Plans

Abbreviations and Acronyms

APE	Area of Potential Effect
BCE	Before Common Era
CE	Common Era
CFR	Code of Federal Regulations
ESB	Environmental survey boundary
ETWS	Extra temporary workspace
FERC	Federal Energy Regulatory Commission
GLIFWC	Great Lakes Indian Fish & Wildlife Commission
MHS	Minnesota Historical Society
MIAC	Minnesota Indian Affairs Council
MP	milepost
NAGPRA	Native American Graves Protection and Repatriation Act
NHPA	National Historic Preservation Act
Northern	Northern Natural Gas
NPS	National Park Service
NRHP	National Register of Historic Places
P&C	Privileged and Confidential
Phase One	Phase One Archaeological Services Inc.
Project	Northern Lights 2025 Expansion Project
RCG&A	R. Christopher Goodwin & Associates, Inc.
ROW	right of way
SHPO	State Historic Preservation Office(r) (Minnesota or Wisconsin)
THPO	Tribal Historic Preservation Office(r)
TWS	Temporary workspace
UDP	Unanticipated Discoveries Plan

4.0 CULTURAL RESOURCES

Resource Report 4 describes the historic and cultural properties present near Northern’s Project and assesses the potential for impacts and mitigation measures, as applicable, associated with construction, operation and maintenance of the Project.

Northern owns and operates an approximately 14,300-mile-long natural gas transmission pipeline system and associated aboveground facilities, including pipeline and facilities in Minnesota and Wisconsin. Northern is proposing to construct the Project, which will consist of (1) a 3.00-mile extension of its 36-inch-diameter Lake Mills to Albert Lea E-line; (2) a 2.43-mile extension of its 30-inch-diameter Elk River 3rd branch line; (3) a non-contiguous 1.91-mile extension of its 30-inch-diameter Farmington to Hugo C-line; (4) a 1.28-mile extension of its 8-inch-diameter Tomah branch line loop; (5) minor modifications to its existing La Crescent compressor station; and (6) aboveground facilities including a launcher, receiver and tie-in valve settings. All Project components are located in various counties in Minnesota and Wisconsin.

4.1 INTRODUCTION

Cultural resources are places, sites, buildings and intangible values that connect people with each other and the past. They reflect how events and places help shape a community’s physical appearance and regional context. Cultural resources provide a community’s residents with an identity. They also contribute to the educational, recreational, aesthetic and spiritual values of a community. Most importantly, cultural resources are unique and irreplaceable.

Because the Project will be permitted by FERC, the Project is subject to Section 106 of the NHPA, as amended. Section 106 requires federal agencies to consider the effects of proposed projects to historic properties listed or eligible for listing in the NRHP (including archaeological resources, prehistoric and historic structures and cultural landscapes). The NHPA and federal regulations require federal agencies to consult with the appropriate SHPOs and THPOs for undertakings with the potential to affect NRHP-listed or NRHP-eligible properties. Northern has begun communication regarding potential historic and cultural resources with the Minnesota and Wisconsin SHPOs and THPOs, and the status of outreach is detailed in sections 4.5 and 4.6. As additional information is obtained, Northern will provide documentation to FERC.

As defined in 36 CFR § 800.16(d), the 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.” For Northern’s Project, the APE is defined based on the potential for effect, which may differ for aboveground resources (historic structures and landscapes) and subsurface resources (archaeological sites). The APE typically includes all areas where undertakings could cause changes to the land, structures or their uses whether the change would be direct, indirect, beneficial or adverse. In addition to areas of ground disturbance, this includes all locations from which elements of the undertaking (such as structures or land disturbance) could be visible. By the definition found in 36 CFR § 800.16(i), an “effect” is an alteration to the characteristics of a historic property qualifying it for inclusion or eligibility for the NRHP.

Potential direct effects may not just impact an archaeological site, but also impact aboveground structures, sites, landscapes, and historic districts. Northern has adopted that definition of the direct APE, which will include footprints of the proposed facilities, ETWS, staging areas, and access roads, as well as the construction ROW required for construction. The APE for archaeological resources also includes areas that will be installed using horizontal directional drill methods.

The historical/architectural APE is referred to as the indirect APE. The indirect APE for the Project will include the viewshed and other areas where direct and indirect project impacts have the potential to alter character-defining features of an applicable property's significance. Based on an agreement reached with the Minnesota SHPO and Northern in 2018 and discussions with the Wisconsin SHPO, the indirect APE for small pipeline fixtures (not exceeding 10 feet in height) is set at an area of line of site extending 500 feet outward from the limits of the planned fixtures or aboveground appurtenant facilities. The radius may be expanded if a portion of the survey area crosses a property with a building or structure more than 45 years old, such as a farmstead. Indirect APE visual effects must include an assessment of the impact of long-term maintenance.

Northern's cultural resource investigations have been conducted in accordance with Section 106 of the NRHP. All aspects of the archaeological investigation were conducted in accordance with methodological guidelines of the *Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation* (NPS 1983). Copies of the Phase I archaeological reports are included in Appendix 4A (filed as P&C).

4.2 ETHNOGRAPHIC ANALYSIS

The earliest evidence of habitation in Wisconsin dates to between 13,500 and 12,200 BCE (Joyce 2006). These early inhabitants are known as Pre-Paleoindians. Evidence of Pre-Paleoindians is not present in Minnesota and the earliest inhabitants in Minnesota are the Paleoindians from 9000 to 7500 BCE (Stanford 1999:286). A northern woodland environment was established in Minnesota and Wisconsin with the retreat of the ice sheet (Gibbon et al. 2002). The Paleo-Indian peoples were followed by Archaic Tradition hunter-gatherers (7500 to 500 BCE) and transitioned the landscape to an expansive prairie, interspersed with large lakes and swiftly flowing rivers (Hodgson et al. 2024). The Woodland Tradition followed the Archaic Tradition. In Minnesota, the Woodland culture is separated into two periods, the earlier Initial Woodland period (500 BCE to 500 CE) and the later Terminal Woodland period (500 to 1650 CE). In Wisconsin, the Woodland Tradition is separated into three stages, the Early Woodland Stage (500 BCE to 150 years CE), the Middle Woodland Stage (150 CE to 500 years CE) and the Late Woodland Stage (500 CE to 1300 CE). The Mississippian/Oneota Tradition (1000 CE to 1650 CE) overlapped portions of the Late Woodland Tradition. At approximately 1000 CE, Mississippian populations from Cahokia, near St. Louis, Missouri, began to extend their influence northward into the Upper Mississippi River Valley and saw the introduction of effigy mounds to the region. The Mississippian peoples in the south and the Terminal Woodland peoples in the north first had contact with Europeans exploring Minnesota and Wisconsin in the mid-17th century (Gibbon et al. 2002). Additional information is provided in the individual cultural resource survey reports included in Appendix 4A.

4.2.1 Minnesota Ethnography

The Eastern Dakota lived throughout southern Minnesota since the 17th century and were in an alliance with French fur traders and merchants. The Eastern Dakota, along with the Western Dakota and the Lakota, comprise the ethnic group of the Sioux people (Gibbon et al. 2002). There are currently four reservations in Minnesota inhabited by descendants of the Eastern Dakota people:

- Upper Sioux Community
- Lower Sioux Community
- Shakopee Mdewakanton Sioux Community
- Prairie Island Indian Community

Between 1805 and 1867, the Dakota and Ojibwe entered into multiple treaties with the U.S. government. In exchange for millions of acres of land, the Dakota were promised payments, goods and services. The Dakota Community was established by treaty in 1851. Between 1837 and 1867, the Ojibwe and Dakota people ceded most of the land that is now Minnesota to the U.S. government (MIAC 2020). The treaty set aside a 10-mile-wide strip of land on both sides of the Minnesota River as the permanent home of the Dakota (MIAC 2020). Due to the U.S.-Dakota Conflict of 1862, the U.S. Congress passed the Forfeiture Act of 1863, which abrogated all treaties made with the Dakota and eliminated their treaty rights (MHS 2020).

The 1679 alliance between the Dakota and the Anishinaabe (also known as Chippewa and Ojibwe) provided the Dakota with fur trade goods and, in return, the Dakota permitted the Anishinaabe to move west towards the Mississippi River (MIAC 2020). The Anishinaabe moved to farm wild rice: the food that grows on water (GLIFWC 2020). There are currently seven reservations in Minnesota inhabited by the Anishinaabe people:

- Bois Forte Band of Chippewa
- Fond du Lac Band of Lake Superior Chippewa
- Grand Portage Band Chippewa
- Leech Lake Band of Ojibwe
- Mille Lacs Band of Ojibwe
- White Earth Nation
- Red Lake Band of Chippewa

Between 1825 and 1867, the Chippewa and Ojibwe entered into multiple treaties with the U.S. government. In exchange for millions of acres of land, the Chippewa and Ojibwe were promised payments, goods and services. The Chippewa and Ojibwe retained the right for tribal members to hunt, fish and gather on their former land. These tribal land use rights continue today (GLIFWC 2020). Additional information is provided in the individual cultural resource survey reports included in Appendix 4A.

4.2.2 Wisconsin Ethnography

The first European documented to have entered into what is now Wisconsin was Jean Nicollet, in 1634 CE, landing near the present-day town of Green Bay. The entrance of Europeans into Wisconsin led to the displacement of many American Indians. Following this displacement, the Iroquois invaded neighboring nations in Michigan and Ontario, driving the Sauk, Meskwaki (Fox), Potawatomi, Mascouten, Kickapoo, Ottawa, and other tribes into the land between Lake Michigan and the Mississippi River. Competition for resources such as food and furs generated almost a century of intertribal warfare among the displaced people and the already-present Menominee, Ho-Chunk, Sioux, and Chippewa.

There are six reservations in Wisconsin inhabited by the Chippewa people:

- Bad River Band of Lake Superior Chippewa
- Lac Courte Oreilles Band of Lake Superior Chippewa
- Lac du Flambeau Band of Lake Superior Chippewa
- Red Cliff Band of Lake Superior Chippewa
- Mole Lake (Sokaogon Chippewa Community) Band of Lake Superior Chippewa
- St. Croix Chippewa Indians of Wisconsin

There are three reservations in Wisconsin inhabited by the Menominee, Ho-Chunk and Potawatomi people:

- Forest County Potawatomi
- Ho-Chunk Nation
- Menominee Indian Tribe of Wisconsin

There are two reservations in Wisconsin inhabited by tribes relocated from New York:

- Oneida Nation
- Stockbridge-Munsee Community Band of Mohican Indians

Additional information is provided in the individual cultural resource survey reports included in Appendix 4A.

4.3 PREVIOUS CULTURAL RESOURCE INVESTIGATION

Northern's cultural resources' sub-consultants, RCG&A and Phase One, conducted background research at the Minnesota and Wisconsin SHPOs to identify previously recorded archaeological and aboveground resources located within a one-mile study area centered on the Project.

The results of the background research for the Project are provided in the cultural resource reports provided in Appendix 4A (filed as P&C) and summarized below.

Lake Mills to Albert Lea E-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources on the list of NRHP properties are in the indirect APE. One archaeological site, 21FE0130, and Minnesota Statewide Historic Inventory property FE-AEA-00264 extends into the 500-foot buffer around the proposed aboveground valve setting. However, due to distance and mature trees, no effects are anticipated.

Elk River 3rd branch line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Farmington to Hugo C-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Tomah branch line loop

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

A single standing structure, a 19th century Greek Revival Farmhouse (AHI # 78410) was previously located on the west side of County Highway Q within the indirect APE. This building was razed and replaced with a modern single-family farmhouse. No other aboveground historical resources previously listed in the Wisconsin Architecture-History Inventory or on the list of the NRHP properties are located in the indirect APE.

La Crescent compressor station

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the La Crescent compressor station to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

4.4 CULTURAL RESOURCES SURVEY

Following the literature review, Northern’s subconsultants conducted a systematic field survey of the direct APE, which includes the construction ROW (TWS), ETWS, access roads, staging areas, and the aboveground appurtenant facility footprints. The survey procedures included a pedestrian walkover of the APE, systematic surface examination of suitable areas, and systematic subsurface testing of areas lacking sufficient surface visibility or which had potential for subsurface resources.

The status of the cultural resources survey for the Project components are detailed in Table 4.4-1.

Table 4.4-1 Project Cultural Survey Status

Facility Description	County	Survey Corridor Width (feet)	MP		Survey Status
			Start	End	
Lake Mills to Albert Lea E-line					
36-inch-diameter extension	Freeborn, MN	321 – 5,280	31.21	34.21	89% complete; additional shovel testing needed on 77.02 acres, anticipated for spring 2024. ¹

¹ Pedestrian surveys for the Lake Mills to Albert Lea E-line is complete; based on a Minnesota SHPO comment recently received on another project, Northern will complete additional shovel testing for mollisols in spring 2024.

Facility Description	County	Survey Corridor Width (feet)	MP		Survey Status
			Start	End	
Elk River 3rd branch line					
30-inch-diameter extension	Washington, MN	104 – 1,200	1.02	3.45	92% complete; additional survey needed on 15.25 acres, anticipated for spring 2024
Farmington to Hugo C-line					
24-inch-diameter extension	Washington, MN	75 – 1,470	0.00	1.91	Complete
Tomah branch line loop					
8-inch-diameter extension	Monroe, WI	48 – 1,697	2.25	3.53	Complete
La Crescent Compressor Station	La Crescent, MN	NA	NA	NA	Complete

The cultural surveys for the Project completed in 2023 did not identify any NRHP-listed properties or potentially eligible historical properties, archaeological sites or other types of cultural resources within the direct APE or indirect APE for the Project. Results of the surveys are discussed below.

To facilitate project design, Northern defined an ESB where cultural field surveys were completed. As the engineering design was finalized, the direct APEs and indirect APEs were refined based on actual project workspace. The archaeology field investigations described below reference acres surveyed for the entire ESB, which is much larger than the actual direct and indirect APEs and encompasses both along with an additional buffer.

Lake Mills to Albert Lea E-line

Archaeology

On August 22, August 23, October 3, and October 23-27, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability and previously recorded cultural resources. Shovel testing at 15-meter intervals was planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields. Shovel testing is pending for selected locations with the potential for buried cultural deposits.

Excluding one farmstead and one hay field, the majority of the survey area consisted of harvested or mature crops with 50 to 100% ground surface visibility. The hay field yielded an average surface visibility of 30%. The total ESB encompassed 678.90 acres. Roadways, inundated, and usually inundated areas, a total of 23.98 acres, were excluded from survey. A total of 77.02 acres remains to be surveyed. The other 591.82 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

A Euro-American archaeological site (21FE0130) also assigned an historic inventory property (FE-AEA-00264) was initially recorded as part of another Northern project in 2022. During the 2023 effort, this site was surveyed again. The 2023 site visit prompted an updated site boundary and an updated site form was submitted to the Minnesota Office of the State Archaeologist. This farmstead site consisted of a combination of standing structures, archaeological features, and a surface artifact scatter. The site is within the ESB, but does not extend into the direct APE. In the original site form, the extant structures were identified as lacking integrity. Since the initial site visit, three buildings have been demolished. The artifacts documented on the surface have been placed in dump locations

of mixed time periods, grouped through heavy machinery in pushpiles, and disturbed by agricultural processes. The archaeological component at 21FE0130 has not been evaluated for listing in the NRHP. RCG&A recommends the architectural buildings (FE-AEA-00264) at this property not eligible for listing in the NRHP.

This resource (21FE0130/FE-AEA-00264) is not in the direct APE and will not be impacted by the Project. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

County Ditch No. 4 (FE-PIC-00008), a historical structure, was initially visited as part of another Northern project in 2022. During the 2023 fieldwork, it was more thoroughly documented. County Ditch No. 4 is an active drainage ditch bound by agricultural land. The majority of this ditch is open cut and possesses a steep V-shaped profile. Brome and other grasses covered the banks of the ditch. Survey measured a top width of between 50 and 60 feet and a bottom width of 9-15 feet. Standing water was present at the base of the ditch during survey in fall 2023 but the overall depth was estimated to be 10-12 feet. Based on observations made from public ROW and aerial images, these dimensions are typical of County Ditch No. 4. This ditch also includes two branches: the Colvin Branch and the Klukow Branch. The Klukow Branch was in the ESB and was documented as part of FE-PIC-0008. County Ditch No. 4 is recommended not eligible for listing in the NRHP. Northern will utilize a private driveway that crosses the ditch without improvements. Therefore, the project will have no effect to County Ditch No. 4 (FE-PIC-00008).

Northern will remove a tie-over valve setting (MP 31.21) and install a new tie-in valve setting (MP 34.21) for the Lake Mills to Albert Lea E-line extension project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 34.21. This entire area was within the surveyed ESB. Northern conducted a visual assessment of the 500 foot buffer by walking the areas surrounding the project. The western portion of archaeological site 21FE0130 / inventory property FE-AEA-00264 is within the visual effects area; however, given the distance and mature vegetation surrounding the standing structures at the site, there will not be any effect to the standing structures from the project.

The proposed construction will not have an effect to any Minnesota Standing Structures Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

Elk River 3rd branch line

Archaeology

On November 1-5 and 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability. Shovel testing at 15-meter intervals was planned for surveyed areas with less than 25% surface visibility); no such areas were identified on this project. The survey area included agricultural fields, a tree farm, wetlands and manicured lawn with small stands of trees. Several historical and recent single-family homes and associated outbuildings were within the ESB.

The agricultural fields and tree farm yielded an average surface visibility of 80%. Visibility in the manicured lawns was limited (average 30%) but stands of trees yielded better ground surface

visibility (average 55%). The total ESB encompassed 194.59 acres. Roadways as well as inundated and usually inundated areas, a total of 58.92 acres, were excluded from survey. A total of 15.25 acres remains to be surveyed. The remaining 120.42 acres had more than 25% ground surface visibility and was subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical ditches (WA-FLC-00033 and WA-XXX-00002) and ten historical standing structures during the 2023 fieldwork. None of the buildings are in the direct APE. Only one newly recorded property, WA-HGC-00077, is in the 500-foot buffer of the proposed valve setting.

Two historical drainage ditches were newly recorded during the 2023 fieldwork. WA-FLC-00033 is an active drainage ditch constructed in approximately 1949. The ditch is open cut and possesses a steep V-shaped profile. Grasses covered the banks of the ditch. Surveyors measured a varied width between 1.5 and 3 meters. Based on observations made from public ROW and aerial images, these dimensions are typical of this ditch. WA-FLC-00033 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-FLC-00033 via HDD.

WA-XXX-00002, the channelized Hardwood Creek, is known as Judicial Ditch No. 2. Ordered in 1902, Judicial Ditch No. 2 is open cut and possesses a V-shaped profile. Surveyors measured a top width of approximately six meters. Grasses covered the banks of the ditch. While standing water was present within the ditch during survey in fall 2023, the overall depth of the ditch was measured at variable depths between 2 to 5 meters. Based on observations made from the public ROW and aerial images, these dimensions are fairly typical of Judicial Ditch No. 2. WA-XXX-00002 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-XXX-00002 via HDD.

Northern plans to remove a tie-over valve setting (MP 1.07) and install a new tie-in valve setting (MP 3.45) for the Elk River 3rd branch line project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 3.45. Northern conducted a desktop analysis and visual assessment of the 500-foot buffer by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

Northern identified four built resources on three properties that are potential historic properties (constructed more than 45 years ago) in the 500-foot buffer around the proposed facility. Prior to the 2023 survey, none of the buildings were recorded in the Minnesota Statewide Historic Inventory. One of the buildings was in the ESB and formally recorded during the survey (WA-HGC-00077; 17903 Henna Avenue North); the others (at 17803 Henna Avenue North and 17958 Henna Avenue North) were observed but not formally recorded.

The single-family residence at 17903 Henna Avenue North occupies a rectangular footprint, possesses two stories, is clad in composite siding and brick veneer, and terminates in a side-gable roof sheathed in asphalt shingles. It possesses an attached, single-bay garage along the south

elevation. Based on county records, the house was constructed in 1969. Historic exterior materials on this building have been altered with replacements to exterior cladding, window openings and asphalt roof shingles. The public ROW runs between the proposed facility and the property at 17903 Henna Avenue North. Additionally, there are several trees that will obscure views of the proposed facility.

The single-family home and garage at 17803 Henna Avenue North have been substantially altered through additions and renovation. The original house was constructed in the mid-1960s, but, according to county records, extensive changes were made in 1989. The proposed facility is not visible from the property at 17803 Henna Avenue North as it is obscured by distance and a line of mature trees.

There are several buildings on the 17958 Henna Avenue North property. Only the single-family home and one outbuilding are within the 500-foot indirect APE around the proposed facility. The two-story home was constructed around 1880 and has had significant alterations to its exterior. In addition, the house is orientated to the north, while the facility will be constructed to the southeast. The combination of distance and topography, as well as an agricultural field and mature deciduous trees visually buffer the potential historic buildings from the proposed Project.

The proposed aboveground valve setting will not substantively alter the viewshed of the potential historic properties at 17803, 17903, and 17958 Henna Avenue North. Temporary visual impacts on the property during construction will not affect the attributes contributing to the potential significance and integrity of these properties. As such, the proposed Project will not adversely impact the aspects of integrity of these potential historic properties.

The proposed Elk River 3rd branch line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Farmington to Hugo C-line

Archaeology

From July 17 to 20, October 18 and November 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at 5-meter intervals in high probability areas and shovel testing at 15-meter intervals were planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields, wetlands and woodlands associated with the wetlands and pasture.

Ground surface visibility was good in the agricultural fields ranging from 40-100%. Woodland and pastures had lower surface visibility that ranged between 25 and 50%. The total ESB encompassed 172.97 acres. Roadways, existing graveled facility lots, as well as inundated and usually inundated areas, a total of 19.26 acres, were excluded from survey. The remaining 153.71 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical properties in the Farmington to Hugo C-line ESB. They were recorded in the Minnesota Statewide Historic Inventory and assigned designations WA-MYT-031 and WA-MYT-032. WA-MYT-031 is a 1973 single-family residence. The two-story, multi-bay building occupies a rectangular footprint, is clad in composite siding and brick veneer, and terminates in a low-pitched, hipped roof with overhanging eaves sheathed in asphalt shingles. The building features a single-story attached garage and a recessed front porch covered by a secondary hipped roof also sheathed in asphalt shingles.

WA-MYT-032 includes two historical buildings, a house (WA-MYT-028) and a shed (WA-MYT-029). WA-MYT-028 is a 1972 single-family residence. The one-and-one-half story, multi-bay building occupies a rectangular footprint, is clad in vinyl siding and brick veneer, and terminates in a front-gable roof with overhanging eaves sheathed in asphalt shingles. The façade features a secondary, front-gable projection and a recessed porch. The east elevation features a two-bay, integral garage. WA-MYT-029 is a 1972 shed near the house. The single-story shed occupies a rectangular footprint, is clad in wood siding, and terminates in a gambrel roof with overhanging eaves sheathed in asphalt shingles. Both of these properties are recommended not eligible for listing in the NRHP and both are avoided through HDD in the current Project design.

Northern proposes to install a new launcher and associated valves and piping at the existing Hugo compressor station (MP 0.00), as well as install a new tie-in valve setting (MP 1.91) for the Farmington to Hugo C-line. Aboveground construction for the aboveground tie-in valve setting will not exceed ten feet in height. The potential for adverse visual effects to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the Hugo compressor station and the proposed valve setting at MP 1.91. Northern conducted a visual assessment of these areas by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

One potential historical resource is located in the Hugo compressor station buffer, a house at 10830 180th Street North. This property has not been recorded in the Minnesota Statewide Historic Inventory. According to county records, it was constructed in 1977 and is a split foyer frame home with an attached garage. Significant alterations were made to the house in 2016. This house is set back from 180th Street North approximately 240 feet and is surrounded by trees. The combination of distance, a public ROW (180th Street North), as well as trees and other foliage visually buffer the potential historic building from the proposed project.

The proposed Farmington to Hugo C-line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Tomah branch line loop

Archaeology

Portions of the Tomah branch line loop was surveyed in August 2019, August and November 2021 and most recently surveyed in October and November 2023 and January 2024. Northern completed archaeological field investigations using standard methodology for archaeological surveys. Pedestrian survey was conducted at five-meter or less interval transects following the general direction of the survey corridor. Shovel testing was conducted at 15-meter or less interval. In areas with a greater probability for archaeological sites such as stream crossings, pedestrian survey was conducted at approximately one-meter intervals and shovel testing at less than five-meter intervals.

The survey area was located primarily in agricultural fields, with intermittent wooded areas, residential yards and wetlands. At the time of the field investigation, most of the survey area consisted of harvested fields and plowed corn and soybean fields. Most fields displayed 90-100% surface visibility which allowed field investigation to be conducted using pedestrian survey methods.

Of the total investigated area (124.7 acres), 55.9 acres were investigated using pedestrian survey methods and 55.4 acres were shovel tested. Approximately 13.4 acres were exempted from investigation survey in areas of slope, stream channels, or areas where ground had been disturbed by road and road drainage ditch construction. No prehistoric or historic period Euro-American artifacts or archaeological features were observed in the direct APE.

Aboveground Historical Properties

Northern plans to relocate a branch line receiver on the Tomah branch line loop (MP 3.53). The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the indirect APE was limited to the 500-foot buffer around the valve setting. Aboveground construction will not exceed eight feet in height. Northern conducted a visual assessment of the indirect APE by walking the areas surrounding the Project and no historical properties were identified.

The proposed construction will not have an effect to any Wisconsin Architecture and History Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

La Crescent compressor station

Archaeology

On September 19, 2023, Northern completed archaeological field investigations using 15-meter interval pedestrian survey in areas of the ESB that were not graveled. The graveled facilities were excluded from survey. The survey area included short and medium grasses and corn fields. Ground surface visibility averaged 25% in grassy areas, but in the corn fields, ground surface visibility averaged 90%.

The total ESB encompassed 3.02 acres. Areas excluded from survey, consisting of graveled access drives and facilities and roadway totaling 1.72 acres. The remaining 1.30 acres averaged more than 25% ground surface visibility and was subjected to pedestrian survey. No archaeological sites or isolated finds were identified in the direct APE.

The current Project design and proposed construction activities will not have direct effects to any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern proposes minor modifications to existing infrastructure at the La Crescent compressor station, including replacing compressor cylinder end caps (currently blind flanges) and adjusting compressor mechanical characteristics to match new operating conditions. While impacts that are subject to review under 36 CFR § 800 may include surficial disturbances caused by topsoil removal, heavy machinery traffic, shallow grading, and spoil dirt management, only vehicular parking is anticipated for this Project component.

The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the existing compressor station lot. Northern conducted a visual assessment of this buffer by examining aerial imagery and observing

areas surrounding the project from the public ROW and ESB. No aboveground cultural resources were observed in the 500-foot buffer.

The proposed construction activities will not have direct effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties in the indirect APE.

4.5 STATUS OF NATIVE AMERICAN CONSULTATIONS

On February 14 and 15, 2024, Northern submitted the results of the cultural resources surveys and the UDPs regarding the Project to the THPOs of the 28 federally recognized Native American Tribes. The letters included a description of the Project components and a request for information from the Tribes regarding cultural resources within the Project area.

Responses from THPOs will be provided to FERC when available. Copies of the Tribal consultations completed to date are included in Appendix 4B.

Table 4.5-1 Summary of Native American Consultation for the Project

Native American Tribe	Subject	Submitted	Follow-Up Message(s)	Comments Received¹
Apache Tribe of Oklahoma	Initial routing/siting package; cultural reports and UDP	February 14 & 15, 2024	In process	None received to date
Bad River Band of the Lake Superior Tribe of Chippewa Indians	Initial routing/siting package; cultural reports and UDP	February 14 & 15, 2024	In process	None received to date
Cheyenne and Arapaho Tribes, Oklahoma	Initial routing/siting package; cultural reports and UDP	February 14 & 15, 2024	In process	None received to date
Flandreau Santee Sioux Tribe	Initial routing/siting package; cultural reports and UDP	February 14 & 15, 2024	In process	None received to date
Fond du Lac Band of the Minnesota Chippewa Tribe	Initial routing/siting package; cultural reports and UDP	February 14 & 15, 2024	In process	None received to date
Fort Belknap Indian Community	Initial routing/siting package; cultural reports and UDP	February 14 & 15, 2024	In process	None received to date
Grand Portage Band of the Minnesota Chippewa Tribe	Initial routing/siting package; cultural reports and UDP	February 14 & 15, 2024	In Process	None received to date
Ho-Chunk Nation of Wisconsin	Initial routing/siting package; cultural reports and UDP	February 14 & 15, 2024	In Process	None received to date
Iowa Tribe of Kansas and Nebraska	Initial routing/siting package; cultural reports and UDP	February 14 & 15, 2024	In Process	None received to date
Keweenaw Bay Indian Community	Initial routing/siting package; cultural reports and UDP	February 14 & 15, 2024	In Process	None received to date
Kickapoo Tribe of Oklahoma	Initial routing/siting package; cultural reports and UDP	February 14 & 15, 2024	In Process	None received to date
Lac du Flambeau Band of Lake Superior Chippewa Indians	Initial routing/siting package; cultural reports and UDP	February 14 & 15, 2024	In Process	None received to date

Native American Tribe	Subject	Submitted	Follow-Up Message(s)	Comments Received¹
Lac Vieux Desert Band of Lake Superior Chippewa Indians	Initial routing/siting package; cultural reports and UDP	February 14 & 15, 2024	In Process	None received to date
Leech Lake Band of the Minnesota Chippewa Tribe	Initial routing/siting package; cultural reports and UDP	February 14 & 15, 2024	In Process	None received to date
Lower Sioux Indian Community	Initial routing/siting package; cultural reports and UDP	February 14 & 15, 2024	In Process	None received to date
Menominee Indian Tribe of Wisconsin	Initial routing/siting package; cultural reports and UDP	February 14 & 15, 2024	Complete	None received to date
Miami Tribe of Oklahoma	Initial routing/siting package; cultural reports and UDP	February 14 & 15, 2024	In Process	None received to date
Mille Lacs Band of Ojibwe (The Mille Lacs Band of the Minnesota Chippewa Tribe)	Initial routing/siting package; cultural reports and UDP	February 14 & 15, 2024	In Process	None received to date
Minnesota Chippewa Tribe	Initial routing/siting package; cultural reports and UDP	February 14 & 15, 2024	In Process	None received to date
Prairie Island Indian Community	Initial routing/siting package; cultural reports and UDP	February 14 & 15, 2024	In Process	None received to date
Red Cliff Band of Lake Superior Chippewa Indians	Initial routing/siting package; cultural reports and UDP	February 14 & 15, 2024	In Process	None received to date
Santee Sioux Nation	Initial routing/siting package; cultural reports and UDP	February 14 & 15, 2024	In Process	None received to date
Sisseton-Wahpeton Oyate of the Lake Traverse Reservation	Initial routing/siting package; cultural reports and UDP	February 14 & 15, 2024	In Process	None received to date
Sokaogon Chippewa Community	Initial routing/siting package; cultural reports and UDP	February 14 & 15, 2024	In Process	None received to date
Spirit Lake Tribe	Initial routing/siting package; cultural reports and UDP	February 14 & 15, 2024	In Process	None received to date
Upper Sioux Community	Initial routing/siting package; cultural reports and UDP	February 14 & 15, 2024	In Process	None received to date
White Earth Band of the Minnesota Chippewa Tribe	Initial routing/siting package; cultural reports and UDP	February 14 & 15, 2024	In Process	None received to date
Winnebago Tribe of Nebraska	Initial routing/siting package; cultural reports and UDP	February 14 & 15, 2024	In Process	None received to date

¹ Status as of February 16, 2024

4.6 STATUS OF SHPO CONSULTATION

Northern submitted the results of the cultural resources surveys to the Minnesota SHPO February 14, 2024, and to the Wisconsin SHPO February 14, 2024. The submittals included a cover letter from Northern detailing the Project information and schedule. The submittals also included a copy of the cultural resources survey reports and the UDP for the relevant states. Documentation of the submittal of information to the SHPOs is included in Appendix 4C.

4.7 UNANTICIPATED DISCOVERIES PLANS

Northern developed UDPs for the Project, one for each state. In the event archaeological materials are encountered during Project activities, Northern will halt construction activities in the vicinity of the find and consult with a qualified archaeologist, the Minnesota SHPO or Minnesota Office of the State Archaeologist, or the Wisconsin SHPO prior to continuing work. Northern will continue work on the other Project components. In addition, Northern will notify FERC and designated tribal personnel. Copies of the UDPs are included in Appendix 4D. Northern will submit copies of the UDPs to the 28 federally recognized tribes and the Minnesota and Wisconsin SHPOs. The UDPs were provided to the SHPOs on the same dates as discussed in Section 4.6 above. Documentation of the submittal of information to the SHPOs is included in Appendix 4C.

Pursuant to federal (NAGPRA) and state laws (Minnesota Statute 307.08: Damages; Illegal Molestation of Human Remains; Burial; Cemeteries; Penalty, Authentication and Wisconsin Statute 157.70 Burial Sites Protection), should grave markers or human skeletal remains be encountered during any activities in the investigated areas, all activities in the area are required to cease immediately. Northern will notify the Minnesota SHPO or Minnesota Office of the State Archaeologist, the Wisconsin SHPO and FERC for further instructions. If Native American remains are identified, Northern also will notify the identified tribal contacts. If skeletal remains are human and not associated with an archaeological context, the county sheriff where the remains were located will be notified.

REFERENCES

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<https://www.dot.state.mn.us/mnmodel/P3FinalReport/chapter3.html>. Accessed on January 2, 2024.
- GLIFWC, <http://www.glifwc.org/TreatyRights/>. Accessed on December 28, 2023.
- RCG&A. 2024a. *Reconnaissance Cultural Resources Survey of the Proposed Northern Natural Gas La Crescent Compressor Station Modifications Project (Northern Lights 2025), Houston County, Minnesota. February 2024.*
- RCG&A. 2024a. *Reconnaissance Cultural Resources Survey of the Proposed Northern Natural Gas Lake Mills To Albert Lea E-Line Project (Northern Lights 2025), Freeborn County, Minnesota. January 2024.*
- RCG&A. 2024a. *Reconnaissance Cultural Resources Survey of the Proposed Northern Natural Gas Elk River 3rd Branch Line Project (Northern Lights 2025), Washington County, Minnesota. February 2024.*

- RCG&A. 2024a. *Reconnaissance Cultural Resources Survey of the Proposed Northern Natural Gas Farmington to Hugo C-Line Project (Northern Lights 2025), Washington County, Minnesota. February 2024.*
- Hodgson, John, Tim Sullivan, and Miriam L. Hernandez, 2024a. *Phase I Cultural Resource Investigation Results for the Northern Natural Gas Tomah Branch Line Loop Project, Rural Sparta Township, Monroe County, Wisconsin, January 5, 2024.*
- MHS, <http://usdakotawar.org/glossary/forfeiture-act>. Accessed on December 28, 2023.
- MIAC, <http://treatiesmatter.org/treaties>. Accessed on December 28, 2023.
- NPS, 1983, *Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation*, Current version available online at http://www.cr.nps.gov/local-law/arch_stnds_0.htm. NPS, Department of the Interior, Washington, D.C.

Appendix 4A-1
Lake Mills to Albert Lea E-line Draft Cultural Resources Survey Report
(Filed Under Separate Cover Marked as “CUI//PRIV – DO NOT RELEASE”)

Appendix 4A-2
Elk River 3rd Branch Line Draft Cultural Resources Survey Report
(Filed Under Separate Cover Marked “CUI//PRIV – DO NOT RELEASE”)

Appendix 4A-3
Farmington to Hugo C-line Draft Cultural Resources Survey Report
(Filed Under Separate Cover Marked “CUI//PRIV – DO NOT RELEASE”)

Appendix 4A-4
Tomah Branch Line Loop Draft Cultural Resources Survey Report
(Filed Under Separate Cover Marked “CUI//PRIV – DO NOT RELEASE”)

Appendix 4A-5
LaCrescent compressor station Draft Cultural Resources Survey Report
(Filed Under Separate Cover Marked “CUI//PRIV – DO NOT RELEASE”)

Appendix 4B
Native American Tribal Correspondence

From: Waller, Hiedi
Sent: Thursday, February 15, 2024 9:42 AM
To: 'mike.wilson@millelacsband.com'
Cc: Knabe, Susan; Terry.Plucker@nngco.com
Subject: FW: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 Mille Lacs THPO SUBMITTALS
Attachments: [NL 2025 THPO_Mille Lacs Band of Ojibwe \(The Mille Lacs Band of the Minnesota Chippewa Tribe Mille Lacs Band of Ojibwe\).pdf](#)

THPO Wilson:

Northern is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Over periodic field events from 2019 through 2024, Phase One Archaeological Services Inc. and R. Christopher Goodwin & Associates, Inc. completed field surveys of the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The results of these survey efforts are included in the cultural resources reports. To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the cultural resources reports and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Due to the size of the files associated with the Project, Northern has set up an FTP site where the cultural resources reports and Unanticipated Discoveries Plans referenced in the attached letter can be downloaded.

Please contact us if you have any questions.

Hiedi Waller, PE
Senior Engineer
Pronouns: she, her, hers
Phone: (262) 643-9161

From: donotreply@secureftp.stantec.com <donotreply@secureftp.stantec.com>
Sent: Wednesday, February 14, 2024 9:20 PM
To: Waller, Hiedi <Hiedi.Waller@stantec.com>
Subject: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS

Your directory has successfully been created!

Please use the link below to access your directory with the username and password provided.

Login Information

Browser link: <https://tmpsftp.stantec.com>

FTP Client Hostname: tmpsftp.stantec.com **Port:** 22 (can be used within a SFTP client to view and transfer files and folders; e.g., FileZilla)

Login name: s0221202004

Password: 9670102

Disk Quota: 20 GB

Expiry Date: 2/21/2024

If you require a one-time one-week extension, please click [here](#).

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1111 South 103rd Street
Omaha, NE 68124

February 14, 2024

Mille Lacs Band of Ojibwe
(The Mille Lacs Band of the Minnesota Chippewa Tribe Mille Lacs Band of Ojibwe)
Mike Wilson, Tribal Preservation Officer
43408 Oodena Drive
Onamia, MN 56359

Re: Northern Natural Gas–Northern Lights 2025 Expansion Project – Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin

Dear Tribal Preservation Officer Wilson:

Northern Natural Gas (Northern) is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured the services of Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Northern is proposing to construct the Project, which will consist of (1) a 3.00-mile extension of its 36-inch-diameter Lake Mills to Albert Lea E-line; (2) a 2.43-mile extension of its 30-inch-diameter Elk River 3rd branch line; (3) a non-contiguous 1.91-mile extension of its 30-inch-diameter Farmington to Hugo C-line; (4) a 1.28-mile extension of its 8-inch-diameter Tomah branch line loop; (5) minor modifications to its existing La Crescent compressor station; and (6) aboveground facilities including a launcher, receiver and tie-in valve settings. All Project components are located in various counties in Minnesota and Wisconsin.

This letter summarizes the results of the investigations and recommendations of the archaeological investigator for the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The archeological reports from R. Christopher Goodwin & Associates, Inc. (RCG&A) and Phase One Archaeological Services Inc. (Phase One) are attached to this letter.

Literature Search

Northern's cultural resources' sub-consultants, RCG&A and Phase One, conducted background research at the Minnesota and Wisconsin SHPOs to identify previously recorded archaeological and above-grade resources. This study area encompassed a Project-specific environmental survey boundary (ESB), the direct Area of Potential Effects (APE) and the indirect APE and included archaeological sites and other cultural resources located in the immediate areas of planned construction along with a one-mile radius of all proposed project activities.

Lake Mills to Albert Lea E-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources on the list of National Register of Historic Places (NRHP) properties are in the indirect APE. One archaeological site, 21FE0130, and Minnesota Statewide Historic Inventory property FE-AEA-00264 extends into the 500-foot buffer around the proposed aboveground valve setting. However, due to distance and mature trees, no effects are anticipated.

Elk River 3rd branch line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Farmington to Hugo C-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Tomah branch line loop

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

A single standing structure, a 19th century Greek Revival Farmhouse (AHI # 78410) was previously located on the west side of County Highway Q within the indirect APE. This building was razed and replaced with a modern single-family farmhouse. No other aboveground historical resources previously listed in the Wisconsin Architecture-History Inventory or on the list of the NRHP properties are located in the indirect APE.

La Crescent compressor station

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the La Crescent compressor station to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Cultural Survey

Following the literature review, Northern's subconsultants conducted a systematic field survey of the direct APE, which includes the construction ROW (TWS), ETWS, access roads, staging areas, and the aboveground appurtenant facility footprints. The survey procedures included a pedestrian walkover of the APE, systematic surface examination of suitable areas, and systematic subsurface testing of areas lacking sufficient surface visibility or which had potential for subsurface resources.

The cultural resources survey is 89% complete for the Lake Mills to Albert Lea E-line with additional shovel testing needed on 77.02 acres anticipated in spring 2024. The cultural resource survey for the Elk River 3rd branch line is 92% complete with additional survey needed on 15.25 acres scheduled for spring 2024. Northern cultural resources surveys are 100% complete for the remaining Project components.

Lake Mills to Albert Lea E-line

Archaeology

On August 22, August 23, October 3, and October 23-27, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability and previously recorded cultural resources. Shovel testing at 15-meter intervals was planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields. Shovel testing is pending for selected locations with the potential for buried cultural deposits.

Excluding one farmstead and one hay field, the majority of the survey area consisted of harvested or mature crops with 50 to 100% ground surface visibility. The hay field yielded an average surface visibility of 30%. The total ESB encompassed 678.90 acres. Roadways, inundated, and usually inundated areas, a total of 23.98 acres, were excluded from survey. A total of 77.02 acres remains to be surveyed. The other 591.82 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

A Euro-American archaeological site (21FE0130) also assigned an historic inventory property (FE-AEA-00264) was initially recorded as part of another Northern project in 2022. During the 2023 effort, this site was surveyed again. The 2023 site visit prompted an updated site boundary

and an updated site form was submitted to the Minnesota Office of the State Archaeologist. This farmstead site consisted of a combination of standing structures, archaeological features, and a surface artifact scatter. The site is within the ESB, but does not extend into the direct APE. In the original site form, the extant structures were identified as lacking integrity. Since the initial site visit, three buildings have been demolished. The artifacts documented on the surface have been placed in dump locations of mixed time periods, grouped through heavy machinery in pushpiles, and disturbed by agricultural processes. The archaeological component at 21FE0130 has not been evaluated for listing in the NRHP. RCG&A recommends the architectural buildings (FE-AEA-00264) at this property not eligible for listing in the NRHP.

This resource (21FE0130/FE-AEA-00264) is not in the direct APE and will not be impacted by the Project. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

County Ditch No. 4 (FE-PIC-00008), a historical structure, was initially visited as part of another Northern project in 2022. During the 2023 fieldwork, it was more thoroughly documented. County Ditch No. 4 is an active drainage ditch bound by agricultural land. The majority of this ditch is open cut and possesses a steep V-shaped profile. Brome and other grasses covered the banks of the ditch. Survey measured a top width of between 50 and 60 feet and a bottom width of 9-15 feet. Standing water was present at the base of the ditch during survey in fall 2023 but the overall depth was estimated to be 10-12 feet. Based on observations made from public ROW and aerial images, these dimensions are typical of County Ditch No. 4. This ditch also includes two branches: the Colvin Branch and the Klukow Branch. The Klukow Branch was in the ESB and was documented as part of FE-PIC-0008. County Ditch No. 4 is recommended not eligible for listing in the NRHP. Northern will utilize a private driveway that crosses the ditch without improvements. Therefore, the project will have no effect to County Ditch No. 4 (FE-PIC-00008).

Northern will remove a tie-over valve setting (MP 31.21) and install a new tie-in valve setting (MP 34.21) for the Lake Mills to Albert Lea E-line extension project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 34.21. This entire area was within the surveyed ESB. Northern conducted a visual assessment of the 500 foot buffer by walking the areas surrounding the project. The western portion of archaeological site 21FE0130 / inventory property FE-AEA-00264 is within the visual effects area; however, given the distance and mature vegetation surrounding the standing structures at the site, there will not be any effect to the standing structures from the project.

The proposed construction will not have an effect to any Minnesota Standing Structures Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

Elk River 3rd branch line

Archaeology

On November 1-5 and 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability. Shovel testing at 15-meter intervals was planned for surveyed areas with less than 25% surface visibility); no such areas were identified on this project. The survey area included agricultural fields, a tree farm, wetlands and manicured lawn with small stands of trees. Several historical and recent single-family homes and associated outbuildings were within the ESB.

The agricultural fields and tree farm yielded an average surface visibility of 80%. Visibility in the manicured lawns was limited (average 30%) but stands of trees yielded better ground surface visibility (average 55%). The total ESB encompassed 194.59 acres. Roadways as well as inundated and usually inundated areas, a total of 58.92 acres, were excluded from survey. A total of 15.25 acres remains to be surveyed. The remaining 120.42 acres had more than 25% ground surface visibility and was subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical ditches (WA-FLC-00033 and WA-XXX-00002) and ten historical standing structures during the 2023 fieldwork. None of the buildings are in the direct APE. Only one newly recorded property, WA-HGC-00077, is in the 500-foot buffer of the proposed valve setting.

Two historical drainage ditches were newly recorded during the 2023 fieldwork. WA-FLC-00033 is an active drainage ditch constructed in approximately 1949. The ditch is open cut and possesses a steep V-shaped profile. Grasses covered the banks of the ditch. Surveyors measured a varied width between 1.5 and 3 meters. Based on observations made from public ROW and aerial images, these dimensions are typical of this ditch. WA-FLC-00033 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-FLC-00033 via HDD.

WA-XXX-00002, the channelized Hardwood Creek, is known as Judicial Ditch No. 2. Ordered in 1902, Judicial Ditch No. 2 is open cut and possesses a V-shaped profile. Surveyors measured a top width of approximately six meters. Grasses covered the banks of the ditch. While standing water was present within the ditch during survey in fall 2023, the overall depth of the ditch was measured at variable depths between 2 to 5 meters. Based on observations made from the public ROW and aerial images, these dimensions are fairly typical of Judicial Ditch No. 2. WA-XXX-

00002 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-XXX-00002 via HDD.

Northern plans to remove a tie-over valve setting (MP 1.07) and install a new tie-in valve setting (MP 3.45) for the Elk River 3rd branch line project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 3.45. Northern conducted a desktop analysis and visual assessment of the 500-foot buffer by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

Northern identified four built resources on three properties that are potential historic properties (constructed more than 45 years ago) in the 500-foot buffer around the proposed facility. Prior to the 2023 survey, none of the buildings were recorded in the Minnesota Statewide Historic Inventory. One of the buildings was in the ESB and formally recorded during the survey (WA-HGC-00077; 17903 Henna Avenue North); the others (at 17803 Henna Avenue North and 17958 Henna Avenue North) were observed but not formally recorded.

The single-family residence at 17903 Henna Avenue North occupies a rectangular footprint, possesses two stories, is clad in composite siding and brick veneer, and terminates in a side-gable roof sheathed in asphalt shingles. It possesses an attached, single-bay garage along the south elevation. Based on county records, the house was constructed in 1969. Historic exterior materials on this building have been altered with replacements to exterior cladding, window openings and asphalt roof shingles. The public ROW runs between the proposed facility and the property at 17903 Henna Avenue North. Additionally, there are several trees that will obscure views of the proposed facility.

The single-family home and garage at 17803 Henna Avenue North have been substantially altered through additions and renovation. The original house was constructed in the mid-1960s, but, according to county records, extensive changes were made in 1989. The proposed facility is not visible from the property at 17803 Henna Avenue North as it is obscured by distance and a line of mature trees.

There are several buildings on the 17958 Henna Avenue North property. Only the single-family home and one outbuilding are within the 500-foot indirect APE around the proposed facility. The two-story home was constructed around 1880 and has had significant alterations to its exterior. In addition, the house is orientated to the north, while the facility will be constructed to the southeast. The combination of distance and topography, as well as an agricultural field and mature deciduous trees visually buffer the potential historic buildings from the proposed Project.

The proposed aboveground valve setting will not substantively alter the viewshed of the potential historic properties at 17803, 17903, and 17958 Henna Avenue North. Temporary visual impacts on the property during construction will not affect the attributes contributing to the potential significance and integrity of these properties. As such, the proposed Project will not adversely impact the aspects of integrity of these potential historic properties.

The proposed Elk River 3rd branch line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Farmington to Hugo C-line

Archaeology

From July 17 to 20, October 18 and November 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at 5-meter intervals in high probability areas and shovel testing at 15-meter intervals were planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields, wetlands and woodlands associated with the wetlands and pasture.

Ground surface visibility was good in the agricultural fields ranging from 40-100%. Woodland and pastures had lower surface visibility that ranged between 25 and 50%. The total ESB encompassed 172.97 acres. Roadways, existing graveled facility lots, as well as inundated and usually inundated areas, a total of 19.26 acres, were excluded from survey. The remaining 153.71 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical properties in the Farmington to Hugo C-line ESB. They were recorded in the Minnesota Statewide Historic Inventory and assigned designations WA-MYT-031 and WA-MYT-032. WA-MYT-031 is a 1973 single-family residence. The two-story, multi-bay building occupies a rectangular footprint, is clad in composite siding and brick veneer, and terminates in a low-pitched, hipped roof with overhanging eaves sheathed in asphalt shingles. The building features a single-story attached garage and a recessed front porch covered by a secondary hipped roof also sheathed in asphalt shingles.

WA-MYT-032 includes two historical buildings, a house (WA-MYT-028) and a shed (WA-MYT-029). WA-MYT-028 is a 1972 single-family residence. The one-and-one-half story, multi-bay building occupies a rectangular footprint, is clad in vinyl siding and brick veneer, and terminates in a front-gable roof with overhanging eaves sheathed in asphalt shingles. The façade features a secondary, front-gable projection and a recessed porch. The east elevation features a two-bay, integral garage. WA-MYT-029 is a 1972 shed near the house. The single-story shed occupies a rectangular footprint, is clad in wood siding, and terminates in a gambrel roof with overhanging eaves sheathed in asphalt shingles. Both of these properties are recommended not eligible for listing in the NRHP and both are avoided through HDD in the current Project design.

Northern proposes to install a new launcher and associated valves and piping at the existing Hugo compressor station (MP 0.00), as well as install a new tie-in valve setting (MP 1.91) for the

Farmington to Hugo C-line. Aboveground construction for the aboveground tie-in valve setting will not exceed ten feet in height. The potential for adverse visual effects to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the Hugo compressor station and the proposed valve setting at MP 1.91. Northern conducted a visual assessment of these areas by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

One potential historical resource is located in the Hugo compressor station buffer, a house at 10830 180th Street North. This property has not been recorded in the Minnesota Statewide Historic Inventory. According to county records, it was constructed in 1977 and is a split foyer frame home with an attached garage. Significant alterations were made to the house in 2016. This house is set back from 180th Street North approximately 240 feet and is surrounded by trees. The combination of distance, a public ROW (180th Street North), as well as trees and other foliage visually buffer the potential historic building from the proposed project.

The proposed Farmington to Hugo C-line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Tomah branch line loop

Archaeology

Portions of the Tomah branch line loop was surveyed in August 2019, August and November 2021 and most recently surveyed in October and November 2023 and January 2024. Northern completed archaeological field investigations using standard methodology for archaeological surveys. Pedestrian survey was conducted at five-meter or less interval transects following the general direction of the survey corridor. Shovel testing was conducted at 15-meter or less interval. In areas with a greater probability for archaeological sites such as stream crossings, pedestrian survey was conducted at approximately one-meter intervals and shovel testing at less than five-meter intervals.

The survey area was located primarily in agricultural fields, with intermittent wooded areas, residential yards and wetlands. At the time of the field investigation, most of the survey area consisted of harvested fields and plowed corn and soybean fields. Most fields displayed 90-100% surface visibility which allowed field investigation to be conducted using pedestrian survey methods.

Of the total investigated area (124.7 acres), 55.9 acres were investigated using pedestrian survey methods and 55.4 acres were shovel tested. Approximately 13.4 acres were exempted from investigation survey in areas of slope, stream channels, or areas where ground had been disturbed by road and road drainage ditch construction. No prehistoric or historic period Euro-American artifacts or archaeological features were observed in the direct APE.

Aboveground Historical Properties

Northern plans to relocate a branch line receiver on the Tomah branch line loop (MP 3.53). The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the indirect APE was limited to the 500-foot buffer around the valve setting. Aboveground

construction will not exceed eight feet in height. Northern conducted a visual assessment of the indirect APE by walking the areas surrounding the Project and no historical properties were identified.

The proposed construction will not have an effect to any Wisconsin Architecture and History Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

La Crescent compressor station

Archaeology

On September 19, 2023, Northern completed archaeological field investigations using 15-meter interval pedestrian survey in areas of the ESB that were not graveled. The graveled facilities were excluded from survey. The survey area included short and medium grasses and corn fields. Ground surface visibility averaged 25% in grassy areas, but in the corn fields, ground surface visibility averaged 90%.

The total ESB encompassed 3.02 acres. Areas excluded from survey, consisting of graveled access drives and facilities and roadway totaling 1.72 acres. The remaining 1.30 acres averaged more than 25% ground surface visibility and was subjected to pedestrian survey. No archaeological sites or isolated finds were identified in the direct APE.

The current Project design and proposed construction activities will not have direct effects to any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern proposes minor modifications to existing infrastructure at the La Crescent compressor station, including replacing compressor cylinder end caps (currently blind flanges) and adjusting compressor mechanical characteristics to match new operating conditions. While impacts that are subject to review under 36 CFR § 800 may include surficial disturbances caused by topsoil removal, heavy machinery traffic, shallow grading, and spoil dirt management, only vehicular parking is anticipated for this Project component.

The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the existing compressor station lot. Northern conducted a visual assessment of this buffer by examining aerial imagery and observing areas surrounding the project from the public ROW and ESB. No aboveground cultural resources were observed in the 500-foot buffer.

Conclusion and Request for Consultation

To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the attached maps and report and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Northern Natural Gas
Northern Lights 2025 Expansion Project
February 14, 2024

Northern respects that the Tribe has unique expertise in identifying and providing information regarding historic properties with religious or cultural significance which may be affected by the Project. Northern is seeking the Tribe's comments on survey methodology, traditional cultural properties, and traditional cultural landscapes along with areas of importance to the Tribe which should be considered. Northern understands this request for information does not circumvent the government-to-government relationship under Section 106 (36 Code of Federal Regulations Part 800) between the Tribe and the FERC. Please be assured that Northern will keep sensitive Tribal information strictly confidential.

While the regulations for implementing Section 106 (36 Code of Federal Regulations Part 800) allow companies like Northern (and their consultants) to gather information, the FERC is responsible for monitoring compliance with the NHPA and determinations pursuant to Section 106. Additionally, the FERC, not Northern, is responsible for government-to-government consultations with American Indian Tribes. The FERC has not delegated this consultation. The FERC will contact you through a *Notice of Intent to Produce an Environmental Document*. If you would like to communicate directly with the FERC natural gas archaeological staff to discuss its cultural resource review and consultation processes, please feel free to contact Elizabeth Molloy, Tribal Liaison, at 202-502-8771 or Elizabeth.Molloy@ferc.gov.

Thank you in advance for your attention to this Project. Northern would very much appreciate receiving your response within 30 days of the date of this letter. Northern will follow up with you via phone contact or email if no response is received within 30 days. In the interim, should you have questions or need additional information, please contact me at 402-398-7226 or Terry.Plucker@nngco.com or Susan Knabe of Stantec at 920-278-3220 or Susan.Knabe@stantec.com.

Sincerely,



Terry Plucker
Environmental Compliance Manager
Northern Natural Gas Company

Enclosures: RCG&A Cultural Resources Reports
Phase One Cultural Resources Report
Unanticipated Discovery Plans (Minnesota and Wisconsin)

CC: Susan Knabe, Stantec Consulting
Matt Nelson, Northern Natural Gas

Chan, Ginger

From: Waller, Hiedi
Sent: Wednesday, February 14, 2024 10:00 PM
To: terry.kemper@millelacsband.com
Cc: Knabe, Susan; Terry.Plucker@nngco.com
Subject: FW: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS
Attachments: NL 2025 THPO_Mille Lacs Band of Ojibwe (The Mille Lacs Band of the Minnesota Chippewa Tribe Mille Lacs Band of Ojibwe).pdf

Tracking:	Recipient	Delivery
	terry.kemper@millelacsband.com	
	Knabe, Susan	Delivered: 2/14/2024 10:02 PM
	Terry.Plucker@nngco.com	

THPO Kemper:

Northern is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Over periodic field events from 2019 through 2024, Phase One Archaeological Services Inc. and R. Christopher Goodwin & Associates, Inc. completed field surveys of the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The results of these survey efforts are included in the cultural resources reports. To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the cultural resources reports and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Due to the size of the files associated with the Project, Northern has set up an FTP site where the cultural resources reports and Unanticipated Discoveries Plans referenced in the attached letter can be downloaded.

Please contact us if you have any questions.

Hiedi Waller, PE
Senior Engineer
Pronouns: she, her, hers
Phone: (262) 643-9161

From: donotreply@secureftp.stantec.com <donotreply@secureftp.stantec.com>
Sent: Wednesday, February 14, 2024 9:20 PM
To: Waller, Hiedi <Hiedi.Waller@stantec.com>
Subject: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS

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Please use the link below to access your directory with the username and password provided.

Login Information

Browser link: <https://tmpsftp.stantec.com>

FTP Client Hostname: tmpsftp.stantec.com **Port:** 22 (can be used within a SFTP client to view and transfer files and folders; e.g., FileZilla)

Login name: s0221202004

Password: 9670102

Disk Quota: 20 GB

Expiry Date: 2/21/2024

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Click here for the [quick reference guide](#).

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1111 South 103rd Street
Omaha, NE 68124

February 14, 2024

Mille Lacs Band of Ojibwe
(The Mille Lacs Band of the Minnesota Chippewa Tribe Mille Lacs Band of Ojibwe)
Mike Wilson, Tribal Preservation Officer
43408 Oodena Drive
Onamia, MN 56359

Re: Northern Natural Gas–Northern Lights 2025 Expansion Project – Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin

Dear Tribal Preservation Officer Wilson:

Northern Natural Gas (Northern) is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured the services of Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Northern is proposing to construct the Project, which will consist of (1) a 3.00-mile extension of its 36-inch-diameter Lake Mills to Albert Lea E-line; (2) a 2.43-mile extension of its 30-inch-diameter Elk River 3rd branch line; (3) a non-contiguous 1.91-mile extension of its 30-inch-diameter Farmington to Hugo C-line; (4) a 1.28-mile extension of its 8-inch-diameter Tomah branch line loop; (5) minor modifications to its existing La Crescent compressor station; and (6) aboveground facilities including a launcher, receiver and tie-in valve settings. All Project components are located in various counties in Minnesota and Wisconsin.

This letter summarizes the results of the investigations and recommendations of the archaeological investigator for the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The archeological reports from R. Christopher Goodwin & Associates, Inc. (RCG&A) and Phase One Archaeological Services Inc. (Phase One) are attached to this letter.

Literature Search

Northern's cultural resources' sub-consultants, RCG&A and Phase One, conducted background research at the Minnesota and Wisconsin SHPOs to identify previously recorded archaeological and above-grade resources. This study area encompassed a Project-specific environmental survey boundary (ESB), the direct Area of Potential Effects (APE) and the indirect APE and included archaeological sites and other cultural resources located in the immediate areas of planned construction along with a one-mile radius of all proposed project activities.

Lake Mills to Albert Lea E-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources on the list of National Register of Historic Places (NRHP) properties are in the indirect APE. One archaeological site, 21FE0130, and Minnesota Statewide Historic Inventory property FE-AEA-00264 extends into the 500-foot buffer around the proposed aboveground valve setting. However, due to distance and mature trees, no effects are anticipated.

Elk River 3rd branch line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Farmington to Hugo C-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Tomah branch line loop

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

A single standing structure, a 19th century Greek Revival Farmhouse (AHI # 78410) was previously located on the west side of County Highway Q within the indirect APE. This building was razed and replaced with a modern single-family farmhouse. No other aboveground historical resources previously listed in the Wisconsin Architecture-History Inventory or on the list of the NRHP properties are located in the indirect APE.

La Crescent compressor station

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the La Crescent compressor station to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Cultural Survey

Following the literature review, Northern's subconsultants conducted a systematic field survey of the direct APE, which includes the construction ROW (TWS), ETWS, access roads, staging areas, and the aboveground appurtenant facility footprints. The survey procedures included a pedestrian walkover of the APE, systematic surface examination of suitable areas, and systematic subsurface testing of areas lacking sufficient surface visibility or which had potential for subsurface resources.

The cultural resources survey is 89% complete for the Lake Mills to Albert Lea E-line with additional shovel testing needed on 77.02 acres anticipated in spring 2024. The cultural resource survey for the Elk River 3rd branch line is 92% complete with additional survey needed on 15.25 acres scheduled for spring 2024. Northern cultural resources surveys are 100% complete for the remaining Project components.

Lake Mills to Albert Lea E-line

Archaeology

On August 22, August 23, October 3, and October 23-27, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability and previously recorded cultural resources. Shovel testing at 15-meter intervals was planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields. Shovel testing is pending for selected locations with the potential for buried cultural deposits.

Excluding one farmstead and one hay field, the majority of the survey area consisted of harvested or mature crops with 50 to 100% ground surface visibility. The hay field yielded an average surface visibility of 30%. The total ESB encompassed 678.90 acres. Roadways, inundated, and usually inundated areas, a total of 23.98 acres, were excluded from survey. A total of 77.02 acres remains to be surveyed. The other 591.82 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

A Euro-American archaeological site (21FE0130) also assigned an historic inventory property (FE-AEA-00264) was initially recorded as part of another Northern project in 2022. During the 2023 effort, this site was surveyed again. The 2023 site visit prompted an updated site boundary

and an updated site form was submitted to the Minnesota Office of the State Archaeologist. This farmstead site consisted of a combination of standing structures, archaeological features, and a surface artifact scatter. The site is within the ESB, but does not extend into the direct APE. In the original site form, the extant structures were identified as lacking integrity. Since the initial site visit, three buildings have been demolished. The artifacts documented on the surface have been placed in dump locations of mixed time periods, grouped through heavy machinery in pushpiles, and disturbed by agricultural processes. The archaeological component at 21FE0130 has not been evaluated for listing in the NRHP. RCG&A recommends the architectural buildings (FE-AEA-00264) at this property not eligible for listing in the NRHP.

This resource (21FE0130/FE-AEA-00264) is not in the direct APE and will not be impacted by the Project. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

County Ditch No. 4 (FE-PIC-00008), a historical structure, was initially visited as part of another Northern project in 2022. During the 2023 fieldwork, it was more thoroughly documented. County Ditch No. 4 is an active drainage ditch bound by agricultural land. The majority of this ditch is open cut and possesses a steep V-shaped profile. Brome and other grasses covered the banks of the ditch. Survey measured a top width of between 50 and 60 feet and a bottom width of 9-15 feet. Standing water was present at the base of the ditch during survey in fall 2023 but the overall depth was estimated to be 10-12 feet. Based on observations made from public ROW and aerial images, these dimensions are typical of County Ditch No. 4. This ditch also includes two branches: the Colvin Branch and the Klukow Branch. The Klukow Branch was in the ESB and was documented as part of FE-PIC-0008. County Ditch No. 4 is recommended not eligible for listing in the NRHP. Northern will utilize a private driveway that crosses the ditch without improvements. Therefore, the project will have no effect to County Ditch No. 4 (FE-PIC-00008).

Northern will remove a tie-over valve setting (MP 31.21) and install a new tie-in valve setting (MP 34.21) for the Lake Mills to Albert Lea E-line extension project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 34.21. This entire area was within the surveyed ESB. Northern conducted a visual assessment of the 500 foot buffer by walking the areas surrounding the project. The western portion of archaeological site 21FE0130 / inventory property FE-AEA-00264 is within the visual effects area; however, given the distance and mature vegetation surrounding the standing structures at the site, there will not be any effect to the standing structures from the project.

The proposed construction will not have an effect to any Minnesota Standing Structures Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

Elk River 3rd branch line

Archaeology

On November 1-5 and 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability. Shovel testing at 15-meter intervals was planned for surveyed areas with less than 25% surface visibility); no such areas were identified on this project. The survey area included agricultural fields, a tree farm, wetlands and manicured lawn with small stands of trees. Several historical and recent single-family homes and associated outbuildings were within the ESB.

The agricultural fields and tree farm yielded an average surface visibility of 80%. Visibility in the manicured lawns was limited (average 30%) but stands of trees yielded better ground surface visibility (average 55%). The total ESB encompassed 194.59 acres. Roadways as well as inundated and usually inundated areas, a total of 58.92 acres, were excluded from survey. A total of 15.25 acres remains to be surveyed. The remaining 120.42 acres had more than 25% ground surface visibility and was subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical ditches (WA-FLC-00033 and WA-XXX-00002) and ten historical standing structures during the 2023 fieldwork. None of the buildings are in the direct APE. Only one newly recorded property, WA-HGC-00077, is in the 500-foot buffer of the proposed valve setting.

Two historical drainage ditches were newly recorded during the 2023 fieldwork. WA-FLC-00033 is an active drainage ditch constructed in approximately 1949. The ditch is open cut and possesses a steep V-shaped profile. Grasses covered the banks of the ditch. Surveyors measured a varied width between 1.5 and 3 meters. Based on observations made from public ROW and aerial images, these dimensions are typical of this ditch. WA-FLC-00033 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-FLC-00033 via HDD.

WA-XXX-00002, the channelized Hardwood Creek, is known as Judicial Ditch No. 2. Ordered in 1902, Judicial Ditch No. 2 is open cut and possesses a V-shaped profile. Surveyors measured a top width of approximately six meters. Grasses covered the banks of the ditch. While standing water was present within the ditch during survey in fall 2023, the overall depth of the ditch was measured at variable depths between 2 to 5 meters. Based on observations made from the public ROW and aerial images, these dimensions are fairly typical of Judicial Ditch No. 2. WA-XXX-

00002 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-XXX-00002 via HDD.

Northern plans to remove a tie-over valve setting (MP 1.07) and install a new tie-in valve setting (MP 3.45) for the Elk River 3rd branch line project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 3.45. Northern conducted a desktop analysis and visual assessment of the 500-foot buffer by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

Northern identified four built resources on three properties that are potential historic properties (constructed more than 45 years ago) in the 500-foot buffer around the proposed facility. Prior to the 2023 survey, none of the buildings were recorded in the Minnesota Statewide Historic Inventory. One of the buildings was in the ESB and formally recorded during the survey (WA-HGC-00077; 17903 Henna Avenue North); the others (at 17803 Henna Avenue North and 17958 Henna Avenue North) were observed but not formally recorded.

The single-family residence at 17903 Henna Avenue North occupies a rectangular footprint, possesses two stories, is clad in composite siding and brick veneer, and terminates in a side-gable roof sheathed in asphalt shingles. It possesses an attached, single-bay garage along the south elevation. Based on county records, the house was constructed in 1969. Historic exterior materials on this building have been altered with replacements to exterior cladding, window openings and asphalt roof shingles. The public ROW runs between the proposed facility and the property at 17903 Henna Avenue North. Additionally, there are several trees that will obscure views of the proposed facility.

The single-family home and garage at 17803 Henna Avenue North have been substantially altered through additions and renovation. The original house was constructed in the mid-1960s, but, according to county records, extensive changes were made in 1989. The proposed facility is not visible from the property at 17803 Henna Avenue North as it is obscured by distance and a line of mature trees.

There are several buildings on the 17958 Henna Avenue North property. Only the single-family home and one outbuilding are within the 500-foot indirect APE around the proposed facility. The two-story home was constructed around 1880 and has had significant alterations to its exterior. In addition, the house is orientated to the north, while the facility will be constructed to the southeast. The combination of distance and topography, as well as an agricultural field and mature deciduous trees visually buffer the potential historic buildings from the proposed Project.

The proposed aboveground valve setting will not substantively alter the viewshed of the potential historic properties at 17803, 17903, and 17958 Henna Avenue North. Temporary visual impacts on the property during construction will not affect the attributes contributing to the potential significance and integrity of these properties. As such, the proposed Project will not adversely impact the aspects of integrity of these potential historic properties.

The proposed Elk River 3rd branch line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Farmington to Hugo C-line

Archaeology

From July 17 to 20, October 18 and November 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at 5-meter intervals in high probability areas and shovel testing at 15-meter intervals were planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields, wetlands and woodlands associated with the wetlands and pasture.

Ground surface visibility was good in the agricultural fields ranging from 40-100%. Woodland and pastures had lower surface visibility that ranged between 25 and 50%. The total ESB encompassed 172.97 acres. Roadways, existing graveled facility lots, as well as inundated and usually inundated areas, a total of 19.26 acres, were excluded from survey. The remaining 153.71 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical properties in the Farmington to Hugo C-line ESB. They were recorded in the Minnesota Statewide Historic Inventory and assigned designations WA-MYT-031 and WA-MYT-032. WA-MYT-031 is a 1973 single-family residence. The two-story, multi-bay building occupies a rectangular footprint, is clad in composite siding and brick veneer, and terminates in a low-pitched, hipped roof with overhanging eaves sheathed in asphalt shingles. The building features a single-story attached garage and a recessed front porch covered by a secondary hipped roof also sheathed in asphalt shingles.

WA-MYT-032 includes two historical buildings, a house (WA-MYT-028) and a shed (WA-MYT-029). WA-MYT-028 is a 1972 single-family residence. The one-and-one-half story, multi-bay building occupies a rectangular footprint, is clad in vinyl siding and brick veneer, and terminates in a front-gable roof with overhanging eaves sheathed in asphalt shingles. The façade features a secondary, front-gable projection and a recessed porch. The east elevation features a two-bay, integral garage. WA-MYT-029 is a 1972 shed near the house. The single-story shed occupies a rectangular footprint, is clad in wood siding, and terminates in a gambrel roof with overhanging eaves sheathed in asphalt shingles. Both of these properties are recommended not eligible for listing in the NRHP and both are avoided through HDD in the current Project design.

Northern proposes to install a new launcher and associated valves and piping at the existing Hugo compressor station (MP 0.00), as well as install a new tie-in valve setting (MP 1.91) for the

Farmington to Hugo C-line. Aboveground construction for the aboveground tie-in valve setting will not exceed ten feet in height. The potential for adverse visual effects to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the Hugo compressor station and the proposed valve setting at MP 1.91. Northern conducted a visual assessment of these areas by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

One potential historical resource is located in the Hugo compressor station buffer, a house at 10830 180th Street North. This property has not been recorded in the Minnesota Statewide Historic Inventory. According to county records, it was constructed in 1977 and is a split foyer frame home with an attached garage. Significant alterations were made to the house in 2016. This house is set back from 180th Street North approximately 240 feet and is surrounded by trees. The combination of distance, a public ROW (180th Street North), as well as trees and other foliage visually buffer the potential historic building from the proposed project.

The proposed Farmington to Hugo C-line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Tomah branch line loop

Archaeology

Portions of the Tomah branch line loop was surveyed in August 2019, August and November 2021 and most recently surveyed in October and November 2023 and January 2024. Northern completed archaeological field investigations using standard methodology for archaeological surveys. Pedestrian survey was conducted at five-meter or less interval transects following the general direction of the survey corridor. Shovel testing was conducted at 15-meter or less interval. In areas with a greater probability for archaeological sites such as stream crossings, pedestrian survey was conducted at approximately one-meter intervals and shovel testing at less than five-meter intervals.

The survey area was located primarily in agricultural fields, with intermittent wooded areas, residential yards and wetlands. At the time of the field investigation, most of the survey area consisted of harvested fields and plowed corn and soybean fields. Most fields displayed 90-100% surface visibility which allowed field investigation to be conducted using pedestrian survey methods.

Of the total investigated area (124.7 acres), 55.9 acres were investigated using pedestrian survey methods and 55.4 acres were shovel tested. Approximately 13.4 acres were exempted from investigation survey in areas of slope, stream channels, or areas where ground had been disturbed by road and road drainage ditch construction. No prehistoric or historic period Euro-American artifacts or archaeological features were observed in the direct APE.

Aboveground Historical Properties

Northern plans to relocate a branch line receiver on the Tomah branch line loop (MP 3.53). The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the indirect APE was limited to the 500-foot buffer around the valve setting. Aboveground

construction will not exceed eight feet in height. Northern conducted a visual assessment of the indirect APE by walking the areas surrounding the Project and no historical properties were identified.

The proposed construction will not have an effect to any Wisconsin Architecture and History Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

La Crescent compressor station

Archaeology

On September 19, 2023, Northern completed archaeological field investigations using 15-meter interval pedestrian survey in areas of the ESB that were not graveled. The graveled facilities were excluded from survey. The survey area included short and medium grasses and corn fields. Ground surface visibility averaged 25% in grassy areas, but in the corn fields, ground surface visibility averaged 90%.

The total ESB encompassed 3.02 acres. Areas excluded from survey, consisting of graveled access drives and facilities and roadway totaling 1.72 acres. The remaining 1.30 acres averaged more than 25% ground surface visibility and was subjected to pedestrian survey. No archaeological sites or isolated finds were identified in the direct APE.

The current Project design and proposed construction activities will not have direct effects to any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern proposes minor modifications to existing infrastructure at the La Crescent compressor station, including replacing compressor cylinder end caps (currently blind flanges) and adjusting compressor mechanical characteristics to match new operating conditions. While impacts that are subject to review under 36 CFR § 800 may include surficial disturbances caused by topsoil removal, heavy machinery traffic, shallow grading, and spoil dirt management, only vehicular parking is anticipated for this Project component.

The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the existing compressor station lot. Northern conducted a visual assessment of this buffer by examining aerial imagery and observing areas surrounding the project from the public ROW and ESB. No aboveground cultural resources were observed in the 500-foot buffer.

Conclusion and Request for Consultation

To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the attached maps and report and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Northern Natural Gas
Northern Lights 2025 Expansion Project
February 14, 2024

Northern respects that the Tribe has unique expertise in identifying and providing information regarding historic properties with religious or cultural significance which may be affected by the Project. Northern is seeking the Tribe's comments on survey methodology, traditional cultural properties, and traditional cultural landscapes along with areas of importance to the Tribe which should be considered. Northern understands this request for information does not circumvent the government-to-government relationship under Section 106 (36 Code of Federal Regulations Part 800) between the Tribe and the FERC. Please be assured that Northern will keep sensitive Tribal information strictly confidential.

While the regulations for implementing Section 106 (36 Code of Federal Regulations Part 800) allow companies like Northern (and their consultants) to gather information, the FERC is responsible for monitoring compliance with the NHPA and determinations pursuant to Section 106. Additionally, the FERC, not Northern, is responsible for government-to-government consultations with American Indian Tribes. The FERC has not delegated this consultation. The FERC will contact you through a *Notice of Intent to Produce an Environmental Document*. If you would like to communicate directly with the FERC natural gas archaeological staff to discuss its cultural resource review and consultation processes, please feel free to contact Elizabeth Molloy, Tribal Liaison, at 202-502-8771 or Elizabeth.Molloy@ferc.gov.

Thank you in advance for your attention to this Project. Northern would very much appreciate receiving your response within 30 days of the date of this letter. Northern will follow up with you via phone contact or email if no response is received within 30 days. In the interim, should you have questions or need additional information, please contact me at 402-398-7226 or Terry.Plucker@nngco.com or Susan Knabe of Stantec at 920-278-3220 or Susan.Knabe@stantec.com.

Sincerely,



Terry Plucker
Environmental Compliance Manager
Northern Natural Gas Company

Enclosures: RCG&A Cultural Resources Reports
Phase One Cultural Resources Report
Unanticipated Discovery Plans (Minnesota and Wisconsin)

CC: Susan Knabe, Stantec Consulting
Matt Nelson, Northern Natural Gas

From: Waller, Hiedi
Sent: Wednesday, February 14, 2024 10:03 PM
To: michael.laronge@scc-nsn.gov
Cc: Knabe, Susan; Terry.Plucker@nngco.com
Subject: FW: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS
Attachments: [NL 2025 THPO_Sokaogon Chippewa Community, Wisconsin.pdf](#)

THPO Laronge:

Northern is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Over periodic field events from 2019 through 2024, Phase One Archaeological Services Inc. and R. Christopher Goodwin & Associates, Inc. completed field surveys of the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The results of these survey efforts are included in the cultural resources reports. To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the cultural resources reports and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Due to the size of the files associated with the Project, Northern has set up an FTP site where the cultural resources reports and Unanticipated Discoveries Plans referenced in the attached letter can be downloaded.

Please contact us if you have any questions.

Hiedi Waller, PE
Senior Engineer
Pronouns: she, her, hers
Phone: (262) 643-9161

From: donotreply@secureftp.stantec.com <donotreply@secureftp.stantec.com>
Sent: Wednesday, February 14, 2024 9:20 PM
To: Waller, Hiedi <Hiedi.Waller@stantec.com>
Subject: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS

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Login Information

Browser link: <https://tmpsftp.stantec.com>

FTP Client Hostname: tmpsftp.stantec.com **Port:** 22 (can be used within a SFTP client to view and transfer files and folders; e.g., FileZilla)

Login name: s0221202004

Password: 9670102

Disk Quota: 20 GB

Expiry Date: 2/21/2024

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Click here for the [quick reference guide](#).

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1111 South 103rd Street
Omaha, NE 68124

February 14, 2024

Sokaogon Chippewa Community, Wisconsin
Michael Laronge, THPO
3051 Sand Lake Road
Crandon, WI 54520

Re: Northern Natural Gas–Northern Lights 2025 Expansion Project – Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin

Dear Tribal Historic Preservation Officer Laronge:

Northern Natural Gas (Northern) is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured the services of Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Northern is proposing to construct the Project, which will consist of (1) a 3.00-mile extension of its 36-inch-diameter Lake Mills to Albert Lea E-line; (2) a 2.43-mile extension of its 30-inch-diameter Elk River 3rd branch line; (3) a non-contiguous 1.91-mile extension of its 30-inch-diameter Farmington to Hugo C-line; (4) a 1.28-mile extension of its 8-inch-diameter Tomah branch line loop; (5) minor modifications to its existing La Crescent compressor station; and (6) aboveground facilities including a launcher, receiver and tie-in valve settings. All Project components are located in various counties in Minnesota and Wisconsin.

This letter summarizes the results of the investigations and recommendations of the archaeological investigator for the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The archeological reports from R. Christopher Goodwin & Associates, Inc. (RCG&A) and Phase One Archaeological Services Inc. (Phase One) are attached to this letter.

Literature Search

Northern's cultural resources' sub-consultants, RCG&A and Phase One, conducted background research at the Minnesota and Wisconsin SHPOs to identify previously recorded archaeological and above-grade resources. This study area encompassed a Project-specific environmental survey boundary (ESB), the direct Area of Potential Effects (APE) and the indirect APE and included archaeological sites and other cultural resources located in the immediate areas of planned construction along with a one-mile radius of all proposed project activities.

Lake Mills to Albert Lea E-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources on the list of National Register of Historic Places (NRHP) properties are in the indirect APE. One archaeological site, 21FE0130, and Minnesota Statewide Historic Inventory property FE-AEA-00264 extends into the 500-foot buffer around the proposed aboveground valve setting. However, due to distance and mature trees, no effects are anticipated.

Elk River 3rd branch line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Farmington to Hugo C-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Tomah branch line loop

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

A single standing structure, a 19th century Greek Revival Farmhouse (AHI # 78410) was previously located on the west side of County Highway Q within the indirect APE. This building was razed and replaced with a modern single-family farmhouse. No other aboveground historical resources previously listed in the Wisconsin Architecture-History Inventory or on the list of the NRHP properties are located in the indirect APE.

La Crescent compressor station

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the La Crescent compressor station to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Cultural Survey

Following the literature review, Northern's subconsultants conducted a systematic field survey of the direct APE, which includes the construction ROW (TWS), ETWS, access roads, staging areas, and the aboveground appurtenant facility footprints. The survey procedures included a pedestrian walkover of the APE, systematic surface examination of suitable areas, and systematic subsurface testing of areas lacking sufficient surface visibility or which had potential for subsurface resources.

The cultural resources survey is 89% complete for the Lake Mills to Albert Lea E-line with additional shovel testing needed on 77.02 acres anticipated in spring 2024. The cultural resource survey for the Elk River 3rd branch line is 92% complete with additional survey needed on 15.25 acres scheduled for spring 2024. Northern cultural resources surveys are 100% complete for the remaining Project components.

Lake Mills to Albert Lea E-line

Archaeology

On August 22, August 23, October 3, and October 23-27, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability and previously recorded cultural resources. Shovel testing at 15-meter intervals was planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields. Shovel testing is pending for selected locations with the potential for buried cultural deposits.

Excluding one farmstead and one hay field, the majority of the survey area consisted of harvested or mature crops with 50 to 100% ground surface visibility. The hay field yielded an average surface visibility of 30%. The total ESB encompassed 678.90 acres. Roadways, inundated, and usually inundated areas, a total of 23.98 acres, were excluded from survey. A total of 77.02 acres remains to be surveyed. The other 591.82 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

A Euro-American archaeological site (21FE0130) also assigned an historic inventory property (FE-AEA-00264) was initially recorded as part of another Northern project in 2022. During the 2023 effort, this site was surveyed again. The 2023 site visit prompted an updated site boundary and an updated site form was submitted to the Minnesota Office of the State Archaeologist. This

farmstead site consisted of a combination of standing structures, archaeological features, and a surface artifact scatter. The site is within the ESB, but does not extend into the direct APE. In the original site form, the extant structures were identified as lacking integrity. Since the initial site visit, three buildings have been demolished. The artifacts documented on the surface have been placed in dump locations of mixed time periods, grouped through heavy machinery in pushpiles, and disturbed by agricultural processes. The archaeological component at 21FE0130 has not been evaluated for listing in the NRHP. RCG&A recommends the architectural buildings (FE-AEA-00264) at this property not eligible for listing in the NRHP.

This resource (21FE0130/FE-AEA-00264) is not in the direct APE and will not be impacted by the Project. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

County Ditch No. 4 (FE-PIC-00008), a historical structure, was initially visited as part of another Northern project in 2022. During the 2023 fieldwork, it was more thoroughly documented. County Ditch No. 4 is an active drainage ditch bound by agricultural land. The majority of this ditch is open cut and possesses a steep V-shaped profile. Brome and other grasses covered the banks of the ditch. Survey measured a top width of between 50 and 60 feet and a bottom width of 9-15 feet. Standing water was present at the base of the ditch during survey in fall 2023 but the overall depth was estimated to be 10-12 feet. Based on observations made from public ROW and aerial images, these dimensions are typical of County Ditch No. 4. This ditch also includes two branches: the Colvin Branch and the Klukow Branch. The Klukow Branch was in the ESB and was documented as part of FE-PIC-0008. County Ditch No. 4 is recommended not eligible for listing in the NRHP. Northern will utilize a private driveway that crosses the ditch without improvements. Therefore, the project will have no effect to County Ditch No. 4 (FE-PIC-00008).

Northern will remove a tie-over valve setting (MP 31.21) and install a new tie-in valve setting (MP 34.21) for the Lake Mills to Albert Lea E-line extension project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 34.21. This entire area was within the surveyed ESB. Northern conducted a visual assessment of the 500 foot buffer by walking the areas surrounding the project. The western portion of archaeological site 21FE0130 / inventory property FE-AEA-00264 is within the visual effects area; however, given the distance and mature vegetation surrounding the standing structures at the site, there will not be any effect to the standing structures from the project.

The proposed construction will not have an effect to any Minnesota Standing Structures Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

Elk River 3rd branch line

Archaeology

On November 1-5 and 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability. Shovel testing at 15-meter intervals was planned for surveyed areas with less than 25% surface visibility); no such areas were identified on this project. The survey area included agricultural fields, a tree farm, wetlands and manicured lawn with small stands of trees. Several historical and recent single-family homes and associated outbuildings were within the ESB.

The agricultural fields and tree farm yielded an average surface visibility of 80%. Visibility in the manicured lawns was limited (average 30%) but stands of trees yielded better ground surface visibility (average 55%). The total ESB encompassed 194.59 acres. Roadways as well as inundated and usually inundated areas, a total of 58.92 acres, were excluded from survey. A total of 15.25 acres remains to be surveyed. The remaining 120.42 acres had more than 25% ground surface visibility and was subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical ditches (WA-FLC-00033 and WA-XXX-00002) and ten historical standing structures during the 2023 fieldwork. None of the buildings are in the direct APE. Only one newly recorded property, WA-HGC-00077, is in the 500-foot buffer of the proposed valve setting.

Two historical drainage ditches were newly recorded during the 2023 fieldwork. WA-FLC-00033 is an active drainage ditch constructed in approximately 1949. The ditch is open cut and possesses a steep V-shaped profile. Grasses covered the banks of the ditch. Surveyors measured a varied width between 1.5 and 3 meters. Based on observations made from public ROW and aerial images, these dimensions are typical of this ditch. WA-FLC-00033 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-FLC-00033 via HDD.

WA-XXX-00002, the channelized Hardwood Creek, is known as Judicial Ditch No. 2. Ordered in 1902, Judicial Ditch No. 2 is open cut and possesses a V-shaped profile. Surveyors measured a top width of approximately six meters. Grasses covered the banks of the ditch. While standing water was present within the ditch during survey in fall 2023, the overall depth of the ditch was measured at variable depths between 2 to 5 meters. Based on observations made from the public ROW and aerial images, these dimensions are fairly typical of Judicial Ditch No. 2. WA-XXX-

00002 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-XXX-00002 via HDD.

Northern plans to remove a tie-over valve setting (MP 1.07) and install a new tie-in valve setting (MP 3.45) for the Elk River 3rd branch line project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 3.45. Northern conducted a desktop analysis and visual assessment of the 500-foot buffer by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

Northern identified four built resources on three properties that are potential historic properties (constructed more than 45 years ago) in the 500-foot buffer around the proposed facility. Prior to the 2023 survey, none of the buildings were recorded in the Minnesota Statewide Historic Inventory. One of the buildings was in the ESB and formally recorded during the survey (WA-HGC-00077; 17903 Henna Avenue North); the others (at 17803 Henna Avenue North and 17958 Henna Avenue North) were observed but not formally recorded.

The single-family residence at 17903 Henna Avenue North occupies a rectangular footprint, possesses two stories, is clad in composite siding and brick veneer, and terminates in a side-gable roof sheathed in asphalt shingles. It possesses an attached, single-bay garage along the south elevation. Based on county records, the house was constructed in 1969. Historic exterior materials on this building have been altered with replacements to exterior cladding, window openings and asphalt roof shingles. The public ROW runs between the proposed facility and the property at 17903 Henna Avenue North. Additionally, there are several trees that will obscure views of the proposed facility.

The single-family home and garage at 17803 Henna Avenue North have been substantially altered through additions and renovation. The original house was constructed in the mid-1960s, but, according to county records, extensive changes were made in 1989. The proposed facility is not visible from the property at 17803 Henna Avenue North as it is obscured by distance and a line of mature trees.

There are several buildings on the 17958 Henna Avenue North property. Only the single-family home and one outbuilding are within the 500-foot indirect APE around the proposed facility. The two-story home was constructed around 1880 and has had significant alterations to its exterior. In addition, the house is orientated to the north, while the facility will be constructed to the southeast. The combination of distance and topography, as well as an agricultural field and mature deciduous trees visually buffer the potential historic buildings from the proposed Project.

The proposed aboveground valve setting will not substantively alter the viewshed of the potential historic properties at 17803, 17903, and 17958 Henna Avenue North. Temporary visual impacts on the property during construction will not affect the attributes contributing to the potential significance and integrity of these properties. As such, the proposed Project will not adversely impact the aspects of integrity of these potential historic properties.

The proposed Elk River 3rd branch line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Farmington to Hugo C-line

Archaeology

From July 17 to 20, October 18 and November 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at 5-meter intervals in high probability areas and shovel testing at 15-meter intervals were planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields, wetlands and woodlands associated with the wetlands and pasture.

Ground surface visibility was good in the agricultural fields ranging from 40-100%. Woodland and pastures had lower surface visibility that ranged between 25 and 50%. The total ESB encompassed 172.97 acres. Roadways, existing graveled facility lots, as well as inundated and usually inundated areas, a total of 19.26 acres, were excluded from survey. The remaining 153.71 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical properties in the Farmington to Hugo C-line ESB. They were recorded in the Minnesota Statewide Historic Inventory and assigned designations WA-MYT-031 and WA-MYT-032. WA-MYT-031 is a 1973 single-family residence. The two-story, multi-bay building occupies a rectangular footprint, is clad in composite siding and brick veneer, and terminates in a low-pitched, hipped roof with overhanging eaves sheathed in asphalt shingles. The building features a single-story attached garage and a recessed front porch covered by a secondary hipped roof also sheathed in asphalt shingles.

WA-MYT-032 includes two historical buildings, a house (WA-MYT-028) and a shed (WA-MYT-029). WA-MYT-028 is a 1972 single-family residence. The one-and-one-half story, multi-bay building occupies a rectangular footprint, is clad in vinyl siding and brick veneer, and terminates in a front-gable roof with overhanging eaves sheathed in asphalt shingles. The façade features a secondary, front-gable projection and a recessed porch. The east elevation features a two-bay, integral garage. WA-MYT-029 is a 1972 shed near the house. The single-story shed occupies a rectangular footprint, is clad in wood siding, and terminates in a gambrel roof with overhanging eaves sheathed in asphalt shingles. Both of these properties are recommended not eligible for listing in the NRHP and both are avoided through HDD in the current Project design.

Northern proposes to install a new launcher and associated valves and piping at the existing Hugo compressor station (MP 0.00), as well as install a new tie-in valve setting (MP 1.91) for the

Farmington to Hugo C-line. Aboveground construction for the aboveground tie-in valve setting will not exceed ten feet in height. The potential for adverse visual effects to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the Hugo compressor station and the proposed valve setting at MP 1.91. Northern conducted a visual assessment of these areas by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

One potential historical resource is located in the Hugo compressor station buffer, a house at 10830 180th Street North. This property has not been recorded in the Minnesota Statewide Historic Inventory. According to county records, it was constructed in 1977 and is a split foyer frame home with an attached garage. Significant alterations were made to the house in 2016. This house is set back from 180th Street North approximately 240 feet and is surrounded by trees. The combination of distance, a public ROW (180th Street North), as well as trees and other foliage visually buffer the potential historic building from the proposed project.

The proposed Farmington to Hugo C-line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Tomah branch line loop

Archaeology

Portions of the Tomah branch line loop was surveyed in August 2019, August and November 2021 and most recently surveyed in October and November 2023 and January 2024. Northern completed archaeological field investigations using standard methodology for archaeological surveys. Pedestrian survey was conducted at five-meter or less interval transects following the general direction of the survey corridor. Shovel testing was conducted at 15-meter or less interval. In areas with a greater probability for archaeological sites such as stream crossings, pedestrian survey was conducted at approximately one-meter intervals and shovel testing at less than five-meter intervals.

The survey area was located primarily in agricultural fields, with intermittent wooded areas, residential yards and wetlands. At the time of the field investigation, most of the survey area consisted of harvested fields and plowed corn and soybean fields. Most fields displayed 90-100% surface visibility which allowed field investigation to be conducted using pedestrian survey methods.

Of the total investigated area (124.7 acres), 55.9 acres were investigated using pedestrian survey methods and 55.4 acres were shovel tested. Approximately 13.4 acres were exempted from investigation survey in areas of slope, stream channels, or areas where ground had been disturbed by road and road drainage ditch construction. No prehistoric or historic period Euro-American artifacts or archaeological features were observed in the direct APE.

Aboveground Historical Properties

Northern plans to relocate a branch line receiver on the Tomah branch line loop (MP 3.53). The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the indirect APE was limited to the 500-foot buffer around the valve setting. Aboveground

construction will not exceed eight feet in height. Northern conducted a visual assessment of the indirect APE by walking the areas surrounding the Project and no historical properties were identified.

The proposed construction will not have an effect to any Wisconsin Architecture and History Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

La Crescent compressor station

Archaeology

On September 19, 2023, Northern completed archaeological field investigations using 15-meter interval pedestrian survey in areas of the ESB that were not graveled. The graveled facilities were excluded from survey. The survey area included short and medium grasses and corn fields. Ground surface visibility averaged 25% in grassy areas, but in the corn fields, ground surface visibility averaged 90%.

The total ESB encompassed 3.02 acres. Areas excluded from survey, consisting of graveled access drives and facilities and roadway totaling 1.72 acres. The remaining 1.30 acres averaged more than 25% ground surface visibility and was subjected to pedestrian survey. No archaeological sites or isolated finds were identified in the direct APE.

The current Project design and proposed construction activities will not have direct effects to any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern proposes minor modifications to existing infrastructure at the La Crescent compressor station, including replacing compressor cylinder end caps (currently blind flanges) and adjusting compressor mechanical characteristics to match new operating conditions. While impacts that are subject to review under 36 CFR § 800 may include surficial disturbances caused by topsoil removal, heavy machinery traffic, shallow grading, and spoil dirt management, only vehicular parking is anticipated for this Project component.

The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the existing compressor station lot. Northern conducted a visual assessment of this buffer by examining aerial imagery and observing areas surrounding the project from the public ROW and ESB. No aboveground cultural resources were observed in the 500-foot buffer.

Conclusion and Request for Consultation

To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the attached maps and report and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Northern Natural Gas
Northern Lights 2025 Expansion Project
February 14, 2024

Northern respects that the Tribe has unique expertise in identifying and providing information regarding historic properties with religious or cultural significance which may be affected by the Project. Northern is seeking the Tribe's comments on survey methodology, traditional cultural properties, and traditional cultural landscapes along with areas of importance to the Tribe which should be considered. Northern understands this request for information does not circumvent the government-to-government relationship under Section 106 (36 Code of Federal Regulations Part 800) between the Tribe and the FERC. Please be assured that Northern will keep sensitive Tribal information strictly confidential.

While the regulations for implementing Section 106 (36 Code of Federal Regulations Part 800) allow companies like Northern (and their consultants) to gather information, the FERC is responsible for monitoring compliance with the NHPA and determinations pursuant to Section 106. Additionally, the FERC, not Northern, is responsible for government-to-government consultations with American Indian Tribes. The FERC has not delegated this consultation. The FERC will contact you through a *Notice of Intent to Produce an Environmental Document*. If you would like to communicate directly with the FERC natural gas archaeological staff to discuss its cultural resource review and consultation processes, please feel free to contact Elizabeth Molloy, Tribal Liaison, at 202-502-8771 or Elizabeth.Molloy@ferc.gov.

Thank you in advance for your attention to this Project. Northern would very much appreciate receiving your response within 30 days of the date of this letter. Northern will follow up with you via phone contact or email if no response is received within 30 days. In the interim, should you have questions or need additional information, please contact me at 402-398-7226 or Terry.Plucker@nngco.com or Susan Knabe of Stantec at 920-278-3220 or Susan.Knabe@stantec.com.

Sincerely,



Terry Plucker
Environmental Compliance Manager
Northern Natural Gas Company

Enclosures: RCG&A Cultural Resources Reports
Phase One Cultural Resources Report
Unanticipated Discovery Plans (Minnesota and Wisconsin)

CC: Susan Knabe, Stantec Consulting
Matt Nelson, Northern Natural Gas

From: Waller, Hiedi
Sent: Wednesday, February 14, 2024 10:02 PM
To: marvin.defoe@redcliff-nsn.gov
Cc: Knabe, Susan; Terry.Plucker@nngco.com
Subject: FW: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS
Attachments: [NL 2025 THPO_Red Cliff Band of Lake Superior Chippewa Indians of Wisconsin.pdf](#)

[THPO Defoe:](#)

Northern is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Over periodic field events from 2019 through 2024, Phase One Archaeological Services Inc. and R. Christopher Goodwin & Associates, Inc. completed field surveys of the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The results of these survey efforts are included in the cultural resources reports. To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the cultural resources reports and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Due to the size of the files associated with the Project, Northern has set up an FTP site where the cultural resources reports and Unanticipated Discoveries Plans referenced in the attached letter can be downloaded.

Please contact us if you have any questions.

Hiedi Waller, PE
Senior Engineer
Pronouns: she, her, hers
Phone: (262) 643-9161

From: donotreply@secureftp.stantec.com <donotreply@secureftp.stantec.com>
Sent: Wednesday, February 14, 2024 9:20 PM
To: Waller, Hiedi <Hiedi.Waller@stantec.com>
Subject: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS

Your directory has successfully been created!

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Login Information

Browser link: <https://tmpsftp.stantec.com>

FTP Client Hostname: tmpsftp.stantec.com **Port:** 22 (can be used within a SFTP client to view and transfer files and folders; e.g., FileZilla)

Login name: s0221202004

Password: 9670102

Disk Quota: 20 GB

Expiry Date: 2/21/2024

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1111 South 103rd Street
Omaha, NE 68124

February 14, 2024

Red Cliff Band of Lake Superior Chippewa Indians of Wisconsin
Marvin Defoe, THPO
888385 Pike Road, Highway 13
Bayfield, WI 54815

Re: Northern Natural Gas–Northern Lights 2025 Expansion Project – Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin

Dear Tribal Historic Preservation Officer Defoe:

Northern Natural Gas (Northern) is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured the services of Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Northern is proposing to construct the Project, which will consist of (1) a 3.00-mile extension of its 36-inch-diameter Lake Mills to Albert Lea E-line; (2) a 2.43-mile extension of its 30-inch-diameter Elk River 3rd branch line; (3) a non-contiguous 1.91-mile extension of its 30-inch-diameter Farmington to Hugo C-line; (4) a 1.28-mile extension of its 8-inch-diameter Tomah branch line loop; (5) minor modifications to its existing La Crescent compressor station; and (6) aboveground facilities including a launcher, receiver and tie-in valve settings. All Project components are located in various counties in Minnesota and Wisconsin.

This letter summarizes the results of the investigations and recommendations of the archaeological investigator for the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The archeological reports from R. Christopher Goodwin & Associates, Inc. (RCG&A) and Phase One Archaeological Services Inc. (Phase One) are attached to this letter.

Literature Search

Northern's cultural resources' sub-consultants, RCG&A and Phase One, conducted background research at the Minnesota and Wisconsin SHPOs to identify previously recorded archaeological and above-grade resources. This study area encompassed a Project-specific environmental survey boundary (ESB), the direct Area of Potential Effects (APE) and the indirect APE and included archaeological sites and other cultural resources located in the immediate areas of planned construction along with a one-mile radius of all proposed project activities.

Lake Mills to Albert Lea E-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources on the list of National Register of Historic Places (NRHP) properties are in the indirect APE. One archaeological site, 21FE0130, and Minnesota Statewide Historic Inventory property FE-AEA-00264 extends into the 500-foot buffer around the proposed aboveground valve setting. However, due to distance and mature trees, no effects are anticipated.

Elk River 3rd branch line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Farmington to Hugo C-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Tomah branch line loop

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

A single standing structure, a 19th century Greek Revival Farmhouse (AHI # 78410) was previously located on the west side of County Highway Q within the indirect APE. This building was razed and replaced with a modern single-family farmhouse. No other aboveground historical resources previously listed in the Wisconsin Architecture-History Inventory or on the list of the NRHP properties are located in the indirect APE.

La Crescent compressor station

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the La Crescent compressor station to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Cultural Survey

Following the literature review, Northern's subconsultants conducted a systematic field survey of the direct APE, which includes the construction ROW (TWS), ETWS, access roads, staging areas, and the aboveground appurtenant facility footprints. The survey procedures included a pedestrian walkover of the APE, systematic surface examination of suitable areas, and systematic subsurface testing of areas lacking sufficient surface visibility or which had potential for subsurface resources.

The cultural resources survey is 89% complete for the Lake Mills to Albert Lea E-line with additional shovel testing needed on 77.02 acres anticipated in spring 2024. The cultural resource survey for the Elk River 3rd branch line is 92% complete with additional survey needed on 15.25 acres scheduled for spring 2024. Northern cultural resources surveys are 100% complete for the remaining Project components.

Lake Mills to Albert Lea E-line

Archaeology

On August 22, August 23, October 3, and October 23-27, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability and previously recorded cultural resources. Shovel testing at 15-meter intervals was planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields. Shovel testing is pending for selected locations with the potential for buried cultural deposits.

Excluding one farmstead and one hay field, the majority of the survey area consisted of harvested or mature crops with 50 to 100% ground surface visibility. The hay field yielded an average surface visibility of 30%. The total ESB encompassed 678.90 acres. Roadways, inundated, and usually inundated areas, a total of 23.98 acres, were excluded from survey. A total of 77.02 acres remains to be surveyed. The other 591.82 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

A Euro-American archaeological site (21FE0130) also assigned an historic inventory property (FE-AEA-00264) was initially recorded as part of another Northern project in 2022. During the 2023 effort, this site was surveyed again. The 2023 site visit prompted an updated site boundary and an updated site form was submitted to the Minnesota Office of the State Archaeologist. This

farmstead site consisted of a combination of standing structures, archaeological features, and a surface artifact scatter. The site is within the ESB, but does not extend into the direct APE. In the original site form, the extant structures were identified as lacking integrity. Since the initial site visit, three buildings have been demolished. The artifacts documented on the surface have been placed in dump locations of mixed time periods, grouped through heavy machinery in pushpiles, and disturbed by agricultural processes. The archaeological component at 21FE0130 has not been evaluated for listing in the NRHP. RCG&A recommends the architectural buildings (FE-AEA-00264) at this property not eligible for listing in the NRHP.

This resource (21FE0130/FE-AEA-00264) is not in the direct APE and will not be impacted by the Project. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

County Ditch No. 4 (FE-PIC-00008), a historical structure, was initially visited as part of another Northern project in 2022. During the 2023 fieldwork, it was more thoroughly documented. County Ditch No. 4 is an active drainage ditch bound by agricultural land. The majority of this ditch is open cut and possesses a steep V-shaped profile. Brome and other grasses covered the banks of the ditch. Survey measured a top width of between 50 and 60 feet and a bottom width of 9-15 feet. Standing water was present at the base of the ditch during survey in fall 2023 but the overall depth was estimated to be 10-12 feet. Based on observations made from public ROW and aerial images, these dimensions are typical of County Ditch No. 4. This ditch also includes two branches: the Colvin Branch and the Klukow Branch. The Klukow Branch was in the ESB and was documented as part of FE-PIC-0008. County Ditch No. 4 is recommended not eligible for listing in the NRHP. Northern will utilize a private driveway that crosses the ditch without improvements. Therefore, the project will have no effect to County Ditch No. 4 (FE-PIC-00008).

Northern will remove a tie-over valve setting (MP 31.21) and install a new tie-in valve setting (MP 34.21) for the Lake Mills to Albert Lea E-line extension project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 34.21. This entire area was within the surveyed ESB. Northern conducted a visual assessment of the 500 foot buffer by walking the areas surrounding the project. The western portion of archaeological site 21FE0130 / inventory property FE-AEA-00264 is within the visual effects area; however, given the distance and mature vegetation surrounding the standing structures at the site, there will not be any effect to the standing structures from the project.

The proposed construction will not have an effect to any Minnesota Standing Structures Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

Elk River 3rd branch line

Archaeology

On November 1-5 and 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability. Shovel testing at 15-meter intervals was planned for surveyed areas with less than 25% surface visibility); no such areas were identified on this project. The survey area included agricultural fields, a tree farm, wetlands and manicured lawn with small stands of trees. Several historical and recent single-family homes and associated outbuildings were within the ESB.

The agricultural fields and tree farm yielded an average surface visibility of 80%. Visibility in the manicured lawns was limited (average 30%) but stands of trees yielded better ground surface visibility (average 55%). The total ESB encompassed 194.59 acres. Roadways as well as inundated and usually inundated areas, a total of 58.92 acres, were excluded from survey. A total of 15.25 acres remains to be surveyed. The remaining 120.42 acres had more than 25% ground surface visibility and was subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical ditches (WA-FLC-00033 and WA-XXX-00002) and ten historical standing structures during the 2023 fieldwork. None of the buildings are in the direct APE. Only one newly recorded property, WA-HGC-00077, is in the 500-foot buffer of the proposed valve setting.

Two historical drainage ditches were newly recorded during the 2023 fieldwork. WA-FLC-00033 is an active drainage ditch constructed in approximately 1949. The ditch is open cut and possesses a steep V-shaped profile. Grasses covered the banks of the ditch. Surveyors measured a varied width between 1.5 and 3 meters. Based on observations made from public ROW and aerial images, these dimensions are typical of this ditch. WA-FLC-00033 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-FLC-00033 via HDD.

WA-XXX-00002, the channelized Hardwood Creek, is known as Judicial Ditch No. 2. Ordered in 1902, Judicial Ditch No. 2 is open cut and possesses a V-shaped profile. Surveyors measured a top width of approximately six meters. Grasses covered the banks of the ditch. While standing water was present within the ditch during survey in fall 2023, the overall depth of the ditch was measured at variable depths between 2 to 5 meters. Based on observations made from the public ROW and aerial images, these dimensions are fairly typical of Judicial Ditch No. 2. WA-XXX-

00002 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-XXX-00002 via HDD.

Northern plans to remove a tie-over valve setting (MP 1.07) and install a new tie-in valve setting (MP 3.45) for the Elk River 3rd branch line project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 3.45. Northern conducted a desktop analysis and visual assessment of the 500-foot buffer by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

Northern identified four built resources on three properties that are potential historic properties (constructed more than 45 years ago) in the 500-foot buffer around the proposed facility. Prior to the 2023 survey, none of the buildings were recorded in the Minnesota Statewide Historic Inventory. One of the buildings was in the ESB and formally recorded during the survey (WA-HGC-00077; 17903 Henna Avenue North); the others (at 17803 Henna Avenue North and 17958 Henna Avenue North) were observed but not formally recorded.

The single-family residence at 17903 Henna Avenue North occupies a rectangular footprint, possesses two stories, is clad in composite siding and brick veneer, and terminates in a side-gable roof sheathed in asphalt shingles. It possesses an attached, single-bay garage along the south elevation. Based on county records, the house was constructed in 1969. Historic exterior materials on this building have been altered with replacements to exterior cladding, window openings and asphalt roof shingles. The public ROW runs between the proposed facility and the property at 17903 Henna Avenue North. Additionally, there are several trees that will obscure views of the proposed facility.

The single-family home and garage at 17803 Henna Avenue North have been substantially altered through additions and renovation. The original house was constructed in the mid-1960s, but, according to county records, extensive changes were made in 1989. The proposed facility is not visible from the property at 17803 Henna Avenue North as it is obscured by distance and a line of mature trees.

There are several buildings on the 17958 Henna Avenue North property. Only the single-family home and one outbuilding are within the 500-foot indirect APE around the proposed facility. The two-story home was constructed around 1880 and has had significant alterations to its exterior. In addition, the house is orientated to the north, while the facility will be constructed to the southeast. The combination of distance and topography, as well as an agricultural field and mature deciduous trees visually buffer the potential historic buildings from the proposed Project.

The proposed aboveground valve setting will not substantively alter the viewshed of the potential historic properties at 17803, 17903, and 17958 Henna Avenue North. Temporary visual impacts on the property during construction will not affect the attributes contributing to the potential significance and integrity of these properties. As such, the proposed Project will not adversely impact the aspects of integrity of these potential historic properties.

The proposed Elk River 3rd branch line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Farmington to Hugo C-line

Archaeology

From July 17 to 20, October 18 and November 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at 5-meter intervals in high probability areas and shovel testing at 15-meter intervals were planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields, wetlands and woodlands associated with the wetlands and pasture.

Ground surface visibility was good in the agricultural fields ranging from 40-100%. Woodland and pastures had lower surface visibility that ranged between 25 and 50%. The total ESB encompassed 172.97 acres. Roadways, existing graveled facility lots, as well as inundated and usually inundated areas, a total of 19.26 acres, were excluded from survey. The remaining 153.71 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical properties in the Farmington to Hugo C-line ESB. They were recorded in the Minnesota Statewide Historic Inventory and assigned designations WA-MYT-031 and WA-MYT-032. WA-MYT-031 is a 1973 single-family residence. The two-story, multi-bay building occupies a rectangular footprint, is clad in composite siding and brick veneer, and terminates in a low-pitched, hipped roof with overhanging eaves sheathed in asphalt shingles. The building features a single-story attached garage and a recessed front porch covered by a secondary hipped roof also sheathed in asphalt shingles.

WA-MYT-032 includes two historical buildings, a house (WA-MYT-028) and a shed (WA-MYT-029). WA-MYT-028 is a 1972 single-family residence. The one-and-one-half story, multi-bay building occupies a rectangular footprint, is clad in vinyl siding and brick veneer, and terminates in a front-gable roof with overhanging eaves sheathed in asphalt shingles. The façade features a secondary, front-gable projection and a recessed porch. The east elevation features a two-bay, integral garage. WA-MYT-029 is a 1972 shed near the house. The single-story shed occupies a rectangular footprint, is clad in wood siding, and terminates in a gambrel roof with overhanging eaves sheathed in asphalt shingles. Both of these properties are recommended not eligible for listing in the NRHP and both are avoided through HDD in the current Project design.

Northern proposes to install a new launcher and associated valves and piping at the existing Hugo compressor station (MP 0.00), as well as install a new tie-in valve setting (MP 1.91) for the

Farmington to Hugo C-line. Aboveground construction for the aboveground tie-in valve setting will not exceed ten feet in height. The potential for adverse visual effects to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the Hugo compressor station and the proposed valve setting at MP 1.91. Northern conducted a visual assessment of these areas by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

One potential historical resource is located in the Hugo compressor station buffer, a house at 10830 180th Street North. This property has not been recorded in the Minnesota Statewide Historic Inventory. According to county records, it was constructed in 1977 and is a split foyer frame home with an attached garage. Significant alterations were made to the house in 2016. This house is set back from 180th Street North approximately 240 feet and is surrounded by trees. The combination of distance, a public ROW (180th Street North), as well as trees and other foliage visually buffer the potential historic building from the proposed project.

The proposed Farmington to Hugo C-line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Tomah branch line loop

Archaeology

Portions of the Tomah branch line loop was surveyed in August 2019, August and November 2021 and most recently surveyed in October and November 2023 and January 2024. Northern completed archaeological field investigations using standard methodology for archaeological surveys. Pedestrian survey was conducted at five-meter or less interval transects following the general direction of the survey corridor. Shovel testing was conducted at 15-meter or less interval. In areas with a greater probability for archaeological sites such as stream crossings, pedestrian survey was conducted at approximately one-meter intervals and shovel testing at less than five-meter intervals.

The survey area was located primarily in agricultural fields, with intermittent wooded areas, residential yards and wetlands. At the time of the field investigation, most of the survey area consisted of harvested fields and plowed corn and soybean fields. Most fields displayed 90-100% surface visibility which allowed field investigation to be conducted using pedestrian survey methods.

Of the total investigated area (124.7 acres), 55.9 acres were investigated using pedestrian survey methods and 55.4 acres were shovel tested. Approximately 13.4 acres were exempted from investigation survey in areas of slope, stream channels, or areas where ground had been disturbed by road and road drainage ditch construction. No prehistoric or historic period Euro-American artifacts or archaeological features were observed in the direct APE.

Aboveground Historical Properties

Northern plans to relocate a branch line receiver on the Tomah branch line loop (MP 3.53). The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the indirect APE was limited to the 500-foot buffer around the valve setting. Aboveground

construction will not exceed eight feet in height. Northern conducted a visual assessment of the indirect APE by walking the areas surrounding the Project and no historical properties were identified.

The proposed construction will not have an effect to any Wisconsin Architecture and History Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

La Crescent compressor station

Archaeology

On September 19, 2023, Northern completed archaeological field investigations using 15-meter interval pedestrian survey in areas of the ESB that were not graveled. The graveled facilities were excluded from survey. The survey area included short and medium grasses and corn fields. Ground surface visibility averaged 25% in grassy areas, but in the corn fields, ground surface visibility averaged 90%.

The total ESB encompassed 3.02 acres. Areas excluded from survey, consisting of graveled access drives and facilities and roadway totaling 1.72 acres. The remaining 1.30 acres averaged more than 25% ground surface visibility and was subjected to pedestrian survey. No archaeological sites or isolated finds were identified in the direct APE.

The current Project design and proposed construction activities will not have direct effects to any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern proposes minor modifications to existing infrastructure at the La Crescent compressor station, including replacing compressor cylinder end caps (currently blind flanges) and adjusting compressor mechanical characteristics to match new operating conditions. While impacts that are subject to review under 36 CFR § 800 may include surficial disturbances caused by topsoil removal, heavy machinery traffic, shallow grading, and spoil dirt management, only vehicular parking is anticipated for this Project component.

The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the existing compressor station lot. Northern conducted a visual assessment of this buffer by examining aerial imagery and observing areas surrounding the project from the public ROW and ESB. No aboveground cultural resources were observed in the 500-foot buffer.

Conclusion and Request for Consultation

To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the attached maps and report and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Northern Natural Gas
Northern Lights 2025 Expansion Project
February 14, 2024

Northern respects that the Tribe has unique expertise in identifying and providing information regarding historic properties with religious or cultural significance which may be affected by the Project. Northern is seeking the Tribe's comments on survey methodology, traditional cultural properties, and traditional cultural landscapes along with areas of importance to the Tribe which should be considered. Northern understands this request for information does not circumvent the government-to-government relationship under Section 106 (36 Code of Federal Regulations Part 800) between the Tribe and the FERC. Please be assured that Northern will keep sensitive Tribal information strictly confidential.

While the regulations for implementing Section 106 (36 Code of Federal Regulations Part 800) allow companies like Northern (and their consultants) to gather information, the FERC is responsible for monitoring compliance with the NHPA and determinations pursuant to Section 106. Additionally, the FERC, not Northern, is responsible for government-to-government consultations with American Indian Tribes. The FERC has not delegated this consultation. The FERC will contact you through a *Notice of Intent to Produce an Environmental Document*. If you would like to communicate directly with the FERC natural gas archaeological staff to discuss its cultural resource review and consultation processes, please feel free to contact Elizabeth Molloy, Tribal Liaison, at 202-502-8771 or Elizabeth.Molloy@ferc.gov.

Thank you in advance for your attention to this Project. Northern would very much appreciate receiving your response within 30 days of the date of this letter. Northern will follow up with you via phone contact or email if no response is received within 30 days. In the interim, should you have questions or need additional information, please contact me at 402-398-7226 or Terry.Plucker@nngco.com or Susan Knabe of Stantec at 920-278-3220 or Susan.Knabe@stantec.com.

Sincerely,



Terry Plucker
Environmental Compliance Manager
Northern Natural Gas Company

Enclosures: RCG&A Cultural Resources Reports
Phase One Cultural Resources Report
Unanticipated Discovery Plans (Minnesota and Wisconsin)

CC: Susan Knabe, Stantec Consulting
Matt Nelson, Northern Natural Gas

From: [Waller, Hiedi](#)
To: amy.burnette@llojibwe.net
Cc: [Knabe, Susan](#); Terry.Plucker@nngco.com
Subject: FW: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS
Date: Wednesday, February 14, 2024 9:58:00 PM
Attachments: [NL 2025 THPO Leech Lake Band of the Minnesota Chippewa Tribe.pdf](#)

THPO Burnette:

Northern is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Over periodic field events from 2019 through 2024, Phase One Archaeological Services Inc. and R. Christopher Goodwin & Associates, Inc. completed field surveys of the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The results of these survey efforts are included in the cultural resources reports. To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the cultural resources reports and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Due to the size of the files associated with the Project, Northern has set up an FTP site where the cultural resources reports and Unanticipated Discoveries Plans referenced in the attached letter can be downloaded.

Please contact us if you have any questions.

Hiedi Waller, PE
Senior Engineer
Pronouns: she, her, hers
Phone: (262) 643-9161

From: donotreply@secureftp.stantec.com <donotreply@secureftp.stantec.com>
Sent: Wednesday, February 14, 2024 9:20 PM
To: Waller, Hiedi <Hiedi.Waller@stantec.com>
Subject: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS

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Login Information

Browser link: <https://tmpsftp.stantec.com>

FTP Client Hostname: tmpsftp.stantec.com **Port:** 22 (can be used within a SFTP client to view and transfer files and folders; e.g., FileZilla)

Login name: s0221202004

Password: 9670102

Disk Quota: 20 GB

Expiry Date: 2/21/2024

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1111 South 103rd Street
Omaha, NE 68124

February 14, 2024

Leech Lake Band of the Minnesota Chippewa Tribe
Amy Burnette, Tribal Historic Preservation Officer
190 Sailstar Drive
Cass Lake, MN 56633

Re: Northern Natural Gas–Northern Lights 2025 Expansion Project – Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin

Dear Tribal Historic Preservation Officer Burnette:

Northern Natural Gas (Northern) is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured the services of Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Northern is proposing to construct the Project, which will consist of (1) a 3.00-mile extension of its 36-inch-diameter Lake Mills to Albert Lea E-line; (2) a 2.43-mile extension of its 30-inch-diameter Elk River 3rd branch line; (3) a non-contiguous 1.91-mile extension of its 30-inch-diameter Farmington to Hugo C-line; (4) a 1.28-mile extension of its 8-inch-diameter Tomah branch line loop; (5) minor modifications to its existing La Crescent compressor station; and (6) aboveground facilities including a launcher, receiver and tie-in valve settings. All Project components are located in various counties in Minnesota and Wisconsin.

This letter summarizes the results of the investigations and recommendations of the archaeological investigator for the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The archeological reports from R. Christopher Goodwin & Associates, Inc. (RCG&A) and Phase One Archaeological Services Inc. (Phase One) are attached to this letter.

Literature Search

Northern's cultural resources' sub-consultants, RCG&A and Phase One, conducted background research at the Minnesota and Wisconsin SHPOs to identify previously recorded archaeological and above-grade resources. This study area encompassed a Project-specific environmental survey boundary (ESB), the direct Area of Potential Effects (APE) and the indirect APE and included archaeological sites and other cultural resources located in the immediate areas of planned construction along with a one-mile radius of all proposed project activities.

Lake Mills to Albert Lea E-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources on the list of National Register of Historic Places (NRHP) properties are in the indirect APE. One archaeological site, 21FE0130, and Minnesota Statewide Historic Inventory property FE-AEA-00264 extends into the 500-foot buffer around the proposed aboveground valve setting. However, due to distance and mature trees, no effects are anticipated.

Elk River 3rd branch line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Farmington to Hugo C-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Tomah branch line loop

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

A single standing structure, a 19th century Greek Revival Farmhouse (AHI # 78410) was previously located on the west side of County Highway Q within the indirect APE. This building was razed and replaced with a modern single-family farmhouse. No other aboveground historical resources previously listed in the Wisconsin Architecture-History Inventory or on the list of the NRHP properties are located in the indirect APE.

La Crescent compressor station

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the La Crescent compressor station to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Cultural Survey

Following the literature review, Northern's subconsultants conducted a systematic field survey of the direct APE, which includes the construction ROW (TWS), ETWS, access roads, staging areas, and the aboveground appurtenant facility footprints. The survey procedures included a pedestrian walkover of the APE, systematic surface examination of suitable areas, and systematic subsurface testing of areas lacking sufficient surface visibility or which had potential for subsurface resources.

The cultural resources survey is 89% complete for the Lake Mills to Albert Lea E-line with additional shovel testing needed on 77.02 acres anticipated in spring 2024. The cultural resource survey for the Elk River 3rd branch line is 92% complete with additional survey needed on 15.25 acres scheduled for spring 2024. Northern cultural resources surveys are 100% complete for the remaining Project components.

Lake Mills to Albert Lea E-line

Archaeology

On August 22, August 23, October 3, and October 23-27, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability and previously recorded cultural resources. Shovel testing at 15-meter intervals was planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields. Shovel testing is pending for selected locations with the potential for buried cultural deposits.

Excluding one farmstead and one hay field, the majority of the survey area consisted of harvested or mature crops with 50 to 100% ground surface visibility. The hay field yielded an average surface visibility of 30%. The total ESB encompassed 678.90 acres. Roadways, inundated, and usually inundated areas, a total of 23.98 acres, were excluded from survey. A total of 77.02 acres remains to be surveyed. The other 591.82 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

A Euro-American archaeological site (21FE0130) also assigned an historic inventory property (FE-AEA-00264) was initially recorded as part of another Northern project in 2022. During the 2023 effort, this site was surveyed again. The 2023 site visit prompted an updated site boundary and an updated site form was submitted to the Minnesota Office of the State Archaeologist. This

farmstead site consisted of a combination of standing structures, archaeological features, and a surface artifact scatter. The site is within the ESB, but does not extend into the direct APE. In the original site form, the extant structures were identified as lacking integrity. Since the initial site visit, three buildings have been demolished. The artifacts documented on the surface have been placed in dump locations of mixed time periods, grouped through heavy machinery in pushpiles, and disturbed by agricultural processes. The archaeological component at 21FE0130 has not been evaluated for listing in the NRHP. RCG&A recommends the architectural buildings (FE-AEA-00264) at this property not eligible for listing in the NRHP.

This resource (21FE0130/FE-AEA-00264) is not in the direct APE and will not be impacted by the Project. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

County Ditch No. 4 (FE-PIC-00008), a historical structure, was initially visited as part of another Northern project in 2022. During the 2023 fieldwork, it was more thoroughly documented. County Ditch No. 4 is an active drainage ditch bound by agricultural land. The majority of this ditch is open cut and possesses a steep V-shaped profile. Brome and other grasses covered the banks of the ditch. Survey measured a top width of between 50 and 60 feet and a bottom width of 9-15 feet. Standing water was present at the base of the ditch during survey in fall 2023 but the overall depth was estimated to be 10-12 feet. Based on observations made from public ROW and aerial images, these dimensions are typical of County Ditch No. 4. This ditch also includes two branches: the Colvin Branch and the Klukow Branch. The Klukow Branch was in the ESB and was documented as part of FE-PIC-0008. County Ditch No. 4 is recommended not eligible for listing in the NRHP. Northern will utilize a private driveway that crosses the ditch without improvements. Therefore, the project will have no effect to County Ditch No. 4 (FE-PIC-00008).

Northern will remove a tie-over valve setting (MP 31.21) and install a new tie-in valve setting (MP 34.21) for the Lake Mills to Albert Lea E-line extension project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 34.21. This entire area was within the surveyed ESB. Northern conducted a visual assessment of the 500 foot buffer by walking the areas surrounding the project. The western portion of archaeological site 21FE0130 / inventory property FE-AEA-00264 is within the visual effects area; however, given the distance and mature vegetation surrounding the standing structures at the site, there will not be any effect to the standing structures from the project.

The proposed construction will not have an effect to any Minnesota Standing Structures Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

Elk River 3rd branch line

Archaeology

On November 1-5 and 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability. Shovel testing at 15-meter intervals was planned for surveyed areas with less than 25% surface visibility); no such areas were identified on this project. The survey area included agricultural fields, a tree farm, wetlands and manicured lawn with small stands of trees. Several historical and recent single-family homes and associated outbuildings were within the ESB.

The agricultural fields and tree farm yielded an average surface visibility of 80%. Visibility in the manicured lawns was limited (average 30%) but stands of trees yielded better ground surface visibility (average 55%). The total ESB encompassed 194.59 acres. Roadways as well as inundated and usually inundated areas, a total of 58.92 acres, were excluded from survey. A total of 15.25 acres remains to be surveyed. The remaining 120.42 acres had more than 25% ground surface visibility and was subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical ditches (WA-FLC-00033 and WA-XXX-00002) and ten historical standing structures during the 2023 fieldwork. None of the buildings are in the direct APE. Only one newly recorded property, WA-HGC-00077, is in the 500-foot buffer of the proposed valve setting.

Two historical drainage ditches were newly recorded during the 2023 fieldwork. WA-FLC-00033 is an active drainage ditch constructed in approximately 1949. The ditch is open cut and possesses a steep V-shaped profile. Grasses covered the banks of the ditch. Surveyors measured a varied width between 1.5 and 3 meters. Based on observations made from public ROW and aerial images, these dimensions are typical of this ditch. WA-FLC-00033 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-FLC-00033 via HDD.

WA-XXX-00002, the channelized Hardwood Creek, is known as Judicial Ditch No. 2. Ordered in 1902, Judicial Ditch No. 2 is open cut and possesses a V-shaped profile. Surveyors measured a top width of approximately six meters. Grasses covered the banks of the ditch. While standing water was present within the ditch during survey in fall 2023, the overall depth of the ditch was measured at variable depths between 2 to 5 meters. Based on observations made from the public ROW and aerial images, these dimensions are fairly typical of Judicial Ditch No. 2. WA-XXX-

00002 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-XXX-00002 via HDD.

Northern plans to remove a tie-over valve setting (MP 1.07) and install a new tie-in valve setting (MP 3.45) for the Elk River 3rd branch line project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 3.45. Northern conducted a desktop analysis and visual assessment of the 500-foot buffer by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

Northern identified four built resources on three properties that are potential historic properties (constructed more than 45 years ago) in the 500-foot buffer around the proposed facility. Prior to the 2023 survey, none of the buildings were recorded in the Minnesota Statewide Historic Inventory. One of the buildings was in the ESB and formally recorded during the survey (WA-HGC-00077; 17903 Henna Avenue North); the others (at 17803 Henna Avenue North and 17958 Henna Avenue North) were observed but not formally recorded.

The single-family residence at 17903 Henna Avenue North occupies a rectangular footprint, possesses two stories, is clad in composite siding and brick veneer, and terminates in a side-gable roof sheathed in asphalt shingles. It possesses an attached, single-bay garage along the south elevation. Based on county records, the house was constructed in 1969. Historic exterior materials on this building have been altered with replacements to exterior cladding, window openings and asphalt roof shingles. The public ROW runs between the proposed facility and the property at 17903 Henna Avenue North. Additionally, there are several trees that will obscure views of the proposed facility.

The single-family home and garage at 17803 Henna Avenue North have been substantially altered through additions and renovation. The original house was constructed in the mid-1960s, but, according to county records, extensive changes were made in 1989. The proposed facility is not visible from the property at 17803 Henna Avenue North as it is obscured by distance and a line of mature trees.

There are several buildings on the 17958 Henna Avenue North property. Only the single-family home and one outbuilding are within the 500-foot indirect APE around the proposed facility. The two-story home was constructed around 1880 and has had significant alterations to its exterior. In addition, the house is orientated to the north, while the facility will be constructed to the southeast. The combination of distance and topography, as well as an agricultural field and mature deciduous trees visually buffer the potential historic buildings from the proposed Project.

The proposed aboveground valve setting will not substantively alter the viewshed of the potential historic properties at 17803, 17903, and 17958 Henna Avenue North. Temporary visual impacts on the property during construction will not affect the attributes contributing to the potential significance and integrity of these properties. As such, the proposed Project will not adversely impact the aspects of integrity of these potential historic properties.

The proposed Elk River 3rd branch line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Farmington to Hugo C-line

Archaeology

From July 17 to 20, October 18 and November 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at 5-meter intervals in high probability areas and shovel testing at 15-meter intervals were planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields, wetlands and woodlands associated with the wetlands and pasture.

Ground surface visibility was good in the agricultural fields ranging from 40-100%. Woodland and pastures had lower surface visibility that ranged between 25 and 50%. The total ESB encompassed 172.97 acres. Roadways, existing graveled facility lots, as well as inundated and usually inundated areas, a total of 19.26 acres, were excluded from survey. The remaining 153.71 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical properties in the Farmington to Hugo C-line ESB. They were recorded in the Minnesota Statewide Historic Inventory and assigned designations WA-MYT-031 and WA-MYT-032. WA-MYT-031 is a 1973 single-family residence. The two-story, multi-bay building occupies a rectangular footprint, is clad in composite siding and brick veneer, and terminates in a low-pitched, hipped roof with overhanging eaves sheathed in asphalt shingles. The building features a single-story attached garage and a recessed front porch covered by a secondary hipped roof also sheathed in asphalt shingles.

WA-MYT-032 includes two historical buildings, a house (WA-MYT-028) and a shed (WA-MYT-029). WA-MYT-028 is a 1972 single-family residence. The one-and-one-half story, multi-bay building occupies a rectangular footprint, is clad in vinyl siding and brick veneer, and terminates in a front-gable roof with overhanging eaves sheathed in asphalt shingles. The façade features a secondary, front-gable projection and a recessed porch. The east elevation features a two-bay, integral garage. WA-MYT-029 is a 1972 shed near the house. The single-story shed occupies a rectangular footprint, is clad in wood siding, and terminates in a gambrel roof with overhanging eaves sheathed in asphalt shingles. Both of these properties are recommended not eligible for listing in the NRHP and both are avoided through HDD in the current Project design.

Northern proposes to install a new launcher and associated valves and piping at the existing Hugo compressor station (MP 0.00), as well as install a new tie-in valve setting (MP 1.91) for the

Farmington to Hugo C-line. Aboveground construction for the aboveground tie-in valve setting will not exceed ten feet in height. The potential for adverse visual effects to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the Hugo compressor station and the proposed valve setting at MP 1.91. Northern conducted a visual assessment of these areas by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

One potential historical resource is located in the Hugo compressor station buffer, a house at 10830 180th Street North. This property has not been recorded in the Minnesota Statewide Historic Inventory. According to county records, it was constructed in 1977 and is a split foyer frame home with an attached garage. Significant alterations were made to the house in 2016. This house is set back from 180th Street North approximately 240 feet and is surrounded by trees. The combination of distance, a public ROW (180th Street North), as well as trees and other foliage visually buffer the potential historic building from the proposed project.

The proposed Farmington to Hugo C-line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Tomah branch line loop

Archaeology

Portions of the Tomah branch line loop was surveyed in August 2019, August and November 2021 and most recently surveyed in October and November 2023 and January 2024. Northern completed archaeological field investigations using standard methodology for archaeological surveys. Pedestrian survey was conducted at five-meter or less interval transects following the general direction of the survey corridor. Shovel testing was conducted at 15-meter or less interval. In areas with a greater probability for archaeological sites such as stream crossings, pedestrian survey was conducted at approximately one-meter intervals and shovel testing at less than five-meter intervals.

The survey area was located primarily in agricultural fields, with intermittent wooded areas, residential yards and wetlands. At the time of the field investigation, most of the survey area consisted of harvested fields and plowed corn and soybean fields. Most fields displayed 90-100% surface visibility which allowed field investigation to be conducted using pedestrian survey methods.

Of the total investigated area (124.7 acres), 55.9 acres were investigated using pedestrian survey methods and 55.4 acres were shovel tested. Approximately 13.4 acres were exempted from investigation survey in areas of slope, stream channels, or areas where ground had been disturbed by road and road drainage ditch construction. No prehistoric or historic period Euro-American artifacts or archaeological features were observed in the direct APE.

Aboveground Historical Properties

Northern plans to relocate a branch line receiver on the Tomah branch line loop (MP 3.53). The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the indirect APE was limited to the 500-foot buffer around the valve setting. Aboveground

construction will not exceed eight feet in height. Northern conducted a visual assessment of the indirect APE by walking the areas surrounding the Project and no historical properties were identified.

The proposed construction will not have an effect to any Wisconsin Architecture and History Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

La Crescent compressor station

Archaeology

On September 19, 2023, Northern completed archaeological field investigations using 15-meter interval pedestrian survey in areas of the ESB that were not graveled. The graveled facilities were excluded from survey. The survey area included short and medium grasses and corn fields. Ground surface visibility averaged 25% in grassy areas, but in the corn fields, ground surface visibility averaged 90%.

The total ESB encompassed 3.02 acres. Areas excluded from survey, consisting of graveled access drives and facilities and roadway totaling 1.72 acres. The remaining 1.30 acres averaged more than 25% ground surface visibility and was subjected to pedestrian survey. No archaeological sites or isolated finds were identified in the direct APE.

The current Project design and proposed construction activities will not have direct effects to any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern proposes minor modifications to existing infrastructure at the La Crescent compressor station, including replacing compressor cylinder end caps (currently blind flanges) and adjusting compressor mechanical characteristics to match new operating conditions. While impacts that are subject to review under 36 CFR § 800 may include surficial disturbances caused by topsoil removal, heavy machinery traffic, shallow grading, and spoil dirt management, only vehicular parking is anticipated for this Project component.

The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the existing compressor station lot. Northern conducted a visual assessment of this buffer by examining aerial imagery and observing areas surrounding the project from the public ROW and ESB. No aboveground cultural resources were observed in the 500-foot buffer.

Conclusion and Request for Consultation

To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the attached maps and report and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Northern Natural Gas
Northern Lights 2025 Expansion Project
February 14, 2024

Northern respects that the Tribe has unique expertise in identifying and providing information regarding historic properties with religious or cultural significance which may be affected by the Project. Northern is seeking the Tribe's comments on survey methodology, traditional cultural properties, and traditional cultural landscapes along with areas of importance to the Tribe which should be considered. Northern understands this request for information does not circumvent the government-to-government relationship under Section 106 (36 Code of Federal Regulations Part 800) between the Tribe and the FERC. Please be assured that Northern will keep sensitive Tribal information strictly confidential.

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Thank you in advance for your attention to this Project. Northern would very much appreciate receiving your response within 30 days of the date of this letter. Northern will follow up with you via phone contact or email if no response is received within 30 days. In the interim, should you have questions or need additional information, please contact me at 402-398-7226 or Terry.Plucker@nngco.com or Susan Knabe of Stantec at 920-278-3220 or Susan.Knabe@stantec.com.

Sincerely,



Terry Plucker
Environmental Compliance Manager
Northern Natural Gas Company

Enclosures: RCG&A Cultural Resources Reports
Phase One Cultural Resources Report
Unanticipated Discovery Plans (Minnesota and Wisconsin)

CC: Susan Knabe, Stantec Consulting
Matt Nelson, Northern Natural Gas

From: [Waller, Hiedi](#)
To: sarah.thompson@ldftribe.com
Cc: [Knabe, Susan](#); Terry.Plucker@nngco.com
Subject: FW: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS
Date: Wednesday, February 14, 2024 9:56:00 PM
Attachments: [NL 2025 THPO Lac du Flambeau Tribe, Lac du Flambeau Band of Lake Superior Chippewa Indians.pdf](#)

THPO Thompson:

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Over periodic field events from 2019 through 2024, Phase One Archaeological Services Inc. and R. Christopher Goodwin & Associates, Inc. completed field surveys of the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The results of these survey efforts are included in the cultural resources reports. To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the cultural resources reports and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Due to the size of the files associated with the Project, Northern has set up an FTP site where the cultural resources reports and Unanticipated Discoveries Plans referenced in the attached letter can be downloaded.

Please contact us if you have any questions.

Hiedi Waller, PE
Senior Engineer
Pronouns: she, her, hers
Phone: (262) 643-9161

From: donotreply@secureftp.stantec.com <donotreply@secureftp.stantec.com>
Sent: Wednesday, February 14, 2024 9:20 PM
To: Waller, Hiedi <Hiedi.Waller@stantec.com>
Subject: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS

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FTP Client Hostname: tmpsftp.stantec.com **Port:** 22 (can be used within a SFTP client to view and transfer files and folders; e.g., FileZilla)

Login name: s0221202004

Password: 9670102

Disk Quota: 20 GB

Expiry Date: 2/21/2024

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1111 South 103rd Street
Omaha, NE 68124

February 14, 2024

Lac du Flambeau Tribe, Lac du Flambeau Band of Lake Superior Chippewa Indians
Sarah Thompson, Tribal Preservation Officer
PO Box 67
Lac Du Flambeau, WI 54538

Re: Northern Natural Gas–Northern Lights 2025 Expansion Project – Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin

Dear Tribal Preservation Officer Thompson:

Northern Natural Gas (Northern) is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured the services of Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Northern is proposing to construct the Project, which will consist of (1) a 3.00-mile extension of its 36-inch-diameter Lake Mills to Albert Lea E-line; (2) a 2.43-mile extension of its 30-inch-diameter Elk River 3rd branch line; (3) a non-contiguous 1.91-mile extension of its 30-inch-diameter Farmington to Hugo C-line; (4) a 1.28-mile extension of its 8-inch-diameter Tomah branch line loop; (5) minor modifications to its existing La Crescent compressor station; and (6) aboveground facilities including a launcher, receiver and tie-in valve settings. All Project components are located in various counties in Minnesota and Wisconsin.

This letter summarizes the results of the investigations and recommendations of the archaeological investigator for the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The archeological reports from R. Christopher Goodwin & Associates, Inc. (RCG&A) and Phase One Archaeological Services Inc. (Phase One) are attached to this letter.

Literature Search

Northern's cultural resources' sub-consultants, RCG&A and Phase One, conducted background research at the Minnesota and Wisconsin SHPOs to identify previously recorded archaeological and above-grade resources. This study area encompassed a Project-specific environmental survey boundary (ESB), the direct Area of Potential Effects (APE) and the indirect APE and included archaeological sites and other cultural resources located in the immediate areas of planned construction along with a one-mile radius of all proposed project activities.

Lake Mills to Albert Lea E-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources on the list of National Register of Historic Places (NRHP) properties are in the indirect APE. One archaeological site, 21FE0130, and Minnesota Statewide Historic Inventory property FE-AEA-00264 extends into the 500-foot buffer around the proposed aboveground valve setting. However, due to distance and mature trees, no effects are anticipated.

Elk River 3rd branch line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Farmington to Hugo C-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Tomah branch line loop

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

A single standing structure, a 19th century Greek Revival Farmhouse (AHI # 78410) was previously located on the west side of County Highway Q within the indirect APE. This building was razed and replaced with a modern single-family farmhouse. No other aboveground historical resources previously listed in the Wisconsin Architecture-History Inventory or on the list of the NRHP properties are located in the indirect APE.

La Crescent compressor station

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the La Crescent compressor station to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Cultural Survey

Following the literature review, Northern's subconsultants conducted a systematic field survey of the direct APE, which includes the construction ROW (TWS), ETWS, access roads, staging areas, and the aboveground appurtenant facility footprints. The survey procedures included a pedestrian walkover of the APE, systematic surface examination of suitable areas, and systematic subsurface testing of areas lacking sufficient surface visibility or which had potential for subsurface resources.

The cultural resources survey is 89% complete for the Lake Mills to Albert Lea E-line with additional shovel testing needed on 77.02 acres anticipated in spring 2024. The cultural resource survey for the Elk River 3rd branch line is 92% complete with additional survey needed on 15.25 acres scheduled for spring 2024. Northern cultural resources surveys are 100% complete for the remaining Project components.

Lake Mills to Albert Lea E-line

Archaeology

On August 22, August 23, October 3, and October 23-27, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability and previously recorded cultural resources. Shovel testing at 15-meter intervals was planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields. Shovel testing is pending for selected locations with the potential for buried cultural deposits.

Excluding one farmstead and one hay field, the majority of the survey area consisted of harvested or mature crops with 50 to 100% ground surface visibility. The hay field yielded an average surface visibility of 30%. The total ESB encompassed 678.90 acres. Roadways, inundated, and usually inundated areas, a total of 23.98 acres, were excluded from survey. A total of 77.02 acres remains to be surveyed. The other 591.82 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

A Euro-American archaeological site (21FE0130) also assigned an historic inventory property (FE-AEA-00264) was initially recorded as part of another Northern project in 2022. During the 2023 effort, this site was surveyed again. The 2023 site visit prompted an updated site boundary and an updated site form was submitted to the Minnesota Office of the State Archaeologist. This

farmstead site consisted of a combination of standing structures, archaeological features, and a surface artifact scatter. The site is within the ESB, but does not extend into the direct APE. In the original site form, the extant structures were identified as lacking integrity. Since the initial site visit, three buildings have been demolished. The artifacts documented on the surface have been placed in dump locations of mixed time periods, grouped through heavy machinery in pushpiles, and disturbed by agricultural processes. The archaeological component at 21FE0130 has not been evaluated for listing in the NRHP. RCG&A recommends the architectural buildings (FE-AEA-00264) at this property not eligible for listing in the NRHP.

This resource (21FE0130/FE-AEA-00264) is not in the direct APE and will not be impacted by the Project. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

County Ditch No. 4 (FE-PIC-00008), a historical structure, was initially visited as part of another Northern project in 2022. During the 2023 fieldwork, it was more thoroughly documented. County Ditch No. 4 is an active drainage ditch bound by agricultural land. The majority of this ditch is open cut and possesses a steep V-shaped profile. Brome and other grasses covered the banks of the ditch. Survey measured a top width of between 50 and 60 feet and a bottom width of 9-15 feet. Standing water was present at the base of the ditch during survey in fall 2023 but the overall depth was estimated to be 10-12 feet. Based on observations made from public ROW and aerial images, these dimensions are typical of County Ditch No. 4. This ditch also includes two branches: the Colvin Branch and the Klukow Branch. The Klukow Branch was in the ESB and was documented as part of FE-PIC-0008. County Ditch No. 4 is recommended not eligible for listing in the NRHP. Northern will utilize a private driveway that crosses the ditch without improvements. Therefore, the project will have no effect to County Ditch No. 4 (FE-PIC-00008).

Northern will remove a tie-over valve setting (MP 31.21) and install a new tie-in valve setting (MP 34.21) for the Lake Mills to Albert Lea E-line extension project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 34.21. This entire area was within the surveyed ESB. Northern conducted a visual assessment of the 500 foot buffer by walking the areas surrounding the project. The western portion of archaeological site 21FE0130 / inventory property FE-AEA-00264 is within the visual effects area; however, given the distance and mature vegetation surrounding the standing structures at the site, there will not be any effect to the standing structures from the project.

The proposed construction will not have an effect to any Minnesota Standing Structures Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

Elk River 3rd branch line

Archaeology

On November 1-5 and 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability. Shovel testing at 15-meter intervals was planned for surveyed areas with less than 25% surface visibility); no such areas were identified on this project. The survey area included agricultural fields, a tree farm, wetlands and manicured lawn with small stands of trees. Several historical and recent single-family homes and associated outbuildings were within the ESB.

The agricultural fields and tree farm yielded an average surface visibility of 80%. Visibility in the manicured lawns was limited (average 30%) but stands of trees yielded better ground surface visibility (average 55%). The total ESB encompassed 194.59 acres. Roadways as well as inundated and usually inundated areas, a total of 58.92 acres, were excluded from survey. A total of 15.25 acres remains to be surveyed. The remaining 120.42 acres had more than 25% ground surface visibility and was subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical ditches (WA-FLC-00033 and WA-XXX-00002) and ten historical standing structures during the 2023 fieldwork. None of the buildings are in the direct APE. Only one newly recorded property, WA-HGC-00077, is in the 500-foot buffer of the proposed valve setting.

Two historical drainage ditches were newly recorded during the 2023 fieldwork. WA-FLC-00033 is an active drainage ditch constructed in approximately 1949. The ditch is open cut and possesses a steep V-shaped profile. Grasses covered the banks of the ditch. Surveyors measured a varied width between 1.5 and 3 meters. Based on observations made from public ROW and aerial images, these dimensions are typical of this ditch. WA-FLC-00033 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-FLC-00033 via HDD.

WA-XXX-00002, the channelized Hardwood Creek, is known as Judicial Ditch No. 2. Ordered in 1902, Judicial Ditch No. 2 is open cut and possesses a V-shaped profile. Surveyors measured a top width of approximately six meters. Grasses covered the banks of the ditch. While standing water was present within the ditch during survey in fall 2023, the overall depth of the ditch was measured at variable depths between 2 to 5 meters. Based on observations made from the public ROW and aerial images, these dimensions are fairly typical of Judicial Ditch No. 2. WA-XXX-

00002 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-XXX-00002 via HDD.

Northern plans to remove a tie-over valve setting (MP 1.07) and install a new tie-in valve setting (MP 3.45) for the Elk River 3rd branch line project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 3.45. Northern conducted a desktop analysis and visual assessment of the 500-foot buffer by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

Northern identified four built resources on three properties that are potential historic properties (constructed more than 45 years ago) in the 500-foot buffer around the proposed facility. Prior to the 2023 survey, none of the buildings were recorded in the Minnesota Statewide Historic Inventory. One of the buildings was in the ESB and formally recorded during the survey (WA-HGC-00077; 17903 Henna Avenue North); the others (at 17803 Henna Avenue North and 17958 Henna Avenue North) were observed but not formally recorded.

The single-family residence at 17903 Henna Avenue North occupies a rectangular footprint, possesses two stories, is clad in composite siding and brick veneer, and terminates in a side-gable roof sheathed in asphalt shingles. It possesses an attached, single-bay garage along the south elevation. Based on county records, the house was constructed in 1969. Historic exterior materials on this building have been altered with replacements to exterior cladding, window openings and asphalt roof shingles. The public ROW runs between the proposed facility and the property at 17903 Henna Avenue North. Additionally, there are several trees that will obscure views of the proposed facility.

The single-family home and garage at 17803 Henna Avenue North have been substantially altered through additions and renovation. The original house was constructed in the mid-1960s, but, according to county records, extensive changes were made in 1989. The proposed facility is not visible from the property at 17803 Henna Avenue North as it is obscured by distance and a line of mature trees.

There are several buildings on the 17958 Henna Avenue North property. Only the single-family home and one outbuilding are within the 500-foot indirect APE around the proposed facility. The two-story home was constructed around 1880 and has had significant alterations to its exterior. In addition, the house is orientated to the north, while the facility will be constructed to the southeast. The combination of distance and topography, as well as an agricultural field and mature deciduous trees visually buffer the potential historic buildings from the proposed Project.

The proposed aboveground valve setting will not substantively alter the viewshed of the potential historic properties at 17803, 17903, and 17958 Henna Avenue North. Temporary visual impacts on the property during construction will not affect the attributes contributing to the potential significance and integrity of these properties. As such, the proposed Project will not adversely impact the aspects of integrity of these potential historic properties.

The proposed Elk River 3rd branch line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Farmington to Hugo C-line

Archaeology

From July 17 to 20, October 18 and November 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at 5-meter intervals in high probability areas and shovel testing at 15-meter intervals were planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields, wetlands and woodlands associated with the wetlands and pasture.

Ground surface visibility was good in the agricultural fields ranging from 40-100%. Woodland and pastures had lower surface visibility that ranged between 25 and 50%. The total ESB encompassed 172.97 acres. Roadways, existing graveled facility lots, as well as inundated and usually inundated areas, a total of 19.26 acres, were excluded from survey. The remaining 153.71 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical properties in the Farmington to Hugo C-line ESB. They were recorded in the Minnesota Statewide Historic Inventory and assigned designations WA-MYT-031 and WA-MYT-032. WA-MYT-031 is a 1973 single-family residence. The two-story, multi-bay building occupies a rectangular footprint, is clad in composite siding and brick veneer, and terminates in a low-pitched, hipped roof with overhanging eaves sheathed in asphalt shingles. The building features a single-story attached garage and a recessed front porch covered by a secondary hipped roof also sheathed in asphalt shingles.

WA-MYT-032 includes two historical buildings, a house (WA-MYT-028) and a shed (WA-MYT-029). WA-MYT-028 is a 1972 single-family residence. The one-and-one-half story, multi-bay building occupies a rectangular footprint, is clad in vinyl siding and brick veneer, and terminates in a front-gable roof with overhanging eaves sheathed in asphalt shingles. The façade features a secondary, front-gable projection and a recessed porch. The east elevation features a two-bay, integral garage. WA-MYT-029 is a 1972 shed near the house. The single-story shed occupies a rectangular footprint, is clad in wood siding, and terminates in a gambrel roof with overhanging eaves sheathed in asphalt shingles. Both of these properties are recommended not eligible for listing in the NRHP and both are avoided through HDD in the current Project design.

Northern proposes to install a new launcher and associated valves and piping at the existing Hugo compressor station (MP 0.00), as well as install a new tie-in valve setting (MP 1.91) for the

Farmington to Hugo C-line. Aboveground construction for the aboveground tie-in valve setting will not exceed ten feet in height. The potential for adverse visual effects to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the Hugo compressor station and the proposed valve setting at MP 1.91. Northern conducted a visual assessment of these areas by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

One potential historical resource is located in the Hugo compressor station buffer, a house at 10830 180th Street North. This property has not been recorded in the Minnesota Statewide Historic Inventory. According to county records, it was constructed in 1977 and is a split foyer frame home with an attached garage. Significant alterations were made to the house in 2016. This house is set back from 180th Street North approximately 240 feet and is surrounded by trees. The combination of distance, a public ROW (180th Street North), as well as trees and other foliage visually buffer the potential historic building from the proposed project.

The proposed Farmington to Hugo C-line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Tomah branch line loop

Archaeology

Portions of the Tomah branch line loop was surveyed in August 2019, August and November 2021 and most recently surveyed in October and November 2023 and January 2024. Northern completed archaeological field investigations using standard methodology for archaeological surveys. Pedestrian survey was conducted at five-meter or less interval transects following the general direction of the survey corridor. Shovel testing was conducted at 15-meter or less interval. In areas with a greater probability for archaeological sites such as stream crossings, pedestrian survey was conducted at approximately one-meter intervals and shovel testing at less than five-meter intervals.

The survey area was located primarily in agricultural fields, with intermittent wooded areas, residential yards and wetlands. At the time of the field investigation, most of the survey area consisted of harvested fields and plowed corn and soybean fields. Most fields displayed 90-100% surface visibility which allowed field investigation to be conducted using pedestrian survey methods.

Of the total investigated area (124.7 acres), 55.9 acres were investigated using pedestrian survey methods and 55.4 acres were shovel tested. Approximately 13.4 acres were exempted from investigation survey in areas of slope, stream channels, or areas where ground had been disturbed by road and road drainage ditch construction. No prehistoric or historic period Euro-American artifacts or archaeological features were observed in the direct APE.

Aboveground Historical Properties

Northern plans to relocate a branch line receiver on the Tomah branch line loop (MP 3.53). The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the indirect APE was limited to the 500-foot buffer around the valve setting. Aboveground

construction will not exceed eight feet in height. Northern conducted a visual assessment of the indirect APE by walking the areas surrounding the Project and no historical properties were identified.

The proposed construction will not have an effect to any Wisconsin Architecture and History Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

La Crescent compressor station

Archaeology

On September 19, 2023, Northern completed archaeological field investigations using 15-meter interval pedestrian survey in areas of the ESB that were not graveled. The graveled facilities were excluded from survey. The survey area included short and medium grasses and corn fields. Ground surface visibility averaged 25% in grassy areas, but in the corn fields, ground surface visibility averaged 90%.

The total ESB encompassed 3.02 acres. Areas excluded from survey, consisting of graveled access drives and facilities and roadway totaling 1.72 acres. The remaining 1.30 acres averaged more than 25% ground surface visibility and was subjected to pedestrian survey. No archaeological sites or isolated finds were identified in the direct APE.

The current Project design and proposed construction activities will not have direct effects to any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern proposes minor modifications to existing infrastructure at the La Crescent compressor station, including replacing compressor cylinder end caps (currently blind flanges) and adjusting compressor mechanical characteristics to match new operating conditions. While impacts that are subject to review under 36 CFR § 800 may include surficial disturbances caused by topsoil removal, heavy machinery traffic, shallow grading, and spoil dirt management, only vehicular parking is anticipated for this Project component.

The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the existing compressor station lot. Northern conducted a visual assessment of this buffer by examining aerial imagery and observing areas surrounding the project from the public ROW and ESB. No aboveground cultural resources were observed in the 500-foot buffer.

Conclusion and Request for Consultation

To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the attached maps and report and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Northern Natural Gas
Northern Lights 2025 Expansion Project
February 14, 2024

Northern respects that the Tribe has unique expertise in identifying and providing information regarding historic properties with religious or cultural significance which may be affected by the Project. Northern is seeking the Tribe's comments on survey methodology, traditional cultural properties, and traditional cultural landscapes along with areas of importance to the Tribe which should be considered. Northern understands this request for information does not circumvent the government-to-government relationship under Section 106 (36 Code of Federal Regulations Part 800) between the Tribe and the FERC. Please be assured that Northern will keep sensitive Tribal information strictly confidential.

While the regulations for implementing Section 106 (36 Code of Federal Regulations Part 800) allow companies like Northern (and their consultants) to gather information, the FERC is responsible for monitoring compliance with the NHPA and determinations pursuant to Section 106. Additionally, the FERC, not Northern, is responsible for government-to-government consultations with American Indian Tribes. The FERC has not delegated this consultation. The FERC will contact you through a *Notice of Intent to Produce an Environmental Document*. If you would like to communicate directly with the FERC natural gas archaeological staff to discuss its cultural resource review and consultation processes, please feel free to contact Elizabeth Molloy, Tribal Liaison, at 202-502-8771 or Elizabeth.Molloy@ferc.gov.

Thank you in advance for your attention to this Project. Northern would very much appreciate receiving your response within 30 days of the date of this letter. Northern will follow up with you via phone contact or email if no response is received within 30 days. In the interim, should you have questions or need additional information, please contact me at 402-398-7226 or Terry.Plucker@nngco.com or Susan Knabe of Stantec at 920-278-3220 or Susan.Knabe@stantec.com.

Sincerely,



Terry Plucker
Environmental Compliance Manager
Northern Natural Gas Company

Enclosures: RCG&A Cultural Resources Reports
Phase One Cultural Resources Report
Unanticipated Discovery Plans (Minnesota and Wisconsin)

CC: Susan Knabe, Stantec Consulting
Matt Nelson, Northern Natural Gas

From: [Waller, Hiedi](#)
To: aconnor@kbic-nsn.gov
Cc: [Knabe, Susan](#); Terry.Plucker@nngco.com
Subject: FW: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS
Date: Wednesday, February 14, 2024 9:54:00 PM
Attachments: [NL 2025 THPO Keweenaw Bay Indian Community, Michigan.pdf](#)

THPO Connor:

Northern is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Over periodic field events from 2019 through 2024, Phase One Archaeological Services Inc. and R. Christopher Goodwin & Associates, Inc. completed field surveys of the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The results of these survey efforts are included in the cultural resources reports. To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the cultural resources reports and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Due to the size of the files associated with the Project, Northern has set up an FTP site where the cultural resources reports and Unanticipated Discoveries Plans referenced in the attached letter can be downloaded.

Please contact us if you have any questions.

Hiedi Waller, PE
Senior Engineer
Pronouns: she, her, hers
Phone: (262) 643-9161

From: donotreply@secureftp.stantec.com <donotreply@secureftp.stantec.com>
Sent: Wednesday, February 14, 2024 9:20 PM
To: Waller, Hiedi <Hiedi.Waller@stantec.com>
Subject: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS

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1111 South 103rd Street
Omaha, NE 68124

February 14, 2024

Keweenaw Bay Indian Community, Michigan
Alden Connor, THPO
16429 Beartown Road
Baraga, MI 49908

Re: Northern Natural Gas–Northern Lights 2025 Expansion Project – Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin

Dear Tribal Historic Preservation Officer Connor:

Northern Natural Gas (Northern) is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured the services of Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Northern is proposing to construct the Project, which will consist of (1) a 3.00-mile extension of its 36-inch-diameter Lake Mills to Albert Lea E-line; (2) a 2.43-mile extension of its 30-inch-diameter Elk River 3rd branch line; (3) a non-contiguous 1.91-mile extension of its 30-inch-diameter Farmington to Hugo C-line; (4) a 1.28-mile extension of its 8-inch-diameter Tomah branch line loop; (5) minor modifications to its existing La Crescent compressor station; and (6) aboveground facilities including a launcher, receiver and tie-in valve settings. All Project components are located in various counties in Minnesota and Wisconsin.

This letter summarizes the results of the investigations and recommendations of the archaeological investigator for the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The archeological reports from R. Christopher Goodwin & Associates, Inc. (RCG&A) and Phase One Archaeological Services Inc. (Phase One) are attached to this letter.

Literature Search

Northern's cultural resources' sub-consultants, RCG&A and Phase One, conducted background research at the Minnesota and Wisconsin SHPOs to identify previously recorded archaeological and above-grade resources. This study area encompassed a Project-specific environmental survey boundary (ESB), the direct Area of Potential Effects (APE) and the indirect APE and included archaeological sites and other cultural resources located in the immediate areas of planned construction along with a one-mile radius of all proposed project activities.

Lake Mills to Albert Lea E-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources on the list of National Register of Historic Places (NRHP) properties are in the indirect APE. One archaeological site, 21FE0130, and Minnesota Statewide Historic Inventory property FE-AEA-00264 extends into the 500-foot buffer around the proposed aboveground valve setting. However, due to distance and mature trees, no effects are anticipated.

Elk River 3rd branch line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Farmington to Hugo C-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Tomah branch line loop

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

A single standing structure, a 19th century Greek Revival Farmhouse (AHI # 78410) was previously located on the west side of County Highway Q within the indirect APE. This building was razed and replaced with a modern single-family farmhouse. No other aboveground historical resources previously listed in the Wisconsin Architecture-History Inventory or on the list of the NRHP properties are located in the indirect APE.

La Crescent compressor station

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the La Crescent compressor station to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Cultural Survey

Following the literature review, Northern's subconsultants conducted a systematic field survey of the direct APE, which includes the construction ROW (TWS), ETWS, access roads, staging areas, and the aboveground appurtenant facility footprints. The survey procedures included a pedestrian walkover of the APE, systematic surface examination of suitable areas, and systematic subsurface testing of areas lacking sufficient surface visibility or which had potential for subsurface resources.

The cultural resources survey is 89% complete for the Lake Mills to Albert Lea E-line with additional shovel testing needed on 77.02 acres anticipated in spring 2024. The cultural resource survey for the Elk River 3rd branch line is 92% complete with additional survey needed on 15.25 acres scheduled for spring 2024. Northern cultural resources surveys are 100% complete for the remaining Project components.

Lake Mills to Albert Lea E-line

Archaeology

On August 22, August 23, October 3, and October 23-27, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability and previously recorded cultural resources. Shovel testing at 15-meter intervals was planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields. Shovel testing is pending for selected locations with the potential for buried cultural deposits.

Excluding one farmstead and one hay field, the majority of the survey area consisted of harvested or mature crops with 50 to 100% ground surface visibility. The hay field yielded an average surface visibility of 30%. The total ESB encompassed 678.90 acres. Roadways, inundated, and usually inundated areas, a total of 23.98 acres, were excluded from survey. A total of 77.02 acres remains to be surveyed. The other 591.82 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

A Euro-American archaeological site (21FE0130) also assigned an historic inventory property (FE-AEA-00264) was initially recorded as part of another Northern project in 2022. During the 2023 effort, this site was surveyed again. The 2023 site visit prompted an updated site boundary and an updated site form was submitted to the Minnesota Office of the State Archaeologist. This

farmstead site consisted of a combination of standing structures, archaeological features, and a surface artifact scatter. The site is within the ESB, but does not extend into the direct APE. In the original site form, the extant structures were identified as lacking integrity. Since the initial site visit, three buildings have been demolished. The artifacts documented on the surface have been placed in dump locations of mixed time periods, grouped through heavy machinery in pushpiles, and disturbed by agricultural processes. The archaeological component at 21FE0130 has not been evaluated for listing in the NRHP. RCG&A recommends the architectural buildings (FE-AEA-00264) at this property not eligible for listing in the NRHP.

This resource (21FE0130/FE-AEA-00264) is not in the direct APE and will not be impacted by the Project. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

County Ditch No. 4 (FE-PIC-00008), a historical structure, was initially visited as part of another Northern project in 2022. During the 2023 fieldwork, it was more thoroughly documented. County Ditch No. 4 is an active drainage ditch bound by agricultural land. The majority of this ditch is open cut and possesses a steep V-shaped profile. Brome and other grasses covered the banks of the ditch. Survey measured a top width of between 50 and 60 feet and a bottom width of 9-15 feet. Standing water was present at the base of the ditch during survey in fall 2023 but the overall depth was estimated to be 10-12 feet. Based on observations made from public ROW and aerial images, these dimensions are typical of County Ditch No. 4. This ditch also includes two branches: the Colvin Branch and the Klukow Branch. The Klukow Branch was in the ESB and was documented as part of FE-PIC-0008. County Ditch No. 4 is recommended not eligible for listing in the NRHP. Northern will utilize a private driveway that crosses the ditch without improvements. Therefore, the project will have no effect to County Ditch No. 4 (FE-PIC-00008).

Northern will remove a tie-over valve setting (MP 31.21) and install a new tie-in valve setting (MP 34.21) for the Lake Mills to Albert Lea E-line extension project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 34.21. This entire area was within the surveyed ESB. Northern conducted a visual assessment of the 500 foot buffer by walking the areas surrounding the project. The western portion of archaeological site 21FE0130 / inventory property FE-AEA-00264 is within the visual effects area; however, given the distance and mature vegetation surrounding the standing structures at the site, there will not be any effect to the standing structures from the project.

The proposed construction will not have an effect to any Minnesota Standing Structures Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

Elk River 3rd branch line

Archaeology

On November 1-5 and 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability. Shovel testing at 15-meter intervals was planned for surveyed areas with less than 25% surface visibility); no such areas were identified on this project. The survey area included agricultural fields, a tree farm, wetlands and manicured lawn with small stands of trees. Several historical and recent single-family homes and associated outbuildings were within the ESB.

The agricultural fields and tree farm yielded an average surface visibility of 80%. Visibility in the manicured lawns was limited (average 30%) but stands of trees yielded better ground surface visibility (average 55%). The total ESB encompassed 194.59 acres. Roadways as well as inundated and usually inundated areas, a total of 58.92 acres, were excluded from survey. A total of 15.25 acres remains to be surveyed. The remaining 120.42 acres had more than 25% ground surface visibility and was subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical ditches (WA-FLC-00033 and WA-XXX-00002) and ten historical standing structures during the 2023 fieldwork. None of the buildings are in the direct APE. Only one newly recorded property, WA-HGC-00077, is in the 500-foot buffer of the proposed valve setting.

Two historical drainage ditches were newly recorded during the 2023 fieldwork. WA-FLC-00033 is an active drainage ditch constructed in approximately 1949. The ditch is open cut and possesses a steep V-shaped profile. Grasses covered the banks of the ditch. Surveyors measured a varied width between 1.5 and 3 meters. Based on observations made from public ROW and aerial images, these dimensions are typical of this ditch. WA-FLC-00033 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-FLC-00033 via HDD.

WA-XXX-00002, the channelized Hardwood Creek, is known as Judicial Ditch No. 2. Ordered in 1902, Judicial Ditch No. 2 is open cut and possesses a V-shaped profile. Surveyors measured a top width of approximately six meters. Grasses covered the banks of the ditch. While standing water was present within the ditch during survey in fall 2023, the overall depth of the ditch was measured at variable depths between 2 to 5 meters. Based on observations made from the public ROW and aerial images, these dimensions are fairly typical of Judicial Ditch No. 2. WA-XXX-

00002 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-XXX-00002 via HDD.

Northern plans to remove a tie-over valve setting (MP 1.07) and install a new tie-in valve setting (MP 3.45) for the Elk River 3rd branch line project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 3.45. Northern conducted a desktop analysis and visual assessment of the 500-foot buffer by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

Northern identified four built resources on three properties that are potential historic properties (constructed more than 45 years ago) in the 500-foot buffer around the proposed facility. Prior to the 2023 survey, none of the buildings were recorded in the Minnesota Statewide Historic Inventory. One of the buildings was in the ESB and formally recorded during the survey (WA-HGC-00077; 17903 Henna Avenue North); the others (at 17803 Henna Avenue North and 17958 Henna Avenue North) were observed but not formally recorded.

The single-family residence at 17903 Henna Avenue North occupies a rectangular footprint, possesses two stories, is clad in composite siding and brick veneer, and terminates in a side-gable roof sheathed in asphalt shingles. It possesses an attached, single-bay garage along the south elevation. Based on county records, the house was constructed in 1969. Historic exterior materials on this building have been altered with replacements to exterior cladding, window openings and asphalt roof shingles. The public ROW runs between the proposed facility and the property at 17903 Henna Avenue North. Additionally, there are several trees that will obscure views of the proposed facility.

The single-family home and garage at 17803 Henna Avenue North have been substantially altered through additions and renovation. The original house was constructed in the mid-1960s, but, according to county records, extensive changes were made in 1989. The proposed facility is not visible from the property at 17803 Henna Avenue North as it is obscured by distance and a line of mature trees.

There are several buildings on the 17958 Henna Avenue North property. Only the single-family home and one outbuilding are within the 500-foot indirect APE around the proposed facility. The two-story home was constructed around 1880 and has had significant alterations to its exterior. In addition, the house is orientated to the north, while the facility will be constructed to the southeast. The combination of distance and topography, as well as an agricultural field and mature deciduous trees visually buffer the potential historic buildings from the proposed Project.

The proposed aboveground valve setting will not substantively alter the viewshed of the potential historic properties at 17803, 17903, and 17958 Henna Avenue North. Temporary visual impacts on the property during construction will not affect the attributes contributing to the potential significance and integrity of these properties. As such, the proposed Project will not adversely impact the aspects of integrity of these potential historic properties.

The proposed Elk River 3rd branch line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Farmington to Hugo C-line

Archaeology

From July 17 to 20, October 18 and November 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at 5-meter intervals in high probability areas and shovel testing at 15-meter intervals were planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields, wetlands and woodlands associated with the wetlands and pasture.

Ground surface visibility was good in the agricultural fields ranging from 40-100%. Woodland and pastures had lower surface visibility that ranged between 25 and 50%. The total ESB encompassed 172.97 acres. Roadways, existing graveled facility lots, as well as inundated and usually inundated areas, a total of 19.26 acres, were excluded from survey. The remaining 153.71 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical properties in the Farmington to Hugo C-line ESB. They were recorded in the Minnesota Statewide Historic Inventory and assigned designations WA-MYT-031 and WA-MYT-032. WA-MYT-031 is a 1973 single-family residence. The two-story, multi-bay building occupies a rectangular footprint, is clad in composite siding and brick veneer, and terminates in a low-pitched, hipped roof with overhanging eaves sheathed in asphalt shingles. The building features a single-story attached garage and a recessed front porch covered by a secondary hipped roof also sheathed in asphalt shingles.

WA-MYT-032 includes two historical buildings, a house (WA-MYT-028) and a shed (WA-MYT-029). WA-MYT-028 is a 1972 single-family residence. The one-and-one-half story, multi-bay building occupies a rectangular footprint, is clad in vinyl siding and brick veneer, and terminates in a front-gable roof with overhanging eaves sheathed in asphalt shingles. The façade features a secondary, front-gable projection and a recessed porch. The east elevation features a two-bay, integral garage. WA-MYT-029 is a 1972 shed near the house. The single-story shed occupies a rectangular footprint, is clad in wood siding, and terminates in a gambrel roof with overhanging eaves sheathed in asphalt shingles. Both of these properties are recommended not eligible for listing in the NRHP and both are avoided through HDD in the current Project design.

Northern proposes to install a new launcher and associated valves and piping at the existing Hugo compressor station (MP 0.00), as well as install a new tie-in valve setting (MP 1.91) for the

Farmington to Hugo C-line. Aboveground construction for the aboveground tie-in valve setting will not exceed ten feet in height. The potential for adverse visual effects to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the Hugo compressor station and the proposed valve setting at MP 1.91. Northern conducted a visual assessment of these areas by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

One potential historical resource is located in the Hugo compressor station buffer, a house at 10830 180th Street North. This property has not been recorded in the Minnesota Statewide Historic Inventory. According to county records, it was constructed in 1977 and is a split foyer frame home with an attached garage. Significant alterations were made to the house in 2016. This house is set back from 180th Street North approximately 240 feet and is surrounded by trees. The combination of distance, a public ROW (180th Street North), as well as trees and other foliage visually buffer the potential historic building from the proposed project.

The proposed Farmington to Hugo C-line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Tomah branch line loop

Archaeology

Portions of the Tomah branch line loop was surveyed in August 2019, August and November 2021 and most recently surveyed in October and November 2023 and January 2024. Northern completed archaeological field investigations using standard methodology for archaeological surveys. Pedestrian survey was conducted at five-meter or less interval transects following the general direction of the survey corridor. Shovel testing was conducted at 15-meter or less interval. In areas with a greater probability for archaeological sites such as stream crossings, pedestrian survey was conducted at approximately one-meter intervals and shovel testing at less than five-meter intervals.

The survey area was located primarily in agricultural fields, with intermittent wooded areas, residential yards and wetlands. At the time of the field investigation, most of the survey area consisted of harvested fields and plowed corn and soybean fields. Most fields displayed 90-100% surface visibility which allowed field investigation to be conducted using pedestrian survey methods.

Of the total investigated area (124.7 acres), 55.9 acres were investigated using pedestrian survey methods and 55.4 acres were shovel tested. Approximately 13.4 acres were exempted from investigation survey in areas of slope, stream channels, or areas where ground had been disturbed by road and road drainage ditch construction. No prehistoric or historic period Euro-American artifacts or archaeological features were observed in the direct APE.

Aboveground Historical Properties

Northern plans to relocate a branch line receiver on the Tomah branch line loop (MP 3.53). The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the indirect APE was limited to the 500-foot buffer around the valve setting. Aboveground

construction will not exceed eight feet in height. Northern conducted a visual assessment of the indirect APE by walking the areas surrounding the Project and no historical properties were identified.

The proposed construction will not have an effect to any Wisconsin Architecture and History Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

La Crescent compressor station

Archaeology

On September 19, 2023, Northern completed archaeological field investigations using 15-meter interval pedestrian survey in areas of the ESB that were not graveled. The graveled facilities were excluded from survey. The survey area included short and medium grasses and corn fields. Ground surface visibility averaged 25% in grassy areas, but in the corn fields, ground surface visibility averaged 90%.

The total ESB encompassed 3.02 acres. Areas excluded from survey, consisting of graveled access drives and facilities and roadway totaling 1.72 acres. The remaining 1.30 acres averaged more than 25% ground surface visibility and was subjected to pedestrian survey. No archaeological sites or isolated finds were identified in the direct APE.

The current Project design and proposed construction activities will not have direct effects to any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern proposes minor modifications to existing infrastructure at the La Crescent compressor station, including replacing compressor cylinder end caps (currently blind flanges) and adjusting compressor mechanical characteristics to match new operating conditions. While impacts that are subject to review under 36 CFR § 800 may include surficial disturbances caused by topsoil removal, heavy machinery traffic, shallow grading, and spoil dirt management, only vehicular parking is anticipated for this Project component.

The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the existing compressor station lot. Northern conducted a visual assessment of this buffer by examining aerial imagery and observing areas surrounding the project from the public ROW and ESB. No aboveground cultural resources were observed in the 500-foot buffer.

Conclusion and Request for Consultation

To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the attached maps and report and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Northern Natural Gas
Northern Lights 2025 Expansion Project
February 14, 2024

Northern respects that the Tribe has unique expertise in identifying and providing information regarding historic properties with religious or cultural significance which may be affected by the Project. Northern is seeking the Tribe's comments on survey methodology, traditional cultural properties, and traditional cultural landscapes along with areas of importance to the Tribe which should be considered. Northern understands this request for information does not circumvent the government-to-government relationship under Section 106 (36 Code of Federal Regulations Part 800) between the Tribe and the FERC. Please be assured that Northern will keep sensitive Tribal information strictly confidential.

While the regulations for implementing Section 106 (36 Code of Federal Regulations Part 800) allow companies like Northern (and their consultants) to gather information, the FERC is responsible for monitoring compliance with the NHPA and determinations pursuant to Section 106. Additionally, the FERC, not Northern, is responsible for government-to-government consultations with American Indian Tribes. The FERC has not delegated this consultation. The FERC will contact you through a *Notice of Intent to Produce an Environmental Document*. If you would like to communicate directly with the FERC natural gas archaeological staff to discuss its cultural resource review and consultation processes, please feel free to contact Elizabeth Molloy, Tribal Liaison, at 202-502-8771 or Elizabeth.Molloy@ferc.gov.

Thank you in advance for your attention to this Project. Northern would very much appreciate receiving your response within 30 days of the date of this letter. Northern will follow up with you via phone contact or email if no response is received within 30 days. In the interim, should you have questions or need additional information, please contact me at 402-398-7226 or Terry.Plucker@nngco.com or Susan Knabe of Stantec at 920-278-3220 or Susan.Knabe@stantec.com.

Sincerely,



Terry Plucker
Environmental Compliance Manager
Northern Natural Gas Company

Enclosures: RCG&A Cultural Resources Reports
Phase One Cultural Resources Report
Unanticipated Discovery Plans (Minnesota and Wisconsin)

CC: Susan Knabe, Stantec Consulting
Matt Nelson, Northern Natural Gas

From: Waller, Hiedi
To: thpo@grandportage.com
Cc: Knabe, Susan; Terry.Plucker@nngco.com
Subject: FW: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS
Date: Wednesday, February 14, 2024 9:52:00 PM
Attachments: [NL 2025 THPO Grand Portage Band of the Minnesota Chippewa Tribe.pdf](#)

THPO Hull:

Northern is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Over periodic field events from 2019 through 2024, Phase One Archaeological Services Inc. and R. Christopher Goodwin & Associates, Inc. completed field surveys of the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The results of these survey efforts are included in the cultural resources reports. To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the cultural resources reports and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Due to the size of the files associated with the Project, Northern has set up an FTP site where the cultural resources reports and Unanticipated Discoveries Plans referenced in the attached letter can be downloaded.

Please contact us if you have any questions.

Hiedi Waller, PE
Senior Engineer
Pronouns: she, her, hers
Phone: (262) 643-9161

From: donotreply@secureftp.stantec.com <donotreply@secureftp.stantec.com>
Sent: Wednesday, February 14, 2024 9:20 PM
To: Waller, Hiedi <Hiedi.Waller@stantec.com>
Subject: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS

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Please use the link below to access your directory with the username and password provided.

Login Information

Browser link: <https://tmpsftp.stantec.com>

FTP Client Hostname: tmpsftp.stantec.com **Port:** 22 (can be used within a SFTP client to view and

transfer files and folders; e.g., FileZilla)

Login name: s0221202004

Password: 9670102

Disk Quota: 20 GB

Expiry Date: 2/21/2024

If you require a one-time one-week extension, please click [here](#).

If you require more than a week, please request a Microsoft 365 Groups/Teams. Information on Groups/Teams request procedure is posted in the [Stantec Help Center](#).

Click here for the [quick reference guide](#).

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1111 South 103rd Street
Omaha, NE 68124

February 14, 2024

Grand Portage Band of the Minnesota Chippewa Tribe
Rob Hull, THPO
PO Box 428
Grand Portage, MN 55605

Re: Northern Natural Gas–Northern Lights 2025 Expansion Project – Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin

Dear Tribal Historic Preservation Officer Hull:

Northern Natural Gas (Northern) is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured the services of Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Northern is proposing to construct the Project, which will consist of (1) a 3.00-mile extension of its 36-inch-diameter Lake Mills to Albert Lea E-line; (2) a 2.43-mile extension of its 30-inch-diameter Elk River 3rd branch line; (3) a non-contiguous 1.91-mile extension of its 30-inch-diameter Farmington to Hugo C-line; (4) a 1.28-mile extension of its 8-inch-diameter Tomah branch line loop; (5) minor modifications to its existing La Crescent compressor station; and (6) aboveground facilities including a launcher, receiver and tie-in valve settings. All Project components are located in various counties in Minnesota and Wisconsin.

This letter summarizes the results of the investigations and recommendations of the archaeological investigator for the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The archeological reports from R. Christopher Goodwin & Associates, Inc. (RCG&A) and Phase One Archaeological Services Inc. (Phase One) are attached to this letter.

Literature Search

Northern's cultural resources' sub-consultants, RCG&A and Phase One, conducted background research at the Minnesota and Wisconsin SHPOs to identify previously recorded archaeological and above-grade resources. This study area encompassed a Project-specific environmental survey boundary (ESB), the direct Area of Potential Effects (APE) and the indirect APE and included archaeological sites and other cultural resources located in the immediate areas of planned construction along with a one-mile radius of all proposed project activities.

Lake Mills to Albert Lea E-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources on the list of National Register of Historic Places (NRHP) properties are in the indirect APE. One archaeological site, 21FE0130, and Minnesota Statewide Historic Inventory property FE-AEA-00264 extends into the 500-foot buffer around the proposed aboveground valve setting. However, due to distance and mature trees, no effects are anticipated.

Elk River 3rd branch line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Farmington to Hugo C-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Tomah branch line loop

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

A single standing structure, a 19th century Greek Revival Farmhouse (AHI # 78410) was previously located on the west side of County Highway Q within the indirect APE. This building was razed and replaced with a modern single-family farmhouse. No other aboveground historical resources previously listed in the Wisconsin Architecture-History Inventory or on the list of the NRHP properties are located in the indirect APE.

La Crescent compressor station

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the La Crescent compressor station to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Cultural Survey

Following the literature review, Northern's subconsultants conducted a systematic field survey of the direct APE, which includes the construction ROW (TWS), ETWS, access roads, staging areas, and the aboveground appurtenant facility footprints. The survey procedures included a pedestrian walkover of the APE, systematic surface examination of suitable areas, and systematic subsurface testing of areas lacking sufficient surface visibility or which had potential for subsurface resources.

The cultural resources survey is 89% complete for the Lake Mills to Albert Lea E-line with additional shovel testing needed on 77.02 acres anticipated in spring 2024. The cultural resource survey for the Elk River 3rd branch line is 92% complete with additional survey needed on 15.25 acres scheduled for spring 2024. Northern cultural resources surveys are 100% complete for the remaining Project components.

Lake Mills to Albert Lea E-line

Archaeology

On August 22, August 23, October 3, and October 23-27, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability and previously recorded cultural resources. Shovel testing at 15-meter intervals was planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields. Shovel testing is pending for selected locations with the potential for buried cultural deposits.

Excluding one farmstead and one hay field, the majority of the survey area consisted of harvested or mature crops with 50 to 100% ground surface visibility. The hay field yielded an average surface visibility of 30%. The total ESB encompassed 678.90 acres. Roadways, inundated, and usually inundated areas, a total of 23.98 acres, were excluded from survey. A total of 77.02 acres remains to be surveyed. The other 591.82 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

A Euro-American archaeological site (21FE0130) also assigned an historic inventory property (FE-AEA-00264) was initially recorded as part of another Northern project in 2022. During the 2023 effort, this site was surveyed again. The 2023 site visit prompted an updated site boundary and an updated site form was submitted to the Minnesota Office of the State Archaeologist. This

farmstead site consisted of a combination of standing structures, archaeological features, and a surface artifact scatter. The site is within the ESB, but does not extend into the direct APE. In the original site form, the extant structures were identified as lacking integrity. Since the initial site visit, three buildings have been demolished. The artifacts documented on the surface have been placed in dump locations of mixed time periods, grouped through heavy machinery in pushpiles, and disturbed by agricultural processes. The archaeological component at 21FE0130 has not been evaluated for listing in the NRHP. RCG&A recommends the architectural buildings (FE-AEA-00264) at this property not eligible for listing in the NRHP.

This resource (21FE0130/FE-AEA-00264) is not in the direct APE and will not be impacted by the Project. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

County Ditch No. 4 (FE-PIC-00008), a historical structure, was initially visited as part of another Northern project in 2022. During the 2023 fieldwork, it was more thoroughly documented. County Ditch No. 4 is an active drainage ditch bound by agricultural land. The majority of this ditch is open cut and possesses a steep V-shaped profile. Brome and other grasses covered the banks of the ditch. Survey measured a top width of between 50 and 60 feet and a bottom width of 9-15 feet. Standing water was present at the base of the ditch during survey in fall 2023 but the overall depth was estimated to be 10-12 feet. Based on observations made from public ROW and aerial images, these dimensions are typical of County Ditch No. 4. This ditch also includes two branches: the Colvin Branch and the Klukow Branch. The Klukow Branch was in the ESB and was documented as part of FE-PIC-0008. County Ditch No. 4 is recommended not eligible for listing in the NRHP. Northern will utilize a private driveway that crosses the ditch without improvements. Therefore, the project will have no effect to County Ditch No. 4 (FE-PIC-00008).

Northern will remove a tie-over valve setting (MP 31.21) and install a new tie-in valve setting (MP 34.21) for the Lake Mills to Albert Lea E-line extension project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 34.21. This entire area was within the surveyed ESB. Northern conducted a visual assessment of the 500 foot buffer by walking the areas surrounding the project. The western portion of archaeological site 21FE0130 / inventory property FE-AEA-00264 is within the visual effects area; however, given the distance and mature vegetation surrounding the standing structures at the site, there will not be any effect to the standing structures from the project.

The proposed construction will not have an effect to any Minnesota Standing Structures Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

Elk River 3rd branch line

Archaeology

On November 1-5 and 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability. Shovel testing at 15-meter intervals was planned for surveyed areas with less than 25% surface visibility); no such areas were identified on this project. The survey area included agricultural fields, a tree farm, wetlands and manicured lawn with small stands of trees. Several historical and recent single-family homes and associated outbuildings were within the ESB.

The agricultural fields and tree farm yielded an average surface visibility of 80%. Visibility in the manicured lawns was limited (average 30%) but stands of trees yielded better ground surface visibility (average 55%). The total ESB encompassed 194.59 acres. Roadways as well as inundated and usually inundated areas, a total of 58.92 acres, were excluded from survey. A total of 15.25 acres remains to be surveyed. The remaining 120.42 acres had more than 25% ground surface visibility and was subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical ditches (WA-FLC-00033 and WA-XXX-00002) and ten historical standing structures during the 2023 fieldwork. None of the buildings are in the direct APE. Only one newly recorded property, WA-HGC-00077, is in the 500-foot buffer of the proposed valve setting.

Two historical drainage ditches were newly recorded during the 2023 fieldwork. WA-FLC-00033 is an active drainage ditch constructed in approximately 1949. The ditch is open cut and possesses a steep V-shaped profile. Grasses covered the banks of the ditch. Surveyors measured a varied width between 1.5 and 3 meters. Based on observations made from public ROW and aerial images, these dimensions are typical of this ditch. WA-FLC-00033 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-FLC-00033 via HDD.

WA-XXX-00002, the channelized Hardwood Creek, is known as Judicial Ditch No. 2. Ordered in 1902, Judicial Ditch No. 2 is open cut and possesses a V-shaped profile. Surveyors measured a top width of approximately six meters. Grasses covered the banks of the ditch. While standing water was present within the ditch during survey in fall 2023, the overall depth of the ditch was measured at variable depths between 2 to 5 meters. Based on observations made from the public ROW and aerial images, these dimensions are fairly typical of Judicial Ditch No. 2. WA-XXX-

00002 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-XXX-00002 via HDD.

Northern plans to remove a tie-over valve setting (MP 1.07) and install a new tie-in valve setting (MP 3.45) for the Elk River 3rd branch line project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 3.45. Northern conducted a desktop analysis and visual assessment of the 500-foot buffer by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

Northern identified four built resources on three properties that are potential historic properties (constructed more than 45 years ago) in the 500-foot buffer around the proposed facility. Prior to the 2023 survey, none of the buildings were recorded in the Minnesota Statewide Historic Inventory. One of the buildings was in the ESB and formally recorded during the survey (WA-HGC-00077; 17903 Henna Avenue North); the others (at 17803 Henna Avenue North and 17958 Henna Avenue North) were observed but not formally recorded.

The single-family residence at 17903 Henna Avenue North occupies a rectangular footprint, possesses two stories, is clad in composite siding and brick veneer, and terminates in a side-gable roof sheathed in asphalt shingles. It possesses an attached, single-bay garage along the south elevation. Based on county records, the house was constructed in 1969. Historic exterior materials on this building have been altered with replacements to exterior cladding, window openings and asphalt roof shingles. The public ROW runs between the proposed facility and the property at 17903 Henna Avenue North. Additionally, there are several trees that will obscure views of the proposed facility.

The single-family home and garage at 17803 Henna Avenue North have been substantially altered through additions and renovation. The original house was constructed in the mid-1960s, but, according to county records, extensive changes were made in 1989. The proposed facility is not visible from the property at 17803 Henna Avenue North as it is obscured by distance and a line of mature trees.

There are several buildings on the 17958 Henna Avenue North property. Only the single-family home and one outbuilding are within the 500-foot indirect APE around the proposed facility. The two-story home was constructed around 1880 and has had significant alterations to its exterior. In addition, the house is orientated to the north, while the facility will be constructed to the southeast. The combination of distance and topography, as well as an agricultural field and mature deciduous trees visually buffer the potential historic buildings from the proposed Project.

The proposed aboveground valve setting will not substantively alter the viewshed of the potential historic properties at 17803, 17903, and 17958 Henna Avenue North. Temporary visual impacts on the property during construction will not affect the attributes contributing to the potential significance and integrity of these properties. As such, the proposed Project will not adversely impact the aspects of integrity of these potential historic properties.

The proposed Elk River 3rd branch line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Farmington to Hugo C-line

Archaeology

From July 17 to 20, October 18 and November 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at 5-meter intervals in high probability areas and shovel testing at 15-meter intervals were planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields, wetlands and woodlands associated with the wetlands and pasture.

Ground surface visibility was good in the agricultural fields ranging from 40-100%. Woodland and pastures had lower surface visibility that ranged between 25 and 50%. The total ESB encompassed 172.97 acres. Roadways, existing graveled facility lots, as well as inundated and usually inundated areas, a total of 19.26 acres, were excluded from survey. The remaining 153.71 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical properties in the Farmington to Hugo C-line ESB. They were recorded in the Minnesota Statewide Historic Inventory and assigned designations WA-MYT-031 and WA-MYT-032. WA-MYT-031 is a 1973 single-family residence. The two-story, multi-bay building occupies a rectangular footprint, is clad in composite siding and brick veneer, and terminates in a low-pitched, hipped roof with overhanging eaves sheathed in asphalt shingles. The building features a single-story attached garage and a recessed front porch covered by a secondary hipped roof also sheathed in asphalt shingles.

WA-MYT-032 includes two historical buildings, a house (WA-MYT-028) and a shed (WA-MYT-029). WA-MYT-028 is a 1972 single-family residence. The one-and-one-half story, multi-bay building occupies a rectangular footprint, is clad in vinyl siding and brick veneer, and terminates in a front-gable roof with overhanging eaves sheathed in asphalt shingles. The façade features a secondary, front-gable projection and a recessed porch. The east elevation features a two-bay, integral garage. WA-MYT-029 is a 1972 shed near the house. The single-story shed occupies a rectangular footprint, is clad in wood siding, and terminates in a gambrel roof with overhanging eaves sheathed in asphalt shingles. Both of these properties are recommended not eligible for listing in the NRHP and both are avoided through HDD in the current Project design.

Northern proposes to install a new launcher and associated valves and piping at the existing Hugo compressor station (MP 0.00), as well as install a new tie-in valve setting (MP 1.91) for the

Farmington to Hugo C-line. Aboveground construction for the aboveground tie-in valve setting will not exceed ten feet in height. The potential for adverse visual effects to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the Hugo compressor station and the proposed valve setting at MP 1.91. Northern conducted a visual assessment of these areas by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

One potential historical resource is located in the Hugo compressor station buffer, a house at 10830 180th Street North. This property has not been recorded in the Minnesota Statewide Historic Inventory. According to county records, it was constructed in 1977 and is a split foyer frame home with an attached garage. Significant alterations were made to the house in 2016. This house is set back from 180th Street North approximately 240 feet and is surrounded by trees. The combination of distance, a public ROW (180th Street North), as well as trees and other foliage visually buffer the potential historic building from the proposed project.

The proposed Farmington to Hugo C-line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Tomah branch line loop

Archaeology

Portions of the Tomah branch line loop was surveyed in August 2019, August and November 2021 and most recently surveyed in October and November 2023 and January 2024. Northern completed archaeological field investigations using standard methodology for archaeological surveys. Pedestrian survey was conducted at five-meter or less interval transects following the general direction of the survey corridor. Shovel testing was conducted at 15-meter or less interval. In areas with a greater probability for archaeological sites such as stream crossings, pedestrian survey was conducted at approximately one-meter intervals and shovel testing at less than five-meter intervals.

The survey area was located primarily in agricultural fields, with intermittent wooded areas, residential yards and wetlands. At the time of the field investigation, most of the survey area consisted of harvested fields and plowed corn and soybean fields. Most fields displayed 90-100% surface visibility which allowed field investigation to be conducted using pedestrian survey methods.

Of the total investigated area (124.7 acres), 55.9 acres were investigated using pedestrian survey methods and 55.4 acres were shovel tested. Approximately 13.4 acres were exempted from investigation survey in areas of slope, stream channels, or areas where ground had been disturbed by road and road drainage ditch construction. No prehistoric or historic period Euro-American artifacts or archaeological features were observed in the direct APE.

Aboveground Historical Properties

Northern plans to relocate a branch line receiver on the Tomah branch line loop (MP 3.53). The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the indirect APE was limited to the 500-foot buffer around the valve setting. Aboveground

construction will not exceed eight feet in height. Northern conducted a visual assessment of the indirect APE by walking the areas surrounding the Project and no historical properties were identified.

The proposed construction will not have an effect to any Wisconsin Architecture and History Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

La Crescent compressor station

Archaeology

On September 19, 2023, Northern completed archaeological field investigations using 15-meter interval pedestrian survey in areas of the ESB that were not graveled. The graveled facilities were excluded from survey. The survey area included short and medium grasses and corn fields. Ground surface visibility averaged 25% in grassy areas, but in the corn fields, ground surface visibility averaged 90%.

The total ESB encompassed 3.02 acres. Areas excluded from survey, consisting of graveled access drives and facilities and roadway totaling 1.72 acres. The remaining 1.30 acres averaged more than 25% ground surface visibility and was subjected to pedestrian survey. No archaeological sites or isolated finds were identified in the direct APE.

The current Project design and proposed construction activities will not have direct effects to any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern proposes minor modifications to existing infrastructure at the La Crescent compressor station, including replacing compressor cylinder end caps (currently blind flanges) and adjusting compressor mechanical characteristics to match new operating conditions. While impacts that are subject to review under 36 CFR § 800 may include surficial disturbances caused by topsoil removal, heavy machinery traffic, shallow grading, and spoil dirt management, only vehicular parking is anticipated for this Project component.

The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the existing compressor station lot. Northern conducted a visual assessment of this buffer by examining aerial imagery and observing areas surrounding the project from the public ROW and ESB. No aboveground cultural resources were observed in the 500-foot buffer.

Conclusion and Request for Consultation

To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the attached maps and report and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Northern Natural Gas
Northern Lights 2025 Expansion Project
February 14, 2024

Northern respects that the Tribe has unique expertise in identifying and providing information regarding historic properties with religious or cultural significance which may be affected by the Project. Northern is seeking the Tribe's comments on survey methodology, traditional cultural properties, and traditional cultural landscapes along with areas of importance to the Tribe which should be considered. Northern understands this request for information does not circumvent the government-to-government relationship under Section 106 (36 Code of Federal Regulations Part 800) between the Tribe and the FERC. Please be assured that Northern will keep sensitive Tribal information strictly confidential.

While the regulations for implementing Section 106 (36 Code of Federal Regulations Part 800) allow companies like Northern (and their consultants) to gather information, the FERC is responsible for monitoring compliance with the NHPA and determinations pursuant to Section 106. Additionally, the FERC, not Northern, is responsible for government-to-government consultations with American Indian Tribes. The FERC has not delegated this consultation. The FERC will contact you through a *Notice of Intent to Produce an Environmental Document*. If you would like to communicate directly with the FERC natural gas archaeological staff to discuss its cultural resource review and consultation processes, please feel free to contact Elizabeth Molloy, Tribal Liaison, at 202-502-8771 or Elizabeth.Molloy@ferc.gov.

Thank you in advance for your attention to this Project. Northern would very much appreciate receiving your response within 30 days of the date of this letter. Northern will follow up with you via phone contact or email if no response is received within 30 days. In the interim, should you have questions or need additional information, please contact me at 402-398-7226 or Terry.Plucker@nngco.com or Susan Knabe of Stantec at 920-278-3220 or Susan.Knabe@stantec.com.

Sincerely,



Terry Plucker
Environmental Compliance Manager
Northern Natural Gas Company

Enclosures: RCG&A Cultural Resources Reports
Phase One Cultural Resources Report
Unanticipated Discovery Plans (Minnesota and Wisconsin)

CC: Susan Knabe, Stantec Consulting
Matt Nelson, Northern Natural Gas

From: [Waller, Hiedi](#)
To: evanschroeder@fdlrez.com
Cc: [Knabe, Susan](#); Terry.Plucker@nngco.com
Subject: FW: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS
Date: Wednesday, February 14, 2024 9:49:00 PM
Attachments: [NL 2025 THPO Fond du Lac Band of the Minnesota Chippewa Tribe.pdf](#)

THPO Schroeder:

Northern is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Over periodic field events from 2019 through 2024, Phase One Archaeological Services Inc. and R. Christopher Goodwin & Associates, Inc. completed field surveys of the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The results of these survey efforts are included in the cultural resources reports. To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the cultural resources reports and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Due to the size of the files associated with the Project, Northern has set up an FTP site where the cultural resources reports and Unanticipated Discoveries Plans referenced in the attached letter can be downloaded.

Please contact us if you have any questions.

Hiedi Waller, PE
Senior Engineer
Pronouns: she, her, hers
Phone: (262) 643-9161

From: donotreply@secureftp.stantec.com <donotreply@secureftp.stantec.com>
Sent: Wednesday, February 14, 2024 9:20 PM
To: Waller, Hiedi <Hiedi.Waller@stantec.com>
Subject: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS

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Please use the link below to access your directory with the username and password provided.

Login Information

Browser link: <https://tmpsftp.stantec.com>

FTP Client Hostname: tmpsftp.stantec.com **Port:** 22 (can be used within a SFTP client to view and

transfer files and folders; e.g., FileZilla)

Login name: s0221202004

Password: 9670102

Disk Quota: 20 GB

Expiry Date: 2/21/2024

If you require a one-time one-week extension, please click [here](#).

If you require more than a week, please request a Microsoft 365 Groups/Teams. Information on Groups/Teams request procedure is posted in the [Stantec Help Center](#).

Click here for the [quick reference guide](#).

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1111 South 103rd Street
Omaha, NE 68124

February 14, 2024

Fond du Lac Band of the Minnesota Chippewa Tribe
Evan Schroeder, THPO
1720 Big Lake Road
Cloquet, MN 55720

Re: Northern Natural Gas–Northern Lights 2025 Expansion Project – Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin

Dear Tribal Historic Preservation Officer Schroeder:

Northern Natural Gas (Northern) is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured the services of Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Northern is proposing to construct the Project, which will consist of (1) a 3.00-mile extension of its 36-inch-diameter Lake Mills to Albert Lea E-line; (2) a 2.43-mile extension of its 30-inch-diameter Elk River 3rd branch line; (3) a non-contiguous 1.91-mile extension of its 30-inch-diameter Farmington to Hugo C-line; (4) a 1.28-mile extension of its 8-inch-diameter Tomah branch line loop; (5) minor modifications to its existing La Crescent compressor station; and (6) aboveground facilities including a launcher, receiver and tie-in valve settings. All Project components are located in various counties in Minnesota and Wisconsin.

This letter summarizes the results of the investigations and recommendations of the archaeological investigator for the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The archeological reports from R. Christopher Goodwin & Associates, Inc. (RCG&A) and Phase One Archaeological Services Inc. (Phase One) are attached to this letter.

Literature Search

Northern's cultural resources' sub-consultants, RCG&A and Phase One, conducted background research at the Minnesota and Wisconsin SHPOs to identify previously recorded archaeological and above-grade resources. This study area encompassed a Project-specific environmental survey boundary (ESB), the direct Area of Potential Effects (APE) and the indirect APE and included archaeological sites and other cultural resources located in the immediate areas of planned construction along with a one-mile radius of all proposed project activities.

Lake Mills to Albert Lea E-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources on the list of National Register of Historic Places (NRHP) properties are in the indirect APE. One archaeological site, 21FE0130, and Minnesota Statewide Historic Inventory property FE-AEA-00264 extends into the 500-foot buffer around the proposed aboveground valve setting. However, due to distance and mature trees, no effects are anticipated.

Elk River 3rd branch line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Farmington to Hugo C-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Tomah branch line loop

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

A single standing structure, a 19th century Greek Revival Farmhouse (AHI # 78410) was previously located on the west side of County Highway Q within the indirect APE. This building was razed and replaced with a modern single-family farmhouse. No other aboveground historical resources previously listed in the Wisconsin Architecture-History Inventory or on the list of the NRHP properties are located in the indirect APE.

La Crescent compressor station

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the La Crescent compressor station to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Cultural Survey

Following the literature review, Northern's subconsultants conducted a systematic field survey of the direct APE, which includes the construction ROW (TWS), ETWS, access roads, staging areas, and the aboveground appurtenant facility footprints. The survey procedures included a pedestrian walkover of the APE, systematic surface examination of suitable areas, and systematic subsurface testing of areas lacking sufficient surface visibility or which had potential for subsurface resources.

The cultural resources survey is 89% complete for the Lake Mills to Albert Lea E-line with additional shovel testing needed on 77.02 acres anticipated in spring 2024. The cultural resource survey for the Elk River 3rd branch line is 92% complete with additional survey needed on 15.25 acres scheduled for spring 2024. Northern cultural resources surveys are 100% complete for the remaining Project components.

Lake Mills to Albert Lea E-line

Archaeology

On August 22, August 23, October 3, and October 23-27, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability and previously recorded cultural resources. Shovel testing at 15-meter intervals was planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields. Shovel testing is pending for selected locations with the potential for buried cultural deposits.

Excluding one farmstead and one hay field, the majority of the survey area consisted of harvested or mature crops with 50 to 100% ground surface visibility. The hay field yielded an average surface visibility of 30%. The total ESB encompassed 678.90 acres. Roadways, inundated, and usually inundated areas, a total of 23.98 acres, were excluded from survey. A total of 77.02 acres remains to be surveyed. The other 591.82 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

A Euro-American archaeological site (21FE0130) also assigned an historic inventory property (FE-AEA-00264) was initially recorded as part of another Northern project in 2022. During the 2023 effort, this site was surveyed again. The 2023 site visit prompted an updated site boundary and an updated site form was submitted to the Minnesota Office of the State Archaeologist. This

farmstead site consisted of a combination of standing structures, archaeological features, and a surface artifact scatter. The site is within the ESB, but does not extend into the direct APE. In the original site form, the extant structures were identified as lacking integrity. Since the initial site visit, three buildings have been demolished. The artifacts documented on the surface have been placed in dump locations of mixed time periods, grouped through heavy machinery in pushpiles, and disturbed by agricultural processes. The archaeological component at 21FE0130 has not been evaluated for listing in the NRHP. RCG&A recommends the architectural buildings (FE-AEA-00264) at this property not eligible for listing in the NRHP.

This resource (21FE0130/FE-AEA-00264) is not in the direct APE and will not be impacted by the Project. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

County Ditch No. 4 (FE-PIC-00008), a historical structure, was initially visited as part of another Northern project in 2022. During the 2023 fieldwork, it was more thoroughly documented. County Ditch No. 4 is an active drainage ditch bound by agricultural land. The majority of this ditch is open cut and possesses a steep V-shaped profile. Brome and other grasses covered the banks of the ditch. Survey measured a top width of between 50 and 60 feet and a bottom width of 9-15 feet. Standing water was present at the base of the ditch during survey in fall 2023 but the overall depth was estimated to be 10-12 feet. Based on observations made from public ROW and aerial images, these dimensions are typical of County Ditch No. 4. This ditch also includes two branches: the Colvin Branch and the Klukow Branch. The Klukow Branch was in the ESB and was documented as part of FE-PIC-0008. County Ditch No. 4 is recommended not eligible for listing in the NRHP. Northern will utilize a private driveway that crosses the ditch without improvements. Therefore, the project will have no effect to County Ditch No. 4 (FE-PIC-00008).

Northern will remove a tie-over valve setting (MP 31.21) and install a new tie-in valve setting (MP 34.21) for the Lake Mills to Albert Lea E-line extension project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 34.21. This entire area was within the surveyed ESB. Northern conducted a visual assessment of the 500 foot buffer by walking the areas surrounding the project. The western portion of archaeological site 21FE0130 / inventory property FE-AEA-00264 is within the visual effects area; however, given the distance and mature vegetation surrounding the standing structures at the site, there will not be any effect to the standing structures from the project.

The proposed construction will not have an effect to any Minnesota Standing Structures Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

Elk River 3rd branch line

Archaeology

On November 1-5 and 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability. Shovel testing at 15-meter intervals was planned for surveyed areas with less than 25% surface visibility); no such areas were identified on this project. The survey area included agricultural fields, a tree farm, wetlands and manicured lawn with small stands of trees. Several historical and recent single-family homes and associated outbuildings were within the ESB.

The agricultural fields and tree farm yielded an average surface visibility of 80%. Visibility in the manicured lawns was limited (average 30%) but stands of trees yielded better ground surface visibility (average 55%). The total ESB encompassed 194.59 acres. Roadways as well as inundated and usually inundated areas, a total of 58.92 acres, were excluded from survey. A total of 15.25 acres remains to be surveyed. The remaining 120.42 acres had more than 25% ground surface visibility and was subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical ditches (WA-FLC-00033 and WA-XXX-00002) and ten historical standing structures during the 2023 fieldwork. None of the buildings are in the direct APE. Only one newly recorded property, WA-HGC-00077, is in the 500-foot buffer of the proposed valve setting.

Two historical drainage ditches were newly recorded during the 2023 fieldwork. WA-FLC-00033 is an active drainage ditch constructed in approximately 1949. The ditch is open cut and possesses a steep V-shaped profile. Grasses covered the banks of the ditch. Surveyors measured a varied width between 1.5 and 3 meters. Based on observations made from public ROW and aerial images, these dimensions are typical of this ditch. WA-FLC-00033 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-FLC-00033 via HDD.

WA-XXX-00002, the channelized Hardwood Creek, is known as Judicial Ditch No. 2. Ordered in 1902, Judicial Ditch No. 2 is open cut and possesses a V-shaped profile. Surveyors measured a top width of approximately six meters. Grasses covered the banks of the ditch. While standing water was present within the ditch during survey in fall 2023, the overall depth of the ditch was measured at variable depths between 2 to 5 meters. Based on observations made from the public ROW and aerial images, these dimensions are fairly typical of Judicial Ditch No. 2. WA-XXX-

00002 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-XXX-00002 via HDD.

Northern plans to remove a tie-over valve setting (MP 1.07) and install a new tie-in valve setting (MP 3.45) for the Elk River 3rd branch line project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 3.45. Northern conducted a desktop analysis and visual assessment of the 500-foot buffer by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

Northern identified four built resources on three properties that are potential historic properties (constructed more than 45 years ago) in the 500-foot buffer around the proposed facility. Prior to the 2023 survey, none of the buildings were recorded in the Minnesota Statewide Historic Inventory. One of the buildings was in the ESB and formally recorded during the survey (WA-HGC-00077; 17903 Henna Avenue North); the others (at 17803 Henna Avenue North and 17958 Henna Avenue North) were observed but not formally recorded.

The single-family residence at 17903 Henna Avenue North occupies a rectangular footprint, possesses two stories, is clad in composite siding and brick veneer, and terminates in a side-gable roof sheathed in asphalt shingles. It possesses an attached, single-bay garage along the south elevation. Based on county records, the house was constructed in 1969. Historic exterior materials on this building have been altered with replacements to exterior cladding, window openings and asphalt roof shingles. The public ROW runs between the proposed facility and the property at 17903 Henna Avenue North. Additionally, there are several trees that will obscure views of the proposed facility.

The single-family home and garage at 17803 Henna Avenue North have been substantially altered through additions and renovation. The original house was constructed in the mid-1960s, but, according to county records, extensive changes were made in 1989. The proposed facility is not visible from the property at 17803 Henna Avenue North as it is obscured by distance and a line of mature trees.

There are several buildings on the 17958 Henna Avenue North property. Only the single-family home and one outbuilding are within the 500-foot indirect APE around the proposed facility. The two-story home was constructed around 1880 and has had significant alterations to its exterior. In addition, the house is orientated to the north, while the facility will be constructed to the southeast. The combination of distance and topography, as well as an agricultural field and mature deciduous trees visually buffer the potential historic buildings from the proposed Project.

The proposed aboveground valve setting will not substantively alter the viewshed of the potential historic properties at 17803, 17903, and 17958 Henna Avenue North. Temporary visual impacts on the property during construction will not affect the attributes contributing to the potential significance and integrity of these properties. As such, the proposed Project will not adversely impact the aspects of integrity of these potential historic properties.

The proposed Elk River 3rd branch line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Farmington to Hugo C-line

Archaeology

From July 17 to 20, October 18 and November 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at 5-meter intervals in high probability areas and shovel testing at 15-meter intervals were planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields, wetlands and woodlands associated with the wetlands and pasture.

Ground surface visibility was good in the agricultural fields ranging from 40-100%. Woodland and pastures had lower surface visibility that ranged between 25 and 50%. The total ESB encompassed 172.97 acres. Roadways, existing graveled facility lots, as well as inundated and usually inundated areas, a total of 19.26 acres, were excluded from survey. The remaining 153.71 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical properties in the Farmington to Hugo C-line ESB. They were recorded in the Minnesota Statewide Historic Inventory and assigned designations WA-MYT-031 and WA-MYT-032. WA-MYT-031 is a 1973 single-family residence. The two-story, multi-bay building occupies a rectangular footprint, is clad in composite siding and brick veneer, and terminates in a low-pitched, hipped roof with overhanging eaves sheathed in asphalt shingles. The building features a single-story attached garage and a recessed front porch covered by a secondary hipped roof also sheathed in asphalt shingles.

WA-MYT-032 includes two historical buildings, a house (WA-MYT-028) and a shed (WA-MYT-029). WA-MYT-028 is a 1972 single-family residence. The one-and-one-half story, multi-bay building occupies a rectangular footprint, is clad in vinyl siding and brick veneer, and terminates in a front-gable roof with overhanging eaves sheathed in asphalt shingles. The façade features a secondary, front-gable projection and a recessed porch. The east elevation features a two-bay, integral garage. WA-MYT-029 is a 1972 shed near the house. The single-story shed occupies a rectangular footprint, is clad in wood siding, and terminates in a gambrel roof with overhanging eaves sheathed in asphalt shingles. Both of these properties are recommended not eligible for listing in the NRHP and both are avoided through HDD in the current Project design.

Northern proposes to install a new launcher and associated valves and piping at the existing Hugo compressor station (MP 0.00), as well as install a new tie-in valve setting (MP 1.91) for the

Farmington to Hugo C-line. Aboveground construction for the aboveground tie-in valve setting will not exceed ten feet in height. The potential for adverse visual effects to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the Hugo compressor station and the proposed valve setting at MP 1.91. Northern conducted a visual assessment of these areas by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

One potential historical resource is located in the Hugo compressor station buffer, a house at 10830 180th Street North. This property has not been recorded in the Minnesota Statewide Historic Inventory. According to county records, it was constructed in 1977 and is a split foyer frame home with an attached garage. Significant alterations were made to the house in 2016. This house is set back from 180th Street North approximately 240 feet and is surrounded by trees. The combination of distance, a public ROW (180th Street North), as well as trees and other foliage visually buffer the potential historic building from the proposed project.

The proposed Farmington to Hugo C-line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Tomah branch line loop

Archaeology

Portions of the Tomah branch line loop was surveyed in August 2019, August and November 2021 and most recently surveyed in October and November 2023 and January 2024. Northern completed archaeological field investigations using standard methodology for archaeological surveys. Pedestrian survey was conducted at five-meter or less interval transects following the general direction of the survey corridor. Shovel testing was conducted at 15-meter or less interval. In areas with a greater probability for archaeological sites such as stream crossings, pedestrian survey was conducted at approximately one-meter intervals and shovel testing at less than five-meter intervals.

The survey area was located primarily in agricultural fields, with intermittent wooded areas, residential yards and wetlands. At the time of the field investigation, most of the survey area consisted of harvested fields and plowed corn and soybean fields. Most fields displayed 90-100% surface visibility which allowed field investigation to be conducted using pedestrian survey methods.

Of the total investigated area (124.7 acres), 55.9 acres were investigated using pedestrian survey methods and 55.4 acres were shovel tested. Approximately 13.4 acres were exempted from investigation survey in areas of slope, stream channels, or areas where ground had been disturbed by road and road drainage ditch construction. No prehistoric or historic period Euro-American artifacts or archaeological features were observed in the direct APE.

Aboveground Historical Properties

Northern plans to relocate a branch line receiver on the Tomah branch line loop (MP 3.53). The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the indirect APE was limited to the 500-foot buffer around the valve setting. Aboveground

construction will not exceed eight feet in height. Northern conducted a visual assessment of the indirect APE by walking the areas surrounding the Project and no historical properties were identified.

The proposed construction will not have an effect to any Wisconsin Architecture and History Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

La Crescent compressor station

Archaeology

On September 19, 2023, Northern completed archaeological field investigations using 15-meter interval pedestrian survey in areas of the ESB that were not graveled. The graveled facilities were excluded from survey. The survey area included short and medium grasses and corn fields. Ground surface visibility averaged 25% in grassy areas, but in the corn fields, ground surface visibility averaged 90%.

The total ESB encompassed 3.02 acres. Areas excluded from survey, consisting of graveled access drives and facilities and roadway totaling 1.72 acres. The remaining 1.30 acres averaged more than 25% ground surface visibility and was subjected to pedestrian survey. No archaeological sites or isolated finds were identified in the direct APE.

The current Project design and proposed construction activities will not have direct effects to any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern proposes minor modifications to existing infrastructure at the La Crescent compressor station, including replacing compressor cylinder end caps (currently blind flanges) and adjusting compressor mechanical characteristics to match new operating conditions. While impacts that are subject to review under 36 CFR § 800 may include surficial disturbances caused by topsoil removal, heavy machinery traffic, shallow grading, and spoil dirt management, only vehicular parking is anticipated for this Project component.

The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the existing compressor station lot. Northern conducted a visual assessment of this buffer by examining aerial imagery and observing areas surrounding the project from the public ROW and ESB. No aboveground cultural resources were observed in the 500-foot buffer.

Conclusion and Request for Consultation

To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the attached maps and report and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Northern Natural Gas
Northern Lights 2025 Expansion Project
February 14, 2024

Northern respects that the Tribe has unique expertise in identifying and providing information regarding historic properties with religious or cultural significance which may be affected by the Project. Northern is seeking the Tribe's comments on survey methodology, traditional cultural properties, and traditional cultural landscapes along with areas of importance to the Tribe which should be considered. Northern understands this request for information does not circumvent the government-to-government relationship under Section 106 (36 Code of Federal Regulations Part 800) between the Tribe and the FERC. Please be assured that Northern will keep sensitive Tribal information strictly confidential.

While the regulations for implementing Section 106 (36 Code of Federal Regulations Part 800) allow companies like Northern (and their consultants) to gather information, the FERC is responsible for monitoring compliance with the NHPA and determinations pursuant to Section 106. Additionally, the FERC, not Northern, is responsible for government-to-government consultations with American Indian Tribes. The FERC has not delegated this consultation. The FERC will contact you through a *Notice of Intent to Produce an Environmental Document*. If you would like to communicate directly with the FERC natural gas archaeological staff to discuss its cultural resource review and consultation processes, please feel free to contact Elizabeth Molloy, Tribal Liaison, at 202-502-8771 or Elizabeth.Molloy@ferc.gov.

Thank you in advance for your attention to this Project. Northern would very much appreciate receiving your response within 30 days of the date of this letter. Northern will follow up with you via phone contact or email if no response is received within 30 days. In the interim, should you have questions or need additional information, please contact me at 402-398-7226 or Terry.Plucker@nngco.com or Susan Knabe of Stantec at 920-278-3220 or Susan.Knabe@stantec.com.

Sincerely,



Terry Plucker
Environmental Compliance Manager
Northern Natural Gas Company

Enclosures: RCG&A Cultural Resources Reports
Phase One Cultural Resources Report
Unanticipated Discovery Plans (Minnesota and Wisconsin)

CC: Susan Knabe, Stantec Consulting
Matt Nelson, Northern Natural Gas

From: Waller, Hiedi
To: thpo@badriver-nsn.gov
Cc: Knabe, Susan; Terry.Plucker@nngco.com
Subject: FW: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS
Date: Wednesday, February 14, 2024 9:46:00 PM
Attachments: [NL 2025 THPO Bad River Band of the Lake Superior Tribe of Chippewa Indians of the Bad River Reservation, Wisconsin.pdf](#)

THPO Plucinski:

Northern is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Over periodic field events from 2019 through 2024, Phase One Archaeological Services Inc. and R. Christopher Goodwin & Associates, Inc. completed field surveys of the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The results of these survey efforts are included in the cultural resources reports. To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the cultural resources reports and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Due to the size of the files associated with the Project, Northern has set up an FTP site where the cultural resources reports and Unanticipated Discoveries Plans referenced in the attached letter can be downloaded.

Please contact us if you have any questions.

Hiedi Waller, PE
Senior Engineer
Pronouns: she, her, hers
Phone: (262) 643-9161

From: donotreply@secureftp.stantec.com <donotreply@secureftp.stantec.com>
Sent: Wednesday, February 14, 2024 9:20 PM
To: Waller, Hiedi <Hiedi.Waller@stantec.com>
Subject: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS

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Please use the link below to access your directory with the username and password provided.

Login Information

Browser link: <https://tmpsftp.stantec.com>

FTP Client Hostname: tmpsftp.stantec.com **Port:** 22 (can be used within a SFTP client to view and transfer files and folders; e.g., FileZilla)

Login name: s0221202004

Password: 9670102

Disk Quota: 20 GB

Expiry Date: 2/21/2024

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1111 South 103rd Street
Omaha, NE 68124

February 14, 2024

Bad River Band of the Lake Superior Tribe of Chippewa Indians of the Bad River Reservation, Wisconsin
Lawrence Plucinski, THPO
PO Box 39
Odanah, WI 54861

Re: Northern Natural Gas–Northern Lights 2025 Expansion Project – Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin

Dear Tribal Historic Preservation Officer Plucinski:

Northern Natural Gas (Northern) is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured the services of Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Northern is proposing to construct the Project, which will consist of (1) a 3.00-mile extension of its 36-inch-diameter Lake Mills to Albert Lea E-line; (2) a 2.43-mile extension of its 30-inch-diameter Elk River 3rd branch line; (3) a non-contiguous 1.91-mile extension of its 30-inch-diameter Farmington to Hugo C-line; (4) a 1.28-mile extension of its 8-inch-diameter Tomah branch line loop; (5) minor modifications to its existing La Crescent compressor station; and (6) aboveground facilities including a launcher, receiver and tie-in valve settings. All Project components are located in various counties in Minnesota and Wisconsin.

This letter summarizes the results of the investigations and recommendations of the archaeological investigator for the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The archeological reports from R. Christopher Goodwin & Associates, Inc. (RCG&A) and Phase One Archaeological Services Inc. (Phase One) are attached to this letter.

Literature Search

Northern's cultural resources' sub-consultants, RCG&A and Phase One, conducted background research at the Minnesota and Wisconsin SHPOs to identify previously recorded archaeological and above-grade resources. This study area encompassed a Project-specific environmental survey boundary (ESB), the direct Area of Potential Effects (APE) and the indirect APE and included archaeological sites and other cultural resources located in the immediate areas of planned construction along with a one-mile radius of all proposed project activities.

Lake Mills to Albert Lea E-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources on the list of National Register of Historic Places (NRHP) properties are in the indirect APE. One archaeological site, 21FE0130, and Minnesota Statewide Historic Inventory property FE-AEA-00264 extends into the 500-foot buffer around the proposed aboveground valve setting. However, due to distance and mature trees, no effects are anticipated.

Elk River 3rd branch line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Farmington to Hugo C-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Tomah branch line loop

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

A single standing structure, a 19th century Greek Revival Farmhouse (AHI # 78410) was previously located on the west side of County Highway Q within the indirect APE. This building was razed and replaced with a modern single-family farmhouse. No other aboveground historical resources previously listed in the Wisconsin Architecture-History Inventory or on the list of the NRHP properties are located in the indirect APE.

La Crescent compressor station

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the La Crescent compressor station to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Cultural Survey

Following the literature review, Northern's subconsultants conducted a systematic field survey of the direct APE, which includes the construction ROW (TWS), ETWS, access roads, staging areas, and the aboveground appurtenant facility footprints. The survey procedures included a pedestrian walkover of the APE, systematic surface examination of suitable areas, and systematic subsurface testing of areas lacking sufficient surface visibility or which had potential for subsurface resources.

The cultural resources survey is 89% complete for the Lake Mills to Albert Lea E-line with additional shovel testing needed on 77.02 acres anticipated in spring 2024. The cultural resource survey for the Elk River 3rd branch line is 92% complete with additional survey needed on 15.25 acres scheduled for spring 2024. Northern cultural resources surveys are 100% complete for the remaining Project components.

Lake Mills to Albert Lea E-line

Archaeology

On August 22, August 23, October 3, and October 23-27, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability and previously recorded cultural resources. Shovel testing at 15-meter intervals was planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields. Shovel testing is pending for selected locations with the potential for buried cultural deposits.

Excluding one farmstead and one hay field, the majority of the survey area consisted of harvested or mature crops with 50 to 100% ground surface visibility. The hay field yielded an average surface visibility of 30%. The total ESB encompassed 678.90 acres. Roadways, inundated, and usually inundated areas, a total of 23.98 acres, were excluded from survey. A total of 77.02 acres remains to be surveyed. The other 591.82 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

A Euro-American archaeological site (21FE0130) also assigned an historic inventory property (FE-AEA-00264) was initially recorded as part of another Northern project in 2022. During the 2023 effort, this site was surveyed again. The 2023 site visit prompted an updated site boundary and an updated site form was submitted to the Minnesota Office of the State Archaeologist. This

farmstead site consisted of a combination of standing structures, archaeological features, and a surface artifact scatter. The site is within the ESB, but does not extend into the direct APE. In the original site form, the extant structures were identified as lacking integrity. Since the initial site visit, three buildings have been demolished. The artifacts documented on the surface have been placed in dump locations of mixed time periods, grouped through heavy machinery in pushpiles, and disturbed by agricultural processes. The archaeological component at 21FE0130 has not been evaluated for listing in the NRHP. RCG&A recommends the architectural buildings (FE-AEA-00264) at this property not eligible for listing in the NRHP.

This resource (21FE0130/FE-AEA-00264) is not in the direct APE and will not be impacted by the Project. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

County Ditch No. 4 (FE-PIC-00008), a historical structure, was initially visited as part of another Northern project in 2022. During the 2023 fieldwork, it was more thoroughly documented. County Ditch No. 4 is an active drainage ditch bound by agricultural land. The majority of this ditch is open cut and possesses a steep V-shaped profile. Brome and other grasses covered the banks of the ditch. Survey measured a top width of between 50 and 60 feet and a bottom width of 9-15 feet. Standing water was present at the base of the ditch during survey in fall 2023 but the overall depth was estimated to be 10-12 feet. Based on observations made from public ROW and aerial images, these dimensions are typical of County Ditch No. 4. This ditch also includes two branches: the Colvin Branch and the Klukow Branch. The Klukow Branch was in the ESB and was documented as part of FE-PIC-0008. County Ditch No. 4 is recommended not eligible for listing in the NRHP. Northern will utilize a private driveway that crosses the ditch without improvements. Therefore, the project will have no effect to County Ditch No. 4 (FE-PIC-00008).

Northern will remove a tie-over valve setting (MP 31.21) and install a new tie-in valve setting (MP 34.21) for the Lake Mills to Albert Lea E-line extension project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 34.21. This entire area was within the surveyed ESB. Northern conducted a visual assessment of the 500 foot buffer by walking the areas surrounding the project. The western portion of archaeological site 21FE0130 / inventory property FE-AEA-00264 is within the visual effects area; however, given the distance and mature vegetation surrounding the standing structures at the site, there will not be any effect to the standing structures from the project.

The proposed construction will not have an effect to any Minnesota Standing Structures Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

Elk River 3rd branch line

Archaeology

On November 1-5 and 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability. Shovel testing at 15-meter intervals was planned for surveyed areas with less than 25% surface visibility); no such areas were identified on this project. The survey area included agricultural fields, a tree farm, wetlands and manicured lawn with small stands of trees. Several historical and recent single-family homes and associated outbuildings were within the ESB.

The agricultural fields and tree farm yielded an average surface visibility of 80%. Visibility in the manicured lawns was limited (average 30%) but stands of trees yielded better ground surface visibility (average 55%). The total ESB encompassed 194.59 acres. Roadways as well as inundated and usually inundated areas, a total of 58.92 acres, were excluded from survey. A total of 15.25 acres remains to be surveyed. The remaining 120.42 acres had more than 25% ground surface visibility and was subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical ditches (WA-FLC-00033 and WA-XXX-00002) and ten historical standing structures during the 2023 fieldwork. None of the buildings are in the direct APE. Only one newly recorded property, WA-HGC-00077, is in the 500-foot buffer of the proposed valve setting.

Two historical drainage ditches were newly recorded during the 2023 fieldwork. WA-FLC-00033 is an active drainage ditch constructed in approximately 1949. The ditch is open cut and possesses a steep V-shaped profile. Grasses covered the banks of the ditch. Surveyors measured a varied width between 1.5 and 3 meters. Based on observations made from public ROW and aerial images, these dimensions are typical of this ditch. WA-FLC-00033 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-FLC-00033 via HDD.

WA-XXX-00002, the channelized Hardwood Creek, is known as Judicial Ditch No. 2. Ordered in 1902, Judicial Ditch No. 2 is open cut and possesses a V-shaped profile. Surveyors measured a top width of approximately six meters. Grasses covered the banks of the ditch. While standing water was present within the ditch during survey in fall 2023, the overall depth of the ditch was measured at variable depths between 2 to 5 meters. Based on observations made from the public ROW and aerial images, these dimensions are fairly typical of Judicial Ditch No. 2. WA-XXX-

00002 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-XXX-00002 via HDD.

Northern plans to remove a tie-over valve setting (MP 1.07) and install a new tie-in valve setting (MP 3.45) for the Elk River 3rd branch line project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 3.45. Northern conducted a desktop analysis and visual assessment of the 500-foot buffer by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

Northern identified four built resources on three properties that are potential historic properties (constructed more than 45 years ago) in the 500-foot buffer around the proposed facility. Prior to the 2023 survey, none of the buildings were recorded in the Minnesota Statewide Historic Inventory. One of the buildings was in the ESB and formally recorded during the survey (WA-HGC-00077; 17903 Henna Avenue North); the others (at 17803 Henna Avenue North and 17958 Henna Avenue North) were observed but not formally recorded.

The single-family residence at 17903 Henna Avenue North occupies a rectangular footprint, possesses two stories, is clad in composite siding and brick veneer, and terminates in a side-gable roof sheathed in asphalt shingles. It possesses an attached, single-bay garage along the south elevation. Based on county records, the house was constructed in 1969. Historic exterior materials on this building have been altered with replacements to exterior cladding, window openings and asphalt roof shingles. The public ROW runs between the proposed facility and the property at 17903 Henna Avenue North. Additionally, there are several trees that will obscure views of the proposed facility.

The single-family home and garage at 17803 Henna Avenue North have been substantially altered through additions and renovation. The original house was constructed in the mid-1960s, but, according to county records, extensive changes were made in 1989. The proposed facility is not visible from the property at 17803 Henna Avenue North as it is obscured by distance and a line of mature trees.

There are several buildings on the 17958 Henna Avenue North property. Only the single-family home and one outbuilding are within the 500-foot indirect APE around the proposed facility. The two-story home was constructed around 1880 and has had significant alterations to its exterior. In addition, the house is orientated to the north, while the facility will be constructed to the southeast. The combination of distance and topography, as well as an agricultural field and mature deciduous trees visually buffer the potential historic buildings from the proposed Project.

The proposed aboveground valve setting will not substantively alter the viewshed of the potential historic properties at 17803, 17903, and 17958 Henna Avenue North. Temporary visual impacts on the property during construction will not affect the attributes contributing to the potential significance and integrity of these properties. As such, the proposed Project will not adversely impact the aspects of integrity of these potential historic properties.

The proposed Elk River 3rd branch line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Farmington to Hugo C-line

Archaeology

From July 17 to 20, October 18 and November 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at 5-meter intervals in high probability areas and shovel testing at 15-meter intervals were planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields, wetlands and woodlands associated with the wetlands and pasture.

Ground surface visibility was good in the agricultural fields ranging from 40-100%. Woodland and pastures had lower surface visibility that ranged between 25 and 50%. The total ESB encompassed 172.97 acres. Roadways, existing graveled facility lots, as well as inundated and usually inundated areas, a total of 19.26 acres, were excluded from survey. The remaining 153.71 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical properties in the Farmington to Hugo C-line ESB. They were recorded in the Minnesota Statewide Historic Inventory and assigned designations WA-MYT-031 and WA-MYT-032. WA-MYT-031 is a 1973 single-family residence. The two-story, multi-bay building occupies a rectangular footprint, is clad in composite siding and brick veneer, and terminates in a low-pitched, hipped roof with overhanging eaves sheathed in asphalt shingles. The building features a single-story attached garage and a recessed front porch covered by a secondary hipped roof also sheathed in asphalt shingles.

WA-MYT-032 includes two historical buildings, a house (WA-MYT-028) and a shed (WA-MYT-029). WA-MYT-028 is a 1972 single-family residence. The one-and-one-half story, multi-bay building occupies a rectangular footprint, is clad in vinyl siding and brick veneer, and terminates in a front-gable roof with overhanging eaves sheathed in asphalt shingles. The façade features a secondary, front-gable projection and a recessed porch. The east elevation features a two-bay, integral garage. WA-MYT-029 is a 1972 shed near the house. The single-story shed occupies a rectangular footprint, is clad in wood siding, and terminates in a gambrel roof with overhanging eaves sheathed in asphalt shingles. Both of these properties are recommended not eligible for listing in the NRHP and both are avoided through HDD in the current Project design.

Northern proposes to install a new launcher and associated valves and piping at the existing Hugo compressor station (MP 0.00), as well as install a new tie-in valve setting (MP 1.91) for the

Farmington to Hugo C-line. Aboveground construction for the aboveground tie-in valve setting will not exceed ten feet in height. The potential for adverse visual effects to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the Hugo compressor station and the proposed valve setting at MP 1.91. Northern conducted a visual assessment of these areas by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

One potential historical resource is located in the Hugo compressor station buffer, a house at 10830 180th Street North. This property has not been recorded in the Minnesota Statewide Historic Inventory. According to county records, it was constructed in 1977 and is a split foyer frame home with an attached garage. Significant alterations were made to the house in 2016. This house is set back from 180th Street North approximately 240 feet and is surrounded by trees. The combination of distance, a public ROW (180th Street North), as well as trees and other foliage visually buffer the potential historic building from the proposed project.

The proposed Farmington to Hugo C-line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Tomah branch line loop

Archaeology

Portions of the Tomah branch line loop was surveyed in August 2019, August and November 2021 and most recently surveyed in October and November 2023 and January 2024. Northern completed archaeological field investigations using standard methodology for archaeological surveys. Pedestrian survey was conducted at five-meter or less interval transects following the general direction of the survey corridor. Shovel testing was conducted at 15-meter or less interval. In areas with a greater probability for archaeological sites such as stream crossings, pedestrian survey was conducted at approximately one-meter intervals and shovel testing at less than five-meter intervals.

The survey area was located primarily in agricultural fields, with intermittent wooded areas, residential yards and wetlands. At the time of the field investigation, most of the survey area consisted of harvested fields and plowed corn and soybean fields. Most fields displayed 90-100% surface visibility which allowed field investigation to be conducted using pedestrian survey methods.

Of the total investigated area (124.7 acres), 55.9 acres were investigated using pedestrian survey methods and 55.4 acres were shovel tested. Approximately 13.4 acres were exempted from investigation survey in areas of slope, stream channels, or areas where ground had been disturbed by road and road drainage ditch construction. No prehistoric or historic period Euro-American artifacts or archaeological features were observed in the direct APE.

Aboveground Historical Properties

Northern plans to relocate a branch line receiver on the Tomah branch line loop (MP 3.53). The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the indirect APE was limited to the 500-foot buffer around the valve setting. Aboveground

construction will not exceed eight feet in height. Northern conducted a visual assessment of the indirect APE by walking the areas surrounding the Project and no historical properties were identified.

The proposed construction will not have an effect to any Wisconsin Architecture and History Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

La Crescent compressor station

Archaeology

On September 19, 2023, Northern completed archaeological field investigations using 15-meter interval pedestrian survey in areas of the ESB that were not graveled. The graveled facilities were excluded from survey. The survey area included short and medium grasses and corn fields. Ground surface visibility averaged 25% in grassy areas, but in the corn fields, ground surface visibility averaged 90%.

The total ESB encompassed 3.02 acres. Areas excluded from survey, consisting of graveled access drives and facilities and roadway totaling 1.72 acres. The remaining 1.30 acres averaged more than 25% ground surface visibility and was subjected to pedestrian survey. No archaeological sites or isolated finds were identified in the direct APE.

The current Project design and proposed construction activities will not have direct effects to any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern proposes minor modifications to existing infrastructure at the La Crescent compressor station, including replacing compressor cylinder end caps (currently blind flanges) and adjusting compressor mechanical characteristics to match new operating conditions. While impacts that are subject to review under 36 CFR § 800 may include surficial disturbances caused by topsoil removal, heavy machinery traffic, shallow grading, and spoil dirt management, only vehicular parking is anticipated for this Project component.

The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the existing compressor station lot. Northern conducted a visual assessment of this buffer by examining aerial imagery and observing areas surrounding the project from the public ROW and ESB. No aboveground cultural resources were observed in the 500-foot buffer.

Conclusion and Request for Consultation

To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the attached maps and report and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Northern Natural Gas
Northern Lights 2025 Expansion Project
February 14, 2024

Northern respects that the Tribe has unique expertise in identifying and providing information regarding historic properties with religious or cultural significance which may be affected by the Project. Northern is seeking the Tribe's comments on survey methodology, traditional cultural properties, and traditional cultural landscapes along with areas of importance to the Tribe which should be considered. Northern understands this request for information does not circumvent the government-to-government relationship under Section 106 (36 Code of Federal Regulations Part 800) between the Tribe and the FERC. Please be assured that Northern will keep sensitive Tribal information strictly confidential.

While the regulations for implementing Section 106 (36 Code of Federal Regulations Part 800) allow companies like Northern (and their consultants) to gather information, the FERC is responsible for monitoring compliance with the NHPA and determinations pursuant to Section 106. Additionally, the FERC, not Northern, is responsible for government-to-government consultations with American Indian Tribes. The FERC has not delegated this consultation. The FERC will contact you through a *Notice of Intent to Produce an Environmental Document*. If you would like to communicate directly with the FERC natural gas archaeological staff to discuss its cultural resource review and consultation processes, please feel free to contact Elizabeth Molloy, Tribal Liaison, at 202-502-8771 or Elizabeth.Molloy@ferc.gov.

Thank you in advance for your attention to this Project. Northern would very much appreciate receiving your response within 30 days of the date of this letter. Northern will follow up with you via phone contact or email if no response is received within 30 days. In the interim, should you have questions or need additional information, please contact me at 402-398-7226 or Terry.Plucker@nngco.com or Susan Knabe of Stantec at 920-278-3220 or Susan.Knabe@stantec.com.

Sincerely,



Terry Plucker
Environmental Compliance Manager
Northern Natural Gas Company

Enclosures: RCG&A Cultural Resources Reports
Phase One Cultural Resources Report
Unanticipated Discovery Plans (Minnesota and Wisconsin)

CC: Susan Knabe, Stantec Consulting
Matt Nelson, Northern Natural Gas

From: [Waller, Hiedi](#)
To: sunshine.bear@winnebagoTribe.com
Cc: [Knabe, Susan](#); Terry.Plucker@nngco.com
Subject: FW: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS
Date: Wednesday, February 14, 2024 9:38:00 PM
Attachments: [NL 2025 THPO Winnebago Tribe of Nebraska.pdf](#)

THPO Thomas-Bear:

Northern is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Over periodic field events from 2019 through 2024, Phase One Archaeological Services Inc. and R. Christopher Goodwin & Associates, Inc. completed field surveys of the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The results of these survey efforts are included in the cultural resources reports. To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the cultural resources reports and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Due to the size of the files associated with the Project, Northern has set up an FTP site where the cultural resources reports and Unanticipated Discoveries Plans referenced in the attached letter can be downloaded.

Please contact us if you have any questions.

Hiedi Waller, PE
Senior Engineer
Pronouns: she, her, hers
Phone: (262) 643-9161

From: donotreply@secureftp.stantec.com <donotreply@secureftp.stantec.com>
Sent: Wednesday, February 14, 2024 9:20 PM
To: Waller, Hiedi <Hiedi.Waller@stantec.com>
Subject: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS

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Login Information

Browser link: <https://tmpsftp.stantec.com>

FTP Client Hostname: tmpsftp.stantec.com **Port:** 22 (can be used within a SFTP client to view and transfer files and folders; e.g., FileZilla)

Login name: s0221202004

Password: 9670102

Disk Quota: 20 GB

Expiry Date: 2/21/2024

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1111 South 103rd Street
Omaha, NE 68124

February 14, 2024

Winnebago Tribe of Nebraska
Sunshine Thomas-Bear, THPO
PO Box 687
Winnebago, NE 68071

Re: Northern Natural Gas–Northern Lights 2025 Expansion Project – Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin

Dear Tribal Historic Preservation Officer Thomas-Bear:

Northern Natural Gas (Northern) is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured the services of Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Northern is proposing to construct the Project, which will consist of (1) a 3.00-mile extension of its 36-inch-diameter Lake Mills to Albert Lea E-line; (2) a 2.43-mile extension of its 30-inch-diameter Elk River 3rd branch line; (3) a non-contiguous 1.91-mile extension of its 30-inch-diameter Farmington to Hugo C-line; (4) a 1.28-mile extension of its 8-inch-diameter Tomah branch line loop; (5) minor modifications to its existing La Crescent compressor station; and (6) aboveground facilities including a launcher, receiver and tie-in valve settings. All Project components are located in various counties in Minnesota and Wisconsin.

This letter summarizes the results of the investigations and recommendations of the archaeological investigator for the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The archeological reports from R. Christopher Goodwin & Associates, Inc. (RCG&A) and Phase One Archaeological Services Inc. (Phase One) are attached to this letter.

Literature Search

Northern's cultural resources' sub-consultants, RCG&A and Phase One, conducted background research at the Minnesota and Wisconsin SHPOs to identify previously recorded archaeological and above-grade resources. This study area encompassed a Project-specific environmental survey boundary (ESB), the direct Area of Potential Effects (APE) and the indirect APE and included archaeological sites and other cultural resources located in the immediate areas of planned construction along with a one-mile radius of all proposed project activities.

Lake Mills to Albert Lea E-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources on the list of National Register of Historic Places (NRHP) properties are in the indirect APE. One archaeological site, 21FE0130, and Minnesota Statewide Historic Inventory property FE-AEA-00264 extends into the 500-foot buffer around the proposed aboveground valve setting. However, due to distance and mature trees, no effects are anticipated.

Elk River 3rd branch line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Farmington to Hugo C-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Tomah branch line loop

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

A single standing structure, a 19th century Greek Revival Farmhouse (AHI # 78410) was previously located on the west side of County Highway Q within the indirect APE. This building was razed and replaced with a modern single-family farmhouse. No other aboveground historical resources previously listed in the Wisconsin Architecture-History Inventory or on the list of the NRHP properties are located in the indirect APE.

La Crescent compressor station

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the La Crescent compressor station to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Cultural Survey

Following the literature review, Northern's subconsultants conducted a systematic field survey of the direct APE, which includes the construction ROW (TWS), ETWS, access roads, staging areas, and the aboveground appurtenant facility footprints. The survey procedures included a pedestrian walkover of the APE, systematic surface examination of suitable areas, and systematic subsurface testing of areas lacking sufficient surface visibility or which had potential for subsurface resources.

The cultural resources survey is 89% complete for the Lake Mills to Albert Lea E-line with additional shovel testing needed on 77.02 acres anticipated in spring 2024. The cultural resource survey for the Elk River 3rd branch line is 92% complete with additional survey needed on 15.25 acres scheduled for spring 2024. Northern cultural resources surveys are 100% complete for the remaining Project components.

Lake Mills to Albert Lea E-line

Archaeology

On August 22, August 23, October 3, and October 23-27, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability and previously recorded cultural resources. Shovel testing at 15-meter intervals was planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields. Shovel testing is pending for selected locations with the potential for buried cultural deposits.

Excluding one farmstead and one hay field, the majority of the survey area consisted of harvested or mature crops with 50 to 100% ground surface visibility. The hay field yielded an average surface visibility of 30%. The total ESB encompassed 678.90 acres. Roadways, inundated, and usually inundated areas, a total of 23.98 acres, were excluded from survey. A total of 77.02 acres remains to be surveyed. The other 591.82 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

A Euro-American archaeological site (21FE0130) also assigned an historic inventory property (FE-AEA-00264) was initially recorded as part of another Northern project in 2022. During the 2023 effort, this site was surveyed again. The 2023 site visit prompted an updated site boundary and an updated site form was submitted to the Minnesota Office of the State Archaeologist. This

farmstead site consisted of a combination of standing structures, archaeological features, and a surface artifact scatter. The site is within the ESB, but does not extend into the direct APE. In the original site form, the extant structures were identified as lacking integrity. Since the initial site visit, three buildings have been demolished. The artifacts documented on the surface have been placed in dump locations of mixed time periods, grouped through heavy machinery in pushpiles, and disturbed by agricultural processes. The archaeological component at 21FE0130 has not been evaluated for listing in the NRHP. RCG&A recommends the architectural buildings (FE-AEA-00264) at this property not eligible for listing in the NRHP.

This resource (21FE0130/FE-AEA-00264) is not in the direct APE and will not be impacted by the Project. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

County Ditch No. 4 (FE-PIC-00008), a historical structure, was initially visited as part of another Northern project in 2022. During the 2023 fieldwork, it was more thoroughly documented. County Ditch No. 4 is an active drainage ditch bound by agricultural land. The majority of this ditch is open cut and possesses a steep V-shaped profile. Brome and other grasses covered the banks of the ditch. Survey measured a top width of between 50 and 60 feet and a bottom width of 9-15 feet. Standing water was present at the base of the ditch during survey in fall 2023 but the overall depth was estimated to be 10-12 feet. Based on observations made from public ROW and aerial images, these dimensions are typical of County Ditch No. 4. This ditch also includes two branches: the Colvin Branch and the Klukow Branch. The Klukow Branch was in the ESB and was documented as part of FE-PIC-0008. County Ditch No. 4 is recommended not eligible for listing in the NRHP. Northern will utilize a private driveway that crosses the ditch without improvements. Therefore, the project will have no effect to County Ditch No. 4 (FE-PIC-00008).

Northern will remove a tie-over valve setting (MP 31.21) and install a new tie-in valve setting (MP 34.21) for the Lake Mills to Albert Lea E-line extension project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 34.21. This entire area was within the surveyed ESB. Northern conducted a visual assessment of the 500 foot buffer by walking the areas surrounding the project. The western portion of archaeological site 21FE0130 / inventory property FE-AEA-00264 is within the visual effects area; however, given the distance and mature vegetation surrounding the standing structures at the site, there will not be any effect to the standing structures from the project.

The proposed construction will not have an effect to any Minnesota Standing Structures Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

Elk River 3rd branch line

Archaeology

On November 1-5 and 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability. Shovel testing at 15-meter intervals was planned for surveyed areas with less than 25% surface visibility); no such areas were identified on this project. The survey area included agricultural fields, a tree farm, wetlands and manicured lawn with small stands of trees. Several historical and recent single-family homes and associated outbuildings were within the ESB.

The agricultural fields and tree farm yielded an average surface visibility of 80%. Visibility in the manicured lawns was limited (average 30%) but stands of trees yielded better ground surface visibility (average 55%). The total ESB encompassed 194.59 acres. Roadways as well as inundated and usually inundated areas, a total of 58.92 acres, were excluded from survey. A total of 15.25 acres remains to be surveyed. The remaining 120.42 acres had more than 25% ground surface visibility and was subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical ditches (WA-FLC-00033 and WA-XXX-00002) and ten historical standing structures during the 2023 fieldwork. None of the buildings are in the direct APE. Only one newly recorded property, WA-HGC-00077, is in the 500-foot buffer of the proposed valve setting.

Two historical drainage ditches were newly recorded during the 2023 fieldwork. WA-FLC-00033 is an active drainage ditch constructed in approximately 1949. The ditch is open cut and possesses a steep V-shaped profile. Grasses covered the banks of the ditch. Surveyors measured a varied width between 1.5 and 3 meters. Based on observations made from public ROW and aerial images, these dimensions are typical of this ditch. WA-FLC-00033 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-FLC-00033 via HDD.

WA-XXX-00002, the channelized Hardwood Creek, is known as Judicial Ditch No. 2. Ordered in 1902, Judicial Ditch No. 2 is open cut and possesses a V-shaped profile. Surveyors measured a top width of approximately six meters. Grasses covered the banks of the ditch. While standing water was present within the ditch during survey in fall 2023, the overall depth of the ditch was measured at variable depths between 2 to 5 meters. Based on observations made from the public ROW and aerial images, these dimensions are fairly typical of Judicial Ditch No. 2. WA-XXX-

00002 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-XXX-00002 via HDD.

Northern plans to remove a tie-over valve setting (MP 1.07) and install a new tie-in valve setting (MP 3.45) for the Elk River 3rd branch line project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 3.45. Northern conducted a desktop analysis and visual assessment of the 500-foot buffer by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

Northern identified four built resources on three properties that are potential historic properties (constructed more than 45 years ago) in the 500-foot buffer around the proposed facility. Prior to the 2023 survey, none of the buildings were recorded in the Minnesota Statewide Historic Inventory. One of the buildings was in the ESB and formally recorded during the survey (WA-HGC-00077; 17903 Henna Avenue North); the others (at 17803 Henna Avenue North and 17958 Henna Avenue North) were observed but not formally recorded.

The single-family residence at 17903 Henna Avenue North occupies a rectangular footprint, possesses two stories, is clad in composite siding and brick veneer, and terminates in a side-gable roof sheathed in asphalt shingles. It possesses an attached, single-bay garage along the south elevation. Based on county records, the house was constructed in 1969. Historic exterior materials on this building have been altered with replacements to exterior cladding, window openings and asphalt roof shingles. The public ROW runs between the proposed facility and the property at 17903 Henna Avenue North. Additionally, there are several trees that will obscure views of the proposed facility.

The single-family home and garage at 17803 Henna Avenue North have been substantially altered through additions and renovation. The original house was constructed in the mid-1960s, but, according to county records, extensive changes were made in 1989. The proposed facility is not visible from the property at 17803 Henna Avenue North as it is obscured by distance and a line of mature trees.

There are several buildings on the 17958 Henna Avenue North property. Only the single-family home and one outbuilding are within the 500-foot indirect APE around the proposed facility. The two-story home was constructed around 1880 and has had significant alterations to its exterior. In addition, the house is orientated to the north, while the facility will be constructed to the southeast. The combination of distance and topography, as well as an agricultural field and mature deciduous trees visually buffer the potential historic buildings from the proposed Project.

The proposed aboveground valve setting will not substantively alter the viewshed of the potential historic properties at 17803, 17903, and 17958 Henna Avenue North. Temporary visual impacts on the property during construction will not affect the attributes contributing to the potential significance and integrity of these properties. As such, the proposed Project will not adversely impact the aspects of integrity of these potential historic properties.

The proposed Elk River 3rd branch line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Farmington to Hugo C-line

Archaeology

From July 17 to 20, October 18 and November 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at 5-meter intervals in high probability areas and shovel testing at 15-meter intervals were planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields, wetlands and woodlands associated with the wetlands and pasture.

Ground surface visibility was good in the agricultural fields ranging from 40-100%. Woodland and pastures had lower surface visibility that ranged between 25 and 50%. The total ESB encompassed 172.97 acres. Roadways, existing graveled facility lots, as well as inundated and usually inundated areas, a total of 19.26 acres, were excluded from survey. The remaining 153.71 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical properties in the Farmington to Hugo C-line ESB. They were recorded in the Minnesota Statewide Historic Inventory and assigned designations WA-MYT-031 and WA-MYT-032. WA-MYT-031 is a 1973 single-family residence. The two-story, multi-bay building occupies a rectangular footprint, is clad in composite siding and brick veneer, and terminates in a low-pitched, hipped roof with overhanging eaves sheathed in asphalt shingles. The building features a single-story attached garage and a recessed front porch covered by a secondary hipped roof also sheathed in asphalt shingles.

WA-MYT-032 includes two historical buildings, a house (WA-MYT-028) and a shed (WA-MYT-029). WA-MYT-028 is a 1972 single-family residence. The one-and-one-half story, multi-bay building occupies a rectangular footprint, is clad in vinyl siding and brick veneer, and terminates in a front-gable roof with overhanging eaves sheathed in asphalt shingles. The façade features a secondary, front-gable projection and a recessed porch. The east elevation features a two-bay, integral garage. WA-MYT-029 is a 1972 shed near the house. The single-story shed occupies a rectangular footprint, is clad in wood siding, and terminates in a gambrel roof with overhanging eaves sheathed in asphalt shingles. Both of these properties are recommended not eligible for listing in the NRHP and both are avoided through HDD in the current Project design.

Northern proposes to install a new launcher and associated valves and piping at the existing Hugo compressor station (MP 0.00), as well as install a new tie-in valve setting (MP 1.91) for the

Farmington to Hugo C-line. Aboveground construction for the aboveground tie-in valve setting will not exceed ten feet in height. The potential for adverse visual effects to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the Hugo compressor station and the proposed valve setting at MP 1.91. Northern conducted a visual assessment of these areas by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

One potential historical resource is located in the Hugo compressor station buffer, a house at 10830 180th Street North. This property has not been recorded in the Minnesota Statewide Historic Inventory. According to county records, it was constructed in 1977 and is a split foyer frame home with an attached garage. Significant alterations were made to the house in 2016. This house is set back from 180th Street North approximately 240 feet and is surrounded by trees. The combination of distance, a public ROW (180th Street North), as well as trees and other foliage visually buffer the potential historic building from the proposed project.

The proposed Farmington to Hugo C-line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Tomah branch line loop

Archaeology

Portions of the Tomah branch line loop was surveyed in August 2019, August and November 2021 and most recently surveyed in October and November 2023 and January 2024. Northern completed archaeological field investigations using standard methodology for archaeological surveys. Pedestrian survey was conducted at five-meter or less interval transects following the general direction of the survey corridor. Shovel testing was conducted at 15-meter or less interval. In areas with a greater probability for archaeological sites such as stream crossings, pedestrian survey was conducted at approximately one-meter intervals and shovel testing at less than five-meter intervals.

The survey area was located primarily in agricultural fields, with intermittent wooded areas, residential yards and wetlands. At the time of the field investigation, most of the survey area consisted of harvested fields and plowed corn and soybean fields. Most fields displayed 90-100% surface visibility which allowed field investigation to be conducted using pedestrian survey methods.

Of the total investigated area (124.7 acres), 55.9 acres were investigated using pedestrian survey methods and 55.4 acres were shovel tested. Approximately 13.4 acres were exempted from investigation survey in areas of slope, stream channels, or areas where ground had been disturbed by road and road drainage ditch construction. No prehistoric or historic period Euro-American artifacts or archaeological features were observed in the direct APE.

Aboveground Historical Properties

Northern plans to relocate a branch line receiver on the Tomah branch line loop (MP 3.53). The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the indirect APE was limited to the 500-foot buffer around the valve setting. Aboveground

construction will not exceed eight feet in height. Northern conducted a visual assessment of the indirect APE by walking the areas surrounding the Project and no historical properties were identified.

The proposed construction will not have an effect to any Wisconsin Architecture and History Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

La Crescent compressor station

Archaeology

On September 19, 2023, Northern completed archaeological field investigations using 15-meter interval pedestrian survey in areas of the ESB that were not graveled. The graveled facilities were excluded from survey. The survey area included short and medium grasses and corn fields. Ground surface visibility averaged 25% in grassy areas, but in the corn fields, ground surface visibility averaged 90%.

The total ESB encompassed 3.02 acres. Areas excluded from survey, consisting of graveled access drives and facilities and roadway totaling 1.72 acres. The remaining 1.30 acres averaged more than 25% ground surface visibility and was subjected to pedestrian survey. No archaeological sites or isolated finds were identified in the direct APE.

The current Project design and proposed construction activities will not have direct effects to any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern proposes minor modifications to existing infrastructure at the La Crescent compressor station, including replacing compressor cylinder end caps (currently blind flanges) and adjusting compressor mechanical characteristics to match new operating conditions. While impacts that are subject to review under 36 CFR § 800 may include surficial disturbances caused by topsoil removal, heavy machinery traffic, shallow grading, and spoil dirt management, only vehicular parking is anticipated for this Project component.

The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the existing compressor station lot. Northern conducted a visual assessment of this buffer by examining aerial imagery and observing areas surrounding the project from the public ROW and ESB. No aboveground cultural resources were observed in the 500-foot buffer.

Conclusion and Request for Consultation

To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the attached maps and report and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Northern Natural Gas
Northern Lights 2025 Expansion Project
February 14, 2024

Northern respects that the Tribe has unique expertise in identifying and providing information regarding historic properties with religious or cultural significance which may be affected by the Project. Northern is seeking the Tribe's comments on survey methodology, traditional cultural properties, and traditional cultural landscapes along with areas of importance to the Tribe which should be considered. Northern understands this request for information does not circumvent the government-to-government relationship under Section 106 (36 Code of Federal Regulations Part 800) between the Tribe and the FERC. Please be assured that Northern will keep sensitive Tribal information strictly confidential.

While the regulations for implementing Section 106 (36 Code of Federal Regulations Part 800) allow companies like Northern (and their consultants) to gather information, the FERC is responsible for monitoring compliance with the NHPA and determinations pursuant to Section 106. Additionally, the FERC, not Northern, is responsible for government-to-government consultations with American Indian Tribes. The FERC has not delegated this consultation. The FERC will contact you through a *Notice of Intent to Produce an Environmental Document*. If you would like to communicate directly with the FERC natural gas archaeological staff to discuss its cultural resource review and consultation processes, please feel free to contact Elizabeth Molloy, Tribal Liaison, at 202-502-8771 or Elizabeth.Molloy@ferc.gov.

Thank you in advance for your attention to this Project. Northern would very much appreciate receiving your response within 30 days of the date of this letter. Northern will follow up with you via phone contact or email if no response is received within 30 days. In the interim, should you have questions or need additional information, please contact me at 402-398-7226 or Terry.Plucker@nngco.com or Susan Knabe of Stantec at 920-278-3220 or Susan.Knabe@stantec.com.

Sincerely,



Terry Plucker
Environmental Compliance Manager
Northern Natural Gas Company

Enclosures: RCG&A Cultural Resources Reports
Phase One Cultural Resources Report
Unanticipated Discovery Plans (Minnesota and Wisconsin)

CC: Susan Knabe, Stantec Consulting
Matt Nelson, Northern Natural Gas

From: Waller, Hiedi
To: thpo@miamination.com
Cc: Knabe, Susan; Terry.Plucker@nngco.com
Subject: FW: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS
Date: Wednesday, February 14, 2024 9:36:00 PM
Attachments: [NL 2025 THPO Miami Tribe of Oklahoma.pdf](#)

THPO York:

Northern is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Over periodic field events from 2019 through 2024, Phase One Archaeological Services Inc. and R. Christopher Goodwin & Associates, Inc. completed field surveys of the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The results of these survey efforts are included in the cultural resources reports. To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the cultural resources reports and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Due to the size of the files associated with the Project, Northern has set up an FTP site where the cultural resources reports and Unanticipated Discoveries Plans referenced in the attached letter can be downloaded.

Please contact us if you have any questions.

Hiedi Waller, PE
Senior Engineer
Pronouns: she, her, hers
Phone: (262) 643-9161

From: donotreply@secureftp.stantec.com <donotreply@secureftp.stantec.com>
Sent: Wednesday, February 14, 2024 9:20 PM
To: Waller, Hiedi <Hiedi.Waller@stantec.com>
Subject: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS

Your directory has successfully been created!

Please use the link below to access your directory with the username and password provided.

Login Information

Browser link: <https://tmpsftp.stantec.com>

FTP Client Hostname: tmpsftp.stantec.com **Port:** 22 (can be used within a SFTP client to view and transfer files and folders; e.g., FileZilla)

Login name: s0221202004

Password: 9670102

Disk Quota: 20 GB

Expiry Date: 2/21/2024

If you require a one-time one-week extension, please click [here](#).

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1111 South 103rd Street
Omaha, NE 68124

February 14, 2024

Miami Tribe of Oklahoma
Logan York, THPO
PO Box 1326
Miami, OK 74355

Re: Northern Natural Gas–Northern Lights 2025 Expansion Project – Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin

Dear Tribal Historic Preservation Officer York:

Northern Natural Gas (Northern) is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured the services of Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Northern is proposing to construct the Project, which will consist of (1) a 3.00-mile extension of its 36-inch-diameter Lake Mills to Albert Lea E-line; (2) a 2.43-mile extension of its 30-inch-diameter Elk River 3rd branch line; (3) a non-contiguous 1.91-mile extension of its 30-inch-diameter Farmington to Hugo C-line; (4) a 1.28-mile extension of its 8-inch-diameter Tomah branch line loop; (5) minor modifications to its existing La Crescent compressor station; and (6) aboveground facilities including a launcher, receiver and tie-in valve settings. All Project components are located in various counties in Minnesota and Wisconsin.

This letter summarizes the results of the investigations and recommendations of the archaeological investigator for the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The archeological reports from R. Christopher Goodwin & Associates, Inc. (RCG&A) and Phase One Archaeological Services Inc. (Phase One) are attached to this letter.

Literature Search

Northern's cultural resources' sub-consultants, RCG&A and Phase One, conducted background research at the Minnesota and Wisconsin SHPOs to identify previously recorded archaeological and above-grade resources. This study area encompassed a Project-specific environmental survey boundary (ESB), the direct Area of Potential Effects (APE) and the indirect APE and included archaeological sites and other cultural resources located in the immediate areas of planned construction along with a one-mile radius of all proposed project activities.

Lake Mills to Albert Lea E-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources on the list of National Register of Historic Places (NRHP) properties are in the indirect APE. One archaeological site, 21FE0130, and Minnesota Statewide Historic Inventory property FE-AEA-00264 extends into the 500-foot buffer around the proposed aboveground valve setting. However, due to distance and mature trees, no effects are anticipated.

Elk River 3rd branch line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Farmington to Hugo C-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Tomah branch line loop

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

A single standing structure, a 19th century Greek Revival Farmhouse (AHI # 78410) was previously located on the west side of County Highway Q within the indirect APE. This building was razed and replaced with a modern single-family farmhouse. No other aboveground historical resources previously listed in the Wisconsin Architecture-History Inventory or on the list of the NRHP properties are located in the indirect APE.

La Crescent compressor station

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the La Crescent compressor station to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Cultural Survey

Following the literature review, Northern's subconsultants conducted a systematic field survey of the direct APE, which includes the construction ROW (TWS), ETWS, access roads, staging areas, and the aboveground appurtenant facility footprints. The survey procedures included a pedestrian walkover of the APE, systematic surface examination of suitable areas, and systematic subsurface testing of areas lacking sufficient surface visibility or which had potential for subsurface resources.

The cultural resources survey is 89% complete for the Lake Mills to Albert Lea E-line with additional shovel testing needed on 77.02 acres anticipated in spring 2024. The cultural resource survey for the Elk River 3rd branch line is 92% complete with additional survey needed on 15.25 acres scheduled for spring 2024. Northern cultural resources surveys are 100% complete for the remaining Project components.

Lake Mills to Albert Lea E-line

Archaeology

On August 22, August 23, October 3, and October 23-27, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability and previously recorded cultural resources. Shovel testing at 15-meter intervals was planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields. Shovel testing is pending for selected locations with the potential for buried cultural deposits.

Excluding one farmstead and one hay field, the majority of the survey area consisted of harvested or mature crops with 50 to 100% ground surface visibility. The hay field yielded an average surface visibility of 30%. The total ESB encompassed 678.90 acres. Roadways, inundated, and usually inundated areas, a total of 23.98 acres, were excluded from survey. A total of 77.02 acres remains to be surveyed. The other 591.82 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

A Euro-American archaeological site (21FE0130) also assigned an historic inventory property (FE-AEA-00264) was initially recorded as part of another Northern project in 2022. During the 2023 effort, this site was surveyed again. The 2023 site visit prompted an updated site boundary and an updated site form was submitted to the Minnesota Office of the State Archaeologist. This

farmstead site consisted of a combination of standing structures, archaeological features, and a surface artifact scatter. The site is within the ESB, but does not extend into the direct APE. In the original site form, the extant structures were identified as lacking integrity. Since the initial site visit, three buildings have been demolished. The artifacts documented on the surface have been placed in dump locations of mixed time periods, grouped through heavy machinery in pushpiles, and disturbed by agricultural processes. The archaeological component at 21FE0130 has not been evaluated for listing in the NRHP. RCG&A recommends the architectural buildings (FE-AEA-00264) at this property not eligible for listing in the NRHP.

This resource (21FE0130/FE-AEA-00264) is not in the direct APE and will not be impacted by the Project. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

County Ditch No. 4 (FE-PIC-00008), a historical structure, was initially visited as part of another Northern project in 2022. During the 2023 fieldwork, it was more thoroughly documented. County Ditch No. 4 is an active drainage ditch bound by agricultural land. The majority of this ditch is open cut and possesses a steep V-shaped profile. Brome and other grasses covered the banks of the ditch. Survey measured a top width of between 50 and 60 feet and a bottom width of 9-15 feet. Standing water was present at the base of the ditch during survey in fall 2023 but the overall depth was estimated to be 10-12 feet. Based on observations made from public ROW and aerial images, these dimensions are typical of County Ditch No. 4. This ditch also includes two branches: the Colvin Branch and the Klukow Branch. The Klukow Branch was in the ESB and was documented as part of FE-PIC-0008. County Ditch No. 4 is recommended not eligible for listing in the NRHP. Northern will utilize a private driveway that crosses the ditch without improvements. Therefore, the project will have no effect to County Ditch No. 4 (FE-PIC-00008).

Northern will remove a tie-over valve setting (MP 31.21) and install a new tie-in valve setting (MP 34.21) for the Lake Mills to Albert Lea E-line extension project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 34.21. This entire area was within the surveyed ESB. Northern conducted a visual assessment of the 500 foot buffer by walking the areas surrounding the project. The western portion of archaeological site 21FE0130 / inventory property FE-AEA-00264 is within the visual effects area; however, given the distance and mature vegetation surrounding the standing structures at the site, there will not be any effect to the standing structures from the project.

The proposed construction will not have an effect to any Minnesota Standing Structures Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

Elk River 3rd branch line

Archaeology

On November 1-5 and 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability. Shovel testing at 15-meter intervals was planned for surveyed areas with less than 25% surface visibility); no such areas were identified on this project. The survey area included agricultural fields, a tree farm, wetlands and manicured lawn with small stands of trees. Several historical and recent single-family homes and associated outbuildings were within the ESB.

The agricultural fields and tree farm yielded an average surface visibility of 80%. Visibility in the manicured lawns was limited (average 30%) but stands of trees yielded better ground surface visibility (average 55%). The total ESB encompassed 194.59 acres. Roadways as well as inundated and usually inundated areas, a total of 58.92 acres, were excluded from survey. A total of 15.25 acres remains to be surveyed. The remaining 120.42 acres had more than 25% ground surface visibility and was subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical ditches (WA-FLC-00033 and WA-XXX-00002) and ten historical standing structures during the 2023 fieldwork. None of the buildings are in the direct APE. Only one newly recorded property, WA-HGC-00077, is in the 500-foot buffer of the proposed valve setting.

Two historical drainage ditches were newly recorded during the 2023 fieldwork. WA-FLC-00033 is an active drainage ditch constructed in approximately 1949. The ditch is open cut and possesses a steep V-shaped profile. Grasses covered the banks of the ditch. Surveyors measured a varied width between 1.5 and 3 meters. Based on observations made from public ROW and aerial images, these dimensions are typical of this ditch. WA-FLC-00033 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-FLC-00033 via HDD.

WA-XXX-00002, the channelized Hardwood Creek, is known as Judicial Ditch No. 2. Ordered in 1902, Judicial Ditch No. 2 is open cut and possesses a V-shaped profile. Surveyors measured a top width of approximately six meters. Grasses covered the banks of the ditch. While standing water was present within the ditch during survey in fall 2023, the overall depth of the ditch was measured at variable depths between 2 to 5 meters. Based on observations made from the public ROW and aerial images, these dimensions are fairly typical of Judicial Ditch No. 2. WA-XXX-

00002 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-XXX-00002 via HDD.

Northern plans to remove a tie-over valve setting (MP 1.07) and install a new tie-in valve setting (MP 3.45) for the Elk River 3rd branch line project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 3.45. Northern conducted a desktop analysis and visual assessment of the 500-foot buffer by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

Northern identified four built resources on three properties that are potential historic properties (constructed more than 45 years ago) in the 500-foot buffer around the proposed facility. Prior to the 2023 survey, none of the buildings were recorded in the Minnesota Statewide Historic Inventory. One of the buildings was in the ESB and formally recorded during the survey (WA-HGC-00077; 17903 Henna Avenue North); the others (at 17803 Henna Avenue North and 17958 Henna Avenue North) were observed but not formally recorded.

The single-family residence at 17903 Henna Avenue North occupies a rectangular footprint, possesses two stories, is clad in composite siding and brick veneer, and terminates in a side-gable roof sheathed in asphalt shingles. It possesses an attached, single-bay garage along the south elevation. Based on county records, the house was constructed in 1969. Historic exterior materials on this building have been altered with replacements to exterior cladding, window openings and asphalt roof shingles. The public ROW runs between the proposed facility and the property at 17903 Henna Avenue North. Additionally, there are several trees that will obscure views of the proposed facility.

The single-family home and garage at 17803 Henna Avenue North have been substantially altered through additions and renovation. The original house was constructed in the mid-1960s, but, according to county records, extensive changes were made in 1989. The proposed facility is not visible from the property at 17803 Henna Avenue North as it is obscured by distance and a line of mature trees.

There are several buildings on the 17958 Henna Avenue North property. Only the single-family home and one outbuilding are within the 500-foot indirect APE around the proposed facility. The two-story home was constructed around 1880 and has had significant alterations to its exterior. In addition, the house is orientated to the north, while the facility will be constructed to the southeast. The combination of distance and topography, as well as an agricultural field and mature deciduous trees visually buffer the potential historic buildings from the proposed Project.

The proposed aboveground valve setting will not substantively alter the viewshed of the potential historic properties at 17803, 17903, and 17958 Henna Avenue North. Temporary visual impacts on the property during construction will not affect the attributes contributing to the potential significance and integrity of these properties. As such, the proposed Project will not adversely impact the aspects of integrity of these potential historic properties.

The proposed Elk River 3rd branch line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Farmington to Hugo C-line

Archaeology

From July 17 to 20, October 18 and November 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at 5-meter intervals in high probability areas and shovel testing at 15-meter intervals were planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields, wetlands and woodlands associated with the wetlands and pasture.

Ground surface visibility was good in the agricultural fields ranging from 40-100%. Woodland and pastures had lower surface visibility that ranged between 25 and 50%. The total ESB encompassed 172.97 acres. Roadways, existing graveled facility lots, as well as inundated and usually inundated areas, a total of 19.26 acres, were excluded from survey. The remaining 153.71 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical properties in the Farmington to Hugo C-line ESB. They were recorded in the Minnesota Statewide Historic Inventory and assigned designations WA-MYT-031 and WA-MYT-032. WA-MYT-031 is a 1973 single-family residence. The two-story, multi-bay building occupies a rectangular footprint, is clad in composite siding and brick veneer, and terminates in a low-pitched, hipped roof with overhanging eaves sheathed in asphalt shingles. The building features a single-story attached garage and a recessed front porch covered by a secondary hipped roof also sheathed in asphalt shingles.

WA-MYT-032 includes two historical buildings, a house (WA-MYT-028) and a shed (WA-MYT-029). WA-MYT-028 is a 1972 single-family residence. The one-and-one-half story, multi-bay building occupies a rectangular footprint, is clad in vinyl siding and brick veneer, and terminates in a front-gable roof with overhanging eaves sheathed in asphalt shingles. The façade features a secondary, front-gable projection and a recessed porch. The east elevation features a two-bay, integral garage. WA-MYT-029 is a 1972 shed near the house. The single-story shed occupies a rectangular footprint, is clad in wood siding, and terminates in a gambrel roof with overhanging eaves sheathed in asphalt shingles. Both of these properties are recommended not eligible for listing in the NRHP and both are avoided through HDD in the current Project design.

Northern proposes to install a new launcher and associated valves and piping at the existing Hugo compressor station (MP 0.00), as well as install a new tie-in valve setting (MP 1.91) for the

Farmington to Hugo C-line. Aboveground construction for the aboveground tie-in valve setting will not exceed ten feet in height. The potential for adverse visual effects to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the Hugo compressor station and the proposed valve setting at MP 1.91. Northern conducted a visual assessment of these areas by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

One potential historical resource is located in the Hugo compressor station buffer, a house at 10830 180th Street North. This property has not been recorded in the Minnesota Statewide Historic Inventory. According to county records, it was constructed in 1977 and is a split foyer frame home with an attached garage. Significant alterations were made to the house in 2016. This house is set back from 180th Street North approximately 240 feet and is surrounded by trees. The combination of distance, a public ROW (180th Street North), as well as trees and other foliage visually buffer the potential historic building from the proposed project.

The proposed Farmington to Hugo C-line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Tomah branch line loop

Archaeology

Portions of the Tomah branch line loop was surveyed in August 2019, August and November 2021 and most recently surveyed in October and November 2023 and January 2024. Northern completed archaeological field investigations using standard methodology for archaeological surveys. Pedestrian survey was conducted at five-meter or less interval transects following the general direction of the survey corridor. Shovel testing was conducted at 15-meter or less interval. In areas with a greater probability for archaeological sites such as stream crossings, pedestrian survey was conducted at approximately one-meter intervals and shovel testing at less than five-meter intervals.

The survey area was located primarily in agricultural fields, with intermittent wooded areas, residential yards and wetlands. At the time of the field investigation, most of the survey area consisted of harvested fields and plowed corn and soybean fields. Most fields displayed 90-100% surface visibility which allowed field investigation to be conducted using pedestrian survey methods.

Of the total investigated area (124.7 acres), 55.9 acres were investigated using pedestrian survey methods and 55.4 acres were shovel tested. Approximately 13.4 acres were exempted from investigation survey in areas of slope, stream channels, or areas where ground had been disturbed by road and road drainage ditch construction. No prehistoric or historic period Euro-American artifacts or archaeological features were observed in the direct APE.

Aboveground Historical Properties

Northern plans to relocate a branch line receiver on the Tomah branch line loop (MP 3.53). The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the indirect APE was limited to the 500-foot buffer around the valve setting. Aboveground

construction will not exceed eight feet in height. Northern conducted a visual assessment of the indirect APE by walking the areas surrounding the Project and no historical properties were identified.

The proposed construction will not have an effect to any Wisconsin Architecture and History Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

La Crescent compressor station

Archaeology

On September 19, 2023, Northern completed archaeological field investigations using 15-meter interval pedestrian survey in areas of the ESB that were not graveled. The graveled facilities were excluded from survey. The survey area included short and medium grasses and corn fields. Ground surface visibility averaged 25% in grassy areas, but in the corn fields, ground surface visibility averaged 90%.

The total ESB encompassed 3.02 acres. Areas excluded from survey, consisting of graveled access drives and facilities and roadway totaling 1.72 acres. The remaining 1.30 acres averaged more than 25% ground surface visibility and was subjected to pedestrian survey. No archaeological sites or isolated finds were identified in the direct APE.

The current Project design and proposed construction activities will not have direct effects to any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern proposes minor modifications to existing infrastructure at the La Crescent compressor station, including replacing compressor cylinder end caps (currently blind flanges) and adjusting compressor mechanical characteristics to match new operating conditions. While impacts that are subject to review under 36 CFR § 800 may include surficial disturbances caused by topsoil removal, heavy machinery traffic, shallow grading, and spoil dirt management, only vehicular parking is anticipated for this Project component.

The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the existing compressor station lot. Northern conducted a visual assessment of this buffer by examining aerial imagery and observing areas surrounding the project from the public ROW and ESB. No aboveground cultural resources were observed in the 500-foot buffer.

Conclusion and Request for Consultation

To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the attached maps and report and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Northern Natural Gas
Northern Lights 2025 Expansion Project
February 14, 2024

Northern respects that the Tribe has unique expertise in identifying and providing information regarding historic properties with religious or cultural significance which may be affected by the Project. Northern is seeking the Tribe's comments on survey methodology, traditional cultural properties, and traditional cultural landscapes along with areas of importance to the Tribe which should be considered. Northern understands this request for information does not circumvent the government-to-government relationship under Section 106 (36 Code of Federal Regulations Part 800) between the Tribe and the FERC. Please be assured that Northern will keep sensitive Tribal information strictly confidential.

While the regulations for implementing Section 106 (36 Code of Federal Regulations Part 800) allow companies like Northern (and their consultants) to gather information, the FERC is responsible for monitoring compliance with the NHPA and determinations pursuant to Section 106. Additionally, the FERC, not Northern, is responsible for government-to-government consultations with American Indian Tribes. The FERC has not delegated this consultation. The FERC will contact you through a *Notice of Intent to Produce an Environmental Document*. If you would like to communicate directly with the FERC natural gas archaeological staff to discuss its cultural resource review and consultation processes, please feel free to contact Elizabeth Molloy, Tribal Liaison, at 202-502-8771 or Elizabeth.Molloy@ferc.gov.

Thank you in advance for your attention to this Project. Northern would very much appreciate receiving your response within 30 days of the date of this letter. Northern will follow up with you via phone contact or email if no response is received within 30 days. In the interim, should you have questions or need additional information, please contact me at 402-398-7226 or Terry.Plucker@nngco.com or Susan Knabe of Stantec at 920-278-3220 or Susan.Knabe@stantec.com.

Sincerely,



Terry Plucker
Environmental Compliance Manager
Northern Natural Gas Company

Enclosures: RCG&A Cultural Resources Reports
Phase One Cultural Resources Report
Unanticipated Discovery Plans (Minnesota and Wisconsin)

CC: Susan Knabe, Stantec Consulting
Matt Nelson, Northern Natural Gas

From: [Waller, Hiedi](#)
To: alina.shively@lvd-nsn.gov
Cc: [Knabe, Susan](#); Terry.Plucker@nngco.com
Subject: FW: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS
Date: Wednesday, February 14, 2024 9:33:00 PM
Attachments: [NL 2025 THPO Lac Vieux Desert Band of Lake Superior Chippewa Indians of Michigan.pdf](#)

THPO Shively:

Northern is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Over periodic field events from 2019 through 2024, Phase One Archaeological Services Inc. and R. Christopher Goodwin & Associates, Inc. completed field surveys of the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The results of these survey efforts are included in the cultural resources reports. To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the cultural resources reports and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Due to the size of the files associated with the Project, Northern has set up an FTP site where the cultural resources reports and Unanticipated Discoveries Plans referenced in the attached letter can be downloaded.

Please contact us if you have any questions.

Hiedi Waller, PE
Senior Engineer
Pronouns: she, her, hers
Phone: (262) 643-9161

From: donotreply@secureftp.stantec.com <donotreply@secureftp.stantec.com>
Sent: Wednesday, February 14, 2024 9:20 PM
To: Waller, Hiedi <Hiedi.Waller@stantec.com>
Subject: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS

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Browser link: <https://tmpsftp.stantec.com>

FTP Client Hostname: tmpsftp.stantec.com **Port:** 22 (can be used within a SFTP client to view and

transfer files and folders; e.g., FileZilla)

Login name: s0221202004

Password: 9670102

Disk Quota: 20 GB

Expiry Date: 2/21/2024

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1111 South 103rd Street
Omaha, NE 68124

February 14, 2024

Lac Vieux Desert Band of Lake Superior Chippewa Indians of Michigan
Alina Shively, THPO
PO Box 249
Watersmeet, MI 49969

Re: Northern Natural Gas–Northern Lights 2025 Expansion Project – Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin

Dear Tribal Historic Preservation Officer Shively:

Northern Natural Gas (Northern) is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured the services of Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Northern is proposing to construct the Project, which will consist of (1) a 3.00-mile extension of its 36-inch-diameter Lake Mills to Albert Lea E-line; (2) a 2.43-mile extension of its 30-inch-diameter Elk River 3rd branch line; (3) a non-contiguous 1.91-mile extension of its 30-inch-diameter Farmington to Hugo C-line; (4) a 1.28-mile extension of its 8-inch-diameter Tomah branch line loop; (5) minor modifications to its existing La Crescent compressor station; and (6) aboveground facilities including a launcher, receiver and tie-in valve settings. All Project components are located in various counties in Minnesota and Wisconsin.

This letter summarizes the results of the investigations and recommendations of the archaeological investigator for the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The archeological reports from R. Christopher Goodwin & Associates, Inc. (RCG&A) and Phase One Archaeological Services Inc. (Phase One) are attached to this letter.

Literature Search

Northern's cultural resources' sub-consultants, RCG&A and Phase One, conducted background research at the Minnesota and Wisconsin SHPOs to identify previously recorded archaeological and above-grade resources. This study area encompassed a Project-specific environmental survey boundary (ESB), the direct Area of Potential Effects (APE) and the indirect APE and included archaeological sites and other cultural resources located in the immediate areas of planned construction along with a one-mile radius of all proposed project activities.

Lake Mills to Albert Lea E-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources on the list of National Register of Historic Places (NRHP) properties are in the indirect APE. One archaeological site, 21FE0130, and Minnesota Statewide Historic Inventory property FE-AEA-00264 extends into the 500-foot buffer around the proposed aboveground valve setting. However, due to distance and mature trees, no effects are anticipated.

Elk River 3rd branch line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Farmington to Hugo C-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Tomah branch line loop

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

A single standing structure, a 19th century Greek Revival Farmhouse (AHI # 78410) was previously located on the west side of County Highway Q within the indirect APE. This building was razed and replaced with a modern single-family farmhouse. No other aboveground historical resources previously listed in the Wisconsin Architecture-History Inventory or on the list of the NRHP properties are located in the indirect APE.

La Crescent compressor station

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the La Crescent compressor station to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Cultural Survey

Following the literature review, Northern's subconsultants conducted a systematic field survey of the direct APE, which includes the construction ROW (TWS), ETWS, access roads, staging areas, and the aboveground appurtenant facility footprints. The survey procedures included a pedestrian walkover of the APE, systematic surface examination of suitable areas, and systematic subsurface testing of areas lacking sufficient surface visibility or which had potential for subsurface resources.

The cultural resources survey is 89% complete for the Lake Mills to Albert Lea E-line with additional shovel testing needed on 77.02 acres anticipated in spring 2024. The cultural resource survey for the Elk River 3rd branch line is 92% complete with additional survey needed on 15.25 acres scheduled for spring 2024. Northern cultural resources surveys are 100% complete for the remaining Project components.

Lake Mills to Albert Lea E-line

Archaeology

On August 22, August 23, October 3, and October 23-27, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability and previously recorded cultural resources. Shovel testing at 15-meter intervals was planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields. Shovel testing is pending for selected locations with the potential for buried cultural deposits.

Excluding one farmstead and one hay field, the majority of the survey area consisted of harvested or mature crops with 50 to 100% ground surface visibility. The hay field yielded an average surface visibility of 30%. The total ESB encompassed 678.90 acres. Roadways, inundated, and usually inundated areas, a total of 23.98 acres, were excluded from survey. A total of 77.02 acres remains to be surveyed. The other 591.82 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

A Euro-American archaeological site (21FE0130) also assigned an historic inventory property (FE-AEA-00264) was initially recorded as part of another Northern project in 2022. During the 2023 effort, this site was surveyed again. The 2023 site visit prompted an updated site boundary and an updated site form was submitted to the Minnesota Office of the State Archaeologist. This

farmstead site consisted of a combination of standing structures, archaeological features, and a surface artifact scatter. The site is within the ESB, but does not extend into the direct APE. In the original site form, the extant structures were identified as lacking integrity. Since the initial site visit, three buildings have been demolished. The artifacts documented on the surface have been placed in dump locations of mixed time periods, grouped through heavy machinery in pushpiles, and disturbed by agricultural processes. The archaeological component at 21FE0130 has not been evaluated for listing in the NRHP. RCG&A recommends the architectural buildings (FE-AEA-00264) at this property not eligible for listing in the NRHP.

This resource (21FE0130/FE-AEA-00264) is not in the direct APE and will not be impacted by the Project. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

County Ditch No. 4 (FE-PIC-00008), a historical structure, was initially visited as part of another Northern project in 2022. During the 2023 fieldwork, it was more thoroughly documented. County Ditch No. 4 is an active drainage ditch bound by agricultural land. The majority of this ditch is open cut and possesses a steep V-shaped profile. Brome and other grasses covered the banks of the ditch. Survey measured a top width of between 50 and 60 feet and a bottom width of 9-15 feet. Standing water was present at the base of the ditch during survey in fall 2023 but the overall depth was estimated to be 10-12 feet. Based on observations made from public ROW and aerial images, these dimensions are typical of County Ditch No. 4. This ditch also includes two branches: the Colvin Branch and the Klukow Branch. The Klukow Branch was in the ESB and was documented as part of FE-PIC-0008. County Ditch No. 4 is recommended not eligible for listing in the NRHP. Northern will utilize a private driveway that crosses the ditch without improvements. Therefore, the project will have no effect to County Ditch No. 4 (FE-PIC-00008).

Northern will remove a tie-over valve setting (MP 31.21) and install a new tie-in valve setting (MP 34.21) for the Lake Mills to Albert Lea E-line extension project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 34.21. This entire area was within the surveyed ESB. Northern conducted a visual assessment of the 500 foot buffer by walking the areas surrounding the project. The western portion of archaeological site 21FE0130 / inventory property FE-AEA-00264 is within the visual effects area; however, given the distance and mature vegetation surrounding the standing structures at the site, there will not be any effect to the standing structures from the project.

The proposed construction will not have an effect to any Minnesota Standing Structures Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

Elk River 3rd branch line

Archaeology

On November 1-5 and 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability. Shovel testing at 15-meter intervals was planned for surveyed areas with less than 25% surface visibility); no such areas were identified on this project. The survey area included agricultural fields, a tree farm, wetlands and manicured lawn with small stands of trees. Several historical and recent single-family homes and associated outbuildings were within the ESB.

The agricultural fields and tree farm yielded an average surface visibility of 80%. Visibility in the manicured lawns was limited (average 30%) but stands of trees yielded better ground surface visibility (average 55%). The total ESB encompassed 194.59 acres. Roadways as well as inundated and usually inundated areas, a total of 58.92 acres, were excluded from survey. A total of 15.25 acres remains to be surveyed. The remaining 120.42 acres had more than 25% ground surface visibility and was subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical ditches (WA-FLC-00033 and WA-XXX-00002) and ten historical standing structures during the 2023 fieldwork. None of the buildings are in the direct APE. Only one newly recorded property, WA-HGC-00077, is in the 500-foot buffer of the proposed valve setting.

Two historical drainage ditches were newly recorded during the 2023 fieldwork. WA-FLC-00033 is an active drainage ditch constructed in approximately 1949. The ditch is open cut and possesses a steep V-shaped profile. Grasses covered the banks of the ditch. Surveyors measured a varied width between 1.5 and 3 meters. Based on observations made from public ROW and aerial images, these dimensions are typical of this ditch. WA-FLC-00033 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-FLC-00033 via HDD.

WA-XXX-00002, the channelized Hardwood Creek, is known as Judicial Ditch No. 2. Ordered in 1902, Judicial Ditch No. 2 is open cut and possesses a V-shaped profile. Surveyors measured a top width of approximately six meters. Grasses covered the banks of the ditch. While standing water was present within the ditch during survey in fall 2023, the overall depth of the ditch was measured at variable depths between 2 to 5 meters. Based on observations made from the public ROW and aerial images, these dimensions are fairly typical of Judicial Ditch No. 2. WA-XXX-

00002 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-XXX-00002 via HDD.

Northern plans to remove a tie-over valve setting (MP 1.07) and install a new tie-in valve setting (MP 3.45) for the Elk River 3rd branch line project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 3.45. Northern conducted a desktop analysis and visual assessment of the 500-foot buffer by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

Northern identified four built resources on three properties that are potential historic properties (constructed more than 45 years ago) in the 500-foot buffer around the proposed facility. Prior to the 2023 survey, none of the buildings were recorded in the Minnesota Statewide Historic Inventory. One of the buildings was in the ESB and formally recorded during the survey (WA-HGC-00077; 17903 Henna Avenue North); the others (at 17803 Henna Avenue North and 17958 Henna Avenue North) were observed but not formally recorded.

The single-family residence at 17903 Henna Avenue North occupies a rectangular footprint, possesses two stories, is clad in composite siding and brick veneer, and terminates in a side-gable roof sheathed in asphalt shingles. It possesses an attached, single-bay garage along the south elevation. Based on county records, the house was constructed in 1969. Historic exterior materials on this building have been altered with replacements to exterior cladding, window openings and asphalt roof shingles. The public ROW runs between the proposed facility and the property at 17903 Henna Avenue North. Additionally, there are several trees that will obscure views of the proposed facility.

The single-family home and garage at 17803 Henna Avenue North have been substantially altered through additions and renovation. The original house was constructed in the mid-1960s, but, according to county records, extensive changes were made in 1989. The proposed facility is not visible from the property at 17803 Henna Avenue North as it is obscured by distance and a line of mature trees.

There are several buildings on the 17958 Henna Avenue North property. Only the single-family home and one outbuilding are within the 500-foot indirect APE around the proposed facility. The two-story home was constructed around 1880 and has had significant alterations to its exterior. In addition, the house is orientated to the north, while the facility will be constructed to the southeast. The combination of distance and topography, as well as an agricultural field and mature deciduous trees visually buffer the potential historic buildings from the proposed Project.

The proposed aboveground valve setting will not substantively alter the viewshed of the potential historic properties at 17803, 17903, and 17958 Henna Avenue North. Temporary visual impacts on the property during construction will not affect the attributes contributing to the potential significance and integrity of these properties. As such, the proposed Project will not adversely impact the aspects of integrity of these potential historic properties.

The proposed Elk River 3rd branch line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Farmington to Hugo C-line

Archaeology

From July 17 to 20, October 18 and November 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at 5-meter intervals in high probability areas and shovel testing at 15-meter intervals were planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields, wetlands and woodlands associated with the wetlands and pasture.

Ground surface visibility was good in the agricultural fields ranging from 40-100%. Woodland and pastures had lower surface visibility that ranged between 25 and 50%. The total ESB encompassed 172.97 acres. Roadways, existing graveled facility lots, as well as inundated and usually inundated areas, a total of 19.26 acres, were excluded from survey. The remaining 153.71 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical properties in the Farmington to Hugo C-line ESB. They were recorded in the Minnesota Statewide Historic Inventory and assigned designations WA-MYT-031 and WA-MYT-032. WA-MYT-031 is a 1973 single-family residence. The two-story, multi-bay building occupies a rectangular footprint, is clad in composite siding and brick veneer, and terminates in a low-pitched, hipped roof with overhanging eaves sheathed in asphalt shingles. The building features a single-story attached garage and a recessed front porch covered by a secondary hipped roof also sheathed in asphalt shingles.

WA-MYT-032 includes two historical buildings, a house (WA-MYT-028) and a shed (WA-MYT-029). WA-MYT-028 is a 1972 single-family residence. The one-and-one-half story, multi-bay building occupies a rectangular footprint, is clad in vinyl siding and brick veneer, and terminates in a front-gable roof with overhanging eaves sheathed in asphalt shingles. The façade features a secondary, front-gable projection and a recessed porch. The east elevation features a two-bay, integral garage. WA-MYT-029 is a 1972 shed near the house. The single-story shed occupies a rectangular footprint, is clad in wood siding, and terminates in a gambrel roof with overhanging eaves sheathed in asphalt shingles. Both of these properties are recommended not eligible for listing in the NRHP and both are avoided through HDD in the current Project design.

Northern proposes to install a new launcher and associated valves and piping at the existing Hugo compressor station (MP 0.00), as well as install a new tie-in valve setting (MP 1.91) for the

Farmington to Hugo C-line. Aboveground construction for the aboveground tie-in valve setting will not exceed ten feet in height. The potential for adverse visual effects to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the Hugo compressor station and the proposed valve setting at MP 1.91. Northern conducted a visual assessment of these areas by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

One potential historical resource is located in the Hugo compressor station buffer, a house at 10830 180th Street North. This property has not been recorded in the Minnesota Statewide Historic Inventory. According to county records, it was constructed in 1977 and is a split foyer frame home with an attached garage. Significant alterations were made to the house in 2016. This house is set back from 180th Street North approximately 240 feet and is surrounded by trees. The combination of distance, a public ROW (180th Street North), as well as trees and other foliage visually buffer the potential historic building from the proposed project.

The proposed Farmington to Hugo C-line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Tomah branch line loop

Archaeology

Portions of the Tomah branch line loop was surveyed in August 2019, August and November 2021 and most recently surveyed in October and November 2023 and January 2024. Northern completed archaeological field investigations using standard methodology for archaeological surveys. Pedestrian survey was conducted at five-meter or less interval transects following the general direction of the survey corridor. Shovel testing was conducted at 15-meter or less interval. In areas with a greater probability for archaeological sites such as stream crossings, pedestrian survey was conducted at approximately one-meter intervals and shovel testing at less than five-meter intervals.

The survey area was located primarily in agricultural fields, with intermittent wooded areas, residential yards and wetlands. At the time of the field investigation, most of the survey area consisted of harvested fields and plowed corn and soybean fields. Most fields displayed 90-100% surface visibility which allowed field investigation to be conducted using pedestrian survey methods.

Of the total investigated area (124.7 acres), 55.9 acres were investigated using pedestrian survey methods and 55.4 acres were shovel tested. Approximately 13.4 acres were exempted from investigation survey in areas of slope, stream channels, or areas where ground had been disturbed by road and road drainage ditch construction. No prehistoric or historic period Euro-American artifacts or archaeological features were observed in the direct APE.

Aboveground Historical Properties

Northern plans to relocate a branch line receiver on the Tomah branch line loop (MP 3.53). The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the indirect APE was limited to the 500-foot buffer around the valve setting. Aboveground

construction will not exceed eight feet in height. Northern conducted a visual assessment of the indirect APE by walking the areas surrounding the Project and no historical properties were identified.

The proposed construction will not have an effect to any Wisconsin Architecture and History Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

La Crescent compressor station

Archaeology

On September 19, 2023, Northern completed archaeological field investigations using 15-meter interval pedestrian survey in areas of the ESB that were not graveled. The graveled facilities were excluded from survey. The survey area included short and medium grasses and corn fields. Ground surface visibility averaged 25% in grassy areas, but in the corn fields, ground surface visibility averaged 90%.

The total ESB encompassed 3.02 acres. Areas excluded from survey, consisting of graveled access drives and facilities and roadway totaling 1.72 acres. The remaining 1.30 acres averaged more than 25% ground surface visibility and was subjected to pedestrian survey. No archaeological sites or isolated finds were identified in the direct APE.

The current Project design and proposed construction activities will not have direct effects to any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern proposes minor modifications to existing infrastructure at the La Crescent compressor station, including replacing compressor cylinder end caps (currently blind flanges) and adjusting compressor mechanical characteristics to match new operating conditions. While impacts that are subject to review under 36 CFR § 800 may include surficial disturbances caused by topsoil removal, heavy machinery traffic, shallow grading, and spoil dirt management, only vehicular parking is anticipated for this Project component.

The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the existing compressor station lot. Northern conducted a visual assessment of this buffer by examining aerial imagery and observing areas surrounding the project from the public ROW and ESB. No aboveground cultural resources were observed in the 500-foot buffer.

Conclusion and Request for Consultation

To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the attached maps and report and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Northern Natural Gas
Northern Lights 2025 Expansion Project
February 14, 2024

Northern respects that the Tribe has unique expertise in identifying and providing information regarding historic properties with religious or cultural significance which may be affected by the Project. Northern is seeking the Tribe's comments on survey methodology, traditional cultural properties, and traditional cultural landscapes along with areas of importance to the Tribe which should be considered. Northern understands this request for information does not circumvent the government-to-government relationship under Section 106 (36 Code of Federal Regulations Part 800) between the Tribe and the FERC. Please be assured that Northern will keep sensitive Tribal information strictly confidential.

While the regulations for implementing Section 106 (36 Code of Federal Regulations Part 800) allow companies like Northern (and their consultants) to gather information, the FERC is responsible for monitoring compliance with the NHPA and determinations pursuant to Section 106. Additionally, the FERC, not Northern, is responsible for government-to-government consultations with American Indian Tribes. The FERC has not delegated this consultation. The FERC will contact you through a *Notice of Intent to Produce an Environmental Document*. If you would like to communicate directly with the FERC natural gas archaeological staff to discuss its cultural resource review and consultation processes, please feel free to contact Elizabeth Molloy, Tribal Liaison, at 202-502-8771 or Elizabeth.Molloy@ferc.gov.

Thank you in advance for your attention to this Project. Northern would very much appreciate receiving your response within 30 days of the date of this letter. Northern will follow up with you via phone contact or email if no response is received within 30 days. In the interim, should you have questions or need additional information, please contact me at 402-398-7226 or Terry.Plucker@nngco.com or Susan Knabe of Stantec at 920-278-3220 or Susan.Knabe@stantec.com.

Sincerely,



Terry Plucker
Environmental Compliance Manager
Northern Natural Gas Company

Enclosures: RCG&A Cultural Resources Reports
Phase One Cultural Resources Report
Unanticipated Discovery Plans (Minnesota and Wisconsin)

CC: Susan Knabe, Stantec Consulting
Matt Nelson, Northern Natural Gas

From: [Waller, Hiedi](#)
To: s.tiger@okkt.net
Cc: [Knabe, Susan](#); Terry.Plucker@nngco.com
Subject: FW: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS
Date: Wednesday, February 14, 2024 9:31:00 PM
Attachments: [NL 2025 Kickapoo Tribe.pdf](#)

Ms. Tiger:

Northern is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Over periodic field events from 2019 through 2024, Phase One Archaeological Services Inc. and R. Christopher Goodwin & Associates, Inc. completed field surveys of the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The results of these survey efforts are included in the cultural resources reports. To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the cultural resources reports and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Due to the size of the files associated with the Project, Northern has set up an FTP site where the cultural resources reports and Unanticipated Discoveries Plans referenced in the attached letter can be downloaded.

Please contact us if you have any questions.

Hiedi Waller, PE
Senior Engineer
Pronouns: she, her, hers
Phone: (262) 643-9161

From: donotreply@secureftp.stantec.com <donotreply@secureftp.stantec.com>
Sent: Wednesday, February 14, 2024 9:20 PM
To: Waller, Hiedi <Hiedi.Waller@stantec.com>
Subject: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS

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Login name: s0221202004

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1111 South 103rd Street
Omaha, NE 68124

February 14, 2024

Kickapoo Tribe of Oklahoma
Susan Tiger, NAGPRA Representative
PO Box 70
McLoud, OK 74851

Re: Northern Natural Gas–Northern Lights 2025 Expansion Project – Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin

Dear Ms. Tiger:

Northern Natural Gas (Northern) is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured the services of Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Northern is proposing to construct the Project, which will consist of (1) a 3.00-mile extension of its 36-inch-diameter Lake Mills to Albert Lea E-line; (2) a 2.43-mile extension of its 30-inch-diameter Elk River 3rd branch line; (3) a non-contiguous 1.91-mile extension of its 30-inch-diameter Farmington to Hugo C-line; (4) a 1.28-mile extension of its 8-inch-diameter Tomah branch line loop; (5) minor modifications to its existing La Crescent compressor station; and (6) aboveground facilities including a launcher, receiver and tie-in valve settings. All Project components are located in various counties in Minnesota and Wisconsin.

This letter summarizes the results of the investigations and recommendations of the archaeological investigator for the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The archeological reports from R. Christopher Goodwin & Associates, Inc. (RCG&A) and Phase One Archaeological Services Inc. (Phase One) are attached to this letter.

Literature Search

Northern's cultural resources' sub-consultants, RCG&A and Phase One, conducted background research at the Minnesota and Wisconsin SHPOs to identify previously recorded archaeological and above-grade resources. This study area encompassed a Project-specific environmental survey boundary (ESB), the direct Area of Potential Effects (APE) and the indirect APE and included archaeological sites and other cultural resources located in the immediate areas of planned construction along with a one-mile radius of all proposed project activities.

Lake Mills to Albert Lea E-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources on the list of National Register of Historic Places (NRHP) properties are in the indirect APE. One archaeological site, 21FE0130, and Minnesota Statewide Historic Inventory property FE-AEA-00264 extends into the 500-foot buffer around the proposed aboveground valve setting. However, due to distance and mature trees, no effects are anticipated.

Elk River 3rd branch line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Farmington to Hugo C-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Tomah branch line loop

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

A single standing structure, a 19th century Greek Revival Farmhouse (AHI # 78410) was previously located on the west side of County Highway Q within the indirect APE. This building was razed and replaced with a modern single-family farmhouse. No other aboveground historical resources previously listed in the Wisconsin Architecture-History Inventory or on the list of the NRHP properties are located in the indirect APE.

La Crescent compressor station

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the La Crescent compressor station to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Cultural Survey

Following the literature review, Northern's subconsultants conducted a systematic field survey of the direct APE, which includes the construction ROW (TWS), ETWS, access roads, staging areas, and the aboveground appurtenant facility footprints. The survey procedures included a pedestrian walkover of the APE, systematic surface examination of suitable areas, and systematic subsurface testing of areas lacking sufficient surface visibility or which had potential for subsurface resources.

The cultural resources survey is 89% complete for the Lake Mills to Albert Lea E-line with additional shovel testing needed on 77.02 acres anticipated in spring 2024. The cultural resource survey for the Elk River 3rd branch line is 92% complete with additional survey needed on 15.25 acres scheduled for spring 2024. Northern cultural resources surveys are 100% complete for the remaining Project components.

Lake Mills to Albert Lea E-line

Archaeology

On August 22, August 23, October 3, and October 23-27, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability and previously recorded cultural resources. Shovel testing at 15-meter intervals was planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields. Shovel testing is pending for selected locations with the potential for buried cultural deposits.

Excluding one farmstead and one hay field, the majority of the survey area consisted of harvested or mature crops with 50 to 100% ground surface visibility. The hay field yielded an average surface visibility of 30%. The total ESB encompassed 678.90 acres. Roadways, inundated, and usually inundated areas, a total of 23.98 acres, were excluded from survey. A total of 77.02 acres remains to be surveyed. The other 591.82 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

A Euro-American archaeological site (21FE0130) also assigned an historic inventory property (FE-AEA-00264) was initially recorded as part of another Northern project in 2022. During the 2023 effort, this site was surveyed again. The 2023 site visit prompted an updated site boundary and an updated site form was submitted to the Minnesota Office of the State Archaeologist. This

farmstead site consisted of a combination of standing structures, archaeological features, and a surface artifact scatter. The site is within the ESB, but does not extend into the direct APE. In the original site form, the extant structures were identified as lacking integrity. Since the initial site visit, three buildings have been demolished. The artifacts documented on the surface have been placed in dump locations of mixed time periods, grouped through heavy machinery in pushpiles, and disturbed by agricultural processes. The archaeological component at 21FE0130 has not been evaluated for listing in the NRHP. RCG&A recommends the architectural buildings (FE-AEA-00264) at this property not eligible for listing in the NRHP.

This resource (21FE0130/FE-AEA-00264) is not in the direct APE and will not be impacted by the Project. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

County Ditch No. 4 (FE-PIC-00008), a historical structure, was initially visited as part of another Northern project in 2022. During the 2023 fieldwork, it was more thoroughly documented. County Ditch No. 4 is an active drainage ditch bound by agricultural land. The majority of this ditch is open cut and possesses a steep V-shaped profile. Brome and other grasses covered the banks of the ditch. Survey measured a top width of between 50 and 60 feet and a bottom width of 9-15 feet. Standing water was present at the base of the ditch during survey in fall 2023 but the overall depth was estimated to be 10-12 feet. Based on observations made from public ROW and aerial images, these dimensions are typical of County Ditch No. 4. This ditch also includes two branches: the Colvin Branch and the Klukow Branch. The Klukow Branch was in the ESB and was documented as part of FE-PIC-0008. County Ditch No. 4 is recommended not eligible for listing in the NRHP. Northern will utilize a private driveway that crosses the ditch without improvements. Therefore, the project will have no effect to County Ditch No. 4 (FE-PIC-00008).

Northern will remove a tie-over valve setting (MP 31.21) and install a new tie-in valve setting (MP 34.21) for the Lake Mills to Albert Lea E-line extension project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 34.21. This entire area was within the surveyed ESB. Northern conducted a visual assessment of the 500 foot buffer by walking the areas surrounding the project. The western portion of archaeological site 21FE0130 / inventory property FE-AEA-00264 is within the visual effects area; however, given the distance and mature vegetation surrounding the standing structures at the site, there will not be any effect to the standing structures from the project.

The proposed construction will not have an effect to any Minnesota Standing Structures Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

Elk River 3rd branch line

Archaeology

On November 1-5 and 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability. Shovel testing at 15-meter intervals was planned for surveyed areas with less than 25% surface visibility); no such areas were identified on this project. The survey area included agricultural fields, a tree farm, wetlands and manicured lawn with small stands of trees. Several historical and recent single-family homes and associated outbuildings were within the ESB.

The agricultural fields and tree farm yielded an average surface visibility of 80%. Visibility in the manicured lawns was limited (average 30%) but stands of trees yielded better ground surface visibility (average 55%). The total ESB encompassed 194.59 acres. Roadways as well as inundated and usually inundated areas, a total of 58.92 acres, were excluded from survey. A total of 15.25 acres remains to be surveyed. The remaining 120.42 acres had more than 25% ground surface visibility and was subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical ditches (WA-FLC-00033 and WA-XXX-00002) and ten historical standing structures during the 2023 fieldwork. None of the buildings are in the direct APE. Only one newly recorded property, WA-HGC-00077, is in the 500-foot buffer of the proposed valve setting.

Two historical drainage ditches were newly recorded during the 2023 fieldwork. WA-FLC-00033 is an active drainage ditch constructed in approximately 1949. The ditch is open cut and possesses a steep V-shaped profile. Grasses covered the banks of the ditch. Surveyors measured a varied width between 1.5 and 3 meters. Based on observations made from public ROW and aerial images, these dimensions are typical of this ditch. WA-FLC-00033 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-FLC-00033 via HDD.

WA-XXX-00002, the channelized Hardwood Creek, is known as Judicial Ditch No. 2. Ordered in 1902, Judicial Ditch No. 2 is open cut and possesses a V-shaped profile. Surveyors measured a top width of approximately six meters. Grasses covered the banks of the ditch. While standing water was present within the ditch during survey in fall 2023, the overall depth of the ditch was measured at variable depths between 2 to 5 meters. Based on observations made from the public ROW and aerial images, these dimensions are fairly typical of Judicial Ditch No. 2. WA-XXX-

00002 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-XXX-00002 via HDD.

Northern plans to remove a tie-over valve setting (MP 1.07) and install a new tie-in valve setting (MP 3.45) for the Elk River 3rd branch line project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 3.45. Northern conducted a desktop analysis and visual assessment of the 500-foot buffer by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

Northern identified four built resources on three properties that are potential historic properties (constructed more than 45 years ago) in the 500-foot buffer around the proposed facility. Prior to the 2023 survey, none of the buildings were recorded in the Minnesota Statewide Historic Inventory. One of the buildings was in the ESB and formally recorded during the survey (WA-HGC-00077; 17903 Henna Avenue North); the others (at 17803 Henna Avenue North and 17958 Henna Avenue North) were observed but not formally recorded.

The single-family residence at 17903 Henna Avenue North occupies a rectangular footprint, possesses two stories, is clad in composite siding and brick veneer, and terminates in a side-gable roof sheathed in asphalt shingles. It possesses an attached, single-bay garage along the south elevation. Based on county records, the house was constructed in 1969. Historic exterior materials on this building have been altered with replacements to exterior cladding, window openings and asphalt roof shingles. The public ROW runs between the proposed facility and the property at 17903 Henna Avenue North. Additionally, there are several trees that will obscure views of the proposed facility.

The single-family home and garage at 17803 Henna Avenue North have been substantially altered through additions and renovation. The original house was constructed in the mid-1960s, but, according to county records, extensive changes were made in 1989. The proposed facility is not visible from the property at 17803 Henna Avenue North as it is obscured by distance and a line of mature trees.

There are several buildings on the 17958 Henna Avenue North property. Only the single-family home and one outbuilding are within the 500-foot indirect APE around the proposed facility. The two-story home was constructed around 1880 and has had significant alterations to its exterior. In addition, the house is orientated to the north, while the facility will be constructed to the southeast. The combination of distance and topography, as well as an agricultural field and mature deciduous trees visually buffer the potential historic buildings from the proposed Project.

The proposed aboveground valve setting will not substantively alter the viewshed of the potential historic properties at 17803, 17903, and 17958 Henna Avenue North. Temporary visual impacts on the property during construction will not affect the attributes contributing to the potential significance and integrity of these properties. As such, the proposed Project will not adversely impact the aspects of integrity of these potential historic properties.

The proposed Elk River 3rd branch line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Farmington to Hugo C-line

Archaeology

From July 17 to 20, October 18 and November 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at 5-meter intervals in high probability areas and shovel testing at 15-meter intervals were planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields, wetlands and woodlands associated with the wetlands and pasture.

Ground surface visibility was good in the agricultural fields ranging from 40-100%. Woodland and pastures had lower surface visibility that ranged between 25 and 50%. The total ESB encompassed 172.97 acres. Roadways, existing graveled facility lots, as well as inundated and usually inundated areas, a total of 19.26 acres, were excluded from survey. The remaining 153.71 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical properties in the Farmington to Hugo C-line ESB. They were recorded in the Minnesota Statewide Historic Inventory and assigned designations WA-MYT-031 and WA-MYT-032. WA-MYT-031 is a 1973 single-family residence. The two-story, multi-bay building occupies a rectangular footprint, is clad in composite siding and brick veneer, and terminates in a low-pitched, hipped roof with overhanging eaves sheathed in asphalt shingles. The building features a single-story attached garage and a recessed front porch covered by a secondary hipped roof also sheathed in asphalt shingles.

WA-MYT-032 includes two historical buildings, a house (WA-MYT-028) and a shed (WA-MYT-029). WA-MYT-028 is a 1972 single-family residence. The one-and-one-half story, multi-bay building occupies a rectangular footprint, is clad in vinyl siding and brick veneer, and terminates in a front-gable roof with overhanging eaves sheathed in asphalt shingles. The façade features a secondary, front-gable projection and a recessed porch. The east elevation features a two-bay, integral garage. WA-MYT-029 is a 1972 shed near the house. The single-story shed occupies a rectangular footprint, is clad in wood siding, and terminates in a gambrel roof with overhanging eaves sheathed in asphalt shingles. Both of these properties are recommended not eligible for listing in the NRHP and both are avoided through HDD in the current Project design.

Northern proposes to install a new launcher and associated valves and piping at the existing Hugo compressor station (MP 0.00), as well as install a new tie-in valve setting (MP 1.91) for the

Farmington to Hugo C-line. Aboveground construction for the aboveground tie-in valve setting will not exceed ten feet in height. The potential for adverse visual effects to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the Hugo compressor station and the proposed valve setting at MP 1.91. Northern conducted a visual assessment of these areas by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

One potential historical resource is located in the Hugo compressor station buffer, a house at 10830 180th Street North. This property has not been recorded in the Minnesota Statewide Historic Inventory. According to county records, it was constructed in 1977 and is a split foyer frame home with an attached garage. Significant alterations were made to the house in 2016. This house is set back from 180th Street North approximately 240 feet and is surrounded by trees. The combination of distance, a public ROW (180th Street North), as well as trees and other foliage visually buffer the potential historic building from the proposed project.

The proposed Farmington to Hugo C-line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Tomah branch line loop

Archaeology

Portions of the Tomah branch line loop was surveyed in August 2019, August and November 2021 and most recently surveyed in October and November 2023 and January 2024. Northern completed archaeological field investigations using standard methodology for archaeological surveys. Pedestrian survey was conducted at five-meter or less interval transects following the general direction of the survey corridor. Shovel testing was conducted at 15-meter or less interval. In areas with a greater probability for archaeological sites such as stream crossings, pedestrian survey was conducted at approximately one-meter intervals and shovel testing at less than five-meter intervals.

The survey area was located primarily in agricultural fields, with intermittent wooded areas, residential yards and wetlands. At the time of the field investigation, most of the survey area consisted of harvested fields and plowed corn and soybean fields. Most fields displayed 90-100% surface visibility which allowed field investigation to be conducted using pedestrian survey methods.

Of the total investigated area (124.7 acres), 55.9 acres were investigated using pedestrian survey methods and 55.4 acres were shovel tested. Approximately 13.4 acres were exempted from investigation survey in areas of slope, stream channels, or areas where ground had been disturbed by road and road drainage ditch construction. No prehistoric or historic period Euro-American artifacts or archaeological features were observed in the direct APE.

Aboveground Historical Properties

Northern plans to relocate a branch line receiver on the Tomah branch line loop (MP 3.53). The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the indirect APE was limited to the 500-foot buffer around the valve setting. Aboveground

construction will not exceed eight feet in height. Northern conducted a visual assessment of the indirect APE by walking the areas surrounding the Project and no historical properties were identified.

The proposed construction will not have an effect to any Wisconsin Architecture and History Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

La Crescent compressor station

Archaeology

On September 19, 2023, Northern completed archaeological field investigations using 15-meter interval pedestrian survey in areas of the ESB that were not graveled. The graveled facilities were excluded from survey. The survey area included short and medium grasses and corn fields. Ground surface visibility averaged 25% in grassy areas, but in the corn fields, ground surface visibility averaged 90%.

The total ESB encompassed 3.02 acres. Areas excluded from survey, consisting of graveled access drives and facilities and roadway totaling 1.72 acres. The remaining 1.30 acres averaged more than 25% ground surface visibility and was subjected to pedestrian survey. No archaeological sites or isolated finds were identified in the direct APE.

The current Project design and proposed construction activities will not have direct effects to any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern proposes minor modifications to existing infrastructure at the La Crescent compressor station, including replacing compressor cylinder end caps (currently blind flanges) and adjusting compressor mechanical characteristics to match new operating conditions. While impacts that are subject to review under 36 CFR § 800 may include surficial disturbances caused by topsoil removal, heavy machinery traffic, shallow grading, and spoil dirt management, only vehicular parking is anticipated for this Project component.

The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the existing compressor station lot. Northern conducted a visual assessment of this buffer by examining aerial imagery and observing areas surrounding the project from the public ROW and ESB. No aboveground cultural resources were observed in the 500-foot buffer.

Conclusion and Request for Consultation

To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the attached maps and report and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Northern Natural Gas
Northern Lights 2025 Expansion Project
February 14, 2024

Northern respects that the Tribe has unique expertise in identifying and providing information regarding historic properties with religious or cultural significance which may be affected by the Project. Northern is seeking the Tribe's comments on survey methodology, traditional cultural properties, and traditional cultural landscapes along with areas of importance to the Tribe which should be considered. Northern understands this request for information does not circumvent the government-to-government relationship under Section 106 (36 Code of Federal Regulations Part 800) between the Tribe and the FERC. Please be assured that Northern will keep sensitive Tribal information strictly confidential.

While the regulations for implementing Section 106 (36 Code of Federal Regulations Part 800) allow companies like Northern (and their consultants) to gather information, the FERC is responsible for monitoring compliance with the NHPA and determinations pursuant to Section 106. Additionally, the FERC, not Northern, is responsible for government-to-government consultations with American Indian Tribes. The FERC has not delegated this consultation. The FERC will contact you through a *Notice of Intent to Produce an Environmental Document*. If you would like to communicate directly with the FERC natural gas archaeological staff to discuss its cultural resource review and consultation processes, please feel free to contact Elizabeth Molloy, Tribal Liaison, at 202-502-8771 or Elizabeth.Molloy@ferc.gov.

Thank you in advance for your attention to this Project. Northern would very much appreciate receiving your response within 30 days of the date of this letter. Northern will follow up with you via phone contact or email if no response is received within 30 days. In the interim, should you have questions or need additional information, please contact me at 402-398-7226 or Terry.Plucker@nngco.com or Susan Knabe of Stantec at 920-278-3220 or Susan.Knabe@stantec.com.

Sincerely,



Terry Plucker
Environmental Compliance Manager
Northern Natural Gas Company

Enclosures: RCG&A Cultural Resources Reports
Phase One Cultural Resources Report
Unanticipated Discovery Plans (Minnesota and Wisconsin)

CC: Susan Knabe, Stantec Consulting
Matt Nelson, Northern Natural Gas

From: [Waller, Hiedi](#)
To: bill.quackenbush@ho-chunk.com
Cc: [Knabe, Susan](#); Terry.Plucker@nngco.com
Subject: FW: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS
Date: Wednesday, February 14, 2024 9:29:00 PM
Attachments: [NL 2025 THPO_Ho-Chunk Nation of Wisconsin.pdf](#)

THPO Quackenbush:

Northern is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Over periodic field events from 2019 through 2024, Phase One Archaeological Services Inc. and R. Christopher Goodwin & Associates, Inc. completed field surveys of the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The results of these survey efforts are included in the cultural resources reports. To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the cultural resources reports and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Due to the size of the files associated with the Project, Northern has set up an FTP site where the cultural resources reports and Unanticipated Discoveries Plans referenced in the attached letter can be downloaded.

Please contact us if you have any questions.

Hiedi Waller, PE
Senior Engineer
Pronouns: she, her, hers
Phone: (262) 643-9161

From: donotreply@secureftp.stantec.com <donotreply@secureftp.stantec.com>
Sent: Wednesday, February 14, 2024 9:20 PM
To: Waller, Hiedi <Hiedi.Waller@stantec.com>
Subject: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS

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Login name: s0221202004

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1111 South 103rd Street
Omaha, NE 68124

February 14, 2024

Ho-Chunk Nation of Wisconsin
William Quackenbush, THPO
16250 Helmet Road
Tomah, WI 54660

Re: Northern Natural Gas–Northern Lights 2025 Expansion Project – Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin

Dear Tribal Historic Preservation Officer Quackenbush:

Northern Natural Gas (Northern) is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured the services of Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Northern is proposing to construct the Project, which will consist of (1) a 3.00-mile extension of its 36-inch-diameter Lake Mills to Albert Lea E-line; (2) a 2.43-mile extension of its 30-inch-diameter Elk River 3rd branch line; (3) a non-contiguous 1.91-mile extension of its 30-inch-diameter Farmington to Hugo C-line; (4) a 1.28-mile extension of its 8-inch-diameter Tomah branch line loop; (5) minor modifications to its existing La Crescent compressor station; and (6) aboveground facilities including a launcher, receiver and tie-in valve settings. All Project components are located in various counties in Minnesota and Wisconsin.

This letter summarizes the results of the investigations and recommendations of the archaeological investigator for the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The archeological reports from R. Christopher Goodwin & Associates, Inc. (RCG&A) and Phase One Archaeological Services Inc. (Phase One) are attached to this letter.

Literature Search

Northern's cultural resources' sub-consultants, RCG&A and Phase One, conducted background research at the Minnesota and Wisconsin SHPOs to identify previously recorded archaeological and above-grade resources. This study area encompassed a Project-specific environmental survey boundary (ESB), the direct Area of Potential Effects (APE) and the indirect APE and included archaeological sites and other cultural resources located in the immediate areas of planned construction along with a one-mile radius of all proposed project activities.

Lake Mills to Albert Lea E-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources on the list of National Register of Historic Places (NRHP) properties are in the indirect APE. One archaeological site, 21FE0130, and Minnesota Statewide Historic Inventory property FE-AEA-00264 extends into the 500-foot buffer around the proposed aboveground valve setting. However, due to distance and mature trees, no effects are anticipated.

Elk River 3rd branch line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Farmington to Hugo C-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Tomah branch line loop

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

A single standing structure, a 19th century Greek Revival Farmhouse (AHI # 78410) was previously located on the west side of County Highway Q within the indirect APE. This building was razed and replaced with a modern single-family farmhouse. No other aboveground historical resources previously listed in the Wisconsin Architecture-History Inventory or on the list of the NRHP properties are located in the indirect APE.

La Crescent compressor station

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the La Crescent compressor station to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Cultural Survey

Following the literature review, Northern's subconsultants conducted a systematic field survey of the direct APE, which includes the construction ROW (TWS), ETWS, access roads, staging areas, and the aboveground appurtenant facility footprints. The survey procedures included a pedestrian walkover of the APE, systematic surface examination of suitable areas, and systematic subsurface testing of areas lacking sufficient surface visibility or which had potential for subsurface resources.

The cultural resources survey is 89% complete for the Lake Mills to Albert Lea E-line with additional shovel testing needed on 77.02 acres anticipated in spring 2024. The cultural resource survey for the Elk River 3rd branch line is 92% complete with additional survey needed on 15.25 acres scheduled for spring 2024. Northern cultural resources surveys are 100% complete for the remaining Project components.

Lake Mills to Albert Lea E-line

Archaeology

On August 22, August 23, October 3, and October 23-27, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability and previously recorded cultural resources. Shovel testing at 15-meter intervals was planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields. Shovel testing is pending for selected locations with the potential for buried cultural deposits.

Excluding one farmstead and one hay field, the majority of the survey area consisted of harvested or mature crops with 50 to 100% ground surface visibility. The hay field yielded an average surface visibility of 30%. The total ESB encompassed 678.90 acres. Roadways, inundated, and usually inundated areas, a total of 23.98 acres, were excluded from survey. A total of 77.02 acres remains to be surveyed. The other 591.82 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

A Euro-American archaeological site (21FE0130) also assigned an historic inventory property (FE-AEA-00264) was initially recorded as part of another Northern project in 2022. During the 2023 effort, this site was surveyed again. The 2023 site visit prompted an updated site boundary and an updated site form was submitted to the Minnesota Office of the State Archaeologist. This

farmstead site consisted of a combination of standing structures, archaeological features, and a surface artifact scatter. The site is within the ESB, but does not extend into the direct APE. In the original site form, the extant structures were identified as lacking integrity. Since the initial site visit, three buildings have been demolished. The artifacts documented on the surface have been placed in dump locations of mixed time periods, grouped through heavy machinery in pushpiles, and disturbed by agricultural processes. The archaeological component at 21FE0130 has not been evaluated for listing in the NRHP. RCG&A recommends the architectural buildings (FE-AEA-00264) at this property not eligible for listing in the NRHP.

This resource (21FE0130/FE-AEA-00264) is not in the direct APE and will not be impacted by the Project. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

County Ditch No. 4 (FE-PIC-00008), a historical structure, was initially visited as part of another Northern project in 2022. During the 2023 fieldwork, it was more thoroughly documented. County Ditch No. 4 is an active drainage ditch bound by agricultural land. The majority of this ditch is open cut and possesses a steep V-shaped profile. Brome and other grasses covered the banks of the ditch. Survey measured a top width of between 50 and 60 feet and a bottom width of 9-15 feet. Standing water was present at the base of the ditch during survey in fall 2023 but the overall depth was estimated to be 10-12 feet. Based on observations made from public ROW and aerial images, these dimensions are typical of County Ditch No. 4. This ditch also includes two branches: the Colvin Branch and the Klukow Branch. The Klukow Branch was in the ESB and was documented as part of FE-PIC-0008. County Ditch No. 4 is recommended not eligible for listing in the NRHP. Northern will utilize a private driveway that crosses the ditch without improvements. Therefore, the project will have no effect to County Ditch No. 4 (FE-PIC-00008).

Northern will remove a tie-over valve setting (MP 31.21) and install a new tie-in valve setting (MP 34.21) for the Lake Mills to Albert Lea E-line extension project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 34.21. This entire area was within the surveyed ESB. Northern conducted a visual assessment of the 500 foot buffer by walking the areas surrounding the project. The western portion of archaeological site 21FE0130 / inventory property FE-AEA-00264 is within the visual effects area; however, given the distance and mature vegetation surrounding the standing structures at the site, there will not be any effect to the standing structures from the project.

The proposed construction will not have an effect to any Minnesota Standing Structures Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

Elk River 3rd branch line

Archaeology

On November 1-5 and 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability. Shovel testing at 15-meter intervals was planned for surveyed areas with less than 25% surface visibility); no such areas were identified on this project. The survey area included agricultural fields, a tree farm, wetlands and manicured lawn with small stands of trees. Several historical and recent single-family homes and associated outbuildings were within the ESB.

The agricultural fields and tree farm yielded an average surface visibility of 80%. Visibility in the manicured lawns was limited (average 30%) but stands of trees yielded better ground surface visibility (average 55%). The total ESB encompassed 194.59 acres. Roadways as well as inundated and usually inundated areas, a total of 58.92 acres, were excluded from survey. A total of 15.25 acres remains to be surveyed. The remaining 120.42 acres had more than 25% ground surface visibility and was subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical ditches (WA-FLC-00033 and WA-XXX-00002) and ten historical standing structures during the 2023 fieldwork. None of the buildings are in the direct APE. Only one newly recorded property, WA-HGC-00077, is in the 500-foot buffer of the proposed valve setting.

Two historical drainage ditches were newly recorded during the 2023 fieldwork. WA-FLC-00033 is an active drainage ditch constructed in approximately 1949. The ditch is open cut and possesses a steep V-shaped profile. Grasses covered the banks of the ditch. Surveyors measured a varied width between 1.5 and 3 meters. Based on observations made from public ROW and aerial images, these dimensions are typical of this ditch. WA-FLC-00033 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-FLC-00033 via HDD.

WA-XXX-00002, the channelized Hardwood Creek, is known as Judicial Ditch No. 2. Ordered in 1902, Judicial Ditch No. 2 is open cut and possesses a V-shaped profile. Surveyors measured a top width of approximately six meters. Grasses covered the banks of the ditch. While standing water was present within the ditch during survey in fall 2023, the overall depth of the ditch was measured at variable depths between 2 to 5 meters. Based on observations made from the public ROW and aerial images, these dimensions are fairly typical of Judicial Ditch No. 2. WA-XXX-

00002 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-XXX-00002 via HDD.

Northern plans to remove a tie-over valve setting (MP 1.07) and install a new tie-in valve setting (MP 3.45) for the Elk River 3rd branch line project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 3.45. Northern conducted a desktop analysis and visual assessment of the 500-foot buffer by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

Northern identified four built resources on three properties that are potential historic properties (constructed more than 45 years ago) in the 500-foot buffer around the proposed facility. Prior to the 2023 survey, none of the buildings were recorded in the Minnesota Statewide Historic Inventory. One of the buildings was in the ESB and formally recorded during the survey (WA-HGC-00077; 17903 Henna Avenue North); the others (at 17803 Henna Avenue North and 17958 Henna Avenue North) were observed but not formally recorded.

The single-family residence at 17903 Henna Avenue North occupies a rectangular footprint, possesses two stories, is clad in composite siding and brick veneer, and terminates in a side-gable roof sheathed in asphalt shingles. It possesses an attached, single-bay garage along the south elevation. Based on county records, the house was constructed in 1969. Historic exterior materials on this building have been altered with replacements to exterior cladding, window openings and asphalt roof shingles. The public ROW runs between the proposed facility and the property at 17903 Henna Avenue North. Additionally, there are several trees that will obscure views of the proposed facility.

The single-family home and garage at 17803 Henna Avenue North have been substantially altered through additions and renovation. The original house was constructed in the mid-1960s, but, according to county records, extensive changes were made in 1989. The proposed facility is not visible from the property at 17803 Henna Avenue North as it is obscured by distance and a line of mature trees.

There are several buildings on the 17958 Henna Avenue North property. Only the single-family home and one outbuilding are within the 500-foot indirect APE around the proposed facility. The two-story home was constructed around 1880 and has had significant alterations to its exterior. In addition, the house is orientated to the north, while the facility will be constructed to the southeast. The combination of distance and topography, as well as an agricultural field and mature deciduous trees visually buffer the potential historic buildings from the proposed Project.

The proposed aboveground valve setting will not substantively alter the viewshed of the potential historic properties at 17803, 17903, and 17958 Henna Avenue North. Temporary visual impacts on the property during construction will not affect the attributes contributing to the potential significance and integrity of these properties. As such, the proposed Project will not adversely impact the aspects of integrity of these potential historic properties.

The proposed Elk River 3rd branch line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Farmington to Hugo C-line

Archaeology

From July 17 to 20, October 18 and November 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at 5-meter intervals in high probability areas and shovel testing at 15-meter intervals were planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields, wetlands and woodlands associated with the wetlands and pasture.

Ground surface visibility was good in the agricultural fields ranging from 40-100%. Woodland and pastures had lower surface visibility that ranged between 25 and 50%. The total ESB encompassed 172.97 acres. Roadways, existing graveled facility lots, as well as inundated and usually inundated areas, a total of 19.26 acres, were excluded from survey. The remaining 153.71 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical properties in the Farmington to Hugo C-line ESB. They were recorded in the Minnesota Statewide Historic Inventory and assigned designations WA-MYT-031 and WA-MYT-032. WA-MYT-031 is a 1973 single-family residence. The two-story, multi-bay building occupies a rectangular footprint, is clad in composite siding and brick veneer, and terminates in a low-pitched, hipped roof with overhanging eaves sheathed in asphalt shingles. The building features a single-story attached garage and a recessed front porch covered by a secondary hipped roof also sheathed in asphalt shingles.

WA-MYT-032 includes two historical buildings, a house (WA-MYT-028) and a shed (WA-MYT-029). WA-MYT-028 is a 1972 single-family residence. The one-and-one-half story, multi-bay building occupies a rectangular footprint, is clad in vinyl siding and brick veneer, and terminates in a front-gable roof with overhanging eaves sheathed in asphalt shingles. The façade features a secondary, front-gable projection and a recessed porch. The east elevation features a two-bay, integral garage. WA-MYT-029 is a 1972 shed near the house. The single-story shed occupies a rectangular footprint, is clad in wood siding, and terminates in a gambrel roof with overhanging eaves sheathed in asphalt shingles. Both of these properties are recommended not eligible for listing in the NRHP and both are avoided through HDD in the current Project design.

Northern proposes to install a new launcher and associated valves and piping at the existing Hugo compressor station (MP 0.00), as well as install a new tie-in valve setting (MP 1.91) for the

Farmington to Hugo C-line. Aboveground construction for the aboveground tie-in valve setting will not exceed ten feet in height. The potential for adverse visual effects to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the Hugo compressor station and the proposed valve setting at MP 1.91. Northern conducted a visual assessment of these areas by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

One potential historical resource is located in the Hugo compressor station buffer, a house at 10830 180th Street North. This property has not been recorded in the Minnesota Statewide Historic Inventory. According to county records, it was constructed in 1977 and is a split foyer frame home with an attached garage. Significant alterations were made to the house in 2016. This house is set back from 180th Street North approximately 240 feet and is surrounded by trees. The combination of distance, a public ROW (180th Street North), as well as trees and other foliage visually buffer the potential historic building from the proposed project.

The proposed Farmington to Hugo C-line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Tomah branch line loop

Archaeology

Portions of the Tomah branch line loop was surveyed in August 2019, August and November 2021 and most recently surveyed in October and November 2023 and January 2024. Northern completed archaeological field investigations using standard methodology for archaeological surveys. Pedestrian survey was conducted at five-meter or less interval transects following the general direction of the survey corridor. Shovel testing was conducted at 15-meter or less interval. In areas with a greater probability for archaeological sites such as stream crossings, pedestrian survey was conducted at approximately one-meter intervals and shovel testing at less than five-meter intervals.

The survey area was located primarily in agricultural fields, with intermittent wooded areas, residential yards and wetlands. At the time of the field investigation, most of the survey area consisted of harvested fields and plowed corn and soybean fields. Most fields displayed 90-100% surface visibility which allowed field investigation to be conducted using pedestrian survey methods.

Of the total investigated area (124.7 acres), 55.9 acres were investigated using pedestrian survey methods and 55.4 acres were shovel tested. Approximately 13.4 acres were exempted from investigation survey in areas of slope, stream channels, or areas where ground had been disturbed by road and road drainage ditch construction. No prehistoric or historic period Euro-American artifacts or archaeological features were observed in the direct APE.

Aboveground Historical Properties

Northern plans to relocate a branch line receiver on the Tomah branch line loop (MP 3.53). The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the indirect APE was limited to the 500-foot buffer around the valve setting. Aboveground

construction will not exceed eight feet in height. Northern conducted a visual assessment of the indirect APE by walking the areas surrounding the Project and no historical properties were identified.

The proposed construction will not have an effect to any Wisconsin Architecture and History Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

La Crescent compressor station

Archaeology

On September 19, 2023, Northern completed archaeological field investigations using 15-meter interval pedestrian survey in areas of the ESB that were not graveled. The graveled facilities were excluded from survey. The survey area included short and medium grasses and corn fields. Ground surface visibility averaged 25% in grassy areas, but in the corn fields, ground surface visibility averaged 90%.

The total ESB encompassed 3.02 acres. Areas excluded from survey, consisting of graveled access drives and facilities and roadway totaling 1.72 acres. The remaining 1.30 acres averaged more than 25% ground surface visibility and was subjected to pedestrian survey. No archaeological sites or isolated finds were identified in the direct APE.

The current Project design and proposed construction activities will not have direct effects to any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern proposes minor modifications to existing infrastructure at the La Crescent compressor station, including replacing compressor cylinder end caps (currently blind flanges) and adjusting compressor mechanical characteristics to match new operating conditions. While impacts that are subject to review under 36 CFR § 800 may include surficial disturbances caused by topsoil removal, heavy machinery traffic, shallow grading, and spoil dirt management, only vehicular parking is anticipated for this Project component.

The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the existing compressor station lot. Northern conducted a visual assessment of this buffer by examining aerial imagery and observing areas surrounding the project from the public ROW and ESB. No aboveground cultural resources were observed in the 500-foot buffer.

Conclusion and Request for Consultation

To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the attached maps and report and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Northern Natural Gas
Northern Lights 2025 Expansion Project
February 14, 2024

Northern respects that the Tribe has unique expertise in identifying and providing information regarding historic properties with religious or cultural significance which may be affected by the Project. Northern is seeking the Tribe's comments on survey methodology, traditional cultural properties, and traditional cultural landscapes along with areas of importance to the Tribe which should be considered. Northern understands this request for information does not circumvent the government-to-government relationship under Section 106 (36 Code of Federal Regulations Part 800) between the Tribe and the FERC. Please be assured that Northern will keep sensitive Tribal information strictly confidential.

While the regulations for implementing Section 106 (36 Code of Federal Regulations Part 800) allow companies like Northern (and their consultants) to gather information, the FERC is responsible for monitoring compliance with the NHPA and determinations pursuant to Section 106. Additionally, the FERC, not Northern, is responsible for government-to-government consultations with American Indian Tribes. The FERC has not delegated this consultation. The FERC will contact you through a *Notice of Intent to Produce an Environmental Document*. If you would like to communicate directly with the FERC natural gas archaeological staff to discuss its cultural resource review and consultation processes, please feel free to contact Elizabeth Molloy, Tribal Liaison, at 202-502-8771 or Elizabeth.Molloy@ferc.gov.

Thank you in advance for your attention to this Project. Northern would very much appreciate receiving your response within 30 days of the date of this letter. Northern will follow up with you via phone contact or email if no response is received within 30 days. In the interim, should you have questions or need additional information, please contact me at 402-398-7226 or Terry.Plucker@nngco.com or Susan Knabe of Stantec at 920-278-3220 or Susan.Knabe@stantec.com.

Sincerely,



Terry Plucker
Environmental Compliance Manager
Northern Natural Gas Company

Enclosures: RCG&A Cultural Resources Reports
Phase One Cultural Resources Report
Unanticipated Discovery Plans (Minnesota and Wisconsin)

CC: Susan Knabe, Stantec Consulting
Matt Nelson, Northern Natural Gas

From: [Waller, Hiedi](#)
To: samanthao@upperstoucommunity-nsn.gov
Cc: [Knabe, Susan](#); Terry.Plucker@nngco.com
Subject: FW: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS
Date: Wednesday, February 14, 2024 9:22:00 PM
Attachments: [NL 2025 THPO Upper Sioux Community, Minnesota.pdf](#)

THPO Odegard:

Northern is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Over periodic field events from 2019 through 2024, Phase One Archaeological Services Inc. and R. Christopher Goodwin & Associates, Inc. completed field surveys of the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The results of these survey efforts are included in the cultural resources reports. To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the cultural resources reports and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Due to the size of the files associated with the Project, Northern has set up an FTP site where the cultural resources reports and Unanticipated Discoveries Plans referenced in the attached letter can be downloaded.

Please contact us if you have any questions.

Hiedi Waller, PE
Senior Engineer
Pronouns: she, her, hers
Phone: (262) 643-9161

From: donotreply@secureftp.stantec.com <donotreply@secureftp.stantec.com>
Sent: Wednesday, February 14, 2024 9:20 PM
To: Waller, Hiedi <Hiedi.Waller@stantec.com>
Subject: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS

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Please use the link below to access your directory with the username and password provided.

Login Information

Browser link: <https://tmpsftp.stantec.com>

FTP Client Hostname: tmpsftp.stantec.com **Port:** 22 (can be used within a SFTP client to view and

transfer files and folders; e.g., FileZilla)

Login name: s0221202004

Password: 9670102

Disk Quota: 20 GB

Expiry Date: 2/21/2024

If you require a one-time one-week extension, please click [here](#).

If you require more than a week, please request a Microsoft 365 Groups/Teams. Information on Groups/Teams request procedure is posted in the [Stantec Help Center](#).

Click here for the [quick reference guide](#).

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1111 South 103rd Street
Omaha, NE 68124

February 14, 2024

Upper Sioux Community, Minnesota
Samantha Odegard, THPO
PO Box 147
5722 Travers Lane
Granite Falls, MN 56241

Re: Northern Natural Gas–Northern Lights 2025 Expansion Project – Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin

Dear Tribal Historic Preservation Officer Odegard:

Northern Natural Gas (Northern) is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured the services of Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Northern is proposing to construct the Project, which will consist of (1) a 3.00-mile extension of its 36-inch-diameter Lake Mills to Albert Lea E-line; (2) a 2.43-mile extension of its 30-inch-diameter Elk River 3rd branch line; (3) a non-contiguous 1.91-mile extension of its 30-inch-diameter Farmington to Hugo C-line; (4) a 1.28-mile extension of its 8-inch-diameter Tomah branch line loop; (5) minor modifications to its existing La Crescent compressor station; and (6) aboveground facilities including a launcher, receiver and tie-in valve settings. All Project components are located in various counties in Minnesota and Wisconsin.

This letter summarizes the results of the investigations and recommendations of the archaeological investigator for the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The archeological reports from R. Christopher Goodwin & Associates, Inc. (RCG&A) and Phase One Archaeological Services Inc. (Phase One) are attached to this letter.

Literature Search

Northern's cultural resources' sub-consultants, RCG&A and Phase One, conducted background research at the Minnesota and Wisconsin SHPOs to identify previously recorded archaeological and above-grade resources. This study area encompassed a Project-specific environmental survey boundary (ESB), the direct Area of Potential Effects (APE) and the indirect APE and included archaeological sites and other cultural resources located in the immediate areas of planned construction along with a one-mile radius of all proposed project activities.

Lake Mills to Albert Lea E-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources on the list of National Register of Historic Places (NRHP) properties are in the indirect APE. One archaeological site, 21FE0130, and Minnesota Statewide Historic Inventory property FE-AEA-00264 extends into the 500-foot buffer around the proposed aboveground valve setting. However, due to distance and mature trees, no effects are anticipated.

Elk River 3rd branch line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Farmington to Hugo C-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Tomah branch line loop

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

A single standing structure, a 19th century Greek Revival Farmhouse (AHI # 78410) was previously located on the west side of County Highway Q within the indirect APE. This building was razed and replaced with a modern single-family farmhouse. No other aboveground historical resources previously listed in the Wisconsin Architecture-History Inventory or on the list of the NRHP properties are located in the indirect APE.

La Crescent compressor station

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the La Crescent compressor station to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Cultural Survey

Following the literature review, Northern's subconsultants conducted a systematic field survey of the direct APE, which includes the construction ROW (TWS), ETWS, access roads, staging areas, and the aboveground appurtenant facility footprints. The survey procedures included a pedestrian walkover of the APE, systematic surface examination of suitable areas, and systematic subsurface testing of areas lacking sufficient surface visibility or which had potential for subsurface resources.

The cultural resources survey is 89% complete for the Lake Mills to Albert Lea E-line with additional shovel testing needed on 77.02 acres anticipated in spring 2024. The cultural resource survey for the Elk River 3rd branch line is 92% complete with additional survey needed on 15.25 acres scheduled for spring 2024. Northern cultural resources surveys are 100% complete for the remaining Project components.

Lake Mills to Albert Lea E-line

Archaeology

On August 22, August 23, October 3, and October 23-27, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability and previously recorded cultural resources. Shovel testing at 15-meter intervals was planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields. Shovel testing is pending for selected locations with the potential for buried cultural deposits.

Excluding one farmstead and one hay field, the majority of the survey area consisted of harvested or mature crops with 50 to 100% ground surface visibility. The hay field yielded an average surface visibility of 30%. The total ESB encompassed 678.90 acres. Roadways, inundated, and usually inundated areas, a total of 23.98 acres, were excluded from survey. A total of 77.02 acres remains to be surveyed. The other 591.82 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

A Euro-American archaeological site (21FE0130) also assigned an historic inventory property (FE-AEA-00264) was initially recorded as part of another Northern project in 2022. During the 2023 effort, this site was surveyed again. The 2023 site visit prompted an updated site boundary

and an updated site form was submitted to the Minnesota Office of the State Archaeologist. This farmstead site consisted of a combination of standing structures, archaeological features, and a surface artifact scatter. The site is within the ESB, but does not extend into the direct APE. In the original site form, the extant structures were identified as lacking integrity. Since the initial site visit, three buildings have been demolished. The artifacts documented on the surface have been placed in dump locations of mixed time periods, grouped through heavy machinery in pushpiles, and disturbed by agricultural processes. The archaeological component at 21FE0130 has not been evaluated for listing in the NRHP. RCG&A recommends the architectural buildings (FE-AEA-00264) at this property not eligible for listing in the NRHP.

This resource (21FE0130/FE-AEA-00264) is not in the direct APE and will not be impacted by the Project. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

County Ditch No. 4 (FE-PIC-00008), a historical structure, was initially visited as part of another Northern project in 2022. During the 2023 fieldwork, it was more thoroughly documented. County Ditch No. 4 is an active drainage ditch bound by agricultural land. The majority of this ditch is open cut and possesses a steep V-shaped profile. Brome and other grasses covered the banks of the ditch. Survey measured a top width of between 50 and 60 feet and a bottom width of 9-15 feet. Standing water was present at the base of the ditch during survey in fall 2023 but the overall depth was estimated to be 10-12 feet. Based on observations made from public ROW and aerial images, these dimensions are typical of County Ditch No. 4. This ditch also includes two branches: the Colvin Branch and the Klukow Branch. The Klukow Branch was in the ESB and was documented as part of FE-PIC-0008. County Ditch No. 4 is recommended not eligible for listing in the NRHP. Northern will utilize a private driveway that crosses the ditch without improvements. Therefore, the project will have no effect to County Ditch No. 4 (FE-PIC-00008).

Northern will remove a tie-over valve setting (MP 31.21) and install a new tie-in valve setting (MP 34.21) for the Lake Mills to Albert Lea E-line extension project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 34.21. This entire area was within the surveyed ESB. Northern conducted a visual assessment of the 500 foot buffer by walking the areas surrounding the project. The western portion of archaeological site 21FE0130 / inventory property FE-AEA-00264 is within the visual effects area; however, given the distance and mature vegetation surrounding the standing structures at the site, there will not be any effect to the standing structures from the project.

The proposed construction will not have an effect to any Minnesota Standing Structures Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

Elk River 3rd branch line

Archaeology

On November 1-5 and 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability. Shovel testing at 15-meter intervals was planned for surveyed areas with less than 25% surface visibility); no such areas were identified on this project. The survey area included agricultural fields, a tree farm, wetlands and manicured lawn with small stands of trees. Several historical and recent single-family homes and associated outbuildings were within the ESB.

The agricultural fields and tree farm yielded an average surface visibility of 80%. Visibility in the manicured lawns was limited (average 30%) but stands of trees yielded better ground surface visibility (average 55%). The total ESB encompassed 194.59 acres. Roadways as well as inundated and usually inundated areas, a total of 58.92 acres, were excluded from survey. A total of 15.25 acres remains to be surveyed. The remaining 120.42 acres had more than 25% ground surface visibility and was subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical ditches (WA-FLC-00033 and WA-XXX-00002) and ten historical standing structures during the 2023 fieldwork. None of the buildings are in the direct APE. Only one newly recorded property, WA-HGC-00077, is in the 500-foot buffer of the proposed valve setting.

Two historical drainage ditches were newly recorded during the 2023 fieldwork. WA-FLC-00033 is an active drainage ditch constructed in approximately 1949. The ditch is open cut and possesses a steep V-shaped profile. Grasses covered the banks of the ditch. Surveyors measured a varied width between 1.5 and 3 meters. Based on observations made from public ROW and aerial images, these dimensions are typical of this ditch. WA-FLC-00033 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-FLC-00033 via HDD.

WA-XXX-00002, the channelized Hardwood Creek, is known as Judicial Ditch No. 2. Ordered in 1902, Judicial Ditch No. 2 is open cut and possesses a V-shaped profile. Surveyors measured a top width of approximately six meters. Grasses covered the banks of the ditch. While standing water was present within the ditch during survey in fall 2023, the overall depth of the ditch was measured at variable depths between 2 to 5 meters. Based on observations made from the public ROW and aerial images, these dimensions are fairly typical of Judicial Ditch No. 2. WA-XXX-

00002 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-XXX-00002 via HDD.

Northern plans to remove a tie-over valve setting (MP 1.07) and install a new tie-in valve setting (MP 3.45) for the Elk River 3rd branch line project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 3.45. Northern conducted a desktop analysis and visual assessment of the 500-foot buffer by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

Northern identified four built resources on three properties that are potential historic properties (constructed more than 45 years ago) in the 500-foot buffer around the proposed facility. Prior to the 2023 survey, none of the buildings were recorded in the Minnesota Statewide Historic Inventory. One of the buildings was in the ESB and formally recorded during the survey (WA-HGC-00077; 17903 Henna Avenue North); the others (at 17803 Henna Avenue North and 17958 Henna Avenue North) were observed but not formally recorded.

The single-family residence at 17903 Henna Avenue North occupies a rectangular footprint, possesses two stories, is clad in composite siding and brick veneer, and terminates in a side-gable roof sheathed in asphalt shingles. It possesses an attached, single-bay garage along the south elevation. Based on county records, the house was constructed in 1969. Historic exterior materials on this building have been altered with replacements to exterior cladding, window openings and asphalt roof shingles. The public ROW runs between the proposed facility and the property at 17903 Henna Avenue North. Additionally, there are several trees that will obscure views of the proposed facility.

The single-family home and garage at 17803 Henna Avenue North have been substantially altered through additions and renovation. The original house was constructed in the mid-1960s, but, according to county records, extensive changes were made in 1989. The proposed facility is not visible from the property at 17803 Henna Avenue North as it is obscured by distance and a line of mature trees.

There are several buildings on the 17958 Henna Avenue North property. Only the single-family home and one outbuilding are within the 500-foot indirect APE around the proposed facility. The two-story home was constructed around 1880 and has had significant alterations to its exterior. In addition, the house is orientated to the north, while the facility will be constructed to the southeast. The combination of distance and topography, as well as an agricultural field and mature deciduous trees visually buffer the potential historic buildings from the proposed Project.

The proposed aboveground valve setting will not substantively alter the viewshed of the potential historic properties at 17803, 17903, and 17958 Henna Avenue North. Temporary visual impacts on the property during construction will not affect the attributes contributing to the potential significance and integrity of these properties. As such, the proposed Project will not adversely impact the aspects of integrity of these potential historic properties.

The proposed Elk River 3rd branch line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Farmington to Hugo C-line

Archaeology

From July 17 to 20, October 18 and November 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at 5-meter intervals in high probability areas and shovel testing at 15-meter intervals were planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields, wetlands and woodlands associated with the wetlands and pasture.

Ground surface visibility was good in the agricultural fields ranging from 40-100%. Woodland and pastures had lower surface visibility that ranged between 25 and 50%. The total ESB encompassed 172.97 acres. Roadways, existing graveled facility lots, as well as inundated and usually inundated areas, a total of 19.26 acres, were excluded from survey. The remaining 153.71 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical properties in the Farmington to Hugo C-line ESB. They were recorded in the Minnesota Statewide Historic Inventory and assigned designations WA-MYT-031 and WA-MYT-032. WA-MYT-031 is a 1973 single-family residence. The two-story, multi-bay building occupies a rectangular footprint, is clad in composite siding and brick veneer, and terminates in a low-pitched, hipped roof with overhanging eaves sheathed in asphalt shingles. The building features a single-story attached garage and a recessed front porch covered by a secondary hipped roof also sheathed in asphalt shingles.

WA-MYT-032 includes two historical buildings, a house (WA-MYT-028) and a shed (WA-MYT-029). WA-MYT-028 is a 1972 single-family residence. The one-and-one-half story, multi-bay building occupies a rectangular footprint, is clad in vinyl siding and brick veneer, and terminates in a front-gable roof with overhanging eaves sheathed in asphalt shingles. The façade features a secondary, front-gable projection and a recessed porch. The east elevation features a two-bay, integral garage. WA-MYT-029 is a 1972 shed near the house. The single-story shed occupies a rectangular footprint, is clad in wood siding, and terminates in a gambrel roof with overhanging eaves sheathed in asphalt shingles. Both of these properties are recommended not eligible for listing in the NRHP and both are avoided through HDD in the current Project design.

Northern proposes to install a new launcher and associated valves and piping at the existing Hugo compressor station (MP 0.00), as well as install a new tie-in valve setting (MP 1.91) for the

Farmington to Hugo C-line. Aboveground construction for the aboveground tie-in valve setting will not exceed ten feet in height. The potential for adverse visual effects to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the Hugo compressor station and the proposed valve setting at MP 1.91. Northern conducted a visual assessment of these areas by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

One potential historical resource is located in the Hugo compressor station buffer, a house at 10830 180th Street North. This property has not been recorded in the Minnesota Statewide Historic Inventory. According to county records, it was constructed in 1977 and is a split foyer frame home with an attached garage. Significant alterations were made to the house in 2016. This house is set back from 180th Street North approximately 240 feet and is surrounded by trees. The combination of distance, a public ROW (180th Street North), as well as trees and other foliage visually buffer the potential historic building from the proposed project.

The proposed Farmington to Hugo C-line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Tomah branch line loop

Archaeology

Portions of the Tomah branch line loop was surveyed in August 2019, August and November 2021 and most recently surveyed in October and November 2023 and January 2024. Northern completed archaeological field investigations using standard methodology for archaeological surveys. Pedestrian survey was conducted at five-meter or less interval transects following the general direction of the survey corridor. Shovel testing was conducted at 15-meter or less interval. In areas with a greater probability for archaeological sites such as stream crossings, pedestrian survey was conducted at approximately one-meter intervals and shovel testing at less than five-meter intervals.

The survey area was located primarily in agricultural fields, with intermittent wooded areas, residential yards and wetlands. At the time of the field investigation, most of the survey area consisted of harvested fields and plowed corn and soybean fields. Most fields displayed 90-100% surface visibility which allowed field investigation to be conducted using pedestrian survey methods.

Of the total investigated area (124.7 acres), 55.9 acres were investigated using pedestrian survey methods and 55.4 acres were shovel tested. Approximately 13.4 acres were exempted from investigation survey in areas of slope, stream channels, or areas where ground had been disturbed by road and road drainage ditch construction. No prehistoric or historic period Euro-American artifacts or archaeological features were observed in the direct APE.

Aboveground Historical Properties

Northern plans to relocate a branch line receiver on the Tomah branch line loop (MP 3.53). The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the indirect APE was limited to the 500-foot buffer around the valve setting. Aboveground

construction will not exceed eight feet in height. Northern conducted a visual assessment of the indirect APE by walking the areas surrounding the Project and no historical properties were identified.

The proposed construction will not have an effect to any Wisconsin Architecture and History Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

La Crescent compressor station

Archaeology

On September 19, 2023, Northern completed archaeological field investigations using 15-meter interval pedestrian survey in areas of the ESB that were not graveled. The graveled facilities were excluded from survey. The survey area included short and medium grasses and corn fields. Ground surface visibility averaged 25% in grassy areas, but in the corn fields, ground surface visibility averaged 90%.

The total ESB encompassed 3.02 acres. Areas excluded from survey, consisting of graveled access drives and facilities and roadway totaling 1.72 acres. The remaining 1.30 acres averaged more than 25% ground surface visibility and was subjected to pedestrian survey. No archaeological sites or isolated finds were identified in the direct APE.

The current Project design and proposed construction activities will not have direct effects to any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern proposes minor modifications to existing infrastructure at the La Crescent compressor station, including replacing compressor cylinder end caps (currently blind flanges) and adjusting compressor mechanical characteristics to match new operating conditions. While impacts that are subject to review under 36 CFR § 800 may include surficial disturbances caused by topsoil removal, heavy machinery traffic, shallow grading, and spoil dirt management, only vehicular parking is anticipated for this Project component.

The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the existing compressor station lot. Northern conducted a visual assessment of this buffer by examining aerial imagery and observing areas surrounding the project from the public ROW and ESB. No aboveground cultural resources were observed in the 500-foot buffer.

Conclusion and Request for Consultation

To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the attached maps and report and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Northern Natural Gas
Northern Lights 2025 Expansion Project
February 14, 2024

Northern respects that the Tribe has unique expertise in identifying and providing information regarding historic properties with religious or cultural significance which may be affected by the Project. Northern is seeking the Tribe's comments on survey methodology, traditional cultural properties, and traditional cultural landscapes along with areas of importance to the Tribe which should be considered. Northern understands this request for information does not circumvent the government-to-government relationship under Section 106 (36 Code of Federal Regulations Part 800) between the Tribe and the FERC. Please be assured that Northern will keep sensitive Tribal information strictly confidential.

While the regulations for implementing Section 106 (36 Code of Federal Regulations Part 800) allow companies like Northern (and their consultants) to gather information, the FERC is responsible for monitoring compliance with the NHPA and determinations pursuant to Section 106. Additionally, the FERC, not Northern, is responsible for government-to-government consultations with American Indian Tribes. The FERC has not delegated this consultation. The FERC will contact you through a *Notice of Intent to Produce an Environmental Document*. If you would like to communicate directly with the FERC natural gas archaeological staff to discuss its cultural resource review and consultation processes, please feel free to contact Elizabeth Molloy, Tribal Liaison, at 202-502-8771 or Elizabeth.Molloy@ferc.gov.

Thank you in advance for your attention to this Project. Northern would very much appreciate receiving your response within 30 days of the date of this letter. Northern will follow up with you via phone contact or email if no response is received within 30 days. In the interim, should you have questions or need additional information, please contact me at 402-398-7226 or Terry.Plucker@nngco.com or Susan Knabe of Stantec at 920-278-3220 or Susan.Knabe@stantec.com.

Sincerely,



Terry Plucker
Environmental Compliance Manager
Northern Natural Gas Company

Enclosures: RCG&A Cultural Resources Reports
Phase One Cultural Resources Report
Unanticipated Discovery Plans (Minnesota and Wisconsin)

CC: Susan Knabe, Stantec Consulting
Matt Nelson, Northern Natural Gas

From: Waller, Hiedi
To: thpo@spiritlakenation.com
Cc: Knabe, Susan; Terry.Plucker@nngco.com
Subject: FW: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS
Date: Wednesday, February 14, 2024 9:20:00 PM
Attachments: [NL 2025 THPO Spirit Lake Tribe, North Dakota.pdf](#)

THPO Graywater:

Northern is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Over periodic field events from 2019 through 2024, Phase One Archaeological Services Inc. and R. Christopher Goodwin & Associates, Inc. completed field surveys of the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The results of these survey efforts are included in the cultural resources reports. To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the cultural resources reports and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Due to the size of the files associated with the Project, Northern has set up an FTP site where the cultural resources reports and Unanticipated Discoveries Plans referenced in the attached letter can be downloaded.

Please contact us if you have any questions.

Hiedi Waller, PE
Senior Engineer
Pronouns: she, her, hers
Phone: (262) 643-9161

From: donotreply@secureftp.stantec.com <donotreply@secureftp.stantec.com>
Sent: Wednesday, February 14, 2024 9:20 PM
To: Waller, Hiedi <Hiedi.Waller@stantec.com>
Subject: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS

Your directory has successfully been created!

Please use the link below to access your directory with the username and password provided.

Login Information

Browser link: <https://tmpsftp.stantec.com>

FTP Client Hostname: tmpsftp.stantec.com **Port:** 22 (can be used within a SFTP client to view and transfer files and folders; e.g., FileZilla)

Login name: s0221202004

Password: 9670102

Disk Quota: 20 GB

Expiry Date: 2/21/2024

If you require a one-time one-week extension, please click [here](#).

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Click here for the [quick reference guide](#).

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1111 South 103rd Street
Omaha, NE 68124

February 14, 2024

Spirit Lake Tribe, North Dakota
Kenneth Graywater, Interim Director THPO
PO Box 198
Fort Totten, ND 58335

Re: Northern Natural Gas–Northern Lights 2025 Expansion Project – Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin

Dear Interim Director Tribal Historic Preservation Officer Graywater:

Northern Natural Gas (Northern) is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured the services of Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Northern is proposing to construct the Project, which will consist of (1) a 3.00-mile extension of its 36-inch-diameter Lake Mills to Albert Lea E-line; (2) a 2.43-mile extension of its 30-inch-diameter Elk River 3rd branch line; (3) a non-contiguous 1.91-mile extension of its 30-inch-diameter Farmington to Hugo C-line; (4) a 1.28-mile extension of its 8-inch-diameter Tomah branch line loop; (5) minor modifications to its existing La Crescent compressor station; and (6) aboveground facilities including a launcher, receiver and tie-in valve settings. All Project components are located in various counties in Minnesota and Wisconsin.

This letter summarizes the results of the investigations and recommendations of the archaeological investigator for the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The archeological reports from R. Christopher Goodwin & Associates, Inc. (RCG&A) and Phase One Archaeological Services Inc. (Phase One) are attached to this letter.

Literature Search

Northern's cultural resources' sub-consultants, RCG&A and Phase One, conducted background research at the Minnesota and Wisconsin SHPOs to identify previously recorded archaeological and above-grade resources. This study area encompassed a Project-specific environmental survey boundary (ESB), the direct Area of Potential Effects (APE) and the indirect APE and included archaeological sites and other cultural resources located in the immediate areas of planned construction along with a one-mile radius of all proposed project activities.

Lake Mills to Albert Lea E-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources on the list of National Register of Historic Places (NRHP) properties are in the indirect APE. One archaeological site, 21FE0130, and Minnesota Statewide Historic Inventory property FE-AEA-00264 extends into the 500-foot buffer around the proposed aboveground valve setting. However, due to distance and mature trees, no effects are anticipated.

Elk River 3rd branch line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Farmington to Hugo C-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Tomah branch line loop

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

A single standing structure, a 19th century Greek Revival Farmhouse (AHI # 78410) was previously located on the west side of County Highway Q within the indirect APE. This building was razed and replaced with a modern single-family farmhouse. No other aboveground historical resources previously listed in the Wisconsin Architecture-History Inventory or on the list of the NRHP properties are located in the indirect APE.

La Crescent compressor station

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the La Crescent compressor station to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Cultural Survey

Following the literature review, Northern's subconsultants conducted a systematic field survey of the direct APE, which includes the construction ROW (TWS), ETWS, access roads, staging areas, and the aboveground appurtenant facility footprints. The survey procedures included a pedestrian walkover of the APE, systematic surface examination of suitable areas, and systematic subsurface testing of areas lacking sufficient surface visibility or which had potential for subsurface resources.

The cultural resources survey is 89% complete for the Lake Mills to Albert Lea E-line with additional shovel testing needed on 77.02 acres anticipated in spring 2024. The cultural resource survey for the Elk River 3rd branch line is 92% complete with additional survey needed on 15.25 acres scheduled for spring 2024. Northern cultural resources surveys are 100% complete for the remaining Project components.

Lake Mills to Albert Lea E-line

Archaeology

On August 22, August 23, October 3, and October 23-27, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability and previously recorded cultural resources. Shovel testing at 15-meter intervals was planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields. Shovel testing is pending for selected locations with the potential for buried cultural deposits.

Excluding one farmstead and one hay field, the majority of the survey area consisted of harvested or mature crops with 50 to 100% ground surface visibility. The hay field yielded an average surface visibility of 30%. The total ESB encompassed 678.90 acres. Roadways, inundated, and usually inundated areas, a total of 23.98 acres, were excluded from survey. A total of 77.02 acres remains to be surveyed. The other 591.82 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

A Euro-American archaeological site (21FE0130) also assigned an historic inventory property (FE-AEA-00264) was initially recorded as part of another Northern project in 2022. During the 2023 effort, this site was surveyed again. The 2023 site visit prompted an updated site boundary and an updated site form was submitted to the Minnesota Office of the State Archaeologist. This

farmstead site consisted of a combination of standing structures, archaeological features, and a surface artifact scatter. The site is within the ESB, but does not extend into the direct APE. In the original site form, the extant structures were identified as lacking integrity. Since the initial site visit, three buildings have been demolished. The artifacts documented on the surface have been placed in dump locations of mixed time periods, grouped through heavy machinery in pushpiles, and disturbed by agricultural processes. The archaeological component at 21FE0130 has not been evaluated for listing in the NRHP. RCG&A recommends the architectural buildings (FE-AEA-00264) at this property not eligible for listing in the NRHP.

This resource (21FE0130/FE-AEA-00264) is not in the direct APE and will not be impacted by the Project. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

County Ditch No. 4 (FE-PIC-00008), a historical structure, was initially visited as part of another Northern project in 2022. During the 2023 fieldwork, it was more thoroughly documented. County Ditch No. 4 is an active drainage ditch bound by agricultural land. The majority of this ditch is open cut and possesses a steep V-shaped profile. Brome and other grasses covered the banks of the ditch. Survey measured a top width of between 50 and 60 feet and a bottom width of 9-15 feet. Standing water was present at the base of the ditch during survey in fall 2023 but the overall depth was estimated to be 10-12 feet. Based on observations made from public ROW and aerial images, these dimensions are typical of County Ditch No. 4. This ditch also includes two branches: the Colvin Branch and the Klukow Branch. The Klukow Branch was in the ESB and was documented as part of FE-PIC-0008. County Ditch No. 4 is recommended not eligible for listing in the NRHP. Northern will utilize a private driveway that crosses the ditch without improvements. Therefore, the project will have no effect to County Ditch No. 4 (FE-PIC-00008).

Northern will remove a tie-over valve setting (MP 31.21) and install a new tie-in valve setting (MP 34.21) for the Lake Mills to Albert Lea E-line extension project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 34.21. This entire area was within the surveyed ESB. Northern conducted a visual assessment of the 500 foot buffer by walking the areas surrounding the project. The western portion of archaeological site 21FE0130 / inventory property FE-AEA-00264 is within the visual effects area; however, given the distance and mature vegetation surrounding the standing structures at the site, there will not be any effect to the standing structures from the project.

The proposed construction will not have an effect to any Minnesota Standing Structures Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

Elk River 3rd branch line

Archaeology

On November 1-5 and 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability. Shovel testing at 15-meter intervals was planned for surveyed areas with less than 25% surface visibility); no such areas were identified on this project. The survey area included agricultural fields, a tree farm, wetlands and manicured lawn with small stands of trees. Several historical and recent single-family homes and associated outbuildings were within the ESB.

The agricultural fields and tree farm yielded an average surface visibility of 80%. Visibility in the manicured lawns was limited (average 30%) but stands of trees yielded better ground surface visibility (average 55%). The total ESB encompassed 194.59 acres. Roadways as well as inundated and usually inundated areas, a total of 58.92 acres, were excluded from survey. A total of 15.25 acres remains to be surveyed. The remaining 120.42 acres had more than 25% ground surface visibility and was subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical ditches (WA-FLC-00033 and WA-XXX-00002) and ten historical standing structures during the 2023 fieldwork. None of the buildings are in the direct APE. Only one newly recorded property, WA-HGC-00077, is in the 500-foot buffer of the proposed valve setting.

Two historical drainage ditches were newly recorded during the 2023 fieldwork. WA-FLC-00033 is an active drainage ditch constructed in approximately 1949. The ditch is open cut and possesses a steep V-shaped profile. Grasses covered the banks of the ditch. Surveyors measured a varied width between 1.5 and 3 meters. Based on observations made from public ROW and aerial images, these dimensions are typical of this ditch. WA-FLC-00033 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-FLC-00033 via HDD.

WA-XXX-00002, the channelized Hardwood Creek, is known as Judicial Ditch No. 2. Ordered in 1902, Judicial Ditch No. 2 is open cut and possesses a V-shaped profile. Surveyors measured a top width of approximately six meters. Grasses covered the banks of the ditch. While standing water was present within the ditch during survey in fall 2023, the overall depth of the ditch was measured at variable depths between 2 to 5 meters. Based on observations made from the public ROW and aerial images, these dimensions are fairly typical of Judicial Ditch No. 2. WA-XXX-

00002 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-XXX-00002 via HDD.

Northern plans to remove a tie-over valve setting (MP 1.07) and install a new tie-in valve setting (MP 3.45) for the Elk River 3rd branch line project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 3.45. Northern conducted a desktop analysis and visual assessment of the 500-foot buffer by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

Northern identified four built resources on three properties that are potential historic properties (constructed more than 45 years ago) in the 500-foot buffer around the proposed facility. Prior to the 2023 survey, none of the buildings were recorded in the Minnesota Statewide Historic Inventory. One of the buildings was in the ESB and formally recorded during the survey (WA-HGC-00077; 17903 Henna Avenue North); the others (at 17803 Henna Avenue North and 17958 Henna Avenue North) were observed but not formally recorded.

The single-family residence at 17903 Henna Avenue North occupies a rectangular footprint, possesses two stories, is clad in composite siding and brick veneer, and terminates in a side-gable roof sheathed in asphalt shingles. It possesses an attached, single-bay garage along the south elevation. Based on county records, the house was constructed in 1969. Historic exterior materials on this building have been altered with replacements to exterior cladding, window openings and asphalt roof shingles. The public ROW runs between the proposed facility and the property at 17903 Henna Avenue North. Additionally, there are several trees that will obscure views of the proposed facility.

The single-family home and garage at 17803 Henna Avenue North have been substantially altered through additions and renovation. The original house was constructed in the mid-1960s, but, according to county records, extensive changes were made in 1989. The proposed facility is not visible from the property at 17803 Henna Avenue North as it is obscured by distance and a line of mature trees.

There are several buildings on the 17958 Henna Avenue North property. Only the single-family home and one outbuilding are within the 500-foot indirect APE around the proposed facility. The two-story home was constructed around 1880 and has had significant alterations to its exterior. In addition, the house is orientated to the north, while the facility will be constructed to the southeast. The combination of distance and topography, as well as an agricultural field and mature deciduous trees visually buffer the potential historic buildings from the proposed Project.

The proposed aboveground valve setting will not substantively alter the viewshed of the potential historic properties at 17803, 17903, and 17958 Henna Avenue North. Temporary visual impacts on the property during construction will not affect the attributes contributing to the potential significance and integrity of these properties. As such, the proposed Project will not adversely impact the aspects of integrity of these potential historic properties.

The proposed Elk River 3rd branch line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Farmington to Hugo C-line

Archaeology

From July 17 to 20, October 18 and November 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at 5-meter intervals in high probability areas and shovel testing at 15-meter intervals were planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields, wetlands and woodlands associated with the wetlands and pasture.

Ground surface visibility was good in the agricultural fields ranging from 40-100%. Woodland and pastures had lower surface visibility that ranged between 25 and 50%. The total ESB encompassed 172.97 acres. Roadways, existing graveled facility lots, as well as inundated and usually inundated areas, a total of 19.26 acres, were excluded from survey. The remaining 153.71 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical properties in the Farmington to Hugo C-line ESB. They were recorded in the Minnesota Statewide Historic Inventory and assigned designations WA-MYT-031 and WA-MYT-032. WA-MYT-031 is a 1973 single-family residence. The two-story, multi-bay building occupies a rectangular footprint, is clad in composite siding and brick veneer, and terminates in a low-pitched, hipped roof with overhanging eaves sheathed in asphalt shingles. The building features a single-story attached garage and a recessed front porch covered by a secondary hipped roof also sheathed in asphalt shingles.

WA-MYT-032 includes two historical buildings, a house (WA-MYT-028) and a shed (WA-MYT-029). WA-MYT-028 is a 1972 single-family residence. The one-and-one-half story, multi-bay building occupies a rectangular footprint, is clad in vinyl siding and brick veneer, and terminates in a front-gable roof with overhanging eaves sheathed in asphalt shingles. The façade features a secondary, front-gable projection and a recessed porch. The east elevation features a two-bay, integral garage. WA-MYT-029 is a 1972 shed near the house. The single-story shed occupies a rectangular footprint, is clad in wood siding, and terminates in a gambrel roof with overhanging eaves sheathed in asphalt shingles. Both of these properties are recommended not eligible for listing in the NRHP and both are avoided through HDD in the current Project design.

Northern proposes to install a new launcher and associated valves and piping at the existing Hugo compressor station (MP 0.00), as well as install a new tie-in valve setting (MP 1.91) for the

Farmington to Hugo C-line. Aboveground construction for the aboveground tie-in valve setting will not exceed ten feet in height. The potential for adverse visual effects to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the Hugo compressor station and the proposed valve setting at MP 1.91. Northern conducted a visual assessment of these areas by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

One potential historical resource is located in the Hugo compressor station buffer, a house at 10830 180th Street North. This property has not been recorded in the Minnesota Statewide Historic Inventory. According to county records, it was constructed in 1977 and is a split foyer frame home with an attached garage. Significant alterations were made to the house in 2016. This house is set back from 180th Street North approximately 240 feet and is surrounded by trees. The combination of distance, a public ROW (180th Street North), as well as trees and other foliage visually buffer the potential historic building from the proposed project.

The proposed Farmington to Hugo C-line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Tomah branch line loop

Archaeology

Portions of the Tomah branch line loop was surveyed in August 2019, August and November 2021 and most recently surveyed in October and November 2023 and January 2024. Northern completed archaeological field investigations using standard methodology for archaeological surveys. Pedestrian survey was conducted at five-meter or less interval transects following the general direction of the survey corridor. Shovel testing was conducted at 15-meter or less interval. In areas with a greater probability for archaeological sites such as stream crossings, pedestrian survey was conducted at approximately one-meter intervals and shovel testing at less than five-meter intervals.

The survey area was located primarily in agricultural fields, with intermittent wooded areas, residential yards and wetlands. At the time of the field investigation, most of the survey area consisted of harvested fields and plowed corn and soybean fields. Most fields displayed 90-100% surface visibility which allowed field investigation to be conducted using pedestrian survey methods.

Of the total investigated area (124.7 acres), 55.9 acres were investigated using pedestrian survey methods and 55.4 acres were shovel tested. Approximately 13.4 acres were exempted from investigation survey in areas of slope, stream channels, or areas where ground had been disturbed by road and road drainage ditch construction. No prehistoric or historic period Euro-American artifacts or archaeological features were observed in the direct APE.

Aboveground Historical Properties

Northern plans to relocate a branch line receiver on the Tomah branch line loop (MP 3.53). The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the indirect APE was limited to the 500-foot buffer around the valve setting. Aboveground

construction will not exceed eight feet in height. Northern conducted a visual assessment of the indirect APE by walking the areas surrounding the Project and no historical properties were identified.

The proposed construction will not have an effect to any Wisconsin Architecture and History Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

La Crescent compressor station

Archaeology

On September 19, 2023, Northern completed archaeological field investigations using 15-meter interval pedestrian survey in areas of the ESB that were not graveled. The graveled facilities were excluded from survey. The survey area included short and medium grasses and corn fields. Ground surface visibility averaged 25% in grassy areas, but in the corn fields, ground surface visibility averaged 90%.

The total ESB encompassed 3.02 acres. Areas excluded from survey, consisting of graveled access drives and facilities and roadway totaling 1.72 acres. The remaining 1.30 acres averaged more than 25% ground surface visibility and was subjected to pedestrian survey. No archaeological sites or isolated finds were identified in the direct APE.

The current Project design and proposed construction activities will not have direct effects to any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern proposes minor modifications to existing infrastructure at the La Crescent compressor station, including replacing compressor cylinder end caps (currently blind flanges) and adjusting compressor mechanical characteristics to match new operating conditions. While impacts that are subject to review under 36 CFR § 800 may include surficial disturbances caused by topsoil removal, heavy machinery traffic, shallow grading, and spoil dirt management, only vehicular parking is anticipated for this Project component.

The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the existing compressor station lot. Northern conducted a visual assessment of this buffer by examining aerial imagery and observing areas surrounding the project from the public ROW and ESB. No aboveground cultural resources were observed in the 500-foot buffer.

Conclusion and Request for Consultation

To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the attached maps and report and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Northern Natural Gas
Northern Lights 2025 Expansion Project
February 14, 2024

Northern respects that the Tribe has unique expertise in identifying and providing information regarding historic properties with religious or cultural significance which may be affected by the Project. Northern is seeking the Tribe's comments on survey methodology, traditional cultural properties, and traditional cultural landscapes along with areas of importance to the Tribe which should be considered. Northern understands this request for information does not circumvent the government-to-government relationship under Section 106 (36 Code of Federal Regulations Part 800) between the Tribe and the FERC. Please be assured that Northern will keep sensitive Tribal information strictly confidential.

While the regulations for implementing Section 106 (36 Code of Federal Regulations Part 800) allow companies like Northern (and their consultants) to gather information, the FERC is responsible for monitoring compliance with the NHPA and determinations pursuant to Section 106. Additionally, the FERC, not Northern, is responsible for government-to-government consultations with American Indian Tribes. The FERC has not delegated this consultation. The FERC will contact you through a *Notice of Intent to Produce an Environmental Document*. If you would like to communicate directly with the FERC natural gas archaeological staff to discuss its cultural resource review and consultation processes, please feel free to contact Elizabeth Molloy, Tribal Liaison, at 202-502-8771 or Elizabeth.Molloy@ferc.gov.

Thank you in advance for your attention to this Project. Northern would very much appreciate receiving your response within 30 days of the date of this letter. Northern will follow up with you via phone contact or email if no response is received within 30 days. In the interim, should you have questions or need additional information, please contact me at 402-398-7226 or Terry.Plucker@nngco.com or Susan Knabe of Stantec at 920-278-3220 or Susan.Knabe@stantec.com.

Sincerely,



Terry Plucker
Environmental Compliance Manager
Northern Natural Gas Company

Enclosures: RCG&A Cultural Resources Reports
Phase One Cultural Resources Report
Unanticipated Discovery Plans (Minnesota and Wisconsin)

CC: Susan Knabe, Stantec Consulting
Matt Nelson, Northern Natural Gas

From: [Waller, Hiedi](#)
To: dianned@swo-nsn.gov
Cc: [Knabe, Susan](#); Terry.Plucker@nngco.com
Subject: FW: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS
Date: Wednesday, February 14, 2024 9:18:00 PM
Attachments: [NL 2025 THPO Sisseton-Wahpeton Oyate of the Lake Traverse Reservation, South Dakota.pdf](#)

THPO Desrosiers:

Northern is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Over periodic field events from 2019 through 2024, Phase One Archaeological Services Inc. and R. Christopher Goodwin & Associates, Inc. completed field surveys of the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The results of these survey efforts are included in the cultural resources reports. To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the cultural resources reports and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Due to the size of the files associated with the Project, Northern has set up an FTP site where the cultural resources reports and Unanticipated Discoveries Plans referenced in the attached letter can be downloaded.

Please contact us if you have any questions.

Hiedi Waller, PE
Senior Engineer
Pronouns: she, her, hers
Phone: (262) 643-9161

From: donotreply@secureftp.stantec.com <donotreply@secureftp.stantec.com>
Sent: Wednesday, February 14, 2024 9:20 PM
To: Waller, Hiedi <Hiedi.Waller@stantec.com>
Subject: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS

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Login Information

Browser link: <https://tmpsftp.stantec.com>

FTP Client Hostname: tmpsftp.stantec.com **Port:** 22 (can be used within a SFTP client to view and

transfer files and folders; e.g., FileZilla)

Login name: s0221202004

Password: 9670102

Disk Quota: 20 GB

Expiry Date: 2/21/2024

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1111 South 103rd Street
Omaha, NE 68124

February 14, 2024

Sisseton-Wahpeton Oyate of the Lake Traverse Reservation, South Dakota
Dianne Desrosiers, THPO
PO Box 907
Sisseton, SD 57262-0509

Re: Northern Natural Gas–Northern Lights 2025 Expansion Project – Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin

Dear Tribal Historic Preservation Officer Desrosiers:

Northern Natural Gas (Northern) is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured the services of Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Northern is proposing to construct the Project, which will consist of (1) a 3.00-mile extension of its 36-inch-diameter Lake Mills to Albert Lea E-line; (2) a 2.43-mile extension of its 30-inch-diameter Elk River 3rd branch line; (3) a non-contiguous 1.91-mile extension of its 30-inch-diameter Farmington to Hugo C-line; (4) a 1.28-mile extension of its 8-inch-diameter Tomah branch line loop; (5) minor modifications to its existing La Crescent compressor station; and (6) aboveground facilities including a launcher, receiver and tie-in valve settings. All Project components are located in various counties in Minnesota and Wisconsin.

This letter summarizes the results of the investigations and recommendations of the archaeological investigator for the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The archeological reports from R. Christopher Goodwin & Associates, Inc. (RCG&A) and Phase One Archaeological Services Inc. (Phase One) are attached to this letter.

Literature Search

Northern's cultural resources' sub-consultants, RCG&A and Phase One, conducted background research at the Minnesota and Wisconsin SHPOs to identify previously recorded archaeological and above-grade resources. This study area encompassed a Project-specific environmental survey boundary (ESB), the direct Area of Potential Effects (APE) and the indirect APE and included archaeological sites and other cultural resources located in the immediate areas of planned construction along with a one-mile radius of all proposed project activities.

Lake Mills to Albert Lea E-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources on the list of National Register of Historic Places (NRHP) properties are in the indirect APE. One archaeological site, 21FE0130, and Minnesota Statewide Historic Inventory property FE-AEA-00264 extends into the 500-foot buffer around the proposed aboveground valve setting. However, due to distance and mature trees, no effects are anticipated.

Elk River 3rd branch line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Farmington to Hugo C-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Tomah branch line loop

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

A single standing structure, a 19th century Greek Revival Farmhouse (AHI # 78410) was previously located on the west side of County Highway Q within the indirect APE. This building was razed and replaced with a modern single-family farmhouse. No other aboveground historical resources previously listed in the Wisconsin Architecture-History Inventory or on the list of the NRHP properties are located in the indirect APE.

La Crescent compressor station

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the La Crescent compressor station to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Cultural Survey

Following the literature review, Northern's subconsultants conducted a systematic field survey of the direct APE, which includes the construction ROW (TWS), ETWS, access roads, staging areas, and the aboveground appurtenant facility footprints. The survey procedures included a pedestrian walkover of the APE, systematic surface examination of suitable areas, and systematic subsurface testing of areas lacking sufficient surface visibility or which had potential for subsurface resources.

The cultural resources survey is 89% complete for the Lake Mills to Albert Lea E-line with additional shovel testing needed on 77.02 acres anticipated in spring 2024. The cultural resource survey for the Elk River 3rd branch line is 92% complete with additional survey needed on 15.25 acres scheduled for spring 2024. Northern cultural resources surveys are 100% complete for the remaining Project components.

Lake Mills to Albert Lea E-line

Archaeology

On August 22, August 23, October 3, and October 23-27, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability and previously recorded cultural resources. Shovel testing at 15-meter intervals was planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields. Shovel testing is pending for selected locations with the potential for buried cultural deposits.

Excluding one farmstead and one hay field, the majority of the survey area consisted of harvested or mature crops with 50 to 100% ground surface visibility. The hay field yielded an average surface visibility of 30%. The total ESB encompassed 678.90 acres. Roadways, inundated, and usually inundated areas, a total of 23.98 acres, were excluded from survey. A total of 77.02 acres remains to be surveyed. The other 591.82 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

A Euro-American archaeological site (21FE0130) also assigned an historic inventory property (FE-AEA-00264) was initially recorded as part of another Northern project in 2022. During the 2023 effort, this site was surveyed again. The 2023 site visit prompted an updated site boundary and an updated site form was submitted to the Minnesota Office of the State Archaeologist. This

farmstead site consisted of a combination of standing structures, archaeological features, and a surface artifact scatter. The site is within the ESB, but does not extend into the direct APE. In the original site form, the extant structures were identified as lacking integrity. Since the initial site visit, three buildings have been demolished. The artifacts documented on the surface have been placed in dump locations of mixed time periods, grouped through heavy machinery in pushpiles, and disturbed by agricultural processes. The archaeological component at 21FE0130 has not been evaluated for listing in the NRHP. RCG&A recommends the architectural buildings (FE-AEA-00264) at this property not eligible for listing in the NRHP.

This resource (21FE0130/FE-AEA-00264) is not in the direct APE and will not be impacted by the Project. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

County Ditch No. 4 (FE-PIC-00008), a historical structure, was initially visited as part of another Northern project in 2022. During the 2023 fieldwork, it was more thoroughly documented. County Ditch No. 4 is an active drainage ditch bound by agricultural land. The majority of this ditch is open cut and possesses a steep V-shaped profile. Brome and other grasses covered the banks of the ditch. Survey measured a top width of between 50 and 60 feet and a bottom width of 9-15 feet. Standing water was present at the base of the ditch during survey in fall 2023 but the overall depth was estimated to be 10-12 feet. Based on observations made from public ROW and aerial images, these dimensions are typical of County Ditch No. 4. This ditch also includes two branches: the Colvin Branch and the Klukow Branch. The Klukow Branch was in the ESB and was documented as part of FE-PIC-0008. County Ditch No. 4 is recommended not eligible for listing in the NRHP. Northern will utilize a private driveway that crosses the ditch without improvements. Therefore, the project will have no effect to County Ditch No. 4 (FE-PIC-00008).

Northern will remove a tie-over valve setting (MP 31.21) and install a new tie-in valve setting (MP 34.21) for the Lake Mills to Albert Lea E-line extension project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 34.21. This entire area was within the surveyed ESB. Northern conducted a visual assessment of the 500 foot buffer by walking the areas surrounding the project. The western portion of archaeological site 21FE0130 / inventory property FE-AEA-00264 is within the visual effects area; however, given the distance and mature vegetation surrounding the standing structures at the site, there will not be any effect to the standing structures from the project.

The proposed construction will not have an effect to any Minnesota Standing Structures Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

Elk River 3rd branch line

Archaeology

On November 1-5 and 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability. Shovel testing at 15-meter intervals was planned for surveyed areas with less than 25% surface visibility); no such areas were identified on this project. The survey area included agricultural fields, a tree farm, wetlands and manicured lawn with small stands of trees. Several historical and recent single-family homes and associated outbuildings were within the ESB.

The agricultural fields and tree farm yielded an average surface visibility of 80%. Visibility in the manicured lawns was limited (average 30%) but stands of trees yielded better ground surface visibility (average 55%). The total ESB encompassed 194.59 acres. Roadways as well as inundated and usually inundated areas, a total of 58.92 acres, were excluded from survey. A total of 15.25 acres remains to be surveyed. The remaining 120.42 acres had more than 25% ground surface visibility and was subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical ditches (WA-FLC-00033 and WA-XXX-00002) and ten historical standing structures during the 2023 fieldwork. None of the buildings are in the direct APE. Only one newly recorded property, WA-HGC-00077, is in the 500-foot buffer of the proposed valve setting.

Two historical drainage ditches were newly recorded during the 2023 fieldwork. WA-FLC-00033 is an active drainage ditch constructed in approximately 1949. The ditch is open cut and possesses a steep V-shaped profile. Grasses covered the banks of the ditch. Surveyors measured a varied width between 1.5 and 3 meters. Based on observations made from public ROW and aerial images, these dimensions are typical of this ditch. WA-FLC-00033 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-FLC-00033 via HDD.

WA-XXX-00002, the channelized Hardwood Creek, is known as Judicial Ditch No. 2. Ordered in 1902, Judicial Ditch No. 2 is open cut and possesses a V-shaped profile. Surveyors measured a top width of approximately six meters. Grasses covered the banks of the ditch. While standing water was present within the ditch during survey in fall 2023, the overall depth of the ditch was measured at variable depths between 2 to 5 meters. Based on observations made from the public ROW and aerial images, these dimensions are fairly typical of Judicial Ditch No. 2. WA-XXX-

00002 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-XXX-00002 via HDD.

Northern plans to remove a tie-over valve setting (MP 1.07) and install a new tie-in valve setting (MP 3.45) for the Elk River 3rd branch line project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 3.45. Northern conducted a desktop analysis and visual assessment of the 500-foot buffer by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

Northern identified four built resources on three properties that are potential historic properties (constructed more than 45 years ago) in the 500-foot buffer around the proposed facility. Prior to the 2023 survey, none of the buildings were recorded in the Minnesota Statewide Historic Inventory. One of the buildings was in the ESB and formally recorded during the survey (WA-HGC-00077; 17903 Henna Avenue North); the others (at 17803 Henna Avenue North and 17958 Henna Avenue North) were observed but not formally recorded.

The single-family residence at 17903 Henna Avenue North occupies a rectangular footprint, possesses two stories, is clad in composite siding and brick veneer, and terminates in a side-gable roof sheathed in asphalt shingles. It possesses an attached, single-bay garage along the south elevation. Based on county records, the house was constructed in 1969. Historic exterior materials on this building have been altered with replacements to exterior cladding, window openings and asphalt roof shingles. The public ROW runs between the proposed facility and the property at 17903 Henna Avenue North. Additionally, there are several trees that will obscure views of the proposed facility.

The single-family home and garage at 17803 Henna Avenue North have been substantially altered through additions and renovation. The original house was constructed in the mid-1960s, but, according to county records, extensive changes were made in 1989. The proposed facility is not visible from the property at 17803 Henna Avenue North as it is obscured by distance and a line of mature trees.

There are several buildings on the 17958 Henna Avenue North property. Only the single-family home and one outbuilding are within the 500-foot indirect APE around the proposed facility. The two-story home was constructed around 1880 and has had significant alterations to its exterior. In addition, the house is orientated to the north, while the facility will be constructed to the southeast. The combination of distance and topography, as well as an agricultural field and mature deciduous trees visually buffer the potential historic buildings from the proposed Project.

The proposed aboveground valve setting will not substantively alter the viewshed of the potential historic properties at 17803, 17903, and 17958 Henna Avenue North. Temporary visual impacts on the property during construction will not affect the attributes contributing to the potential significance and integrity of these properties. As such, the proposed Project will not adversely impact the aspects of integrity of these potential historic properties.

The proposed Elk River 3rd branch line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Farmington to Hugo C-line

Archaeology

From July 17 to 20, October 18 and November 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at 5-meter intervals in high probability areas and shovel testing at 15-meter intervals were planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields, wetlands and woodlands associated with the wetlands and pasture.

Ground surface visibility was good in the agricultural fields ranging from 40-100%. Woodland and pastures had lower surface visibility that ranged between 25 and 50%. The total ESB encompassed 172.97 acres. Roadways, existing graveled facility lots, as well as inundated and usually inundated areas, a total of 19.26 acres, were excluded from survey. The remaining 153.71 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical properties in the Farmington to Hugo C-line ESB. They were recorded in the Minnesota Statewide Historic Inventory and assigned designations WA-MYT-031 and WA-MYT-032. WA-MYT-031 is a 1973 single-family residence. The two-story, multi-bay building occupies a rectangular footprint, is clad in composite siding and brick veneer, and terminates in a low-pitched, hipped roof with overhanging eaves sheathed in asphalt shingles. The building features a single-story attached garage and a recessed front porch covered by a secondary hipped roof also sheathed in asphalt shingles.

WA-MYT-032 includes two historical buildings, a house (WA-MYT-028) and a shed (WA-MYT-029). WA-MYT-028 is a 1972 single-family residence. The one-and-one-half story, multi-bay building occupies a rectangular footprint, is clad in vinyl siding and brick veneer, and terminates in a front-gable roof with overhanging eaves sheathed in asphalt shingles. The façade features a secondary, front-gable projection and a recessed porch. The east elevation features a two-bay, integral garage. WA-MYT-029 is a 1972 shed near the house. The single-story shed occupies a rectangular footprint, is clad in wood siding, and terminates in a gambrel roof with overhanging eaves sheathed in asphalt shingles. Both of these properties are recommended not eligible for listing in the NRHP and both are avoided through HDD in the current Project design.

Northern proposes to install a new launcher and associated valves and piping at the existing Hugo compressor station (MP 0.00), as well as install a new tie-in valve setting (MP 1.91) for the

Farmington to Hugo C-line. Aboveground construction for the aboveground tie-in valve setting will not exceed ten feet in height. The potential for adverse visual effects to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the Hugo compressor station and the proposed valve setting at MP 1.91. Northern conducted a visual assessment of these areas by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

One potential historical resource is located in the Hugo compressor station buffer, a house at 10830 180th Street North. This property has not been recorded in the Minnesota Statewide Historic Inventory. According to county records, it was constructed in 1977 and is a split foyer frame home with an attached garage. Significant alterations were made to the house in 2016. This house is set back from 180th Street North approximately 240 feet and is surrounded by trees. The combination of distance, a public ROW (180th Street North), as well as trees and other foliage visually buffer the potential historic building from the proposed project.

The proposed Farmington to Hugo C-line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Tomah branch line loop

Archaeology

Portions of the Tomah branch line loop was surveyed in August 2019, August and November 2021 and most recently surveyed in October and November 2023 and January 2024. Northern completed archaeological field investigations using standard methodology for archaeological surveys. Pedestrian survey was conducted at five-meter or less interval transects following the general direction of the survey corridor. Shovel testing was conducted at 15-meter or less interval. In areas with a greater probability for archaeological sites such as stream crossings, pedestrian survey was conducted at approximately one-meter intervals and shovel testing at less than five-meter intervals.

The survey area was located primarily in agricultural fields, with intermittent wooded areas, residential yards and wetlands. At the time of the field investigation, most of the survey area consisted of harvested fields and plowed corn and soybean fields. Most fields displayed 90-100% surface visibility which allowed field investigation to be conducted using pedestrian survey methods.

Of the total investigated area (124.7 acres), 55.9 acres were investigated using pedestrian survey methods and 55.4 acres were shovel tested. Approximately 13.4 acres were exempted from investigation survey in areas of slope, stream channels, or areas where ground had been disturbed by road and road drainage ditch construction. No prehistoric or historic period Euro-American artifacts or archaeological features were observed in the direct APE.

Aboveground Historical Properties

Northern plans to relocate a branch line receiver on the Tomah branch line loop (MP 3.53). The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the indirect APE was limited to the 500-foot buffer around the valve setting. Aboveground

construction will not exceed eight feet in height. Northern conducted a visual assessment of the indirect APE by walking the areas surrounding the Project and no historical properties were identified.

The proposed construction will not have an effect to any Wisconsin Architecture and History Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

La Crescent compressor station

Archaeology

On September 19, 2023, Northern completed archaeological field investigations using 15-meter interval pedestrian survey in areas of the ESB that were not graveled. The graveled facilities were excluded from survey. The survey area included short and medium grasses and corn fields. Ground surface visibility averaged 25% in grassy areas, but in the corn fields, ground surface visibility averaged 90%.

The total ESB encompassed 3.02 acres. Areas excluded from survey, consisting of graveled access drives and facilities and roadway totaling 1.72 acres. The remaining 1.30 acres averaged more than 25% ground surface visibility and was subjected to pedestrian survey. No archaeological sites or isolated finds were identified in the direct APE.

The current Project design and proposed construction activities will not have direct effects to any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern proposes minor modifications to existing infrastructure at the La Crescent compressor station, including replacing compressor cylinder end caps (currently blind flanges) and adjusting compressor mechanical characteristics to match new operating conditions. While impacts that are subject to review under 36 CFR § 800 may include surficial disturbances caused by topsoil removal, heavy machinery traffic, shallow grading, and spoil dirt management, only vehicular parking is anticipated for this Project component.

The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the existing compressor station lot. Northern conducted a visual assessment of this buffer by examining aerial imagery and observing areas surrounding the project from the public ROW and ESB. No aboveground cultural resources were observed in the 500-foot buffer.

Conclusion and Request for Consultation

To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the attached maps and report and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Northern Natural Gas
Northern Lights 2025 Expansion Project
February 14, 2024

Northern respects that the Tribe has unique expertise in identifying and providing information regarding historic properties with religious or cultural significance which may be affected by the Project. Northern is seeking the Tribe's comments on survey methodology, traditional cultural properties, and traditional cultural landscapes along with areas of importance to the Tribe which should be considered. Northern understands this request for information does not circumvent the government-to-government relationship under Section 106 (36 Code of Federal Regulations Part 800) between the Tribe and the FERC. Please be assured that Northern will keep sensitive Tribal information strictly confidential.

While the regulations for implementing Section 106 (36 Code of Federal Regulations Part 800) allow companies like Northern (and their consultants) to gather information, the FERC is responsible for monitoring compliance with the NHPA and determinations pursuant to Section 106. Additionally, the FERC, not Northern, is responsible for government-to-government consultations with American Indian Tribes. The FERC has not delegated this consultation. The FERC will contact you through a *Notice of Intent to Produce an Environmental Document*. If you would like to communicate directly with the FERC natural gas archaeological staff to discuss its cultural resource review and consultation processes, please feel free to contact Elizabeth Molloy, Tribal Liaison, at 202-502-8771 or Elizabeth.Molloy@ferc.gov.

Thank you in advance for your attention to this Project. Northern would very much appreciate receiving your response within 30 days of the date of this letter. Northern will follow up with you via phone contact or email if no response is received within 30 days. In the interim, should you have questions or need additional information, please contact me at 402-398-7226 or Terry.Plucker@nngco.com or Susan Knabe of Stantec at 920-278-3220 or Susan.Knabe@stantec.com.

Sincerely,



Terry Plucker
Environmental Compliance Manager
Northern Natural Gas Company

Enclosures: RCG&A Cultural Resources Reports
Phase One Cultural Resources Report
Unanticipated Discovery Plans (Minnesota and Wisconsin)

CC: Susan Knabe, Stantec Consulting
Matt Nelson, Northern Natural Gas

From: [Waller, Hiedi](#)
To: ssn.thpo@gmail.com
Cc: [Knabe, Susan](#); Terry.Plucker@nngco.com
Subject: FW: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS
Date: Wednesday, February 14, 2024 9:15:00 PM
Attachments: [NL 2025 THPO Santee Sioux Nation, Nebraska.pdf](#)

THPO Frazier:

Northern is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Over periodic field events from 2019 through 2024, Phase One Archaeological Services Inc. and R. Christopher Goodwin & Associates, Inc. completed field surveys of the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The results of these survey efforts are included in the cultural resources reports. To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the cultural resources reports and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Due to the size of the files associated with the Project, Northern has set up an FTP site where the cultural resources reports and Unanticipated Discoveries Plans referenced in the attached letter can be downloaded.

Please contact us if you have any questions.

Hiedi Waller, PE
Senior Engineer
Pronouns: she, her, hers
Phone: (262) 643-9161

From: donotreply@secureftp.stantec.com <donotreply@secureftp.stantec.com>
Sent: Wednesday, February 14, 2024 9:20 PM
To: Waller, Hiedi <Hiedi.Waller@stantec.com>
Subject: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS

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Please use the link below to access your directory with the username and password provided.

Login Information

Browser link: <https://tmpsftp.stantec.com>

FTP Client Hostname: tmpsftp.stantec.com **Port:** 22 (can be used within a SFTP client to view and

transfer files and folders; e.g., FileZilla)

Login name: s0221202004

Password: 9670102

Disk Quota: 20 GB

Expiry Date: 2/21/2024

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Click here for the [quick reference guide](#).

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1111 South 103rd Street
Omaha, NE 68124

February 14, 2024

Santee Sioux Nation, Nebraska
Misty Frazier, THPO
425 Frazier Ave. N. Suite 2
Niobrara, NE 68760

Re: Northern Natural Gas–Northern Lights 2025 Expansion Project – Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin

Dear Tribal Historic Preservation Officer Frazier:

Northern Natural Gas (Northern) is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured the services of Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Northern is proposing to construct the Project, which will consist of (1) a 3.00-mile extension of its 36-inch-diameter Lake Mills to Albert Lea E-line; (2) a 2.43-mile extension of its 30-inch-diameter Elk River 3rd branch line; (3) a non-contiguous 1.91-mile extension of its 30-inch-diameter Farmington to Hugo C-line; (4) a 1.28-mile extension of its 8-inch-diameter Tomah branch line loop; (5) minor modifications to its existing La Crescent compressor station; and (6) aboveground facilities including a launcher, receiver and tie-in valve settings. All Project components are located in various counties in Minnesota and Wisconsin.

This letter summarizes the results of the investigations and recommendations of the archaeological investigator for the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The archeological reports from R. Christopher Goodwin & Associates, Inc. (RCG&A) and Phase One Archaeological Services Inc. (Phase One) are attached to this letter.

Literature Search

Northern's cultural resources' sub-consultants, RCG&A and Phase One, conducted background research at the Minnesota and Wisconsin SHPOs to identify previously recorded archaeological and above-grade resources. This study area encompassed a Project-specific environmental survey boundary (ESB), the direct Area of Potential Effects (APE) and the indirect APE and included archaeological sites and other cultural resources located in the immediate areas of planned construction along with a one-mile radius of all proposed project activities.

Lake Mills to Albert Lea E-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources on the list of National Register of Historic Places (NRHP) properties are in the indirect APE. One archaeological site, 21FE0130, and Minnesota Statewide Historic Inventory property FE-AEA-00264 extends into the 500-foot buffer around the proposed aboveground valve setting. However, due to distance and mature trees, no effects are anticipated.

Elk River 3rd branch line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Farmington to Hugo C-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Tomah branch line loop

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

A single standing structure, a 19th century Greek Revival Farmhouse (AHI # 78410) was previously located on the west side of County Highway Q within the indirect APE. This building was razed and replaced with a modern single-family farmhouse. No other aboveground historical resources previously listed in the Wisconsin Architecture-History Inventory or on the list of the NRHP properties are located in the indirect APE.

La Crescent compressor station

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the La Crescent compressor station to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Cultural Survey

Following the literature review, Northern's subconsultants conducted a systematic field survey of the direct APE, which includes the construction ROW (TWS), ETWS, access roads, staging areas, and the aboveground appurtenant facility footprints. The survey procedures included a pedestrian walkover of the APE, systematic surface examination of suitable areas, and systematic subsurface testing of areas lacking sufficient surface visibility or which had potential for subsurface resources.

The cultural resources survey is 89% complete for the Lake Mills to Albert Lea E-line with additional shovel testing needed on 77.02 acres anticipated in spring 2024. The cultural resource survey for the Elk River 3rd branch line is 92% complete with additional survey needed on 15.25 acres scheduled for spring 2024. Northern cultural resources surveys are 100% complete for the remaining Project components.

Lake Mills to Albert Lea E-line

Archaeology

On August 22, August 23, October 3, and October 23-27, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability and previously recorded cultural resources. Shovel testing at 15-meter intervals was planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields. Shovel testing is pending for selected locations with the potential for buried cultural deposits.

Excluding one farmstead and one hay field, the majority of the survey area consisted of harvested or mature crops with 50 to 100% ground surface visibility. The hay field yielded an average surface visibility of 30%. The total ESB encompassed 678.90 acres. Roadways, inundated, and usually inundated areas, a total of 23.98 acres, were excluded from survey. A total of 77.02 acres remains to be surveyed. The other 591.82 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

A Euro-American archaeological site (21FE0130) also assigned an historic inventory property (FE-AEA-00264) was initially recorded as part of another Northern project in 2022. During the 2023 effort, this site was surveyed again. The 2023 site visit prompted an updated site boundary and an updated site form was submitted to the Minnesota Office of the State Archaeologist. This

farmstead site consisted of a combination of standing structures, archaeological features, and a surface artifact scatter. The site is within the ESB, but does not extend into the direct APE. In the original site form, the extant structures were identified as lacking integrity. Since the initial site visit, three buildings have been demolished. The artifacts documented on the surface have been placed in dump locations of mixed time periods, grouped through heavy machinery in pushpiles, and disturbed by agricultural processes. The archaeological component at 21FE0130 has not been evaluated for listing in the NRHP. RCG&A recommends the architectural buildings (FE-AEA-00264) at this property not eligible for listing in the NRHP.

This resource (21FE0130/FE-AEA-00264) is not in the direct APE and will not be impacted by the Project. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

County Ditch No. 4 (FE-PIC-00008), a historical structure, was initially visited as part of another Northern project in 2022. During the 2023 fieldwork, it was more thoroughly documented. County Ditch No. 4 is an active drainage ditch bound by agricultural land. The majority of this ditch is open cut and possesses a steep V-shaped profile. Brome and other grasses covered the banks of the ditch. Survey measured a top width of between 50 and 60 feet and a bottom width of 9-15 feet. Standing water was present at the base of the ditch during survey in fall 2023 but the overall depth was estimated to be 10-12 feet. Based on observations made from public ROW and aerial images, these dimensions are typical of County Ditch No. 4. This ditch also includes two branches: the Colvin Branch and the Klukow Branch. The Klukow Branch was in the ESB and was documented as part of FE-PIC-0008. County Ditch No. 4 is recommended not eligible for listing in the NRHP. Northern will utilize a private driveway that crosses the ditch without improvements. Therefore, the project will have no effect to County Ditch No. 4 (FE-PIC-00008).

Northern will remove a tie-over valve setting (MP 31.21) and install a new tie-in valve setting (MP 34.21) for the Lake Mills to Albert Lea E-line extension project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 34.21. This entire area was within the surveyed ESB. Northern conducted a visual assessment of the 500 foot buffer by walking the areas surrounding the project. The western portion of archaeological site 21FE0130 / inventory property FE-AEA-00264 is within the visual effects area; however, given the distance and mature vegetation surrounding the standing structures at the site, there will not be any effect to the standing structures from the project.

The proposed construction will not have an effect to any Minnesota Standing Structures Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

Elk River 3rd branch line

Archaeology

On November 1-5 and 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability. Shovel testing at 15-meter intervals was planned for surveyed areas with less than 25% surface visibility); no such areas were identified on this project. The survey area included agricultural fields, a tree farm, wetlands and manicured lawn with small stands of trees. Several historical and recent single-family homes and associated outbuildings were within the ESB.

The agricultural fields and tree farm yielded an average surface visibility of 80%. Visibility in the manicured lawns was limited (average 30%) but stands of trees yielded better ground surface visibility (average 55%). The total ESB encompassed 194.59 acres. Roadways as well as inundated and usually inundated areas, a total of 58.92 acres, were excluded from survey. A total of 15.25 acres remains to be surveyed. The remaining 120.42 acres had more than 25% ground surface visibility and was subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical ditches (WA-FLC-00033 and WA-XXX-00002) and ten historical standing structures during the 2023 fieldwork. None of the buildings are in the direct APE. Only one newly recorded property, WA-HGC-00077, is in the 500-foot buffer of the proposed valve setting.

Two historical drainage ditches were newly recorded during the 2023 fieldwork. WA-FLC-00033 is an active drainage ditch constructed in approximately 1949. The ditch is open cut and possesses a steep V-shaped profile. Grasses covered the banks of the ditch. Surveyors measured a varied width between 1.5 and 3 meters. Based on observations made from public ROW and aerial images, these dimensions are typical of this ditch. WA-FLC-00033 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-FLC-00033 via HDD.

WA-XXX-00002, the channelized Hardwood Creek, is known as Judicial Ditch No. 2. Ordered in 1902, Judicial Ditch No. 2 is open cut and possesses a V-shaped profile. Surveyors measured a top width of approximately six meters. Grasses covered the banks of the ditch. While standing water was present within the ditch during survey in fall 2023, the overall depth of the ditch was measured at variable depths between 2 to 5 meters. Based on observations made from the public ROW and aerial images, these dimensions are fairly typical of Judicial Ditch No. 2. WA-XXX-

00002 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-XXX-00002 via HDD.

Northern plans to remove a tie-over valve setting (MP 1.07) and install a new tie-in valve setting (MP 3.45) for the Elk River 3rd branch line project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 3.45. Northern conducted a desktop analysis and visual assessment of the 500-foot buffer by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

Northern identified four built resources on three properties that are potential historic properties (constructed more than 45 years ago) in the 500-foot buffer around the proposed facility. Prior to the 2023 survey, none of the buildings were recorded in the Minnesota Statewide Historic Inventory. One of the buildings was in the ESB and formally recorded during the survey (WA-HGC-00077; 17903 Henna Avenue North); the others (at 17803 Henna Avenue North and 17958 Henna Avenue North) were observed but not formally recorded.

The single-family residence at 17903 Henna Avenue North occupies a rectangular footprint, possesses two stories, is clad in composite siding and brick veneer, and terminates in a side-gable roof sheathed in asphalt shingles. It possesses an attached, single-bay garage along the south elevation. Based on county records, the house was constructed in 1969. Historic exterior materials on this building have been altered with replacements to exterior cladding, window openings and asphalt roof shingles. The public ROW runs between the proposed facility and the property at 17903 Henna Avenue North. Additionally, there are several trees that will obscure views of the proposed facility.

The single-family home and garage at 17803 Henna Avenue North have been substantially altered through additions and renovation. The original house was constructed in the mid-1960s, but, according to county records, extensive changes were made in 1989. The proposed facility is not visible from the property at 17803 Henna Avenue North as it is obscured by distance and a line of mature trees.

There are several buildings on the 17958 Henna Avenue North property. Only the single-family home and one outbuilding are within the 500-foot indirect APE around the proposed facility. The two-story home was constructed around 1880 and has had significant alterations to its exterior. In addition, the house is orientated to the north, while the facility will be constructed to the southeast. The combination of distance and topography, as well as an agricultural field and mature deciduous trees visually buffer the potential historic buildings from the proposed Project.

The proposed aboveground valve setting will not substantively alter the viewshed of the potential historic properties at 17803, 17903, and 17958 Henna Avenue North. Temporary visual impacts on the property during construction will not affect the attributes contributing to the potential significance and integrity of these properties. As such, the proposed Project will not adversely impact the aspects of integrity of these potential historic properties.

The proposed Elk River 3rd branch line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Farmington to Hugo C-line

Archaeology

From July 17 to 20, October 18 and November 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at 5-meter intervals in high probability areas and shovel testing at 15-meter intervals were planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields, wetlands and woodlands associated with the wetlands and pasture.

Ground surface visibility was good in the agricultural fields ranging from 40-100%. Woodland and pastures had lower surface visibility that ranged between 25 and 50%. The total ESB encompassed 172.97 acres. Roadways, existing graveled facility lots, as well as inundated and usually inundated areas, a total of 19.26 acres, were excluded from survey. The remaining 153.71 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical properties in the Farmington to Hugo C-line ESB. They were recorded in the Minnesota Statewide Historic Inventory and assigned designations WA-MYT-031 and WA-MYT-032. WA-MYT-031 is a 1973 single-family residence. The two-story, multi-bay building occupies a rectangular footprint, is clad in composite siding and brick veneer, and terminates in a low-pitched, hipped roof with overhanging eaves sheathed in asphalt shingles. The building features a single-story attached garage and a recessed front porch covered by a secondary hipped roof also sheathed in asphalt shingles.

WA-MYT-032 includes two historical buildings, a house (WA-MYT-028) and a shed (WA-MYT-029). WA-MYT-028 is a 1972 single-family residence. The one-and-one-half story, multi-bay building occupies a rectangular footprint, is clad in vinyl siding and brick veneer, and terminates in a front-gable roof with overhanging eaves sheathed in asphalt shingles. The façade features a secondary, front-gable projection and a recessed porch. The east elevation features a two-bay, integral garage. WA-MYT-029 is a 1972 shed near the house. The single-story shed occupies a rectangular footprint, is clad in wood siding, and terminates in a gambrel roof with overhanging eaves sheathed in asphalt shingles. Both of these properties are recommended not eligible for listing in the NRHP and both are avoided through HDD in the current Project design.

Northern proposes to install a new launcher and associated valves and piping at the existing Hugo compressor station (MP 0.00), as well as install a new tie-in valve setting (MP 1.91) for the

Farmington to Hugo C-line. Aboveground construction for the aboveground tie-in valve setting will not exceed ten feet in height. The potential for adverse visual effects to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the Hugo compressor station and the proposed valve setting at MP 1.91. Northern conducted a visual assessment of these areas by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

One potential historical resource is located in the Hugo compressor station buffer, a house at 10830 180th Street North. This property has not been recorded in the Minnesota Statewide Historic Inventory. According to county records, it was constructed in 1977 and is a split foyer frame home with an attached garage. Significant alterations were made to the house in 2016. This house is set back from 180th Street North approximately 240 feet and is surrounded by trees. The combination of distance, a public ROW (180th Street North), as well as trees and other foliage visually buffer the potential historic building from the proposed project.

The proposed Farmington to Hugo C-line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Tomah branch line loop

Archaeology

Portions of the Tomah branch line loop was surveyed in August 2019, August and November 2021 and most recently surveyed in October and November 2023 and January 2024. Northern completed archaeological field investigations using standard methodology for archaeological surveys. Pedestrian survey was conducted at five-meter or less interval transects following the general direction of the survey corridor. Shovel testing was conducted at 15-meter or less interval. In areas with a greater probability for archaeological sites such as stream crossings, pedestrian survey was conducted at approximately one-meter intervals and shovel testing at less than five-meter intervals.

The survey area was located primarily in agricultural fields, with intermittent wooded areas, residential yards and wetlands. At the time of the field investigation, most of the survey area consisted of harvested fields and plowed corn and soybean fields. Most fields displayed 90-100% surface visibility which allowed field investigation to be conducted using pedestrian survey methods.

Of the total investigated area (124.7 acres), 55.9 acres were investigated using pedestrian survey methods and 55.4 acres were shovel tested. Approximately 13.4 acres were exempted from investigation survey in areas of slope, stream channels, or areas where ground had been disturbed by road and road drainage ditch construction. No prehistoric or historic period Euro-American artifacts or archaeological features were observed in the direct APE.

Aboveground Historical Properties

Northern plans to relocate a branch line receiver on the Tomah branch line loop (MP 3.53). The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the indirect APE was limited to the 500-foot buffer around the valve setting. Aboveground

construction will not exceed eight feet in height. Northern conducted a visual assessment of the indirect APE by walking the areas surrounding the Project and no historical properties were identified.

The proposed construction will not have an effect to any Wisconsin Architecture and History Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

La Crescent compressor station

Archaeology

On September 19, 2023, Northern completed archaeological field investigations using 15-meter interval pedestrian survey in areas of the ESB that were not graveled. The graveled facilities were excluded from survey. The survey area included short and medium grasses and corn fields. Ground surface visibility averaged 25% in grassy areas, but in the corn fields, ground surface visibility averaged 90%.

The total ESB encompassed 3.02 acres. Areas excluded from survey, consisting of graveled access drives and facilities and roadway totaling 1.72 acres. The remaining 1.30 acres averaged more than 25% ground surface visibility and was subjected to pedestrian survey. No archaeological sites or isolated finds were identified in the direct APE.

The current Project design and proposed construction activities will not have direct effects to any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern proposes minor modifications to existing infrastructure at the La Crescent compressor station, including replacing compressor cylinder end caps (currently blind flanges) and adjusting compressor mechanical characteristics to match new operating conditions. While impacts that are subject to review under 36 CFR § 800 may include surficial disturbances caused by topsoil removal, heavy machinery traffic, shallow grading, and spoil dirt management, only vehicular parking is anticipated for this Project component.

The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the existing compressor station lot. Northern conducted a visual assessment of this buffer by examining aerial imagery and observing areas surrounding the project from the public ROW and ESB. No aboveground cultural resources were observed in the 500-foot buffer.

Conclusion and Request for Consultation

To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the attached maps and report and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Northern Natural Gas
Northern Lights 2025 Expansion Project
February 14, 2024

Northern respects that the Tribe has unique expertise in identifying and providing information regarding historic properties with religious or cultural significance which may be affected by the Project. Northern is seeking the Tribe's comments on survey methodology, traditional cultural properties, and traditional cultural landscapes along with areas of importance to the Tribe which should be considered. Northern understands this request for information does not circumvent the government-to-government relationship under Section 106 (36 Code of Federal Regulations Part 800) between the Tribe and the FERC. Please be assured that Northern will keep sensitive Tribal information strictly confidential.

While the regulations for implementing Section 106 (36 Code of Federal Regulations Part 800) allow companies like Northern (and their consultants) to gather information, the FERC is responsible for monitoring compliance with the NHPA and determinations pursuant to Section 106. Additionally, the FERC, not Northern, is responsible for government-to-government consultations with American Indian Tribes. The FERC has not delegated this consultation. The FERC will contact you through a *Notice of Intent to Produce an Environmental Document*. If you would like to communicate directly with the FERC natural gas archaeological staff to discuss its cultural resource review and consultation processes, please feel free to contact Elizabeth Molloy, Tribal Liaison, at 202-502-8771 or Elizabeth.Molloy@ferc.gov.

Thank you in advance for your attention to this Project. Northern would very much appreciate receiving your response within 30 days of the date of this letter. Northern will follow up with you via phone contact or email if no response is received within 30 days. In the interim, should you have questions or need additional information, please contact me at 402-398-7226 or Terry.Plucker@nngco.com or Susan Knabe of Stantec at 920-278-3220 or Susan.Knabe@stantec.com.

Sincerely,



Terry Plucker
Environmental Compliance Manager
Northern Natural Gas Company

Enclosures: RCG&A Cultural Resources Reports
Phase One Cultural Resources Report
Unanticipated Discovery Plans (Minnesota and Wisconsin)

CC: Susan Knabe, Stantec Consulting
Matt Nelson, Northern Natural Gas

From: [Waller, Hiedi](#)
To: noah.white@piic.org
Cc: [Knabe, Susan](#); Terry.Plucker@nngco.com
Subject: FW: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS
Date: Wednesday, February 14, 2024 9:13:00 PM
Attachments: [NL 2025 THPO Prairie Island Indian Community in the State of Minnesota.pdf](#)

THPO White:

Northern is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Over periodic field events from 2019 through 2024, Phase One Archaeological Services Inc. and R. Christopher Goodwin & Associates, Inc. completed field surveys of the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The results of these survey efforts are included in the cultural resources reports. To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the cultural resources reports and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Due to the size of the files associated with the Project, Northern has set up an FTP site where the cultural resources reports and Unanticipated Discoveries Plans referenced in the attached letter can be downloaded.

Please contact us if you have any questions.

Hiedi Waller, PE
Senior Engineer
Pronouns: she, her, hers
Phone: (262) 643-9161

From: donotreply@secureftp.stantec.com <donotreply@secureftp.stantec.com>
Sent: Wednesday, February 14, 2024 9:20 PM
To: Waller, Hiedi <Hiedi.Waller@stantec.com>
Subject: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS

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Login Information

Browser link: <https://tmpsftp.stantec.com>

FTP Client Hostname: tmpsftp.stantec.com **Port:** 22 (can be used within a SFTP client to view and

transfer files and folders; e.g., FileZilla)

Login name: s0221202004

Password: 9670102

Disk Quota: 20 GB

Expiry Date: 2/21/2024

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1111 South 103rd Street
Omaha, NE 68124

February 14, 2024

Prairie Island Indian Community in the State of Minnesota
Noah White, THPO
5636 Sturgeon Lake Road
Welch, MN 55089

Re: Northern Natural Gas–Northern Lights 2025 Expansion Project – Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin

Dear Tribal Historic Preservation Officer White:

Northern Natural Gas (Northern) is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured the services of Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Northern is proposing to construct the Project, which will consist of (1) a 3.00-mile extension of its 36-inch-diameter Lake Mills to Albert Lea E-line; (2) a 2.43-mile extension of its 30-inch-diameter Elk River 3rd branch line; (3) a non-contiguous 1.91-mile extension of its 30-inch-diameter Farmington to Hugo C-line; (4) a 1.28-mile extension of its 8-inch-diameter Tomah branch line loop; (5) minor modifications to its existing La Crescent compressor station; and (6) aboveground facilities including a launcher, receiver and tie-in valve settings. All Project components are located in various counties in Minnesota and Wisconsin.

This letter summarizes the results of the investigations and recommendations of the archaeological investigator for the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The archeological reports from R. Christopher Goodwin & Associates, Inc. (RCG&A) and Phase One Archaeological Services Inc. (Phase One) are attached to this letter.

Literature Search

Northern's cultural resources' sub-consultants, RCG&A and Phase One, conducted background research at the Minnesota and Wisconsin SHPOs to identify previously recorded archaeological and above-grade resources. This study area encompassed a Project-specific environmental survey boundary (ESB), the direct Area of Potential Effects (APE) and the indirect APE and included archaeological sites and other cultural resources located in the immediate areas of planned construction along with a one-mile radius of all proposed project activities.

Lake Mills to Albert Lea E-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources on the list of National Register of Historic Places (NRHP) properties are in the indirect APE. One archaeological site, 21FE0130, and Minnesota Statewide Historic Inventory property FE-AEA-00264 extends into the 500-foot buffer around the proposed aboveground valve setting. However, due to distance and mature trees, no effects are anticipated.

Elk River 3rd branch line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Farmington to Hugo C-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Tomah branch line loop

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

A single standing structure, a 19th century Greek Revival Farmhouse (AHI # 78410) was previously located on the west side of County Highway Q within the indirect APE. This building was razed and replaced with a modern single-family farmhouse. No other aboveground historical resources previously listed in the Wisconsin Architecture-History Inventory or on the list of the NRHP properties are located in the indirect APE.

La Crescent compressor station

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the La Crescent compressor station to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Cultural Survey

Following the literature review, Northern's subconsultants conducted a systematic field survey of the direct APE, which includes the construction ROW (TWS), ETWS, access roads, staging areas, and the aboveground appurtenant facility footprints. The survey procedures included a pedestrian walkover of the APE, systematic surface examination of suitable areas, and systematic subsurface testing of areas lacking sufficient surface visibility or which had potential for subsurface resources.

The cultural resources survey is 89% complete for the Lake Mills to Albert Lea E-line with additional shovel testing needed on 77.02 acres anticipated in spring 2024. The cultural resource survey for the Elk River 3rd branch line is 92% complete with additional survey needed on 15.25 acres scheduled for spring 2024. Northern cultural resources surveys are 100% complete for the remaining Project components.

Lake Mills to Albert Lea E-line

Archaeology

On August 22, August 23, October 3, and October 23-27, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability and previously recorded cultural resources. Shovel testing at 15-meter intervals was planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields. Shovel testing is pending for selected locations with the potential for buried cultural deposits.

Excluding one farmstead and one hay field, the majority of the survey area consisted of harvested or mature crops with 50 to 100% ground surface visibility. The hay field yielded an average surface visibility of 30%. The total ESB encompassed 678.90 acres. Roadways, inundated, and usually inundated areas, a total of 23.98 acres, were excluded from survey. A total of 77.02 acres remains to be surveyed. The other 591.82 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

A Euro-American archaeological site (21FE0130) also assigned an historic inventory property (FE-AEA-00264) was initially recorded as part of another Northern project in 2022. During the 2023 effort, this site was surveyed again. The 2023 site visit prompted an updated site boundary and an updated site form was submitted to the Minnesota Office of the State Archaeologist. This

farmstead site consisted of a combination of standing structures, archaeological features, and a surface artifact scatter. The site is within the ESB, but does not extend into the direct APE. In the original site form, the extant structures were identified as lacking integrity. Since the initial site visit, three buildings have been demolished. The artifacts documented on the surface have been placed in dump locations of mixed time periods, grouped through heavy machinery in pushpiles, and disturbed by agricultural processes. The archaeological component at 21FE0130 has not been evaluated for listing in the NRHP. RCG&A recommends the architectural buildings (FE-AEA-00264) at this property not eligible for listing in the NRHP.

This resource (21FE0130/FE-AEA-00264) is not in the direct APE and will not be impacted by the Project. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

County Ditch No. 4 (FE-PIC-00008), a historical structure, was initially visited as part of another Northern project in 2022. During the 2023 fieldwork, it was more thoroughly documented. County Ditch No. 4 is an active drainage ditch bound by agricultural land. The majority of this ditch is open cut and possesses a steep V-shaped profile. Brome and other grasses covered the banks of the ditch. Survey measured a top width of between 50 and 60 feet and a bottom width of 9-15 feet. Standing water was present at the base of the ditch during survey in fall 2023 but the overall depth was estimated to be 10-12 feet. Based on observations made from public ROW and aerial images, these dimensions are typical of County Ditch No. 4. This ditch also includes two branches: the Colvin Branch and the Klukow Branch. The Klukow Branch was in the ESB and was documented as part of FE-PIC-0008. County Ditch No. 4 is recommended not eligible for listing in the NRHP. Northern will utilize a private driveway that crosses the ditch without improvements. Therefore, the project will have no effect to County Ditch No. 4 (FE-PIC-00008).

Northern will remove a tie-over valve setting (MP 31.21) and install a new tie-in valve setting (MP 34.21) for the Lake Mills to Albert Lea E-line extension project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 34.21. This entire area was within the surveyed ESB. Northern conducted a visual assessment of the 500 foot buffer by walking the areas surrounding the project. The western portion of archaeological site 21FE0130 / inventory property FE-AEA-00264 is within the visual effects area; however, given the distance and mature vegetation surrounding the standing structures at the site, there will not be any effect to the standing structures from the project.

The proposed construction will not have an effect to any Minnesota Standing Structures Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

Elk River 3rd branch line

Archaeology

On November 1-5 and 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability. Shovel testing at 15-meter intervals was planned for surveyed areas with less than 25% surface visibility); no such areas were identified on this project. The survey area included agricultural fields, a tree farm, wetlands and manicured lawn with small stands of trees. Several historical and recent single-family homes and associated outbuildings were within the ESB.

The agricultural fields and tree farm yielded an average surface visibility of 80%. Visibility in the manicured lawns was limited (average 30%) but stands of trees yielded better ground surface visibility (average 55%). The total ESB encompassed 194.59 acres. Roadways as well as inundated and usually inundated areas, a total of 58.92 acres, were excluded from survey. A total of 15.25 acres remains to be surveyed. The remaining 120.42 acres had more than 25% ground surface visibility and was subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical ditches (WA-FLC-00033 and WA-XXX-00002) and ten historical standing structures during the 2023 fieldwork. None of the buildings are in the direct APE. Only one newly recorded property, WA-HGC-00077, is in the 500-foot buffer of the proposed valve setting.

Two historical drainage ditches were newly recorded during the 2023 fieldwork. WA-FLC-00033 is an active drainage ditch constructed in approximately 1949. The ditch is open cut and possesses a steep V-shaped profile. Grasses covered the banks of the ditch. Surveyors measured a varied width between 1.5 and 3 meters. Based on observations made from public ROW and aerial images, these dimensions are typical of this ditch. WA-FLC-00033 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-FLC-00033 via HDD.

WA-XXX-00002, the channelized Hardwood Creek, is known as Judicial Ditch No. 2. Ordered in 1902, Judicial Ditch No. 2 is open cut and possesses a V-shaped profile. Surveyors measured a top width of approximately six meters. Grasses covered the banks of the ditch. While standing water was present within the ditch during survey in fall 2023, the overall depth of the ditch was measured at variable depths between 2 to 5 meters. Based on observations made from the public ROW and aerial images, these dimensions are fairly typical of Judicial Ditch No. 2. WA-XXX-

00002 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-XXX-00002 via HDD.

Northern plans to remove a tie-over valve setting (MP 1.07) and install a new tie-in valve setting (MP 3.45) for the Elk River 3rd branch line project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 3.45. Northern conducted a desktop analysis and visual assessment of the 500-foot buffer by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

Northern identified four built resources on three properties that are potential historic properties (constructed more than 45 years ago) in the 500-foot buffer around the proposed facility. Prior to the 2023 survey, none of the buildings were recorded in the Minnesota Statewide Historic Inventory. One of the buildings was in the ESB and formally recorded during the survey (WA-HGC-00077; 17903 Henna Avenue North); the others (at 17803 Henna Avenue North and 17958 Henna Avenue North) were observed but not formally recorded.

The single-family residence at 17903 Henna Avenue North occupies a rectangular footprint, possesses two stories, is clad in composite siding and brick veneer, and terminates in a side-gable roof sheathed in asphalt shingles. It possesses an attached, single-bay garage along the south elevation. Based on county records, the house was constructed in 1969. Historic exterior materials on this building have been altered with replacements to exterior cladding, window openings and asphalt roof shingles. The public ROW runs between the proposed facility and the property at 17903 Henna Avenue North. Additionally, there are several trees that will obscure views of the proposed facility.

The single-family home and garage at 17803 Henna Avenue North have been substantially altered through additions and renovation. The original house was constructed in the mid-1960s, but, according to county records, extensive changes were made in 1989. The proposed facility is not visible from the property at 17803 Henna Avenue North as it is obscured by distance and a line of mature trees.

There are several buildings on the 17958 Henna Avenue North property. Only the single-family home and one outbuilding are within the 500-foot indirect APE around the proposed facility. The two-story home was constructed around 1880 and has had significant alterations to its exterior. In addition, the house is orientated to the north, while the facility will be constructed to the southeast. The combination of distance and topography, as well as an agricultural field and mature deciduous trees visually buffer the potential historic buildings from the proposed Project.

The proposed aboveground valve setting will not substantively alter the viewshed of the potential historic properties at 17803, 17903, and 17958 Henna Avenue North. Temporary visual impacts on the property during construction will not affect the attributes contributing to the potential significance and integrity of these properties. As such, the proposed Project will not adversely impact the aspects of integrity of these potential historic properties.

The proposed Elk River 3rd branch line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Farmington to Hugo C-line

Archaeology

From July 17 to 20, October 18 and November 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at 5-meter intervals in high probability areas and shovel testing at 15-meter intervals were planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields, wetlands and woodlands associated with the wetlands and pasture.

Ground surface visibility was good in the agricultural fields ranging from 40-100%. Woodland and pastures had lower surface visibility that ranged between 25 and 50%. The total ESB encompassed 172.97 acres. Roadways, existing graveled facility lots, as well as inundated and usually inundated areas, a total of 19.26 acres, were excluded from survey. The remaining 153.71 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical properties in the Farmington to Hugo C-line ESB. They were recorded in the Minnesota Statewide Historic Inventory and assigned designations WA-MYT-031 and WA-MYT-032. WA-MYT-031 is a 1973 single-family residence. The two-story, multi-bay building occupies a rectangular footprint, is clad in composite siding and brick veneer, and terminates in a low-pitched, hipped roof with overhanging eaves sheathed in asphalt shingles. The building features a single-story attached garage and a recessed front porch covered by a secondary hipped roof also sheathed in asphalt shingles.

WA-MYT-032 includes two historical buildings, a house (WA-MYT-028) and a shed (WA-MYT-029). WA-MYT-028 is a 1972 single-family residence. The one-and-one-half story, multi-bay building occupies a rectangular footprint, is clad in vinyl siding and brick veneer, and terminates in a front-gable roof with overhanging eaves sheathed in asphalt shingles. The façade features a secondary, front-gable projection and a recessed porch. The east elevation features a two-bay, integral garage. WA-MYT-029 is a 1972 shed near the house. The single-story shed occupies a rectangular footprint, is clad in wood siding, and terminates in a gambrel roof with overhanging eaves sheathed in asphalt shingles. Both of these properties are recommended not eligible for listing in the NRHP and both are avoided through HDD in the current Project design.

Northern proposes to install a new launcher and associated valves and piping at the existing Hugo compressor station (MP 0.00), as well as install a new tie-in valve setting (MP 1.91) for the

Farmington to Hugo C-line. Aboveground construction for the aboveground tie-in valve setting will not exceed ten feet in height. The potential for adverse visual effects to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the Hugo compressor station and the proposed valve setting at MP 1.91. Northern conducted a visual assessment of these areas by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

One potential historical resource is located in the Hugo compressor station buffer, a house at 10830 180th Street North. This property has not been recorded in the Minnesota Statewide Historic Inventory. According to county records, it was constructed in 1977 and is a split foyer frame home with an attached garage. Significant alterations were made to the house in 2016. This house is set back from 180th Street North approximately 240 feet and is surrounded by trees. The combination of distance, a public ROW (180th Street North), as well as trees and other foliage visually buffer the potential historic building from the proposed project.

The proposed Farmington to Hugo C-line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Tomah branch line loop

Archaeology

Portions of the Tomah branch line loop was surveyed in August 2019, August and November 2021 and most recently surveyed in October and November 2023 and January 2024. Northern completed archaeological field investigations using standard methodology for archaeological surveys. Pedestrian survey was conducted at five-meter or less interval transects following the general direction of the survey corridor. Shovel testing was conducted at 15-meter or less interval. In areas with a greater probability for archaeological sites such as stream crossings, pedestrian survey was conducted at approximately one-meter intervals and shovel testing at less than five-meter intervals.

The survey area was located primarily in agricultural fields, with intermittent wooded areas, residential yards and wetlands. At the time of the field investigation, most of the survey area consisted of harvested fields and plowed corn and soybean fields. Most fields displayed 90-100% surface visibility which allowed field investigation to be conducted using pedestrian survey methods.

Of the total investigated area (124.7 acres), 55.9 acres were investigated using pedestrian survey methods and 55.4 acres were shovel tested. Approximately 13.4 acres were exempted from investigation survey in areas of slope, stream channels, or areas where ground had been disturbed by road and road drainage ditch construction. No prehistoric or historic period Euro-American artifacts or archaeological features were observed in the direct APE.

Aboveground Historical Properties

Northern plans to relocate a branch line receiver on the Tomah branch line loop (MP 3.53). The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the indirect APE was limited to the 500-foot buffer around the valve setting. Aboveground

construction will not exceed eight feet in height. Northern conducted a visual assessment of the indirect APE by walking the areas surrounding the Project and no historical properties were identified.

The proposed construction will not have an effect to any Wisconsin Architecture and History Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

La Crescent compressor station

Archaeology

On September 19, 2023, Northern completed archaeological field investigations using 15-meter interval pedestrian survey in areas of the ESB that were not graveled. The graveled facilities were excluded from survey. The survey area included short and medium grasses and corn fields. Ground surface visibility averaged 25% in grassy areas, but in the corn fields, ground surface visibility averaged 90%.

The total ESB encompassed 3.02 acres. Areas excluded from survey, consisting of graveled access drives and facilities and roadway totaling 1.72 acres. The remaining 1.30 acres averaged more than 25% ground surface visibility and was subjected to pedestrian survey. No archaeological sites or isolated finds were identified in the direct APE.

The current Project design and proposed construction activities will not have direct effects to any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern proposes minor modifications to existing infrastructure at the La Crescent compressor station, including replacing compressor cylinder end caps (currently blind flanges) and adjusting compressor mechanical characteristics to match new operating conditions. While impacts that are subject to review under 36 CFR § 800 may include surficial disturbances caused by topsoil removal, heavy machinery traffic, shallow grading, and spoil dirt management, only vehicular parking is anticipated for this Project component.

The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the existing compressor station lot. Northern conducted a visual assessment of this buffer by examining aerial imagery and observing areas surrounding the project from the public ROW and ESB. No aboveground cultural resources were observed in the 500-foot buffer.

Conclusion and Request for Consultation

To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the attached maps and report and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Northern Natural Gas
Northern Lights 2025 Expansion Project
February 14, 2024

Northern respects that the Tribe has unique expertise in identifying and providing information regarding historic properties with religious or cultural significance which may be affected by the Project. Northern is seeking the Tribe's comments on survey methodology, traditional cultural properties, and traditional cultural landscapes along with areas of importance to the Tribe which should be considered. Northern understands this request for information does not circumvent the government-to-government relationship under Section 106 (36 Code of Federal Regulations Part 800) between the Tribe and the FERC. Please be assured that Northern will keep sensitive Tribal information strictly confidential.

While the regulations for implementing Section 106 (36 Code of Federal Regulations Part 800) allow companies like Northern (and their consultants) to gather information, the FERC is responsible for monitoring compliance with the NHPA and determinations pursuant to Section 106. Additionally, the FERC, not Northern, is responsible for government-to-government consultations with American Indian Tribes. The FERC has not delegated this consultation. The FERC will contact you through a *Notice of Intent to Produce an Environmental Document*. If you would like to communicate directly with the FERC natural gas archaeological staff to discuss its cultural resource review and consultation processes, please feel free to contact Elizabeth Molloy, Tribal Liaison, at 202-502-8771 or Elizabeth.Molloy@ferc.gov.

Thank you in advance for your attention to this Project. Northern would very much appreciate receiving your response within 30 days of the date of this letter. Northern will follow up with you via phone contact or email if no response is received within 30 days. In the interim, should you have questions or need additional information, please contact me at 402-398-7226 or Terry.Plucker@nngco.com or Susan Knabe of Stantec at 920-278-3220 or Susan.Knabe@stantec.com.

Sincerely,



Terry Plucker
Environmental Compliance Manager
Northern Natural Gas Company

Enclosures: RCG&A Cultural Resources Reports
Phase One Cultural Resources Report
Unanticipated Discovery Plans (Minnesota and Wisconsin)

CC: Susan Knabe, Stantec Consulting
Matt Nelson, Northern Natural Gas

From: [Waller, Hiedi](#)
To: historicpreservationgroup@mitw.org
Cc: [Knabe, Susan](#); Terry.Plucker@nngco.com
Subject: FW: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS
Date: Wednesday, February 14, 2024 9:11:00 PM
Attachments: [NL 2025 THPO Menominee Indian Tribe of Wisconsin.pdf](#)

THPO Grignon:

Northern is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Over periodic field events from 2019 through 2024, Phase One Archaeological Services Inc. and R. Christopher Goodwin & Associates, Inc. completed field surveys of the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The results of these survey efforts are included in the cultural resources reports. To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the cultural resources reports and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Due to the size of the files associated with the Project, Northern has set up an FTP site where the cultural resources reports and Unanticipated Discoveries Plans referenced in the attached letter can be downloaded.

Please contact us if you have any questions.

Hiedi Waller, PE
Senior Engineer
Pronouns: she, her, hers
Phone: (262) 643-9161

From: donotreply@secureftp.stantec.com <donotreply@secureftp.stantec.com>
Sent: Wednesday, February 14, 2024 9:20 PM
To: Waller, Hiedi <Hiedi.Waller@stantec.com>
Subject: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS

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FTP Client Hostname: tmpsftp.stantec.com **Port:** 22 (can be used within a SFTP client to view and

transfer files and folders; e.g., FileZilla)

Login name: s0221202004

Password: 9670102

Disk Quota: 20 GB

Expiry Date: 2/21/2024

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1111 South 103rd Street
Omaha, NE 68124

February 14, 2024

Menominee Indian Tribe of Wisconsin
David Grignon, THPO
PO Box 910
Keshena, WI 54135

Re: Northern Natural Gas–Northern Lights 2025 Expansion Project – Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin

Dear Tribal Historic Preservation Officer Grignon:

Northern Natural Gas (Northern) is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured the services of Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Northern is proposing to construct the Project, which will consist of (1) a 3.00-mile extension of its 36-inch-diameter Lake Mills to Albert Lea E-line; (2) a 2.43-mile extension of its 30-inch-diameter Elk River 3rd branch line; (3) a non-contiguous 1.91-mile extension of its 30-inch-diameter Farmington to Hugo C-line; (4) a 1.28-mile extension of its 8-inch-diameter Tomah branch line loop; (5) minor modifications to its existing La Crescent compressor station; and (6) aboveground facilities including a launcher, receiver and tie-in valve settings. All Project components are located in various counties in Minnesota and Wisconsin.

This letter summarizes the results of the investigations and recommendations of the archaeological investigator for the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The archeological reports from R. Christopher Goodwin & Associates, Inc. (RCG&A) and Phase One Archaeological Services Inc. (Phase One) are attached to this letter.

Literature Search

Northern's cultural resources' sub-consultants, RCG&A and Phase One, conducted background research at the Minnesota and Wisconsin SHPOs to identify previously recorded archaeological and above-grade resources. This study area encompassed a Project-specific environmental survey boundary (ESB), the direct Area of Potential Effects (APE) and the indirect APE and included archaeological sites and other cultural resources located in the immediate areas of planned construction along with a one-mile radius of all proposed project activities.

Lake Mills to Albert Lea E-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources on the list of National Register of Historic Places (NRHP) properties are in the indirect APE. One archaeological site, 21FE0130, and Minnesota Statewide Historic Inventory property FE-AEA-00264 extends into the 500-foot buffer around the proposed aboveground valve setting. However, due to distance and mature trees, no effects are anticipated.

Elk River 3rd branch line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Farmington to Hugo C-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Tomah branch line loop

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

A single standing structure, a 19th century Greek Revival Farmhouse (AHI # 78410) was previously located on the west side of County Highway Q within the indirect APE. This building was razed and replaced with a modern single-family farmhouse. No other aboveground historical resources previously listed in the Wisconsin Architecture-History Inventory or on the list of the NRHP properties are located in the indirect APE.

La Crescent compressor station

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the La Crescent compressor station to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Cultural Survey

Following the literature review, Northern's subconsultants conducted a systematic field survey of the direct APE, which includes the construction ROW (TWS), ETWS, access roads, staging areas, and the aboveground appurtenant facility footprints. The survey procedures included a pedestrian walkover of the APE, systematic surface examination of suitable areas, and systematic subsurface testing of areas lacking sufficient surface visibility or which had potential for subsurface resources.

The cultural resources survey is 89% complete for the Lake Mills to Albert Lea E-line with additional shovel testing needed on 77.02 acres anticipated in spring 2024. The cultural resource survey for the Elk River 3rd branch line is 92% complete with additional survey needed on 15.25 acres scheduled for spring 2024. Northern cultural resources surveys are 100% complete for the remaining Project components.

Lake Mills to Albert Lea E-line

Archaeology

On August 22, August 23, October 3, and October 23-27, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability and previously recorded cultural resources. Shovel testing at 15-meter intervals was planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields. Shovel testing is pending for selected locations with the potential for buried cultural deposits.

Excluding one farmstead and one hay field, the majority of the survey area consisted of harvested or mature crops with 50 to 100% ground surface visibility. The hay field yielded an average surface visibility of 30%. The total ESB encompassed 678.90 acres. Roadways, inundated, and usually inundated areas, a total of 23.98 acres, were excluded from survey. A total of 77.02 acres remains to be surveyed. The other 591.82 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

A Euro-American archaeological site (21FE0130) also assigned an historic inventory property (FE-AEA-00264) was initially recorded as part of another Northern project in 2022. During the 2023 effort, this site was surveyed again. The 2023 site visit prompted an updated site boundary and an updated site form was submitted to the Minnesota Office of the State Archaeologist. This

farmstead site consisted of a combination of standing structures, archaeological features, and a surface artifact scatter. The site is within the ESB, but does not extend into the direct APE. In the original site form, the extant structures were identified as lacking integrity. Since the initial site visit, three buildings have been demolished. The artifacts documented on the surface have been placed in dump locations of mixed time periods, grouped through heavy machinery in pushpiles, and disturbed by agricultural processes. The archaeological component at 21FE0130 has not been evaluated for listing in the NRHP. RCG&A recommends the architectural buildings (FE-AEA-00264) at this property not eligible for listing in the NRHP.

This resource (21FE0130/FE-AEA-00264) is not in the direct APE and will not be impacted by the Project. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

County Ditch No. 4 (FE-PIC-00008), a historical structure, was initially visited as part of another Northern project in 2022. During the 2023 fieldwork, it was more thoroughly documented. County Ditch No. 4 is an active drainage ditch bound by agricultural land. The majority of this ditch is open cut and possesses a steep V-shaped profile. Brome and other grasses covered the banks of the ditch. Survey measured a top width of between 50 and 60 feet and a bottom width of 9-15 feet. Standing water was present at the base of the ditch during survey in fall 2023 but the overall depth was estimated to be 10-12 feet. Based on observations made from public ROW and aerial images, these dimensions are typical of County Ditch No. 4. This ditch also includes two branches: the Colvin Branch and the Klukow Branch. The Klukow Branch was in the ESB and was documented as part of FE-PIC-0008. County Ditch No. 4 is recommended not eligible for listing in the NRHP. Northern will utilize a private driveway that crosses the ditch without improvements. Therefore, the project will have no effect to County Ditch No. 4 (FE-PIC-00008).

Northern will remove a tie-over valve setting (MP 31.21) and install a new tie-in valve setting (MP 34.21) for the Lake Mills to Albert Lea E-line extension project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 34.21. This entire area was within the surveyed ESB. Northern conducted a visual assessment of the 500 foot buffer by walking the areas surrounding the project. The western portion of archaeological site 21FE0130 / inventory property FE-AEA-00264 is within the visual effects area; however, given the distance and mature vegetation surrounding the standing structures at the site, there will not be any effect to the standing structures from the project.

The proposed construction will not have an effect to any Minnesota Standing Structures Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

Elk River 3rd branch line

Archaeology

On November 1-5 and 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability. Shovel testing at 15-meter intervals was planned for surveyed areas with less than 25% surface visibility); no such areas were identified on this project. The survey area included agricultural fields, a tree farm, wetlands and manicured lawn with small stands of trees. Several historical and recent single-family homes and associated outbuildings were within the ESB.

The agricultural fields and tree farm yielded an average surface visibility of 80%. Visibility in the manicured lawns was limited (average 30%) but stands of trees yielded better ground surface visibility (average 55%). The total ESB encompassed 194.59 acres. Roadways as well as inundated and usually inundated areas, a total of 58.92 acres, were excluded from survey. A total of 15.25 acres remains to be surveyed. The remaining 120.42 acres had more than 25% ground surface visibility and was subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical ditches (WA-FLC-00033 and WA-XXX-00002) and ten historical standing structures during the 2023 fieldwork. None of the buildings are in the direct APE. Only one newly recorded property, WA-HGC-00077, is in the 500-foot buffer of the proposed valve setting.

Two historical drainage ditches were newly recorded during the 2023 fieldwork. WA-FLC-00033 is an active drainage ditch constructed in approximately 1949. The ditch is open cut and possesses a steep V-shaped profile. Grasses covered the banks of the ditch. Surveyors measured a varied width between 1.5 and 3 meters. Based on observations made from public ROW and aerial images, these dimensions are typical of this ditch. WA-FLC-00033 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-FLC-00033 via HDD.

WA-XXX-00002, the channelized Hardwood Creek, is known as Judicial Ditch No. 2. Ordered in 1902, Judicial Ditch No. 2 is open cut and possesses a V-shaped profile. Surveyors measured a top width of approximately six meters. Grasses covered the banks of the ditch. While standing water was present within the ditch during survey in fall 2023, the overall depth of the ditch was measured at variable depths between 2 to 5 meters. Based on observations made from the public ROW and aerial images, these dimensions are fairly typical of Judicial Ditch No. 2. WA-XXX-

00002 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-XXX-00002 via HDD.

Northern plans to remove a tie-over valve setting (MP 1.07) and install a new tie-in valve setting (MP 3.45) for the Elk River 3rd branch line project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 3.45. Northern conducted a desktop analysis and visual assessment of the 500-foot buffer by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

Northern identified four built resources on three properties that are potential historic properties (constructed more than 45 years ago) in the 500-foot buffer around the proposed facility. Prior to the 2023 survey, none of the buildings were recorded in the Minnesota Statewide Historic Inventory. One of the buildings was in the ESB and formally recorded during the survey (WA-HGC-00077; 17903 Henna Avenue North); the others (at 17803 Henna Avenue North and 17958 Henna Avenue North) were observed but not formally recorded.

The single-family residence at 17903 Henna Avenue North occupies a rectangular footprint, possesses two stories, is clad in composite siding and brick veneer, and terminates in a side-gable roof sheathed in asphalt shingles. It possesses an attached, single-bay garage along the south elevation. Based on county records, the house was constructed in 1969. Historic exterior materials on this building have been altered with replacements to exterior cladding, window openings and asphalt roof shingles. The public ROW runs between the proposed facility and the property at 17903 Henna Avenue North. Additionally, there are several trees that will obscure views of the proposed facility.

The single-family home and garage at 17803 Henna Avenue North have been substantially altered through additions and renovation. The original house was constructed in the mid-1960s, but, according to county records, extensive changes were made in 1989. The proposed facility is not visible from the property at 17803 Henna Avenue North as it is obscured by distance and a line of mature trees.

There are several buildings on the 17958 Henna Avenue North property. Only the single-family home and one outbuilding are within the 500-foot indirect APE around the proposed facility. The two-story home was constructed around 1880 and has had significant alterations to its exterior. In addition, the house is orientated to the north, while the facility will be constructed to the southeast. The combination of distance and topography, as well as an agricultural field and mature deciduous trees visually buffer the potential historic buildings from the proposed Project.

The proposed aboveground valve setting will not substantively alter the viewshed of the potential historic properties at 17803, 17903, and 17958 Henna Avenue North. Temporary visual impacts on the property during construction will not affect the attributes contributing to the potential significance and integrity of these properties. As such, the proposed Project will not adversely impact the aspects of integrity of these potential historic properties.

The proposed Elk River 3rd branch line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Farmington to Hugo C-line

Archaeology

From July 17 to 20, October 18 and November 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at 5-meter intervals in high probability areas and shovel testing at 15-meter intervals were planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields, wetlands and woodlands associated with the wetlands and pasture.

Ground surface visibility was good in the agricultural fields ranging from 40-100%. Woodland and pastures had lower surface visibility that ranged between 25 and 50%. The total ESB encompassed 172.97 acres. Roadways, existing graveled facility lots, as well as inundated and usually inundated areas, a total of 19.26 acres, were excluded from survey. The remaining 153.71 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical properties in the Farmington to Hugo C-line ESB. They were recorded in the Minnesota Statewide Historic Inventory and assigned designations WA-MYT-031 and WA-MYT-032. WA-MYT-031 is a 1973 single-family residence. The two-story, multi-bay building occupies a rectangular footprint, is clad in composite siding and brick veneer, and terminates in a low-pitched, hipped roof with overhanging eaves sheathed in asphalt shingles. The building features a single-story attached garage and a recessed front porch covered by a secondary hipped roof also sheathed in asphalt shingles.

WA-MYT-032 includes two historical buildings, a house (WA-MYT-028) and a shed (WA-MYT-029). WA-MYT-028 is a 1972 single-family residence. The one-and-one-half story, multi-bay building occupies a rectangular footprint, is clad in vinyl siding and brick veneer, and terminates in a front-gable roof with overhanging eaves sheathed in asphalt shingles. The façade features a secondary, front-gable projection and a recessed porch. The east elevation features a two-bay, integral garage. WA-MYT-029 is a 1972 shed near the house. The single-story shed occupies a rectangular footprint, is clad in wood siding, and terminates in a gambrel roof with overhanging eaves sheathed in asphalt shingles. Both of these properties are recommended not eligible for listing in the NRHP and both are avoided through HDD in the current Project design.

Northern proposes to install a new launcher and associated valves and piping at the existing Hugo compressor station (MP 0.00), as well as install a new tie-in valve setting (MP 1.91) for the

Farmington to Hugo C-line. Aboveground construction for the aboveground tie-in valve setting will not exceed ten feet in height. The potential for adverse visual effects to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the Hugo compressor station and the proposed valve setting at MP 1.91. Northern conducted a visual assessment of these areas by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

One potential historical resource is located in the Hugo compressor station buffer, a house at 10830 180th Street North. This property has not been recorded in the Minnesota Statewide Historic Inventory. According to county records, it was constructed in 1977 and is a split foyer frame home with an attached garage. Significant alterations were made to the house in 2016. This house is set back from 180th Street North approximately 240 feet and is surrounded by trees. The combination of distance, a public ROW (180th Street North), as well as trees and other foliage visually buffer the potential historic building from the proposed project.

The proposed Farmington to Hugo C-line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Tomah branch line loop

Archaeology

Portions of the Tomah branch line loop was surveyed in August 2019, August and November 2021 and most recently surveyed in October and November 2023 and January 2024. Northern completed archaeological field investigations using standard methodology for archaeological surveys. Pedestrian survey was conducted at five-meter or less interval transects following the general direction of the survey corridor. Shovel testing was conducted at 15-meter or less interval. In areas with a greater probability for archaeological sites such as stream crossings, pedestrian survey was conducted at approximately one-meter intervals and shovel testing at less than five-meter intervals.

The survey area was located primarily in agricultural fields, with intermittent wooded areas, residential yards and wetlands. At the time of the field investigation, most of the survey area consisted of harvested fields and plowed corn and soybean fields. Most fields displayed 90-100% surface visibility which allowed field investigation to be conducted using pedestrian survey methods.

Of the total investigated area (124.7 acres), 55.9 acres were investigated using pedestrian survey methods and 55.4 acres were shovel tested. Approximately 13.4 acres were exempted from investigation survey in areas of slope, stream channels, or areas where ground had been disturbed by road and road drainage ditch construction. No prehistoric or historic period Euro-American artifacts or archaeological features were observed in the direct APE.

Aboveground Historical Properties

Northern plans to relocate a branch line receiver on the Tomah branch line loop (MP 3.53). The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the indirect APE was limited to the 500-foot buffer around the valve setting. Aboveground

construction will not exceed eight feet in height. Northern conducted a visual assessment of the indirect APE by walking the areas surrounding the Project and no historical properties were identified.

The proposed construction will not have an effect to any Wisconsin Architecture and History Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

La Crescent compressor station

Archaeology

On September 19, 2023, Northern completed archaeological field investigations using 15-meter interval pedestrian survey in areas of the ESB that were not graveled. The graveled facilities were excluded from survey. The survey area included short and medium grasses and corn fields. Ground surface visibility averaged 25% in grassy areas, but in the corn fields, ground surface visibility averaged 90%.

The total ESB encompassed 3.02 acres. Areas excluded from survey, consisting of graveled access drives and facilities and roadway totaling 1.72 acres. The remaining 1.30 acres averaged more than 25% ground surface visibility and was subjected to pedestrian survey. No archaeological sites or isolated finds were identified in the direct APE.

The current Project design and proposed construction activities will not have direct effects to any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern proposes minor modifications to existing infrastructure at the La Crescent compressor station, including replacing compressor cylinder end caps (currently blind flanges) and adjusting compressor mechanical characteristics to match new operating conditions. While impacts that are subject to review under 36 CFR § 800 may include surficial disturbances caused by topsoil removal, heavy machinery traffic, shallow grading, and spoil dirt management, only vehicular parking is anticipated for this Project component.

The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the existing compressor station lot. Northern conducted a visual assessment of this buffer by examining aerial imagery and observing areas surrounding the project from the public ROW and ESB. No aboveground cultural resources were observed in the 500-foot buffer.

Conclusion and Request for Consultation

To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the attached maps and report and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Northern Natural Gas
Northern Lights 2025 Expansion Project
February 14, 2024

Northern respects that the Tribe has unique expertise in identifying and providing information regarding historic properties with religious or cultural significance which may be affected by the Project. Northern is seeking the Tribe's comments on survey methodology, traditional cultural properties, and traditional cultural landscapes along with areas of importance to the Tribe which should be considered. Northern understands this request for information does not circumvent the government-to-government relationship under Section 106 (36 Code of Federal Regulations Part 800) between the Tribe and the FERC. Please be assured that Northern will keep sensitive Tribal information strictly confidential.

While the regulations for implementing Section 106 (36 Code of Federal Regulations Part 800) allow companies like Northern (and their consultants) to gather information, the FERC is responsible for monitoring compliance with the NHPA and determinations pursuant to Section 106. Additionally, the FERC, not Northern, is responsible for government-to-government consultations with American Indian Tribes. The FERC has not delegated this consultation. The FERC will contact you through a *Notice of Intent to Produce an Environmental Document*. If you would like to communicate directly with the FERC natural gas archaeological staff to discuss its cultural resource review and consultation processes, please feel free to contact Elizabeth Molloy, Tribal Liaison, at 202-502-8771 or Elizabeth.Molloy@ferc.gov.

Thank you in advance for your attention to this Project. Northern would very much appreciate receiving your response within 30 days of the date of this letter. Northern will follow up with you via phone contact or email if no response is received within 30 days. In the interim, should you have questions or need additional information, please contact me at 402-398-7226 or Terry.Plucker@nngco.com or Susan Knabe of Stantec at 920-278-3220 or Susan.Knabe@stantec.com.

Sincerely,



Terry Plucker
Environmental Compliance Manager
Northern Natural Gas Company

Enclosures: RCG&A Cultural Resources Reports
Phase One Cultural Resources Report
Unanticipated Discovery Plans (Minnesota and Wisconsin)

CC: Susan Knabe, Stantec Consulting
Matt Nelson, Northern Natural Gas

From: [Waller, Hiedi](#)
To: cheyanne.stjohn@lowersioux.com
Cc: [Knabe, Susan](#); Terry.Plucker@nngco.com
Subject: FW: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS
Date: Wednesday, February 14, 2024 9:09:00 PM
Attachments: [NL 2025 THPO Lower Sioux Indian Community in the State of Minnesota.pdf](#)

THPO St. John:

Northern is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Over periodic field events from 2019 through 2024, Phase One Archaeological Services Inc. and R. Christopher Goodwin & Associates, Inc. completed field surveys of the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The results of these survey efforts are included in the cultural resources reports. To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the cultural resources reports and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Due to the size of the files associated with the Project, Northern has set up an FTP site where the cultural resources reports and Unanticipated Discoveries Plans referenced in the attached letter can be downloaded.

Please contact us if you have any questions.

Hiedi Waller, PE
Senior Engineer
Pronouns: she, her, hers
Phone: (262) 643-9161

From: donotreply@secureftp.stantec.com <donotreply@secureftp.stantec.com>
Sent: Wednesday, February 14, 2024 9:20 PM
To: Waller, Hiedi <Hiedi.Waller@stantec.com>
Subject: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS

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Login name: s0221202004

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1111 South 103rd Street
Omaha, NE 68124

February 14, 2024

Lower Sioux Indian Community in the State of Minnesota
Cheyenne St. John, THPO
PO Box 308
39527 Reservation Highway 1
Morton, MN 56270

Re: Northern Natural Gas–Northern Lights 2025 Expansion Project – Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin

Dear Tribal Historic Preservation Officer St. John:

Northern Natural Gas (Northern) is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured the services of Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Northern is proposing to construct the Project, which will consist of (1) a 3.00-mile extension of its 36-inch-diameter Lake Mills to Albert Lea E-line; (2) a 2.43-mile extension of its 30-inch-diameter Elk River 3rd branch line; (3) a non-contiguous 1.91-mile extension of its 30-inch-diameter Farmington to Hugo C-line; (4) a 1.28-mile extension of its 8-inch-diameter Tomah branch line loop; (5) minor modifications to its existing La Crescent compressor station; and (6) aboveground facilities including a launcher, receiver and tie-in valve settings. All Project components are located in various counties in Minnesota and Wisconsin.

This letter summarizes the results of the investigations and recommendations of the archaeological investigator for the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The archeological reports from R. Christopher Goodwin & Associates, Inc. (RCG&A) and Phase One Archaeological Services Inc. (Phase One) are attached to this letter.

Literature Search

Northern's cultural resources' sub-consultants, RCG&A and Phase One, conducted background research at the Minnesota and Wisconsin SHPOs to identify previously recorded archaeological and above-grade resources. This study area encompassed a Project-specific environmental survey boundary (ESB), the direct Area of Potential Effects (APE) and the indirect APE and included archaeological sites and other cultural resources located in the immediate areas of planned construction along with a one-mile radius of all proposed project activities.

Lake Mills to Albert Lea E-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources on the list of National Register of Historic Places (NRHP) properties are in the indirect APE. One archaeological site, 21FE0130, and Minnesota Statewide Historic Inventory property FE-AEA-00264 extends into the 500-foot buffer around the proposed aboveground valve setting. However, due to distance and mature trees, no effects are anticipated.

Elk River 3rd branch line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Farmington to Hugo C-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Tomah branch line loop

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

A single standing structure, a 19th century Greek Revival Farmhouse (AHI # 78410) was previously located on the west side of County Highway Q within the indirect APE. This building was razed and replaced with a modern single-family farmhouse. No other aboveground historical resources previously listed in the Wisconsin Architecture-History Inventory or on the list of the NRHP properties are located in the indirect APE.

La Crescent compressor station

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the La Crescent compressor station to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Cultural Survey

Following the literature review, Northern's subconsultants conducted a systematic field survey of the direct APE, which includes the construction ROW (TWS), ETWS, access roads, staging areas, and the aboveground appurtenant facility footprints. The survey procedures included a pedestrian walkover of the APE, systematic surface examination of suitable areas, and systematic subsurface testing of areas lacking sufficient surface visibility or which had potential for subsurface resources.

The cultural resources survey is 89% complete for the Lake Mills to Albert Lea E-line with additional shovel testing needed on 77.02 acres anticipated in spring 2024. The cultural resource survey for the Elk River 3rd branch line is 92% complete with additional survey needed on 15.25 acres scheduled for spring 2024. Northern cultural resources surveys are 100% complete for the remaining Project components.

Lake Mills to Albert Lea E-line

Archaeology

On August 22, August 23, October 3, and October 23-27, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability and previously recorded cultural resources. Shovel testing at 15-meter intervals was planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields. Shovel testing is pending for selected locations with the potential for buried cultural deposits.

Excluding one farmstead and one hay field, the majority of the survey area consisted of harvested or mature crops with 50 to 100% ground surface visibility. The hay field yielded an average surface visibility of 30%. The total ESB encompassed 678.90 acres. Roadways, inundated, and usually inundated areas, a total of 23.98 acres, were excluded from survey. A total of 77.02 acres remains to be surveyed. The other 591.82 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

A Euro-American archaeological site (21FE0130) also assigned an historic inventory property (FE-AEA-00264) was initially recorded as part of another Northern project in 2022. During the 2023 effort, this site was surveyed again. The 2023 site visit prompted an updated site boundary

and an updated site form was submitted to the Minnesota Office of the State Archaeologist. This farmstead site consisted of a combination of standing structures, archaeological features, and a surface artifact scatter. The site is within the ESB, but does not extend into the direct APE. In the original site form, the extant structures were identified as lacking integrity. Since the initial site visit, three buildings have been demolished. The artifacts documented on the surface have been placed in dump locations of mixed time periods, grouped through heavy machinery in pushpiles, and disturbed by agricultural processes. The archaeological component at 21FE0130 has not been evaluated for listing in the NRHP. RCG&A recommends the architectural buildings (FE-AEA-00264) at this property not eligible for listing in the NRHP.

This resource (21FE0130/FE-AEA-00264) is not in the direct APE and will not be impacted by the Project. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

County Ditch No. 4 (FE-PIC-00008), a historical structure, was initially visited as part of another Northern project in 2022. During the 2023 fieldwork, it was more thoroughly documented. County Ditch No. 4 is an active drainage ditch bound by agricultural land. The majority of this ditch is open cut and possesses a steep V-shaped profile. Brome and other grasses covered the banks of the ditch. Survey measured a top width of between 50 and 60 feet and a bottom width of 9-15 feet. Standing water was present at the base of the ditch during survey in fall 2023 but the overall depth was estimated to be 10-12 feet. Based on observations made from public ROW and aerial images, these dimensions are typical of County Ditch No. 4. This ditch also includes two branches: the Colvin Branch and the Klukow Branch. The Klukow Branch was in the ESB and was documented as part of FE-PIC-0008. County Ditch No. 4 is recommended not eligible for listing in the NRHP. Northern will utilize a private driveway that crosses the ditch without improvements. Therefore, the project will have no effect to County Ditch No. 4 (FE-PIC-00008).

Northern will remove a tie-over valve setting (MP 31.21) and install a new tie-in valve setting (MP 34.21) for the Lake Mills to Albert Lea E-line extension project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 34.21. This entire area was within the surveyed ESB. Northern conducted a visual assessment of the 500 foot buffer by walking the areas surrounding the project. The western portion of archaeological site 21FE0130 / inventory property FE-AEA-00264 is within the visual effects area; however, given the distance and mature vegetation surrounding the standing structures at the site, there will not be any effect to the standing structures from the project.

The proposed construction will not have an effect to any Minnesota Standing Structures Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

Elk River 3rd branch line

Archaeology

On November 1-5 and 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability. Shovel testing at 15-meter intervals was planned for surveyed areas with less than 25% surface visibility); no such areas were identified on this project. The survey area included agricultural fields, a tree farm, wetlands and manicured lawn with small stands of trees. Several historical and recent single-family homes and associated outbuildings were within the ESB.

The agricultural fields and tree farm yielded an average surface visibility of 80%. Visibility in the manicured lawns was limited (average 30%) but stands of trees yielded better ground surface visibility (average 55%). The total ESB encompassed 194.59 acres. Roadways as well as inundated and usually inundated areas, a total of 58.92 acres, were excluded from survey. A total of 15.25 acres remains to be surveyed. The remaining 120.42 acres had more than 25% ground surface visibility and was subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical ditches (WA-FLC-00033 and WA-XXX-00002) and ten historical standing structures during the 2023 fieldwork. None of the buildings are in the direct APE. Only one newly recorded property, WA-HGC-00077, is in the 500-foot buffer of the proposed valve setting.

Two historical drainage ditches were newly recorded during the 2023 fieldwork. WA-FLC-00033 is an active drainage ditch constructed in approximately 1949. The ditch is open cut and possesses a steep V-shaped profile. Grasses covered the banks of the ditch. Surveyors measured a varied width between 1.5 and 3 meters. Based on observations made from public ROW and aerial images, these dimensions are typical of this ditch. WA-FLC-00033 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-FLC-00033 via HDD.

WA-XXX-00002, the channelized Hardwood Creek, is known as Judicial Ditch No. 2. Ordered in 1902, Judicial Ditch No. 2 is open cut and possesses a V-shaped profile. Surveyors measured a top width of approximately six meters. Grasses covered the banks of the ditch. While standing water was present within the ditch during survey in fall 2023, the overall depth of the ditch was measured at variable depths between 2 to 5 meters. Based on observations made from the public ROW and aerial images, these dimensions are fairly typical of Judicial Ditch No. 2. WA-XXX-

00002 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-XXX-00002 via HDD.

Northern plans to remove a tie-over valve setting (MP 1.07) and install a new tie-in valve setting (MP 3.45) for the Elk River 3rd branch line project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 3.45. Northern conducted a desktop analysis and visual assessment of the 500-foot buffer by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

Northern identified four built resources on three properties that are potential historic properties (constructed more than 45 years ago) in the 500-foot buffer around the proposed facility. Prior to the 2023 survey, none of the buildings were recorded in the Minnesota Statewide Historic Inventory. One of the buildings was in the ESB and formally recorded during the survey (WA-HGC-00077; 17903 Henna Avenue North); the others (at 17803 Henna Avenue North and 17958 Henna Avenue North) were observed but not formally recorded.

The single-family residence at 17903 Henna Avenue North occupies a rectangular footprint, possesses two stories, is clad in composite siding and brick veneer, and terminates in a side-gable roof sheathed in asphalt shingles. It possesses an attached, single-bay garage along the south elevation. Based on county records, the house was constructed in 1969. Historic exterior materials on this building have been altered with replacements to exterior cladding, window openings and asphalt roof shingles. The public ROW runs between the proposed facility and the property at 17903 Henna Avenue North. Additionally, there are several trees that will obscure views of the proposed facility.

The single-family home and garage at 17803 Henna Avenue North have been substantially altered through additions and renovation. The original house was constructed in the mid-1960s, but, according to county records, extensive changes were made in 1989. The proposed facility is not visible from the property at 17803 Henna Avenue North as it is obscured by distance and a line of mature trees.

There are several buildings on the 17958 Henna Avenue North property. Only the single-family home and one outbuilding are within the 500-foot indirect APE around the proposed facility. The two-story home was constructed around 1880 and has had significant alterations to its exterior. In addition, the house is orientated to the north, while the facility will be constructed to the southeast. The combination of distance and topography, as well as an agricultural field and mature deciduous trees visually buffer the potential historic buildings from the proposed Project.

The proposed aboveground valve setting will not substantively alter the viewshed of the potential historic properties at 17803, 17903, and 17958 Henna Avenue North. Temporary visual impacts on the property during construction will not affect the attributes contributing to the potential significance and integrity of these properties. As such, the proposed Project will not adversely impact the aspects of integrity of these potential historic properties.

The proposed Elk River 3rd branch line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Farmington to Hugo C-line

Archaeology

From July 17 to 20, October 18 and November 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at 5-meter intervals in high probability areas and shovel testing at 15-meter intervals were planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields, wetlands and woodlands associated with the wetlands and pasture.

Ground surface visibility was good in the agricultural fields ranging from 40-100%. Woodland and pastures had lower surface visibility that ranged between 25 and 50%. The total ESB encompassed 172.97 acres. Roadways, existing graveled facility lots, as well as inundated and usually inundated areas, a total of 19.26 acres, were excluded from survey. The remaining 153.71 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical properties in the Farmington to Hugo C-line ESB. They were recorded in the Minnesota Statewide Historic Inventory and assigned designations WA-MYT-031 and WA-MYT-032. WA-MYT-031 is a 1973 single-family residence. The two-story, multi-bay building occupies a rectangular footprint, is clad in composite siding and brick veneer, and terminates in a low-pitched, hipped roof with overhanging eaves sheathed in asphalt shingles. The building features a single-story attached garage and a recessed front porch covered by a secondary hipped roof also sheathed in asphalt shingles.

WA-MYT-032 includes two historical buildings, a house (WA-MYT-028) and a shed (WA-MYT-029). WA-MYT-028 is a 1972 single-family residence. The one-and-one-half story, multi-bay building occupies a rectangular footprint, is clad in vinyl siding and brick veneer, and terminates in a front-gable roof with overhanging eaves sheathed in asphalt shingles. The façade features a secondary, front-gable projection and a recessed porch. The east elevation features a two-bay, integral garage. WA-MYT-029 is a 1972 shed near the house. The single-story shed occupies a rectangular footprint, is clad in wood siding, and terminates in a gambrel roof with overhanging eaves sheathed in asphalt shingles. Both of these properties are recommended not eligible for listing in the NRHP and both are avoided through HDD in the current Project design.

Northern proposes to install a new launcher and associated valves and piping at the existing Hugo compressor station (MP 0.00), as well as install a new tie-in valve setting (MP 1.91) for the

Farmington to Hugo C-line. Aboveground construction for the aboveground tie-in valve setting will not exceed ten feet in height. The potential for adverse visual effects to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the Hugo compressor station and the proposed valve setting at MP 1.91. Northern conducted a visual assessment of these areas by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

One potential historical resource is located in the Hugo compressor station buffer, a house at 10830 180th Street North. This property has not been recorded in the Minnesota Statewide Historic Inventory. According to county records, it was constructed in 1977 and is a split foyer frame home with an attached garage. Significant alterations were made to the house in 2016. This house is set back from 180th Street North approximately 240 feet and is surrounded by trees. The combination of distance, a public ROW (180th Street North), as well as trees and other foliage visually buffer the potential historic building from the proposed project.

The proposed Farmington to Hugo C-line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Tomah branch line loop

Archaeology

Portions of the Tomah branch line loop was surveyed in August 2019, August and November 2021 and most recently surveyed in October and November 2023 and January 2024. Northern completed archaeological field investigations using standard methodology for archaeological surveys. Pedestrian survey was conducted at five-meter or less interval transects following the general direction of the survey corridor. Shovel testing was conducted at 15-meter or less interval. In areas with a greater probability for archaeological sites such as stream crossings, pedestrian survey was conducted at approximately one-meter intervals and shovel testing at less than five-meter intervals.

The survey area was located primarily in agricultural fields, with intermittent wooded areas, residential yards and wetlands. At the time of the field investigation, most of the survey area consisted of harvested fields and plowed corn and soybean fields. Most fields displayed 90-100% surface visibility which allowed field investigation to be conducted using pedestrian survey methods.

Of the total investigated area (124.7 acres), 55.9 acres were investigated using pedestrian survey methods and 55.4 acres were shovel tested. Approximately 13.4 acres were exempted from investigation survey in areas of slope, stream channels, or areas where ground had been disturbed by road and road drainage ditch construction. No prehistoric or historic period Euro-American artifacts or archaeological features were observed in the direct APE.

Aboveground Historical Properties

Northern plans to relocate a branch line receiver on the Tomah branch line loop (MP 3.53). The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the indirect APE was limited to the 500-foot buffer around the valve setting. Aboveground

construction will not exceed eight feet in height. Northern conducted a visual assessment of the indirect APE by walking the areas surrounding the Project and no historical properties were identified.

The proposed construction will not have an effect to any Wisconsin Architecture and History Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

La Crescent compressor station

Archaeology

On September 19, 2023, Northern completed archaeological field investigations using 15-meter interval pedestrian survey in areas of the ESB that were not graveled. The graveled facilities were excluded from survey. The survey area included short and medium grasses and corn fields. Ground surface visibility averaged 25% in grassy areas, but in the corn fields, ground surface visibility averaged 90%.

The total ESB encompassed 3.02 acres. Areas excluded from survey, consisting of graveled access drives and facilities and roadway totaling 1.72 acres. The remaining 1.30 acres averaged more than 25% ground surface visibility and was subjected to pedestrian survey. No archaeological sites or isolated finds were identified in the direct APE.

The current Project design and proposed construction activities will not have direct effects to any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern proposes minor modifications to existing infrastructure at the La Crescent compressor station, including replacing compressor cylinder end caps (currently blind flanges) and adjusting compressor mechanical characteristics to match new operating conditions. While impacts that are subject to review under 36 CFR § 800 may include surficial disturbances caused by topsoil removal, heavy machinery traffic, shallow grading, and spoil dirt management, only vehicular parking is anticipated for this Project component.

The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the existing compressor station lot. Northern conducted a visual assessment of this buffer by examining aerial imagery and observing areas surrounding the project from the public ROW and ESB. No aboveground cultural resources were observed in the 500-foot buffer.

Conclusion and Request for Consultation

To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the attached maps and report and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Northern Natural Gas
Northern Lights 2025 Expansion Project
February 14, 2024

Northern respects that the Tribe has unique expertise in identifying and providing information regarding historic properties with religious or cultural significance which may be affected by the Project. Northern is seeking the Tribe's comments on survey methodology, traditional cultural properties, and traditional cultural landscapes along with areas of importance to the Tribe which should be considered. Northern understands this request for information does not circumvent the government-to-government relationship under Section 106 (36 Code of Federal Regulations Part 800) between the Tribe and the FERC. Please be assured that Northern will keep sensitive Tribal information strictly confidential.

While the regulations for implementing Section 106 (36 Code of Federal Regulations Part 800) allow companies like Northern (and their consultants) to gather information, the FERC is responsible for monitoring compliance with the NHPA and determinations pursuant to Section 106. Additionally, the FERC, not Northern, is responsible for government-to-government consultations with American Indian Tribes. The FERC has not delegated this consultation. The FERC will contact you through a *Notice of Intent to Produce an Environmental Document*. If you would like to communicate directly with the FERC natural gas archaeological staff to discuss its cultural resource review and consultation processes, please feel free to contact Elizabeth Molloy, Tribal Liaison, at 202-502-8771 or Elizabeth.Molloy@ferc.gov.

Thank you in advance for your attention to this Project. Northern would very much appreciate receiving your response within 30 days of the date of this letter. Northern will follow up with you via phone contact or email if no response is received within 30 days. In the interim, should you have questions or need additional information, please contact me at 402-398-7226 or Terry.Plucker@nngco.com or Susan Knabe of Stantec at 920-278-3220 or Susan.Knabe@stantec.com.

Sincerely,



Terry Plucker
Environmental Compliance Manager
Northern Natural Gas Company

Enclosures: RCG&A Cultural Resources Reports
Phase One Cultural Resources Report
Unanticipated Discovery Plans (Minnesota and Wisconsin)

CC: Susan Knabe, Stantec Consulting
Matt Nelson, Northern Natural Gas

From: [Waller, Hiedi](#)
To: lfoster@iowas.org
Cc: [Knabe, Susan](#); Terry.Plucker@nngco.com
Subject: FW: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS
Date: Wednesday, February 14, 2024 9:07:00 PM
Attachments: [NL 2025 THPO Iowa Tribe of Kansas and Nebraska.pdf](#)

THPO Foster:

Northern is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Over periodic field events from 2019 through 2024, Phase One Archaeological Services Inc. and R. Christopher Goodwin & Associates, Inc. completed field surveys of the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The results of these survey efforts are included in the cultural resources reports. To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the cultural resources reports and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Due to the size of the files associated with the Project, Northern has set up an FTP site where the cultural resources reports and Unanticipated Discoveries Plans referenced in the attached letter can be downloaded.

Please contact us if you have any questions.

Hiedi Waller, PE
Senior Engineer
Pronouns: she, her, hers
Phone: (262) 643-9161

From: donotreply@secureftp.stantec.com <donotreply@secureftp.stantec.com>
Sent: Wednesday, February 14, 2024 9:20 PM
To: Waller, Hiedi <Hiedi.Waller@stantec.com>
Subject: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS

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Login name: s0221202004

Password: 9670102

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1111 South 103rd Street
Omaha, NE 68124

February 14, 2024

Iowa Tribe of Kansas and Nebraska
Lance Foster, THPO
3345 Thrasher Road
White Cloud, KS 66094

Re: Northern Natural Gas–Northern Lights 2025 Expansion Project – Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin

Dear Tribal Historic Preservation Officer Foster:

Northern Natural Gas (Northern) is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured the services of Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Northern is proposing to construct the Project, which will consist of (1) a 3.00-mile extension of its 36-inch-diameter Lake Mills to Albert Lea E-line; (2) a 2.43-mile extension of its 30-inch-diameter Elk River 3rd branch line; (3) a non-contiguous 1.91-mile extension of its 30-inch-diameter Farmington to Hugo C-line; (4) a 1.28-mile extension of its 8-inch-diameter Tomah branch line loop; (5) minor modifications to its existing La Crescent compressor station; and (6) aboveground facilities including a launcher, receiver and tie-in valve settings. All Project components are located in various counties in Minnesota and Wisconsin.

This letter summarizes the results of the investigations and recommendations of the archaeological investigator for the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The archeological reports from R. Christopher Goodwin & Associates, Inc. (RCG&A) and Phase One Archaeological Services Inc. (Phase One) are attached to this letter.

Literature Search

Northern's cultural resources' sub-consultants, RCG&A and Phase One, conducted background research at the Minnesota and Wisconsin SHPOs to identify previously recorded archaeological and above-grade resources. This study area encompassed a Project-specific environmental survey boundary (ESB), the direct Area of Potential Effects (APE) and the indirect APE and included archaeological sites and other cultural resources located in the immediate areas of planned construction along with a one-mile radius of all proposed project activities.

Lake Mills to Albert Lea E-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources on the list of National Register of Historic Places (NRHP) properties are in the indirect APE. One archaeological site, 21FE0130, and Minnesota Statewide Historic Inventory property FE-AEA-00264 extends into the 500-foot buffer around the proposed aboveground valve setting. However, due to distance and mature trees, no effects are anticipated.

Elk River 3rd branch line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Farmington to Hugo C-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Tomah branch line loop

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

A single standing structure, a 19th century Greek Revival Farmhouse (AHI # 78410) was previously located on the west side of County Highway Q within the indirect APE. This building was razed and replaced with a modern single-family farmhouse. No other aboveground historical resources previously listed in the Wisconsin Architecture-History Inventory or on the list of the NRHP properties are located in the indirect APE.

La Crescent compressor station

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the La Crescent compressor station to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Cultural Survey

Following the literature review, Northern's subconsultants conducted a systematic field survey of the direct APE, which includes the construction ROW (TWS), ETWS, access roads, staging areas, and the aboveground appurtenant facility footprints. The survey procedures included a pedestrian walkover of the APE, systematic surface examination of suitable areas, and systematic subsurface testing of areas lacking sufficient surface visibility or which had potential for subsurface resources.

The cultural resources survey is 89% complete for the Lake Mills to Albert Lea E-line with additional shovel testing needed on 77.02 acres anticipated in spring 2024. The cultural resource survey for the Elk River 3rd branch line is 92% complete with additional survey needed on 15.25 acres scheduled for spring 2024. Northern cultural resources surveys are 100% complete for the remaining Project components.

Lake Mills to Albert Lea E-line

Archaeology

On August 22, August 23, October 3, and October 23-27, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability and previously recorded cultural resources. Shovel testing at 15-meter intervals was planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields. Shovel testing is pending for selected locations with the potential for buried cultural deposits.

Excluding one farmstead and one hay field, the majority of the survey area consisted of harvested or mature crops with 50 to 100% ground surface visibility. The hay field yielded an average surface visibility of 30%. The total ESB encompassed 678.90 acres. Roadways, inundated, and usually inundated areas, a total of 23.98 acres, were excluded from survey. A total of 77.02 acres remains to be surveyed. The other 591.82 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

A Euro-American archaeological site (21FE0130) also assigned an historic inventory property (FE-AEA-00264) was initially recorded as part of another Northern project in 2022. During the 2023 effort, this site was surveyed again. The 2023 site visit prompted an updated site boundary and an updated site form was submitted to the Minnesota Office of the State Archaeologist. This

farmstead site consisted of a combination of standing structures, archaeological features, and a surface artifact scatter. The site is within the ESB, but does not extend into the direct APE. In the original site form, the extant structures were identified as lacking integrity. Since the initial site visit, three buildings have been demolished. The artifacts documented on the surface have been placed in dump locations of mixed time periods, grouped through heavy machinery in pushpiles, and disturbed by agricultural processes. The archaeological component at 21FE0130 has not been evaluated for listing in the NRHP. RCG&A recommends the architectural buildings (FE-AEA-00264) at this property not eligible for listing in the NRHP.

This resource (21FE0130/FE-AEA-00264) is not in the direct APE and will not be impacted by the Project. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

County Ditch No. 4 (FE-PIC-00008), a historical structure, was initially visited as part of another Northern project in 2022. During the 2023 fieldwork, it was more thoroughly documented. County Ditch No. 4 is an active drainage ditch bound by agricultural land. The majority of this ditch is open cut and possesses a steep V-shaped profile. Brome and other grasses covered the banks of the ditch. Survey measured a top width of between 50 and 60 feet and a bottom width of 9-15 feet. Standing water was present at the base of the ditch during survey in fall 2023 but the overall depth was estimated to be 10-12 feet. Based on observations made from public ROW and aerial images, these dimensions are typical of County Ditch No. 4. This ditch also includes two branches: the Colvin Branch and the Klukow Branch. The Klukow Branch was in the ESB and was documented as part of FE-PIC-0008. County Ditch No. 4 is recommended not eligible for listing in the NRHP. Northern will utilize a private driveway that crosses the ditch without improvements. Therefore, the project will have no effect to County Ditch No. 4 (FE-PIC-00008).

Northern will remove a tie-over valve setting (MP 31.21) and install a new tie-in valve setting (MP 34.21) for the Lake Mills to Albert Lea E-line extension project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 34.21. This entire area was within the surveyed ESB. Northern conducted a visual assessment of the 500 foot buffer by walking the areas surrounding the project. The western portion of archaeological site 21FE0130 / inventory property FE-AEA-00264 is within the visual effects area; however, given the distance and mature vegetation surrounding the standing structures at the site, there will not be any effect to the standing structures from the project.

The proposed construction will not have an effect to any Minnesota Standing Structures Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

Elk River 3rd branch line

Archaeology

On November 1-5 and 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability. Shovel testing at 15-meter intervals was planned for surveyed areas with less than 25% surface visibility); no such areas were identified on this project. The survey area included agricultural fields, a tree farm, wetlands and manicured lawn with small stands of trees. Several historical and recent single-family homes and associated outbuildings were within the ESB.

The agricultural fields and tree farm yielded an average surface visibility of 80%. Visibility in the manicured lawns was limited (average 30%) but stands of trees yielded better ground surface visibility (average 55%). The total ESB encompassed 194.59 acres. Roadways as well as inundated and usually inundated areas, a total of 58.92 acres, were excluded from survey. A total of 15.25 acres remains to be surveyed. The remaining 120.42 acres had more than 25% ground surface visibility and was subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical ditches (WA-FLC-00033 and WA-XXX-00002) and ten historical standing structures during the 2023 fieldwork. None of the buildings are in the direct APE. Only one newly recorded property, WA-HGC-00077, is in the 500-foot buffer of the proposed valve setting.

Two historical drainage ditches were newly recorded during the 2023 fieldwork. WA-FLC-00033 is an active drainage ditch constructed in approximately 1949. The ditch is open cut and possesses a steep V-shaped profile. Grasses covered the banks of the ditch. Surveyors measured a varied width between 1.5 and 3 meters. Based on observations made from public ROW and aerial images, these dimensions are typical of this ditch. WA-FLC-00033 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-FLC-00033 via HDD.

WA-XXX-00002, the channelized Hardwood Creek, is known as Judicial Ditch No. 2. Ordered in 1902, Judicial Ditch No. 2 is open cut and possesses a V-shaped profile. Surveyors measured a top width of approximately six meters. Grasses covered the banks of the ditch. While standing water was present within the ditch during survey in fall 2023, the overall depth of the ditch was measured at variable depths between 2 to 5 meters. Based on observations made from the public ROW and aerial images, these dimensions are fairly typical of Judicial Ditch No. 2. WA-XXX-

00002 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-XXX-00002 via HDD.

Northern plans to remove a tie-over valve setting (MP 1.07) and install a new tie-in valve setting (MP 3.45) for the Elk River 3rd branch line project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 3.45. Northern conducted a desktop analysis and visual assessment of the 500-foot buffer by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

Northern identified four built resources on three properties that are potential historic properties (constructed more than 45 years ago) in the 500-foot buffer around the proposed facility. Prior to the 2023 survey, none of the buildings were recorded in the Minnesota Statewide Historic Inventory. One of the buildings was in the ESB and formally recorded during the survey (WA-HGC-00077; 17903 Henna Avenue North); the others (at 17803 Henna Avenue North and 17958 Henna Avenue North) were observed but not formally recorded.

The single-family residence at 17903 Henna Avenue North occupies a rectangular footprint, possesses two stories, is clad in composite siding and brick veneer, and terminates in a side-gable roof sheathed in asphalt shingles. It possesses an attached, single-bay garage along the south elevation. Based on county records, the house was constructed in 1969. Historic exterior materials on this building have been altered with replacements to exterior cladding, window openings and asphalt roof shingles. The public ROW runs between the proposed facility and the property at 17903 Henna Avenue North. Additionally, there are several trees that will obscure views of the proposed facility.

The single-family home and garage at 17803 Henna Avenue North have been substantially altered through additions and renovation. The original house was constructed in the mid-1960s, but, according to county records, extensive changes were made in 1989. The proposed facility is not visible from the property at 17803 Henna Avenue North as it is obscured by distance and a line of mature trees.

There are several buildings on the 17958 Henna Avenue North property. Only the single-family home and one outbuilding are within the 500-foot indirect APE around the proposed facility. The two-story home was constructed around 1880 and has had significant alterations to its exterior. In addition, the house is orientated to the north, while the facility will be constructed to the southeast. The combination of distance and topography, as well as an agricultural field and mature deciduous trees visually buffer the potential historic buildings from the proposed Project.

The proposed aboveground valve setting will not substantively alter the viewshed of the potential historic properties at 17803, 17903, and 17958 Henna Avenue North. Temporary visual impacts on the property during construction will not affect the attributes contributing to the potential significance and integrity of these properties. As such, the proposed Project will not adversely impact the aspects of integrity of these potential historic properties.

The proposed Elk River 3rd branch line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Farmington to Hugo C-line

Archaeology

From July 17 to 20, October 18 and November 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at 5-meter intervals in high probability areas and shovel testing at 15-meter intervals were planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields, wetlands and woodlands associated with the wetlands and pasture.

Ground surface visibility was good in the agricultural fields ranging from 40-100%. Woodland and pastures had lower surface visibility that ranged between 25 and 50%. The total ESB encompassed 172.97 acres. Roadways, existing graveled facility lots, as well as inundated and usually inundated areas, a total of 19.26 acres, were excluded from survey. The remaining 153.71 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical properties in the Farmington to Hugo C-line ESB. They were recorded in the Minnesota Statewide Historic Inventory and assigned designations WA-MYT-031 and WA-MYT-032. WA-MYT-031 is a 1973 single-family residence. The two-story, multi-bay building occupies a rectangular footprint, is clad in composite siding and brick veneer, and terminates in a low-pitched, hipped roof with overhanging eaves sheathed in asphalt shingles. The building features a single-story attached garage and a recessed front porch covered by a secondary hipped roof also sheathed in asphalt shingles.

WA-MYT-032 includes two historical buildings, a house (WA-MYT-028) and a shed (WA-MYT-029). WA-MYT-028 is a 1972 single-family residence. The one-and-one-half story, multi-bay building occupies a rectangular footprint, is clad in vinyl siding and brick veneer, and terminates in a front-gable roof with overhanging eaves sheathed in asphalt shingles. The façade features a secondary, front-gable projection and a recessed porch. The east elevation features a two-bay, integral garage. WA-MYT-029 is a 1972 shed near the house. The single-story shed occupies a rectangular footprint, is clad in wood siding, and terminates in a gambrel roof with overhanging eaves sheathed in asphalt shingles. Both of these properties are recommended not eligible for listing in the NRHP and both are avoided through HDD in the current Project design.

Northern proposes to install a new launcher and associated valves and piping at the existing Hugo compressor station (MP 0.00), as well as install a new tie-in valve setting (MP 1.91) for the

Farmington to Hugo C-line. Aboveground construction for the aboveground tie-in valve setting will not exceed ten feet in height. The potential for adverse visual effects to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the Hugo compressor station and the proposed valve setting at MP 1.91. Northern conducted a visual assessment of these areas by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

One potential historical resource is located in the Hugo compressor station buffer, a house at 10830 180th Street North. This property has not been recorded in the Minnesota Statewide Historic Inventory. According to county records, it was constructed in 1977 and is a split foyer frame home with an attached garage. Significant alterations were made to the house in 2016. This house is set back from 180th Street North approximately 240 feet and is surrounded by trees. The combination of distance, a public ROW (180th Street North), as well as trees and other foliage visually buffer the potential historic building from the proposed project.

The proposed Farmington to Hugo C-line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Tomah branch line loop

Archaeology

Portions of the Tomah branch line loop was surveyed in August 2019, August and November 2021 and most recently surveyed in October and November 2023 and January 2024. Northern completed archaeological field investigations using standard methodology for archaeological surveys. Pedestrian survey was conducted at five-meter or less interval transects following the general direction of the survey corridor. Shovel testing was conducted at 15-meter or less interval. In areas with a greater probability for archaeological sites such as stream crossings, pedestrian survey was conducted at approximately one-meter intervals and shovel testing at less than five-meter intervals.

The survey area was located primarily in agricultural fields, with intermittent wooded areas, residential yards and wetlands. At the time of the field investigation, most of the survey area consisted of harvested fields and plowed corn and soybean fields. Most fields displayed 90-100% surface visibility which allowed field investigation to be conducted using pedestrian survey methods.

Of the total investigated area (124.7 acres), 55.9 acres were investigated using pedestrian survey methods and 55.4 acres were shovel tested. Approximately 13.4 acres were exempted from investigation survey in areas of slope, stream channels, or areas where ground had been disturbed by road and road drainage ditch construction. No prehistoric or historic period Euro-American artifacts or archaeological features were observed in the direct APE.

Aboveground Historical Properties

Northern plans to relocate a branch line receiver on the Tomah branch line loop (MP 3.53). The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the indirect APE was limited to the 500-foot buffer around the valve setting. Aboveground

construction will not exceed eight feet in height. Northern conducted a visual assessment of the indirect APE by walking the areas surrounding the Project and no historical properties were identified.

The proposed construction will not have an effect to any Wisconsin Architecture and History Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

La Crescent compressor station

Archaeology

On September 19, 2023, Northern completed archaeological field investigations using 15-meter interval pedestrian survey in areas of the ESB that were not graveled. The graveled facilities were excluded from survey. The survey area included short and medium grasses and corn fields. Ground surface visibility averaged 25% in grassy areas, but in the corn fields, ground surface visibility averaged 90%.

The total ESB encompassed 3.02 acres. Areas excluded from survey, consisting of graveled access drives and facilities and roadway totaling 1.72 acres. The remaining 1.30 acres averaged more than 25% ground surface visibility and was subjected to pedestrian survey. No archaeological sites or isolated finds were identified in the direct APE.

The current Project design and proposed construction activities will not have direct effects to any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern proposes minor modifications to existing infrastructure at the La Crescent compressor station, including replacing compressor cylinder end caps (currently blind flanges) and adjusting compressor mechanical characteristics to match new operating conditions. While impacts that are subject to review under 36 CFR § 800 may include surficial disturbances caused by topsoil removal, heavy machinery traffic, shallow grading, and spoil dirt management, only vehicular parking is anticipated for this Project component.

The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the existing compressor station lot. Northern conducted a visual assessment of this buffer by examining aerial imagery and observing areas surrounding the project from the public ROW and ESB. No aboveground cultural resources were observed in the 500-foot buffer.

Conclusion and Request for Consultation

To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the attached maps and report and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Northern Natural Gas
Northern Lights 2025 Expansion Project
February 14, 2024

Northern respects that the Tribe has unique expertise in identifying and providing information regarding historic properties with religious or cultural significance which may be affected by the Project. Northern is seeking the Tribe's comments on survey methodology, traditional cultural properties, and traditional cultural landscapes along with areas of importance to the Tribe which should be considered. Northern understands this request for information does not circumvent the government-to-government relationship under Section 106 (36 Code of Federal Regulations Part 800) between the Tribe and the FERC. Please be assured that Northern will keep sensitive Tribal information strictly confidential.

While the regulations for implementing Section 106 (36 Code of Federal Regulations Part 800) allow companies like Northern (and their consultants) to gather information, the FERC is responsible for monitoring compliance with the NHPA and determinations pursuant to Section 106. Additionally, the FERC, not Northern, is responsible for government-to-government consultations with American Indian Tribes. The FERC has not delegated this consultation. The FERC will contact you through a *Notice of Intent to Produce an Environmental Document*. If you would like to communicate directly with the FERC natural gas archaeological staff to discuss its cultural resource review and consultation processes, please feel free to contact Elizabeth Molloy, Tribal Liaison, at 202-502-8771 or Elizabeth.Molloy@ferc.gov.

Thank you in advance for your attention to this Project. Northern would very much appreciate receiving your response within 30 days of the date of this letter. Northern will follow up with you via phone contact or email if no response is received within 30 days. In the interim, should you have questions or need additional information, please contact me at 402-398-7226 or Terry.Plucker@nngco.com or Susan Knabe of Stantec at 920-278-3220 or Susan.Knabe@stantec.com.

Sincerely,



Terry Plucker
Environmental Compliance Manager
Northern Natural Gas Company

Enclosures: RCG&A Cultural Resources Reports
Phase One Cultural Resources Report
Unanticipated Discovery Plans (Minnesota and Wisconsin)

CC: Susan Knabe, Stantec Consulting
Matt Nelson, Northern Natural Gas

From: [Waller, Hiedi](#)
To: mblackwolf@ftbelknap.org
Cc: [Knabe, Susan](#); Terry.Plucker@nngco.com
Subject: FW: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS
Date: Wednesday, February 14, 2024 9:04:00 PM
Attachments: [NL 2025 THPO Fort Belknap.pdf](#)

THPO Blackwolf:

Northern is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Over periodic field events from 2019 through 2024, Phase One Archaeological Services Inc. and R. Christopher Goodwin & Associates, Inc. completed field surveys of the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The results of these survey efforts are included in the cultural resources reports. To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the cultural resources reports and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Due to the size of the files associated with the Project, Northern has set up an FTP site where the cultural resources reports and Unanticipated Discoveries Plans referenced in the attached letter can be downloaded.

Please contact us if you have any questions.

Hiedi Waller, PE
Senior Engineer
Pronouns: she, her, hers
Phone: (262) 643-9161

From: donotreply@secureftp.stantec.com <donotreply@secureftp.stantec.com>
Sent: Wednesday, February 14, 2024 9:20 PM
To: Waller, Hiedi <Hiedi.Waller@stantec.com>
Subject: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS

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Please use the link below to access your directory with the username and password provided.

Login Information

Browser link: <https://tmpsftp.stantec.com>

FTP Client Hostname: tmpsftp.stantec.com **Port:** 22 (can be used within a SFTP client to view and

transfer files and folders; e.g., FileZilla)

Login name: s0221202004

Password: 9670102

Disk Quota: 20 GB

Expiry Date: 2/21/2024

If you require a one-time one-week extension, please click [here](#).

If you require more than a week, please request a Microsoft 365 Groups/Teams. Information on Groups/Teams request procedure is posted in the [Stantec Help Center](#).

Click here for the [quick reference guide](#).

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1111 South 103rd Street
Omaha, NE 68124

February 14, 2024

Fort Belknap Indian Community of the Fort Belknap Reservation of Montana
Michael Blackwolf, THPO
656 Agency Main Street
Harlem, MT 59526

Re: Northern Natural Gas–Northern Lights 2025 Expansion Project – Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin

Dear Tribal Historic Preservation Officer Blackwolf:

Northern Natural Gas (Northern) is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured the services of Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Northern is proposing to construct the Project, which will consist of (1) a 3.00-mile extension of its 36-inch-diameter Lake Mills to Albert Lea E-line; (2) a 2.43-mile extension of its 30-inch-diameter Elk River 3rd branch line; (3) a non-contiguous 1.91-mile extension of its 30-inch-diameter Farmington to Hugo C-line; (4) a 1.28-mile extension of its 8-inch-diameter Tomah branch line loop; (5) minor modifications to its existing La Crescent compressor station; and (6) aboveground facilities including a launcher, receiver and tie-in valve settings. All Project components are located in various counties in Minnesota and Wisconsin.

This letter summarizes the results of the investigations and recommendations of the archaeological investigator for the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The archeological reports from R. Christopher Goodwin & Associates, Inc. (RCG&A) and Phase One Archaeological Services Inc. (Phase One) are attached to this letter.

Literature Search

Northern's cultural resources' sub-consultants, RCG&A and Phase One, conducted background research at the Minnesota and Wisconsin SHPOs to identify previously recorded archaeological and above-grade resources. This study area encompassed a Project-specific environmental survey boundary (ESB), the direct Area of Potential Effects (APE) and the indirect APE and included archaeological sites and other cultural resources located in the immediate areas of planned construction along with a one-mile radius of all proposed project activities.

Lake Mills to Albert Lea E-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources on the list of National Register of Historic Places (NRHP) properties are in the indirect APE. One archaeological site, 21FE0130, and Minnesota Statewide Historic Inventory property FE-AEA-00264 extends into the 500-foot buffer around the proposed aboveground valve setting. However, due to distance and mature trees, no effects are anticipated.

Elk River 3rd branch line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Farmington to Hugo C-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Tomah branch line loop

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

A single standing structure, a 19th century Greek Revival Farmhouse (AHI # 78410) was previously located on the west side of County Highway Q within the indirect APE. This building was razed and replaced with a modern single-family farmhouse. No other aboveground historical resources previously listed in the Wisconsin Architecture-History Inventory or on the list of the NRHP properties are located in the indirect APE.

La Crescent compressor station

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the La Crescent compressor station to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Cultural Survey

Following the literature review, Northern's subconsultants conducted a systematic field survey of the direct APE, which includes the construction ROW (TWS), ETWS, access roads, staging areas, and the aboveground appurtenant facility footprints. The survey procedures included a pedestrian walkover of the APE, systematic surface examination of suitable areas, and systematic subsurface testing of areas lacking sufficient surface visibility or which had potential for subsurface resources.

The cultural resources survey is 89% complete for the Lake Mills to Albert Lea E-line with additional shovel testing needed on 77.02 acres anticipated in spring 2024. The cultural resource survey for the Elk River 3rd branch line is 92% complete with additional survey needed on 15.25 acres scheduled for spring 2024. Northern cultural resources surveys are 100% complete for the remaining Project components.

Lake Mills to Albert Lea E-line

Archaeology

On August 22, August 23, October 3, and October 23-27, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability and previously recorded cultural resources. Shovel testing at 15-meter intervals was planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields. Shovel testing is pending for selected locations with the potential for buried cultural deposits.

Excluding one farmstead and one hay field, the majority of the survey area consisted of harvested or mature crops with 50 to 100% ground surface visibility. The hay field yielded an average surface visibility of 30%. The total ESB encompassed 678.90 acres. Roadways, inundated, and usually inundated areas, a total of 23.98 acres, were excluded from survey. A total of 77.02 acres remains to be surveyed. The other 591.82 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

A Euro-American archaeological site (21FE0130) also assigned an historic inventory property (FE-AEA-00264) was initially recorded as part of another Northern project in 2022. During the 2023 effort, this site was surveyed again. The 2023 site visit prompted an updated site boundary and an updated site form was submitted to the Minnesota Office of the State Archaeologist. This

farmstead site consisted of a combination of standing structures, archaeological features, and a surface artifact scatter. The site is within the ESB, but does not extend into the direct APE. In the original site form, the extant structures were identified as lacking integrity. Since the initial site visit, three buildings have been demolished. The artifacts documented on the surface have been placed in dump locations of mixed time periods, grouped through heavy machinery in pushpiles, and disturbed by agricultural processes. The archaeological component at 21FE0130 has not been evaluated for listing in the NRHP. RCG&A recommends the architectural buildings (FE-AEA-00264) at this property not eligible for listing in the NRHP.

This resource (21FE0130/FE-AEA-00264) is not in the direct APE and will not be impacted by the Project. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

County Ditch No. 4 (FE-PIC-00008), a historical structure, was initially visited as part of another Northern project in 2022. During the 2023 fieldwork, it was more thoroughly documented. County Ditch No. 4 is an active drainage ditch bound by agricultural land. The majority of this ditch is open cut and possesses a steep V-shaped profile. Brome and other grasses covered the banks of the ditch. Survey measured a top width of between 50 and 60 feet and a bottom width of 9-15 feet. Standing water was present at the base of the ditch during survey in fall 2023 but the overall depth was estimated to be 10-12 feet. Based on observations made from public ROW and aerial images, these dimensions are typical of County Ditch No. 4. This ditch also includes two branches: the Colvin Branch and the Klukow Branch. The Klukow Branch was in the ESB and was documented as part of FE-PIC-0008. County Ditch No. 4 is recommended not eligible for listing in the NRHP. Northern will utilize a private driveway that crosses the ditch without improvements. Therefore, the project will have no effect to County Ditch No. 4 (FE-PIC-00008).

Northern will remove a tie-over valve setting (MP 31.21) and install a new tie-in valve setting (MP 34.21) for the Lake Mills to Albert Lea E-line extension project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 34.21. This entire area was within the surveyed ESB. Northern conducted a visual assessment of the 500 foot buffer by walking the areas surrounding the project. The western portion of archaeological site 21FE0130 / inventory property FE-AEA-00264 is within the visual effects area; however, given the distance and mature vegetation surrounding the standing structures at the site, there will not be any effect to the standing structures from the project.

The proposed construction will not have an effect to any Minnesota Standing Structures Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

Elk River 3rd branch line

Archaeology

On November 1-5 and 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability. Shovel testing at 15-meter intervals was planned for surveyed areas with less than 25% surface visibility); no such areas were identified on this project. The survey area included agricultural fields, a tree farm, wetlands and manicured lawn with small stands of trees. Several historical and recent single-family homes and associated outbuildings were within the ESB.

The agricultural fields and tree farm yielded an average surface visibility of 80%. Visibility in the manicured lawns was limited (average 30%) but stands of trees yielded better ground surface visibility (average 55%). The total ESB encompassed 194.59 acres. Roadways as well as inundated and usually inundated areas, a total of 58.92 acres, were excluded from survey. A total of 15.25 acres remains to be surveyed. The remaining 120.42 acres had more than 25% ground surface visibility and was subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical ditches (WA-FLC-00033 and WA-XXX-00002) and ten historical standing structures during the 2023 fieldwork. None of the buildings are in the direct APE. Only one newly recorded property, WA-HGC-00077, is in the 500-foot buffer of the proposed valve setting.

Two historical drainage ditches were newly recorded during the 2023 fieldwork. WA-FLC-00033 is an active drainage ditch constructed in approximately 1949. The ditch is open cut and possesses a steep V-shaped profile. Grasses covered the banks of the ditch. Surveyors measured a varied width between 1.5 and 3 meters. Based on observations made from public ROW and aerial images, these dimensions are typical of this ditch. WA-FLC-00033 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-FLC-00033 via HDD.

WA-XXX-00002, the channelized Hardwood Creek, is known as Judicial Ditch No. 2. Ordered in 1902, Judicial Ditch No. 2 is open cut and possesses a V-shaped profile. Surveyors measured a top width of approximately six meters. Grasses covered the banks of the ditch. While standing water was present within the ditch during survey in fall 2023, the overall depth of the ditch was measured at variable depths between 2 to 5 meters. Based on observations made from the public ROW and aerial images, these dimensions are fairly typical of Judicial Ditch No. 2. WA-XXX-

00002 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-XXX-00002 via HDD.

Northern plans to remove a tie-over valve setting (MP 1.07) and install a new tie-in valve setting (MP 3.45) for the Elk River 3rd branch line project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 3.45. Northern conducted a desktop analysis and visual assessment of the 500-foot buffer by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

Northern identified four built resources on three properties that are potential historic properties (constructed more than 45 years ago) in the 500-foot buffer around the proposed facility. Prior to the 2023 survey, none of the buildings were recorded in the Minnesota Statewide Historic Inventory. One of the buildings was in the ESB and formally recorded during the survey (WA-HGC-00077; 17903 Henna Avenue North); the others (at 17803 Henna Avenue North and 17958 Henna Avenue North) were observed but not formally recorded.

The single-family residence at 17903 Henna Avenue North occupies a rectangular footprint, possesses two stories, is clad in composite siding and brick veneer, and terminates in a side-gable roof sheathed in asphalt shingles. It possesses an attached, single-bay garage along the south elevation. Based on county records, the house was constructed in 1969. Historic exterior materials on this building have been altered with replacements to exterior cladding, window openings and asphalt roof shingles. The public ROW runs between the proposed facility and the property at 17903 Henna Avenue North. Additionally, there are several trees that will obscure views of the proposed facility.

The single-family home and garage at 17803 Henna Avenue North have been substantially altered through additions and renovation. The original house was constructed in the mid-1960s, but, according to county records, extensive changes were made in 1989. The proposed facility is not visible from the property at 17803 Henna Avenue North as it is obscured by distance and a line of mature trees.

There are several buildings on the 17958 Henna Avenue North property. Only the single-family home and one outbuilding are within the 500-foot indirect APE around the proposed facility. The two-story home was constructed around 1880 and has had significant alterations to its exterior. In addition, the house is orientated to the north, while the facility will be constructed to the southeast. The combination of distance and topography, as well as an agricultural field and mature deciduous trees visually buffer the potential historic buildings from the proposed Project.

The proposed aboveground valve setting will not substantively alter the viewshed of the potential historic properties at 17803, 17903, and 17958 Henna Avenue North. Temporary visual impacts on the property during construction will not affect the attributes contributing to the potential significance and integrity of these properties. As such, the proposed Project will not adversely impact the aspects of integrity of these potential historic properties.

The proposed Elk River 3rd branch line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Farmington to Hugo C-line

Archaeology

From July 17 to 20, October 18 and November 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at 5-meter intervals in high probability areas and shovel testing at 15-meter intervals were planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields, wetlands and woodlands associated with the wetlands and pasture.

Ground surface visibility was good in the agricultural fields ranging from 40-100%. Woodland and pastures had lower surface visibility that ranged between 25 and 50%. The total ESB encompassed 172.97 acres. Roadways, existing graveled facility lots, as well as inundated and usually inundated areas, a total of 19.26 acres, were excluded from survey. The remaining 153.71 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical properties in the Farmington to Hugo C-line ESB. They were recorded in the Minnesota Statewide Historic Inventory and assigned designations WA-MYT-031 and WA-MYT-032. WA-MYT-031 is a 1973 single-family residence. The two-story, multi-bay building occupies a rectangular footprint, is clad in composite siding and brick veneer, and terminates in a low-pitched, hipped roof with overhanging eaves sheathed in asphalt shingles. The building features a single-story attached garage and a recessed front porch covered by a secondary hipped roof also sheathed in asphalt shingles.

WA-MYT-032 includes two historical buildings, a house (WA-MYT-028) and a shed (WA-MYT-029). WA-MYT-028 is a 1972 single-family residence. The one-and-one-half story, multi-bay building occupies a rectangular footprint, is clad in vinyl siding and brick veneer, and terminates in a front-gable roof with overhanging eaves sheathed in asphalt shingles. The façade features a secondary, front-gable projection and a recessed porch. The east elevation features a two-bay, integral garage. WA-MYT-029 is a 1972 shed near the house. The single-story shed occupies a rectangular footprint, is clad in wood siding, and terminates in a gambrel roof with overhanging eaves sheathed in asphalt shingles. Both of these properties are recommended not eligible for listing in the NRHP and both are avoided through HDD in the current Project design.

Northern proposes to install a new launcher and associated valves and piping at the existing Hugo compressor station (MP 0.00), as well as install a new tie-in valve setting (MP 1.91) for the

Farmington to Hugo C-line. Aboveground construction for the aboveground tie-in valve setting will not exceed ten feet in height. The potential for adverse visual effects to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the Hugo compressor station and the proposed valve setting at MP 1.91. Northern conducted a visual assessment of these areas by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

One potential historical resource is located in the Hugo compressor station buffer, a house at 10830 180th Street North. This property has not been recorded in the Minnesota Statewide Historic Inventory. According to county records, it was constructed in 1977 and is a split foyer frame home with an attached garage. Significant alterations were made to the house in 2016. This house is set back from 180th Street North approximately 240 feet and is surrounded by trees. The combination of distance, a public ROW (180th Street North), as well as trees and other foliage visually buffer the potential historic building from the proposed project.

The proposed Farmington to Hugo C-line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Tomah branch line loop

Archaeology

Portions of the Tomah branch line loop was surveyed in August 2019, August and November 2021 and most recently surveyed in October and November 2023 and January 2024. Northern completed archaeological field investigations using standard methodology for archaeological surveys. Pedestrian survey was conducted at five-meter or less interval transects following the general direction of the survey corridor. Shovel testing was conducted at 15-meter or less interval. In areas with a greater probability for archaeological sites such as stream crossings, pedestrian survey was conducted at approximately one-meter intervals and shovel testing at less than five-meter intervals.

The survey area was located primarily in agricultural fields, with intermittent wooded areas, residential yards and wetlands. At the time of the field investigation, most of the survey area consisted of harvested fields and plowed corn and soybean fields. Most fields displayed 90-100% surface visibility which allowed field investigation to be conducted using pedestrian survey methods.

Of the total investigated area (124.7 acres), 55.9 acres were investigated using pedestrian survey methods and 55.4 acres were shovel tested. Approximately 13.4 acres were exempted from investigation survey in areas of slope, stream channels, or areas where ground had been disturbed by road and road drainage ditch construction. No prehistoric or historic period Euro-American artifacts or archaeological features were observed in the direct APE.

Aboveground Historical Properties

Northern plans to relocate a branch line receiver on the Tomah branch line loop (MP 3.53). The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the indirect APE was limited to the 500-foot buffer around the valve setting. Aboveground

construction will not exceed eight feet in height. Northern conducted a visual assessment of the indirect APE by walking the areas surrounding the Project and no historical properties were identified.

The proposed construction will not have an effect to any Wisconsin Architecture and History Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

La Crescent compressor station

Archaeology

On September 19, 2023, Northern completed archaeological field investigations using 15-meter interval pedestrian survey in areas of the ESB that were not graveled. The graveled facilities were excluded from survey. The survey area included short and medium grasses and corn fields. Ground surface visibility averaged 25% in grassy areas, but in the corn fields, ground surface visibility averaged 90%.

The total ESB encompassed 3.02 acres. Areas excluded from survey, consisting of graveled access drives and facilities and roadway totaling 1.72 acres. The remaining 1.30 acres averaged more than 25% ground surface visibility and was subjected to pedestrian survey. No archaeological sites or isolated finds were identified in the direct APE.

The current Project design and proposed construction activities will not have direct effects to any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern proposes minor modifications to existing infrastructure at the La Crescent compressor station, including replacing compressor cylinder end caps (currently blind flanges) and adjusting compressor mechanical characteristics to match new operating conditions. While impacts that are subject to review under 36 CFR § 800 may include surficial disturbances caused by topsoil removal, heavy machinery traffic, shallow grading, and spoil dirt management, only vehicular parking is anticipated for this Project component.

The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the existing compressor station lot. Northern conducted a visual assessment of this buffer by examining aerial imagery and observing areas surrounding the project from the public ROW and ESB. No aboveground cultural resources were observed in the 500-foot buffer.

Conclusion and Request for Consultation

To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the attached maps and report and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Northern Natural Gas
Northern Lights 2025 Expansion Project
February 14, 2024

Northern respects that the Tribe has unique expertise in identifying and providing information regarding historic properties with religious or cultural significance which may be affected by the Project. Northern is seeking the Tribe's comments on survey methodology, traditional cultural properties, and traditional cultural landscapes along with areas of importance to the Tribe which should be considered. Northern understands this request for information does not circumvent the government-to-government relationship under Section 106 (36 Code of Federal Regulations Part 800) between the Tribe and the FERC. Please be assured that Northern will keep sensitive Tribal information strictly confidential.

While the regulations for implementing Section 106 (36 Code of Federal Regulations Part 800) allow companies like Northern (and their consultants) to gather information, the FERC is responsible for monitoring compliance with the NHPA and determinations pursuant to Section 106. Additionally, the FERC, not Northern, is responsible for government-to-government consultations with American Indian Tribes. The FERC has not delegated this consultation. The FERC will contact you through a *Notice of Intent to Produce an Environmental Document*. If you would like to communicate directly with the FERC natural gas archaeological staff to discuss its cultural resource review and consultation processes, please feel free to contact Elizabeth Molloy, Tribal Liaison, at 202-502-8771 or Elizabeth.Molloy@ferc.gov.

Thank you in advance for your attention to this Project. Northern would very much appreciate receiving your response within 30 days of the date of this letter. Northern will follow up with you via phone contact or email if no response is received within 30 days. In the interim, should you have questions or need additional information, please contact me at 402-398-7226 or Terry.Plucker@nngco.com or Susan Knabe of Stantec at 920-278-3220 or Susan.Knabe@stantec.com.

Sincerely,



Terry Plucker
Environmental Compliance Manager
Northern Natural Gas Company

Enclosures: RCG&A Cultural Resources Reports
Phase One Cultural Resources Report
Unanticipated Discovery Plans (Minnesota and Wisconsin)

CC: Susan Knabe, Stantec Consulting
Matt Nelson, Northern Natural Gas

From: [Waller, Hiedi](#)
To: garrie.killsahundred@fsst.org
Cc: [Knabe, Susan](#); Terry.Plucker@nngco.com
Subject: FW: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS
Date: Wednesday, February 14, 2024 9:01:00 PM
Attachments: [NL 2025 THPO Flandreau Santee Sioux Tribe of South Dakota.pdf](#)

THPO Kills-A-Hundred:

Northern is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Over periodic field events from 2019 through 2024, Phase One Archaeological Services Inc. and R. Christopher Goodwin & Associates, Inc. completed field surveys of the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The results of these survey efforts are included in the cultural resources reports. To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the cultural resources reports and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Due to the size of the files associated with the Project, Northern has set up an FTP site where the cultural resources reports and Unanticipated Discoveries Plans referenced in the attached letter can be downloaded.

Please contact us if you have any questions.

Hiedi Waller, PE
Senior Engineer
Pronouns: she, her, hers
Phone: (262) 643-9161

From: donotreply@secureftp.stantec.com <donotreply@secureftp.stantec.com>
Sent: Wednesday, February 14, 2024 9:20 PM
To: Waller, Hiedi <Hiedi.Waller@stantec.com>
Subject: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS

Your directory has successfully been created!

Please use the link below to access your directory with the username and password provided.

Login Information

Browser link: <https://tmpsftp.stantec.com>

FTP Client Hostname: tmpsftp.stantec.com **Port:** 22 (can be used within a SFTP client to view and

transfer files and folders; e.g., FileZilla)

Login name: s0221202004

Password: 9670102

Disk Quota: 20 GB

Expiry Date: 2/21/2024

If you require a one-time one-week extension, please click [here](#).

If you require more than a week, please request a Microsoft 365 Groups/Teams. Information on Groups/Teams request procedure is posted in the [Stantec Help Center](#).

Click here for the [quick reference guide](#).

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1111 South 103rd Street
Omaha, NE 68124

February 14, 2024

Flandreau Santee Sioux Tribe of South Dakota
Garrie Kills-A-Hundred, THPO
PO Box 283
Flandreau, SD 57028

Re: Northern Natural Gas–Northern Lights 2025 Expansion Project – Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin

Dear Tribal Historic Preservation Officer Kills-A-Hundred:

Northern Natural Gas (Northern) is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured the services of Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Northern is proposing to construct the Project, which will consist of (1) a 3.00-mile extension of its 36-inch-diameter Lake Mills to Albert Lea E-line; (2) a 2.43-mile extension of its 30-inch-diameter Elk River 3rd branch line; (3) a non-contiguous 1.91-mile extension of its 30-inch-diameter Farmington to Hugo C-line; (4) a 1.28-mile extension of its 8-inch-diameter Tomah branch line loop; (5) minor modifications to its existing La Crescent compressor station; and (6) aboveground facilities including a launcher, receiver and tie-in valve settings. All Project components are located in various counties in Minnesota and Wisconsin.

This letter summarizes the results of the investigations and recommendations of the archaeological investigator for the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The archeological reports from R. Christopher Goodwin & Associates, Inc. (RCG&A) and Phase One Archaeological Services Inc. (Phase One) are attached to this letter.

Literature Search

Northern's cultural resources' sub-consultants, RCG&A and Phase One, conducted background research at the Minnesota and Wisconsin SHPOs to identify previously recorded archaeological and above-grade resources. This study area encompassed a Project-specific environmental survey boundary (ESB), the direct Area of Potential Effects (APE) and the indirect APE and included archaeological sites and other cultural resources located in the immediate areas of planned construction along with a one-mile radius of all proposed project activities.

Lake Mills to Albert Lea E-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources on the list of National Register of Historic Places (NRHP) properties are in the indirect APE. One archaeological site, 21FE0130, and Minnesota Statewide Historic Inventory property FE-AEA-00264 extends into the 500-foot buffer around the proposed aboveground valve setting. However, due to distance and mature trees, no effects are anticipated.

Elk River 3rd branch line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Farmington to Hugo C-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Tomah branch line loop

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

A single standing structure, a 19th century Greek Revival Farmhouse (AHI # 78410) was previously located on the west side of County Highway Q within the indirect APE. This building was razed and replaced with a modern single-family farmhouse. No other aboveground historical resources previously listed in the Wisconsin Architecture-History Inventory or on the list of the NRHP properties are located in the indirect APE.

La Crescent compressor station

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the La Crescent compressor station to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Cultural Survey

Following the literature review, Northern's subconsultants conducted a systematic field survey of the direct APE, which includes the construction ROW (TWS), ETWS, access roads, staging areas, and the aboveground appurtenant facility footprints. The survey procedures included a pedestrian walkover of the APE, systematic surface examination of suitable areas, and systematic subsurface testing of areas lacking sufficient surface visibility or which had potential for subsurface resources.

The cultural resources survey is 89% complete for the Lake Mills to Albert Lea E-line with additional shovel testing needed on 77.02 acres anticipated in spring 2024. The cultural resource survey for the Elk River 3rd branch line is 92% complete with additional survey needed on 15.25 acres scheduled for spring 2024. Northern cultural resources surveys are 100% complete for the remaining Project components.

Lake Mills to Albert Lea E-line

Archaeology

On August 22, August 23, October 3, and October 23-27, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability and previously recorded cultural resources. Shovel testing at 15-meter intervals was planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields. Shovel testing is pending for selected locations with the potential for buried cultural deposits.

Excluding one farmstead and one hay field, the majority of the survey area consisted of harvested or mature crops with 50 to 100% ground surface visibility. The hay field yielded an average surface visibility of 30%. The total ESB encompassed 678.90 acres. Roadways, inundated, and usually inundated areas, a total of 23.98 acres, were excluded from survey. A total of 77.02 acres remains to be surveyed. The other 591.82 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

A Euro-American archaeological site (21FE0130) also assigned an historic inventory property (FE-AEA-00264) was initially recorded as part of another Northern project in 2022. During the 2023 effort, this site was surveyed again. The 2023 site visit prompted an updated site boundary and an updated site form was submitted to the Minnesota Office of the State Archaeologist. This

farmstead site consisted of a combination of standing structures, archaeological features, and a surface artifact scatter. The site is within the ESB, but does not extend into the direct APE. In the original site form, the extant structures were identified as lacking integrity. Since the initial site visit, three buildings have been demolished. The artifacts documented on the surface have been placed in dump locations of mixed time periods, grouped through heavy machinery in pushpiles, and disturbed by agricultural processes. The archaeological component at 21FE0130 has not been evaluated for listing in the NRHP. RCG&A recommends the architectural buildings (FE-AEA-00264) at this property not eligible for listing in the NRHP.

This resource (21FE0130/FE-AEA-00264) is not in the direct APE and will not be impacted by the Project. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

County Ditch No. 4 (FE-PIC-00008), a historical structure, was initially visited as part of another Northern project in 2022. During the 2023 fieldwork, it was more thoroughly documented. County Ditch No. 4 is an active drainage ditch bound by agricultural land. The majority of this ditch is open cut and possesses a steep V-shaped profile. Brome and other grasses covered the banks of the ditch. Survey measured a top width of between 50 and 60 feet and a bottom width of 9-15 feet. Standing water was present at the base of the ditch during survey in fall 2023 but the overall depth was estimated to be 10-12 feet. Based on observations made from public ROW and aerial images, these dimensions are typical of County Ditch No. 4. This ditch also includes two branches: the Colvin Branch and the Klukow Branch. The Klukow Branch was in the ESB and was documented as part of FE-PIC-0008. County Ditch No. 4 is recommended not eligible for listing in the NRHP. Northern will utilize a private driveway that crosses the ditch without improvements. Therefore, the project will have no effect to County Ditch No. 4 (FE-PIC-00008).

Northern will remove a tie-over valve setting (MP 31.21) and install a new tie-in valve setting (MP 34.21) for the Lake Mills to Albert Lea E-line extension project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 34.21. This entire area was within the surveyed ESB. Northern conducted a visual assessment of the 500 foot buffer by walking the areas surrounding the project. The western portion of archaeological site 21FE0130 / inventory property FE-AEA-00264 is within the visual effects area; however, given the distance and mature vegetation surrounding the standing structures at the site, there will not be any effect to the standing structures from the project.

The proposed construction will not have an effect to any Minnesota Standing Structures Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

Elk River 3rd branch line

Archaeology

On November 1-5 and 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability. Shovel testing at 15-meter intervals was planned for surveyed areas with less than 25% surface visibility); no such areas were identified on this project. The survey area included agricultural fields, a tree farm, wetlands and manicured lawn with small stands of trees. Several historical and recent single-family homes and associated outbuildings were within the ESB.

The agricultural fields and tree farm yielded an average surface visibility of 80%. Visibility in the manicured lawns was limited (average 30%) but stands of trees yielded better ground surface visibility (average 55%). The total ESB encompassed 194.59 acres. Roadways as well as inundated and usually inundated areas, a total of 58.92 acres, were excluded from survey. A total of 15.25 acres remains to be surveyed. The remaining 120.42 acres had more than 25% ground surface visibility and was subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical ditches (WA-FLC-00033 and WA-XXX-00002) and ten historical standing structures during the 2023 fieldwork. None of the buildings are in the direct APE. Only one newly recorded property, WA-HGC-00077, is in the 500-foot buffer of the proposed valve setting.

Two historical drainage ditches were newly recorded during the 2023 fieldwork. WA-FLC-00033 is an active drainage ditch constructed in approximately 1949. The ditch is open cut and possesses a steep V-shaped profile. Grasses covered the banks of the ditch. Surveyors measured a varied width between 1.5 and 3 meters. Based on observations made from public ROW and aerial images, these dimensions are typical of this ditch. WA-FLC-00033 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-FLC-00033 via HDD.

WA-XXX-00002, the channelized Hardwood Creek, is known as Judicial Ditch No. 2. Ordered in 1902, Judicial Ditch No. 2 is open cut and possesses a V-shaped profile. Surveyors measured a top width of approximately six meters. Grasses covered the banks of the ditch. While standing water was present within the ditch during survey in fall 2023, the overall depth of the ditch was measured at variable depths between 2 to 5 meters. Based on observations made from the public ROW and aerial images, these dimensions are fairly typical of Judicial Ditch No. 2. WA-XXX-

00002 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-XXX-00002 via HDD.

Northern plans to remove a tie-over valve setting (MP 1.07) and install a new tie-in valve setting (MP 3.45) for the Elk River 3rd branch line project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 3.45. Northern conducted a desktop analysis and visual assessment of the 500-foot buffer by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

Northern identified four built resources on three properties that are potential historic properties (constructed more than 45 years ago) in the 500-foot buffer around the proposed facility. Prior to the 2023 survey, none of the buildings were recorded in the Minnesota Statewide Historic Inventory. One of the buildings was in the ESB and formally recorded during the survey (WA-HGC-00077; 17903 Henna Avenue North); the others (at 17803 Henna Avenue North and 17958 Henna Avenue North) were observed but not formally recorded.

The single-family residence at 17903 Henna Avenue North occupies a rectangular footprint, possesses two stories, is clad in composite siding and brick veneer, and terminates in a side-gable roof sheathed in asphalt shingles. It possesses an attached, single-bay garage along the south elevation. Based on county records, the house was constructed in 1969. Historic exterior materials on this building have been altered with replacements to exterior cladding, window openings and asphalt roof shingles. The public ROW runs between the proposed facility and the property at 17903 Henna Avenue North. Additionally, there are several trees that will obscure views of the proposed facility.

The single-family home and garage at 17803 Henna Avenue North have been substantially altered through additions and renovation. The original house was constructed in the mid-1960s, but, according to county records, extensive changes were made in 1989. The proposed facility is not visible from the property at 17803 Henna Avenue North as it is obscured by distance and a line of mature trees.

There are several buildings on the 17958 Henna Avenue North property. Only the single-family home and one outbuilding are within the 500-foot indirect APE around the proposed facility. The two-story home was constructed around 1880 and has had significant alterations to its exterior. In addition, the house is orientated to the north, while the facility will be constructed to the southeast. The combination of distance and topography, as well as an agricultural field and mature deciduous trees visually buffer the potential historic buildings from the proposed Project.

The proposed aboveground valve setting will not substantively alter the viewshed of the potential historic properties at 17803, 17903, and 17958 Henna Avenue North. Temporary visual impacts on the property during construction will not affect the attributes contributing to the potential significance and integrity of these properties. As such, the proposed Project will not adversely impact the aspects of integrity of these potential historic properties.

The proposed Elk River 3rd branch line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Farmington to Hugo C-line

Archaeology

From July 17 to 20, October 18 and November 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at 5-meter intervals in high probability areas and shovel testing at 15-meter intervals were planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields, wetlands and woodlands associated with the wetlands and pasture.

Ground surface visibility was good in the agricultural fields ranging from 40-100%. Woodland and pastures had lower surface visibility that ranged between 25 and 50%. The total ESB encompassed 172.97 acres. Roadways, existing graveled facility lots, as well as inundated and usually inundated areas, a total of 19.26 acres, were excluded from survey. The remaining 153.71 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical properties in the Farmington to Hugo C-line ESB. They were recorded in the Minnesota Statewide Historic Inventory and assigned designations WA-MYT-031 and WA-MYT-032. WA-MYT-031 is a 1973 single-family residence. The two-story, multi-bay building occupies a rectangular footprint, is clad in composite siding and brick veneer, and terminates in a low-pitched, hipped roof with overhanging eaves sheathed in asphalt shingles. The building features a single-story attached garage and a recessed front porch covered by a secondary hipped roof also sheathed in asphalt shingles.

WA-MYT-032 includes two historical buildings, a house (WA-MYT-028) and a shed (WA-MYT-029). WA-MYT-028 is a 1972 single-family residence. The one-and-one-half story, multi-bay building occupies a rectangular footprint, is clad in vinyl siding and brick veneer, and terminates in a front-gable roof with overhanging eaves sheathed in asphalt shingles. The façade features a secondary, front-gable projection and a recessed porch. The east elevation features a two-bay, integral garage. WA-MYT-029 is a 1972 shed near the house. The single-story shed occupies a rectangular footprint, is clad in wood siding, and terminates in a gambrel roof with overhanging eaves sheathed in asphalt shingles. Both of these properties are recommended not eligible for listing in the NRHP and both are avoided through HDD in the current Project design.

Northern proposes to install a new launcher and associated valves and piping at the existing Hugo compressor station (MP 0.00), as well as install a new tie-in valve setting (MP 1.91) for the

Farmington to Hugo C-line. Aboveground construction for the aboveground tie-in valve setting will not exceed ten feet in height. The potential for adverse visual effects to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the Hugo compressor station and the proposed valve setting at MP 1.91. Northern conducted a visual assessment of these areas by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

One potential historical resource is located in the Hugo compressor station buffer, a house at 10830 180th Street North. This property has not been recorded in the Minnesota Statewide Historic Inventory. According to county records, it was constructed in 1977 and is a split foyer frame home with an attached garage. Significant alterations were made to the house in 2016. This house is set back from 180th Street North approximately 240 feet and is surrounded by trees. The combination of distance, a public ROW (180th Street North), as well as trees and other foliage visually buffer the potential historic building from the proposed project.

The proposed Farmington to Hugo C-line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Tomah branch line loop

Archaeology

Portions of the Tomah branch line loop was surveyed in August 2019, August and November 2021 and most recently surveyed in October and November 2023 and January 2024. Northern completed archaeological field investigations using standard methodology for archaeological surveys. Pedestrian survey was conducted at five-meter or less interval transects following the general direction of the survey corridor. Shovel testing was conducted at 15-meter or less interval. In areas with a greater probability for archaeological sites such as stream crossings, pedestrian survey was conducted at approximately one-meter intervals and shovel testing at less than five-meter intervals.

The survey area was located primarily in agricultural fields, with intermittent wooded areas, residential yards and wetlands. At the time of the field investigation, most of the survey area consisted of harvested fields and plowed corn and soybean fields. Most fields displayed 90-100% surface visibility which allowed field investigation to be conducted using pedestrian survey methods.

Of the total investigated area (124.7 acres), 55.9 acres were investigated using pedestrian survey methods and 55.4 acres were shovel tested. Approximately 13.4 acres were exempted from investigation survey in areas of slope, stream channels, or areas where ground had been disturbed by road and road drainage ditch construction. No prehistoric or historic period Euro-American artifacts or archaeological features were observed in the direct APE.

Aboveground Historical Properties

Northern plans to relocate a branch line receiver on the Tomah branch line loop (MP 3.53). The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the indirect APE was limited to the 500-foot buffer around the valve setting. Aboveground

construction will not exceed eight feet in height. Northern conducted a visual assessment of the indirect APE by walking the areas surrounding the Project and no historical properties were identified.

The proposed construction will not have an effect to any Wisconsin Architecture and History Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

La Crescent compressor station

Archaeology

On September 19, 2023, Northern completed archaeological field investigations using 15-meter interval pedestrian survey in areas of the ESB that were not graveled. The graveled facilities were excluded from survey. The survey area included short and medium grasses and corn fields. Ground surface visibility averaged 25% in grassy areas, but in the corn fields, ground surface visibility averaged 90%.

The total ESB encompassed 3.02 acres. Areas excluded from survey, consisting of graveled access drives and facilities and roadway totaling 1.72 acres. The remaining 1.30 acres averaged more than 25% ground surface visibility and was subjected to pedestrian survey. No archaeological sites or isolated finds were identified in the direct APE.

The current Project design and proposed construction activities will not have direct effects to any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern proposes minor modifications to existing infrastructure at the La Crescent compressor station, including replacing compressor cylinder end caps (currently blind flanges) and adjusting compressor mechanical characteristics to match new operating conditions. While impacts that are subject to review under 36 CFR § 800 may include surficial disturbances caused by topsoil removal, heavy machinery traffic, shallow grading, and spoil dirt management, only vehicular parking is anticipated for this Project component.

The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the existing compressor station lot. Northern conducted a visual assessment of this buffer by examining aerial imagery and observing areas surrounding the project from the public ROW and ESB. No aboveground cultural resources were observed in the 500-foot buffer.

Conclusion and Request for Consultation

To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the attached maps and report and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Northern Natural Gas
Northern Lights 2025 Expansion Project
February 14, 2024

Northern respects that the Tribe has unique expertise in identifying and providing information regarding historic properties with religious or cultural significance which may be affected by the Project. Northern is seeking the Tribe's comments on survey methodology, traditional cultural properties, and traditional cultural landscapes along with areas of importance to the Tribe which should be considered. Northern understands this request for information does not circumvent the government-to-government relationship under Section 106 (36 Code of Federal Regulations Part 800) between the Tribe and the FERC. Please be assured that Northern will keep sensitive Tribal information strictly confidential.

While the regulations for implementing Section 106 (36 Code of Federal Regulations Part 800) allow companies like Northern (and their consultants) to gather information, the FERC is responsible for monitoring compliance with the NHPA and determinations pursuant to Section 106. Additionally, the FERC, not Northern, is responsible for government-to-government consultations with American Indian Tribes. The FERC has not delegated this consultation. The FERC will contact you through a *Notice of Intent to Produce an Environmental Document*. If you would like to communicate directly with the FERC natural gas archaeological staff to discuss its cultural resource review and consultation processes, please feel free to contact Elizabeth Molloy, Tribal Liaison, at 202-502-8771 or Elizabeth.Molloy@ferc.gov.

Thank you in advance for your attention to this Project. Northern would very much appreciate receiving your response within 30 days of the date of this letter. Northern will follow up with you via phone contact or email if no response is received within 30 days. In the interim, should you have questions or need additional information, please contact me at 402-398-7226 or Terry.Plucker@nngco.com or Susan Knabe of Stantec at 920-278-3220 or Susan.Knabe@stantec.com.

Sincerely,



Terry Plucker
Environmental Compliance Manager
Northern Natural Gas Company

Enclosures: RCG&A Cultural Resources Reports
Phase One Cultural Resources Report
Unanticipated Discovery Plans (Minnesota and Wisconsin)

CC: Susan Knabe, Stantec Consulting
Matt Nelson, Northern Natural Gas

From: [Waller, Hiedi](#)
To: Mbear@cheyenneandrapaho-nsn.gov
Cc: [Knabe, Susan](#); Terry.Plucker@nngco.com
Subject: FW: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS
Date: Wednesday, February 14, 2024 8:57:00 PM
Attachments: [NL 2025 THPO Cheyenne and Arapaho Tribes OK.pdf](#)

THPO Bear:

Northern is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Over periodic field events from 2019 through 2024, Phase One Archaeological Services Inc. and R. Christopher Goodwin & Associates, Inc. completed field surveys of the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The results of these survey efforts are included in the cultural resources reports. To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the cultural resources reports and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Due to the size of the files associated with the Project, Northern has set up an FTP site where the cultural resources reports and Unanticipated Discoveries Plans referenced in the attached letter can be downloaded.

Please contact us if you have any questions.

Hiedi Waller, PE
Senior Engineer
Pronouns: she, her, hers
Phone: (262) 643-9161

From: donotreply@secureftp.stantec.com <donotreply@secureftp.stantec.com>
Sent: Wednesday, February 14, 2024 9:20 PM
To: Waller, Hiedi <Hiedi.Waller@stantec.com>
Subject: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS

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Please use the link below to access your directory with the username and password provided.

Login Information

Browser link: <https://tmpsftp.stantec.com>

FTP Client Hostname: tmpsftp.stantec.com **Port:** 22 (can be used within a SFTP client to view and

transfer files and folders; e.g., FileZilla)

Login name: s0221202004

Password: 9670102

Disk Quota: 20 GB

Expiry Date: 2/21/2024

If you require a one-time one-week extension, please click [here](#).

If you require more than a week, please request a Microsoft 365 Groups/Teams. Information on Groups/Teams request procedure is posted in the [Stantec Help Center](#).

Click here for the [quick reference guide](#).

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1111 South 103rd Street
Omaha, NE 68124

February 14, 2024

Cheyenne and Arapaho Tribes, Oklahoma
Max Bear, THPO
700 Black Kettle Blvd
Concho, OK 73022

Re: Northern Natural Gas–Northern Lights 2025 Expansion Project – Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin

Dear Tribal Historic Preservation Officer Bear:

Northern Natural Gas (Northern) is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured the services of Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Northern is proposing to construct the Project, which will consist of (1) a 3.00-mile extension of its 36-inch-diameter Lake Mills to Albert Lea E-line; (2) a 2.43-mile extension of its 30-inch-diameter Elk River 3rd branch line; (3) a non-contiguous 1.91-mile extension of its 30-inch-diameter Farmington to Hugo C-line; (4) a 1.28-mile extension of its 8-inch-diameter Tomah branch line loop; (5) minor modifications to its existing La Crescent compressor station; and (6) aboveground facilities including a launcher, receiver and tie-in valve settings. All Project components are located in various counties in Minnesota and Wisconsin.

This letter summarizes the results of the investigations and recommendations of the archaeological investigator for the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The archeological reports from R. Christopher Goodwin & Associates, Inc. (RCG&A) and Phase One Archaeological Services Inc. (Phase One) are attached to this letter.

Literature Search

Northern's cultural resources' sub-consultants, RCG&A and Phase One, conducted background research at the Minnesota and Wisconsin SHPOs to identify previously recorded archaeological and above-grade resources. This study area encompassed a Project-specific environmental survey boundary (ESB), the direct Area of Potential Effects (APE) and the indirect APE and included archaeological sites and other cultural resources located in the immediate areas of planned construction along with a one-mile radius of all proposed project activities.

Lake Mills to Albert Lea E-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources on the list of National Register of Historic Places (NRHP) properties are in the indirect APE. One archaeological site, 21FE0130, and Minnesota Statewide Historic Inventory property FE-AEA-00264 extends into the 500-foot buffer around the proposed aboveground valve setting. However, due to distance and mature trees, no effects are anticipated.

Elk River 3rd branch line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Farmington to Hugo C-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Tomah branch line loop

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

A single standing structure, a 19th century Greek Revival Farmhouse (AHI # 78410) was previously located on the west side of County Highway Q within the indirect APE. This building was razed and replaced with a modern single-family farmhouse. No other aboveground historical resources previously listed in the Wisconsin Architecture-History Inventory or on the list of the NRHP properties are located in the indirect APE.

La Crescent compressor station

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the La Crescent compressor station to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Cultural Survey

Following the literature review, Northern's subconsultants conducted a systematic field survey of the direct APE, which includes the construction ROW (TWS), ETWS, access roads, staging areas, and the aboveground appurtenant facility footprints. The survey procedures included a pedestrian walkover of the APE, systematic surface examination of suitable areas, and systematic subsurface testing of areas lacking sufficient surface visibility or which had potential for subsurface resources.

The cultural resources survey is 89% complete for the Lake Mills to Albert Lea E-line with additional shovel testing needed on 77.02 acres anticipated in spring 2024. The cultural resource survey for the Elk River 3rd branch line is 92% complete with additional survey needed on 15.25 acres scheduled for spring 2024. Northern cultural resources surveys are 100% complete for the remaining Project components.

Lake Mills to Albert Lea E-line

Archaeology

On August 22, August 23, October 3, and October 23-27, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability and previously recorded cultural resources. Shovel testing at 15-meter intervals was planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields. Shovel testing is pending for selected locations with the potential for buried cultural deposits.

Excluding one farmstead and one hay field, the majority of the survey area consisted of harvested or mature crops with 50 to 100% ground surface visibility. The hay field yielded an average surface visibility of 30%. The total ESB encompassed 678.90 acres. Roadways, inundated, and usually inundated areas, a total of 23.98 acres, were excluded from survey. A total of 77.02 acres remains to be surveyed. The other 591.82 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

A Euro-American archaeological site (21FE0130) also assigned an historic inventory property (FE-AEA-00264) was initially recorded as part of another Northern project in 2022. During the 2023 effort, this site was surveyed again. The 2023 site visit prompted an updated site boundary and an updated site form was submitted to the Minnesota Office of the State Archaeologist. This

farmstead site consisted of a combination of standing structures, archaeological features, and a surface artifact scatter. The site is within the ESB, but does not extend into the direct APE. In the original site form, the extant structures were identified as lacking integrity. Since the initial site visit, three buildings have been demolished. The artifacts documented on the surface have been placed in dump locations of mixed time periods, grouped through heavy machinery in pushpiles, and disturbed by agricultural processes. The archaeological component at 21FE0130 has not been evaluated for listing in the NRHP. RCG&A recommends the architectural buildings (FE-AEA-00264) at this property not eligible for listing in the NRHP.

This resource (21FE0130/FE-AEA-00264) is not in the direct APE and will not be impacted by the Project. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

County Ditch No. 4 (FE-PIC-00008), a historical structure, was initially visited as part of another Northern project in 2022. During the 2023 fieldwork, it was more thoroughly documented. County Ditch No. 4 is an active drainage ditch bound by agricultural land. The majority of this ditch is open cut and possesses a steep V-shaped profile. Brome and other grasses covered the banks of the ditch. Survey measured a top width of between 50 and 60 feet and a bottom width of 9-15 feet. Standing water was present at the base of the ditch during survey in fall 2023 but the overall depth was estimated to be 10-12 feet. Based on observations made from public ROW and aerial images, these dimensions are typical of County Ditch No. 4. This ditch also includes two branches: the Colvin Branch and the Klukow Branch. The Klukow Branch was in the ESB and was documented as part of FE-PIC-0008. County Ditch No. 4 is recommended not eligible for listing in the NRHP. Northern will utilize a private driveway that crosses the ditch without improvements. Therefore, the project will have no effect to County Ditch No. 4 (FE-PIC-00008).

Northern will remove a tie-over valve setting (MP 31.21) and install a new tie-in valve setting (MP 34.21) for the Lake Mills to Albert Lea E-line extension project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 34.21. This entire area was within the surveyed ESB. Northern conducted a visual assessment of the 500 foot buffer by walking the areas surrounding the project. The western portion of archaeological site 21FE0130 / inventory property FE-AEA-00264 is within the visual effects area; however, given the distance and mature vegetation surrounding the standing structures at the site, there will not be any effect to the standing structures from the project.

The proposed construction will not have an effect to any Minnesota Standing Structures Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

Elk River 3rd branch line

Archaeology

On November 1-5 and 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability. Shovel testing at 15-meter intervals was planned for surveyed areas with less than 25% surface visibility); no such areas were identified on this project. The survey area included agricultural fields, a tree farm, wetlands and manicured lawn with small stands of trees. Several historical and recent single-family homes and associated outbuildings were within the ESB.

The agricultural fields and tree farm yielded an average surface visibility of 80%. Visibility in the manicured lawns was limited (average 30%) but stands of trees yielded better ground surface visibility (average 55%). The total ESB encompassed 194.59 acres. Roadways as well as inundated and usually inundated areas, a total of 58.92 acres, were excluded from survey. A total of 15.25 acres remains to be surveyed. The remaining 120.42 acres had more than 25% ground surface visibility and was subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical ditches (WA-FLC-00033 and WA-XXX-00002) and ten historical standing structures during the 2023 fieldwork. None of the buildings are in the direct APE. Only one newly recorded property, WA-HGC-00077, is in the 500-foot buffer of the proposed valve setting.

Two historical drainage ditches were newly recorded during the 2023 fieldwork. WA-FLC-00033 is an active drainage ditch constructed in approximately 1949. The ditch is open cut and possesses a steep V-shaped profile. Grasses covered the banks of the ditch. Surveyors measured a varied width between 1.5 and 3 meters. Based on observations made from public ROW and aerial images, these dimensions are typical of this ditch. WA-FLC-00033 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-FLC-00033 via HDD.

WA-XXX-00002, the channelized Hardwood Creek, is known as Judicial Ditch No. 2. Ordered in 1902, Judicial Ditch No. 2 is open cut and possesses a V-shaped profile. Surveyors measured a top width of approximately six meters. Grasses covered the banks of the ditch. While standing water was present within the ditch during survey in fall 2023, the overall depth of the ditch was measured at variable depths between 2 to 5 meters. Based on observations made from the public ROW and aerial images, these dimensions are fairly typical of Judicial Ditch No. 2. WA-XXX-

00002 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-XXX-00002 via HDD.

Northern plans to remove a tie-over valve setting (MP 1.07) and install a new tie-in valve setting (MP 3.45) for the Elk River 3rd branch line project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 3.45. Northern conducted a desktop analysis and visual assessment of the 500-foot buffer by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

Northern identified four built resources on three properties that are potential historic properties (constructed more than 45 years ago) in the 500-foot buffer around the proposed facility. Prior to the 2023 survey, none of the buildings were recorded in the Minnesota Statewide Historic Inventory. One of the buildings was in the ESB and formally recorded during the survey (WA-HGC-00077; 17903 Henna Avenue North); the others (at 17803 Henna Avenue North and 17958 Henna Avenue North) were observed but not formally recorded.

The single-family residence at 17903 Henna Avenue North occupies a rectangular footprint, possesses two stories, is clad in composite siding and brick veneer, and terminates in a side-gable roof sheathed in asphalt shingles. It possesses an attached, single-bay garage along the south elevation. Based on county records, the house was constructed in 1969. Historic exterior materials on this building have been altered with replacements to exterior cladding, window openings and asphalt roof shingles. The public ROW runs between the proposed facility and the property at 17903 Henna Avenue North. Additionally, there are several trees that will obscure views of the proposed facility.

The single-family home and garage at 17803 Henna Avenue North have been substantially altered through additions and renovation. The original house was constructed in the mid-1960s, but, according to county records, extensive changes were made in 1989. The proposed facility is not visible from the property at 17803 Henna Avenue North as it is obscured by distance and a line of mature trees.

There are several buildings on the 17958 Henna Avenue North property. Only the single-family home and one outbuilding are within the 500-foot indirect APE around the proposed facility. The two-story home was constructed around 1880 and has had significant alterations to its exterior. In addition, the house is orientated to the north, while the facility will be constructed to the southeast. The combination of distance and topography, as well as an agricultural field and mature deciduous trees visually buffer the potential historic buildings from the proposed Project.

The proposed aboveground valve setting will not substantively alter the viewshed of the potential historic properties at 17803, 17903, and 17958 Henna Avenue North. Temporary visual impacts on the property during construction will not affect the attributes contributing to the potential significance and integrity of these properties. As such, the proposed Project will not adversely impact the aspects of integrity of these potential historic properties.

The proposed Elk River 3rd branch line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Farmington to Hugo C-line

Archaeology

From July 17 to 20, October 18 and November 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at 5-meter intervals in high probability areas and shovel testing at 15-meter intervals were planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields, wetlands and woodlands associated with the wetlands and pasture.

Ground surface visibility was good in the agricultural fields ranging from 40-100%. Woodland and pastures had lower surface visibility that ranged between 25 and 50%. The total ESB encompassed 172.97 acres. Roadways, existing graveled facility lots, as well as inundated and usually inundated areas, a total of 19.26 acres, were excluded from survey. The remaining 153.71 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical properties in the Farmington to Hugo C-line ESB. They were recorded in the Minnesota Statewide Historic Inventory and assigned designations WA-MYT-031 and WA-MYT-032. WA-MYT-031 is a 1973 single-family residence. The two-story, multi-bay building occupies a rectangular footprint, is clad in composite siding and brick veneer, and terminates in a low-pitched, hipped roof with overhanging eaves sheathed in asphalt shingles. The building features a single-story attached garage and a recessed front porch covered by a secondary hipped roof also sheathed in asphalt shingles.

WA-MYT-032 includes two historical buildings, a house (WA-MYT-028) and a shed (WA-MYT-029). WA-MYT-028 is a 1972 single-family residence. The one-and-one-half story, multi-bay building occupies a rectangular footprint, is clad in vinyl siding and brick veneer, and terminates in a front-gable roof with overhanging eaves sheathed in asphalt shingles. The façade features a secondary, front-gable projection and a recessed porch. The east elevation features a two-bay, integral garage. WA-MYT-029 is a 1972 shed near the house. The single-story shed occupies a rectangular footprint, is clad in wood siding, and terminates in a gambrel roof with overhanging eaves sheathed in asphalt shingles. Both of these properties are recommended not eligible for listing in the NRHP and both are avoided through HDD in the current Project design.

Northern proposes to install a new launcher and associated valves and piping at the existing Hugo compressor station (MP 0.00), as well as install a new tie-in valve setting (MP 1.91) for the

Farmington to Hugo C-line. Aboveground construction for the aboveground tie-in valve setting will not exceed ten feet in height. The potential for adverse visual effects to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the Hugo compressor station and the proposed valve setting at MP 1.91. Northern conducted a visual assessment of these areas by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

One potential historical resource is located in the Hugo compressor station buffer, a house at 10830 180th Street North. This property has not been recorded in the Minnesota Statewide Historic Inventory. According to county records, it was constructed in 1977 and is a split foyer frame home with an attached garage. Significant alterations were made to the house in 2016. This house is set back from 180th Street North approximately 240 feet and is surrounded by trees. The combination of distance, a public ROW (180th Street North), as well as trees and other foliage visually buffer the potential historic building from the proposed project.

The proposed Farmington to Hugo C-line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Tomah branch line loop

Archaeology

Portions of the Tomah branch line loop was surveyed in August 2019, August and November 2021 and most recently surveyed in October and November 2023 and January 2024. Northern completed archaeological field investigations using standard methodology for archaeological surveys. Pedestrian survey was conducted at five-meter or less interval transects following the general direction of the survey corridor. Shovel testing was conducted at 15-meter or less interval. In areas with a greater probability for archaeological sites such as stream crossings, pedestrian survey was conducted at approximately one-meter intervals and shovel testing at less than five-meter intervals.

The survey area was located primarily in agricultural fields, with intermittent wooded areas, residential yards and wetlands. At the time of the field investigation, most of the survey area consisted of harvested fields and plowed corn and soybean fields. Most fields displayed 90-100% surface visibility which allowed field investigation to be conducted using pedestrian survey methods.

Of the total investigated area (124.7 acres), 55.9 acres were investigated using pedestrian survey methods and 55.4 acres were shovel tested. Approximately 13.4 acres were exempted from investigation survey in areas of slope, stream channels, or areas where ground had been disturbed by road and road drainage ditch construction. No prehistoric or historic period Euro-American artifacts or archaeological features were observed in the direct APE.

Aboveground Historical Properties

Northern plans to relocate a branch line receiver on the Tomah branch line loop (MP 3.53). The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the indirect APE was limited to the 500-foot buffer around the valve setting. Aboveground

construction will not exceed eight feet in height. Northern conducted a visual assessment of the indirect APE by walking the areas surrounding the Project and no historical properties were identified.

The proposed construction will not have an effect to any Wisconsin Architecture and History Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

La Crescent compressor station

Archaeology

On September 19, 2023, Northern completed archaeological field investigations using 15-meter interval pedestrian survey in areas of the ESB that were not graveled. The graveled facilities were excluded from survey. The survey area included short and medium grasses and corn fields. Ground surface visibility averaged 25% in grassy areas, but in the corn fields, ground surface visibility averaged 90%.

The total ESB encompassed 3.02 acres. Areas excluded from survey, consisting of graveled access drives and facilities and roadway totaling 1.72 acres. The remaining 1.30 acres averaged more than 25% ground surface visibility and was subjected to pedestrian survey. No archaeological sites or isolated finds were identified in the direct APE.

The current Project design and proposed construction activities will not have direct effects to any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern proposes minor modifications to existing infrastructure at the La Crescent compressor station, including replacing compressor cylinder end caps (currently blind flanges) and adjusting compressor mechanical characteristics to match new operating conditions. While impacts that are subject to review under 36 CFR § 800 may include surficial disturbances caused by topsoil removal, heavy machinery traffic, shallow grading, and spoil dirt management, only vehicular parking is anticipated for this Project component.

The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the existing compressor station lot. Northern conducted a visual assessment of this buffer by examining aerial imagery and observing areas surrounding the project from the public ROW and ESB. No aboveground cultural resources were observed in the 500-foot buffer.

Conclusion and Request for Consultation

To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the attached maps and report and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Northern Natural Gas
Northern Lights 2025 Expansion Project
February 14, 2024

Northern respects that the Tribe has unique expertise in identifying and providing information regarding historic properties with religious or cultural significance which may be affected by the Project. Northern is seeking the Tribe's comments on survey methodology, traditional cultural properties, and traditional cultural landscapes along with areas of importance to the Tribe which should be considered. Northern understands this request for information does not circumvent the government-to-government relationship under Section 106 (36 Code of Federal Regulations Part 800) between the Tribe and the FERC. Please be assured that Northern will keep sensitive Tribal information strictly confidential.

While the regulations for implementing Section 106 (36 Code of Federal Regulations Part 800) allow companies like Northern (and their consultants) to gather information, the FERC is responsible for monitoring compliance with the NHPA and determinations pursuant to Section 106. Additionally, the FERC, not Northern, is responsible for government-to-government consultations with American Indian Tribes. The FERC has not delegated this consultation. The FERC will contact you through a *Notice of Intent to Produce an Environmental Document*. If you would like to communicate directly with the FERC natural gas archaeological staff to discuss its cultural resource review and consultation processes, please feel free to contact Elizabeth Molloy, Tribal Liaison, at 202-502-8771 or Elizabeth.Molloy@ferc.gov.

Thank you in advance for your attention to this Project. Northern would very much appreciate receiving your response within 30 days of the date of this letter. Northern will follow up with you via phone contact or email if no response is received within 30 days. In the interim, should you have questions or need additional information, please contact me at 402-398-7226 or Terry.Plucker@nngco.com or Susan Knabe of Stantec at 920-278-3220 or Susan.Knabe@stantec.com.

Sincerely,



Terry Plucker
Environmental Compliance Manager
Northern Natural Gas Company

Enclosures: RCG&A Cultural Resources Reports
Phase One Cultural Resources Report
Unanticipated Discovery Plans (Minnesota and Wisconsin)

CC: Susan Knabe, Stantec Consulting
Matt Nelson, Northern Natural Gas

From: [Waller, Hiedi](#)
To: durell.cooper@apachetribe.org
Cc: [Knabe, Susan](#); Terry.Plucker@nngco.com
Subject: FW: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS
Date: Wednesday, February 14, 2024 8:50:00 PM
Attachments: [NL 2025 THPO Apache Tribe of Oklahoma.pdf](#)

Chairman Copper:

Northern is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Over periodic field events from 2019 through 2024, Phase One Archaeological Services Inc. and R. Christopher Goodwin & Associates, Inc. completed field surveys of the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The results of these survey efforts are included in the cultural resources reports. To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the cultural resources reports and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Due to the size of the files associated with the Project, Northern has set up an FTP site where the cultural resources reports and Unanticipated Discoveries Plans referenced in the attached letter can be downloaded.

Please contact us if you have any questions.

Hiedi Waller, PE
Senior Engineer
Pronouns: she, her, hers
Phone: (262) 643-9161

From: donotreply@secureftp.stantec.com <donotreply@secureftp.stantec.com>
Sent: Wednesday, February 14, 2024 9:20 PM
To: Waller, Hiedi <Hiedi.Waller@stantec.com>
Subject: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS

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Please use the link below to access your directory with the username and password provided.

Login Information

Browser link: <https://tmpsftp.stantec.com>

FTP Client Hostname: tmpsftp.stantec.com **Port:** 22 (can be used within a SFTP client to view and

transfer files and folders; e.g., FileZilla)

Login name: s0221202004

Password: 9670102

Disk Quota: 20 GB

Expiry Date: 2/21/2024

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Click here for the [quick reference guide](#).

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1111 South 103rd Street
Omaha, NE 68124

February 14, 2024

Apache Tribe of Oklahoma
Durrell Cooper, Chairman
511 East Colorado
Anadarko, OK 73005

Re: Northern Natural Gas–Northern Lights 2025 Expansion Project – Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin

Dear Chairman Cooper:

Northern Natural Gas (Northern) is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured the services of Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Northern is proposing to construct the Project, which will consist of (1) a 3.00-mile extension of its 36-inch-diameter Lake Mills to Albert Lea E-line; (2) a 2.43-mile extension of its 30-inch-diameter Elk River 3rd branch line; (3) a non-contiguous 1.91-mile extension of its 30-inch-diameter Farmington to Hugo C-line; (4) a 1.28-mile extension of its 8-inch-diameter Tomah branch line loop; (5) minor modifications to its existing La Crescent compressor station; and (6) aboveground facilities including a launcher, receiver and tie-in valve settings. All Project components are located in various counties in Minnesota and Wisconsin.

This letter summarizes the results of the investigations and recommendations of the archaeological investigator for the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The archeological reports from R. Christopher Goodwin & Associates, Inc. (RCG&A) and Phase One Archaeological Services Inc. (Phase One) are attached to this letter.

Literature Search

Northern's cultural resources' sub-consultants, RCG&A and Phase One, conducted background research at the Minnesota and Wisconsin SHPOs to identify previously recorded archaeological and above-grade resources. This study area encompassed a Project-specific environmental survey boundary (ESB), the direct Area of Potential Effects (APE) and the indirect APE and included archaeological sites and other cultural resources located in the immediate areas of planned construction along with a one-mile radius of all proposed project activities.

Lake Mills to Albert Lea E-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources on the list of National Register of Historic Places (NRHP) properties are in the indirect APE. One archaeological site, 21FE0130, and Minnesota Statewide Historic Inventory property FE-AEA-00264 extends into the 500-foot buffer around the proposed aboveground valve setting. However, due to distance and mature trees, no effects are anticipated.

Elk River 3rd branch line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Farmington to Hugo C-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Tomah branch line loop

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

A single standing structure, a 19th century Greek Revival Farmhouse (AHI # 78410) was previously located on the west side of County Highway Q within the indirect APE. This building was razed and replaced with a modern single-family farmhouse. No other aboveground historical resources previously listed in the Wisconsin Architecture-History Inventory or on the list of the NRHP properties are located in the indirect APE.

La Crescent compressor station

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the La Crescent compressor station to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Cultural Survey

Following the literature review, Northern's subconsultants conducted a systematic field survey of the direct APE, which includes the construction ROW (TWS), ETWS, access roads, staging areas, and the aboveground appurtenant facility footprints. The survey procedures included a pedestrian walkover of the APE, systematic surface examination of suitable areas, and systematic subsurface testing of areas lacking sufficient surface visibility or which had potential for subsurface resources.

The cultural resources survey is 89% complete for the Lake Mills to Albert Lea E-line with additional shovel testing needed on 77.02 acres anticipated in spring 2024. The cultural resource survey for the Elk River 3rd branch line is 92% complete with additional survey needed on 15.25 acres scheduled for spring 2024. Northern cultural resources surveys are 100% complete for the remaining Project components.

Lake Mills to Albert Lea E-line

Archaeology

On August 22, August 23, October 3, and October 23-27, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability and previously recorded cultural resources. Shovel testing at 15-meter intervals was planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields. Shovel testing is pending for selected locations with the potential for buried cultural deposits.

Excluding one farmstead and one hay field, the majority of the survey area consisted of harvested or mature crops with 50 to 100% ground surface visibility. The hay field yielded an average surface visibility of 30%. The total ESB encompassed 678.90 acres. Roadways, inundated, and usually inundated areas, a total of 23.98 acres, were excluded from survey. A total of 77.02 acres remains to be surveyed. The other 591.82 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

A Euro-American archaeological site (21FE0130) also assigned an historic inventory property (FE-AEA-00264) was initially recorded as part of another Northern project in 2022. During the 2023 effort, this site was surveyed again. The 2023 site visit prompted an updated site boundary and an updated site form was submitted to the Minnesota Office of the State Archaeologist. This

farmstead site consisted of a combination of standing structures, archaeological features, and a surface artifact scatter. The site is within the ESB, but does not extend into the direct APE. In the original site form, the extant structures were identified as lacking integrity. Since the initial site visit, three buildings have been demolished. The artifacts documented on the surface have been placed in dump locations of mixed time periods, grouped through heavy machinery in pushpiles, and disturbed by agricultural processes. The archaeological component at 21FE0130 has not been evaluated for listing in the NRHP. RCG&A recommends the architectural buildings (FE-AEA-00264) at this property not eligible for listing in the NRHP.

This resource (21FE0130/FE-AEA-00264) is not in the direct APE and will not be impacted by the Project. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

County Ditch No. 4 (FE-PIC-00008), a historical structure, was initially visited as part of another Northern project in 2022. During the 2023 fieldwork, it was more thoroughly documented. County Ditch No. 4 is an active drainage ditch bound by agricultural land. The majority of this ditch is open cut and possesses a steep V-shaped profile. Brome and other grasses covered the banks of the ditch. Survey measured a top width of between 50 and 60 feet and a bottom width of 9-15 feet. Standing water was present at the base of the ditch during survey in fall 2023 but the overall depth was estimated to be 10-12 feet. Based on observations made from public ROW and aerial images, these dimensions are typical of County Ditch No. 4. This ditch also includes two branches: the Colvin Branch and the Klukow Branch. The Klukow Branch was in the ESB and was documented as part of FE-PIC-0008. County Ditch No. 4 is recommended not eligible for listing in the NRHP. Northern will utilize a private driveway that crosses the ditch without improvements. Therefore, the project will have no effect to County Ditch No. 4 (FE-PIC-00008).

Northern will remove a tie-over valve setting (MP 31.21) and install a new tie-in valve setting (MP 34.21) for the Lake Mills to Albert Lea E-line extension project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 34.21. This entire area was within the surveyed ESB. Northern conducted a visual assessment of the 500 foot buffer by walking the areas surrounding the project. The western portion of archaeological site 21FE0130 / inventory property FE-AEA-00264 is within the visual effects area; however, given the distance and mature vegetation surrounding the standing structures at the site, there will not be any effect to the standing structures from the project.

The proposed construction will not have an effect to any Minnesota Standing Structures Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

Elk River 3rd branch line

Archaeology

On November 1-5 and 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability. Shovel testing at 15-meter intervals was planned for surveyed areas with less than 25% surface visibility); no such areas were identified on this project. The survey area included agricultural fields, a tree farm, wetlands and manicured lawn with small stands of trees. Several historical and recent single-family homes and associated outbuildings were within the ESB.

The agricultural fields and tree farm yielded an average surface visibility of 80%. Visibility in the manicured lawns was limited (average 30%) but stands of trees yielded better ground surface visibility (average 55%). The total ESB encompassed 194.59 acres. Roadways as well as inundated and usually inundated areas, a total of 58.92 acres, were excluded from survey. A total of 15.25 acres remains to be surveyed. The remaining 120.42 acres had more than 25% ground surface visibility and was subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical ditches (WA-FLC-00033 and WA-XXX-00002) and ten historical standing structures during the 2023 fieldwork. None of the buildings are in the direct APE. Only one newly recorded property, WA-HGC-00077, is in the 500-foot buffer of the proposed valve setting.

Two historical drainage ditches were newly recorded during the 2023 fieldwork. WA-FLC-00033 is an active drainage ditch constructed in approximately 1949. The ditch is open cut and possesses a steep V-shaped profile. Grasses covered the banks of the ditch. Surveyors measured a varied width between 1.5 and 3 meters. Based on observations made from public ROW and aerial images, these dimensions are typical of this ditch. WA-FLC-00033 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-FLC-00033 via HDD.

WA-XXX-00002, the channelized Hardwood Creek, is known as Judicial Ditch No. 2. Ordered in 1902, Judicial Ditch No. 2 is open cut and possesses a V-shaped profile. Surveyors measured a top width of approximately six meters. Grasses covered the banks of the ditch. While standing water was present within the ditch during survey in fall 2023, the overall depth of the ditch was measured at variable depths between 2 to 5 meters. Based on observations made from the public ROW and aerial images, these dimensions are fairly typical of Judicial Ditch No. 2. WA-XXX-

00002 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-XXX-00002 via HDD.

Northern plans to remove a tie-over valve setting (MP 1.07) and install a new tie-in valve setting (MP 3.45) for the Elk River 3rd branch line project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 3.45. Northern conducted a desktop analysis and visual assessment of the 500-foot buffer by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

Northern identified four built resources on three properties that are potential historic properties (constructed more than 45 years ago) in the 500-foot buffer around the proposed facility. Prior to the 2023 survey, none of the buildings were recorded in the Minnesota Statewide Historic Inventory. One of the buildings was in the ESB and formally recorded during the survey (WA-HGC-00077; 17903 Henna Avenue North); the others (at 17803 Henna Avenue North and 17958 Henna Avenue North) were observed but not formally recorded.

The single-family residence at 17903 Henna Avenue North occupies a rectangular footprint, possesses two stories, is clad in composite siding and brick veneer, and terminates in a side-gable roof sheathed in asphalt shingles. It possesses an attached, single-bay garage along the south elevation. Based on county records, the house was constructed in 1969. Historic exterior materials on this building have been altered with replacements to exterior cladding, window openings and asphalt roof shingles. The public ROW runs between the proposed facility and the property at 17903 Henna Avenue North. Additionally, there are several trees that will obscure views of the proposed facility.

The single-family home and garage at 17803 Henna Avenue North have been substantially altered through additions and renovation. The original house was constructed in the mid-1960s, but, according to county records, extensive changes were made in 1989. The proposed facility is not visible from the property at 17803 Henna Avenue North as it is obscured by distance and a line of mature trees.

There are several buildings on the 17958 Henna Avenue North property. Only the single-family home and one outbuilding are within the 500-foot indirect APE around the proposed facility. The two-story home was constructed around 1880 and has had significant alterations to its exterior. In addition, the house is orientated to the north, while the facility will be constructed to the southeast. The combination of distance and topography, as well as an agricultural field and mature deciduous trees visually buffer the potential historic buildings from the proposed Project.

The proposed aboveground valve setting will not substantively alter the viewshed of the potential historic properties at 17803, 17903, and 17958 Henna Avenue North. Temporary visual impacts on the property during construction will not affect the attributes contributing to the potential significance and integrity of these properties. As such, the proposed Project will not adversely impact the aspects of integrity of these potential historic properties.

The proposed Elk River 3rd branch line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Farmington to Hugo C-line

Archaeology

From July 17 to 20, October 18 and November 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at 5-meter intervals in high probability areas and shovel testing at 15-meter intervals were planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields, wetlands and woodlands associated with the wetlands and pasture.

Ground surface visibility was good in the agricultural fields ranging from 40-100%. Woodland and pastures had lower surface visibility that ranged between 25 and 50%. The total ESB encompassed 172.97 acres. Roadways, existing graveled facility lots, as well as inundated and usually inundated areas, a total of 19.26 acres, were excluded from survey. The remaining 153.71 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical properties in the Farmington to Hugo C-line ESB. They were recorded in the Minnesota Statewide Historic Inventory and assigned designations WA-MYT-031 and WA-MYT-032. WA-MYT-031 is a 1973 single-family residence. The two-story, multi-bay building occupies a rectangular footprint, is clad in composite siding and brick veneer, and terminates in a low-pitched, hipped roof with overhanging eaves sheathed in asphalt shingles. The building features a single-story attached garage and a recessed front porch covered by a secondary hipped roof also sheathed in asphalt shingles.

WA-MYT-032 includes two historical buildings, a house (WA-MYT-028) and a shed (WA-MYT-029). WA-MYT-028 is a 1972 single-family residence. The one-and-one-half story, multi-bay building occupies a rectangular footprint, is clad in vinyl siding and brick veneer, and terminates in a front-gable roof with overhanging eaves sheathed in asphalt shingles. The façade features a secondary, front-gable projection and a recessed porch. The east elevation features a two-bay, integral garage. WA-MYT-029 is a 1972 shed near the house. The single-story shed occupies a rectangular footprint, is clad in wood siding, and terminates in a gambrel roof with overhanging eaves sheathed in asphalt shingles. Both of these properties are recommended not eligible for listing in the NRHP and both are avoided through HDD in the current Project design.

Northern proposes to install a new launcher and associated valves and piping at the existing Hugo compressor station (MP 0.00), as well as install a new tie-in valve setting (MP 1.91) for the

Farmington to Hugo C-line. Aboveground construction for the aboveground tie-in valve setting will not exceed ten feet in height. The potential for adverse visual effects to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the Hugo compressor station and the proposed valve setting at MP 1.91. Northern conducted a visual assessment of these areas by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

One potential historical resource is located in the Hugo compressor station buffer, a house at 10830 180th Street North. This property has not been recorded in the Minnesota Statewide Historic Inventory. According to county records, it was constructed in 1977 and is a split foyer frame home with an attached garage. Significant alterations were made to the house in 2016. This house is set back from 180th Street North approximately 240 feet and is surrounded by trees. The combination of distance, a public ROW (180th Street North), as well as trees and other foliage visually buffer the potential historic building from the proposed project.

The proposed Farmington to Hugo C-line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Tomah branch line loop

Archaeology

Portions of the Tomah branch line loop was surveyed in August 2019, August and November 2021 and most recently surveyed in October and November 2023 and January 2024. Northern completed archaeological field investigations using standard methodology for archaeological surveys. Pedestrian survey was conducted at five-meter or less interval transects following the general direction of the survey corridor. Shovel testing was conducted at 15-meter or less interval. In areas with a greater probability for archaeological sites such as stream crossings, pedestrian survey was conducted at approximately one-meter intervals and shovel testing at less than five-meter intervals.

The survey area was located primarily in agricultural fields, with intermittent wooded areas, residential yards and wetlands. At the time of the field investigation, most of the survey area consisted of harvested fields and plowed corn and soybean fields. Most fields displayed 90-100% surface visibility which allowed field investigation to be conducted using pedestrian survey methods.

Of the total investigated area (124.7 acres), 55.9 acres were investigated using pedestrian survey methods and 55.4 acres were shovel tested. Approximately 13.4 acres were exempted from investigation survey in areas of slope, stream channels, or areas where ground had been disturbed by road and road drainage ditch construction. No prehistoric or historic period Euro-American artifacts or archaeological features were observed in the direct APE.

Aboveground Historical Properties

Northern plans to relocate a branch line receiver on the Tomah branch line loop (MP 3.53). The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the indirect APE was limited to the 500-foot buffer around the valve setting. Aboveground

construction will not exceed eight feet in height. Northern conducted a visual assessment of the indirect APE by walking the areas surrounding the Project and no historical properties were identified.

The proposed construction will not have an effect to any Wisconsin Architecture and History Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

La Crescent compressor station

Archaeology

On September 19, 2023, Northern completed archaeological field investigations using 15-meter interval pedestrian survey in areas of the ESB that were not graveled. The graveled facilities were excluded from survey. The survey area included short and medium grasses and corn fields. Ground surface visibility averaged 25% in grassy areas, but in the corn fields, ground surface visibility averaged 90%.

The total ESB encompassed 3.02 acres. Areas excluded from survey, consisting of graveled access drives and facilities and roadway totaling 1.72 acres. The remaining 1.30 acres averaged more than 25% ground surface visibility and was subjected to pedestrian survey. No archaeological sites or isolated finds were identified in the direct APE.

The current Project design and proposed construction activities will not have direct effects to any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern proposes minor modifications to existing infrastructure at the La Crescent compressor station, including replacing compressor cylinder end caps (currently blind flanges) and adjusting compressor mechanical characteristics to match new operating conditions. While impacts that are subject to review under 36 CFR § 800 may include surficial disturbances caused by topsoil removal, heavy machinery traffic, shallow grading, and spoil dirt management, only vehicular parking is anticipated for this Project component.

The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the existing compressor station lot. Northern conducted a visual assessment of this buffer by examining aerial imagery and observing areas surrounding the project from the public ROW and ESB. No aboveground cultural resources were observed in the 500-foot buffer.

Conclusion and Request for Consultation

To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the attached maps and report and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Northern Natural Gas
Northern Lights 2025 Expansion Project
February 14, 2024

Northern respects that the Tribe has unique expertise in identifying and providing information regarding historic properties with religious or cultural significance which may be affected by the Project. Northern is seeking the Tribe's comments on survey methodology, traditional cultural properties, and traditional cultural landscapes along with areas of importance to the Tribe which should be considered. Northern understands this request for information does not circumvent the government-to-government relationship under Section 106 (36 Code of Federal Regulations Part 800) between the Tribe and the FERC. Please be assured that Northern will keep sensitive Tribal information strictly confidential.

While the regulations for implementing Section 106 (36 Code of Federal Regulations Part 800) allow companies like Northern (and their consultants) to gather information, the FERC is responsible for monitoring compliance with the NHPA and determinations pursuant to Section 106. Additionally, the FERC, not Northern, is responsible for government-to-government consultations with American Indian Tribes. The FERC has not delegated this consultation. The FERC will contact you through a *Notice of Intent to Produce an Environmental Document*. If you would like to communicate directly with the FERC natural gas archaeological staff to discuss its cultural resource review and consultation processes, please feel free to contact Elizabeth Molloy, Tribal Liaison, at 202-502-8771 or Elizabeth.Molloy@ferc.gov.

Thank you in advance for your attention to this Project. Northern would very much appreciate receiving your response within 30 days of the date of this letter. Northern will follow up with you via phone contact or email if no response is received within 30 days. In the interim, should you have questions or need additional information, please contact me at 402-398-7226 or Terry.Plucker@nngco.com or Susan Knabe of Stantec at 920-278-3220 or Susan.Knabe@stantec.com.

Sincerely,



Terry Plucker
Environmental Compliance Manager
Northern Natural Gas Company

Enclosures: RCG&A Cultural Resources Reports
Phase One Cultural Resources Report
Unanticipated Discovery Plans (Minnesota and Wisconsin)

CC: Susan Knabe, Stantec Consulting
Matt Nelson, Northern Natural Gas

From: Waller, Hiedi
To: jaime.arsenault@whiteearth-nsn.gov
Cc: Knabe, Susan; Terry.Plucker@nngco.com
Subject: FW: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS
Date: Wednesday, February 14, 2024 10:05:00 PM
Attachments: [NL 2025 THPO White Earth Band of Minnesota Chippewa.pdf](#)

THPO Arsenault:

Northern is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Over periodic field events from 2019 through 2024, Phase One Archaeological Services Inc. and R. Christopher Goodwin & Associates, Inc. completed field surveys of the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The results of these survey efforts are included in the cultural resources reports. To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the cultural resources reports and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Due to the size of the files associated with the Project, Northern has set up an FTP site where the cultural resources reports and Unanticipated Discoveries Plans referenced in the attached letter can be downloaded.

Please contact us if you have any questions.

Hiedi Waller, PE
Senior Engineer
Pronouns: she, her, hers
Phone: (262) 643-9161

From: donotreply@secureftp.stantec.com <donotreply@secureftp.stantec.com>
Sent: Wednesday, February 14, 2024 9:20 PM
To: Waller, Hiedi <Hiedi.Waller@stantec.com>
Subject: Stantec FTP Confirmation - NORTHERN NATURAL GAS NL 2025 THPO SUBMITTALS

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Login Information

Browser link: <https://tmpsftp.stantec.com>

FTP Client Hostname: tmpsftp.stantec.com **Port:** 22 (can be used within a SFTP client to view and transfer files and folders; e.g., FileZilla)

Login name: s0221202004

Password: 9670102

Disk Quota: 20 GB

Expiry Date: 2/21/2024

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1111 South 103rd Street
Omaha, NE 68124

February 14, 2024

White Earth Band of Minnesota Chippewa
Jaime Arsenault, THPO
PO Box 418
White Earth MN, 56591

Re: Northern Natural Gas–Northern Lights 2025 Expansion Project – Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin

Dear Tribal Historic Preservation Officer Arsenault:

Northern Natural Gas (Northern) is proposing to construct the Northern Lights 2025 Expansion Project (Project). Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured the services of Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Northern is proposing to construct the Project, which will consist of (1) a 3.00-mile extension of its 36-inch-diameter Lake Mills to Albert Lea E-line; (2) a 2.43-mile extension of its 30-inch-diameter Elk River 3rd branch line; (3) a non-contiguous 1.91-mile extension of its 30-inch-diameter Farmington to Hugo C-line; (4) a 1.28-mile extension of its 8-inch-diameter Tomah branch line loop; (5) minor modifications to its existing La Crescent compressor station; and (6) aboveground facilities including a launcher, receiver and tie-in valve settings. All Project components are located in various counties in Minnesota and Wisconsin.

This letter summarizes the results of the investigations and recommendations of the archaeological investigator for the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota and Monroe County, Wisconsin. The archeological reports from R. Christopher Goodwin & Associates, Inc. (RCG&A) and Phase One Archaeological Services Inc. (Phase One) are attached to this letter.

Literature Search

Northern's cultural resources' sub-consultants, RCG&A and Phase One, conducted background research at the Minnesota and Wisconsin SHPOs to identify previously recorded archaeological and above-grade resources. This study area encompassed a Project-specific environmental survey boundary (ESB), the direct Area of Potential Effects (APE) and the indirect APE and included archaeological sites and other cultural resources located in the immediate areas of planned construction along with a one-mile radius of all proposed project activities.

Lake Mills to Albert Lea E-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources on the list of National Register of Historic Places (NRHP) properties are in the indirect APE. One archaeological site, 21FE0130, and Minnesota Statewide Historic Inventory property FE-AEA-00264 extends into the 500-foot buffer around the proposed aboveground valve setting. However, due to distance and mature trees, no effects are anticipated.

Elk River 3rd branch line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Farmington to Hugo C-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Tomah branch line loop

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

A single standing structure, a 19th century Greek Revival Farmhouse (AHI # 78410) was previously located on the west side of County Highway Q within the indirect APE. This building was razed and replaced with a modern single-family farmhouse. No other aboveground historical resources previously listed in the Wisconsin Architecture-History Inventory or on the list of the NRHP properties are located in the indirect APE.

La Crescent compressor station

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the La Crescent compressor station to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Cultural Survey

Following the literature review, Northern's subconsultants conducted a systematic field survey of the direct APE, which includes the construction ROW (TWS), ETWS, access roads, staging areas, and the aboveground appurtenant facility footprints. The survey procedures included a pedestrian walkover of the APE, systematic surface examination of suitable areas, and systematic subsurface testing of areas lacking sufficient surface visibility or which had potential for subsurface resources.

The cultural resources survey is 89% complete for the Lake Mills to Albert Lea E-line with additional shovel testing needed on 77.02 acres anticipated in spring 2024. The cultural resource survey for the Elk River 3rd branch line is 92% complete with additional survey needed on 15.25 acres scheduled for spring 2024. Northern cultural resources surveys are 100% complete for the remaining Project components.

Lake Mills to Albert Lea E-line

Archaeology

On August 22, August 23, October 3, and October 23-27, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability and previously recorded cultural resources. Shovel testing at 15-meter intervals was planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields. Shovel testing is pending for selected locations with the potential for buried cultural deposits.

Excluding one farmstead and one hay field, the majority of the survey area consisted of harvested or mature crops with 50 to 100% ground surface visibility. The hay field yielded an average surface visibility of 30%. The total ESB encompassed 678.90 acres. Roadways, inundated, and usually inundated areas, a total of 23.98 acres, were excluded from survey. A total of 77.02 acres remains to be surveyed. The other 591.82 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

A Euro-American archaeological site (21FE0130) also assigned an historic inventory property (FE-AEA-00264) was initially recorded as part of another Northern project in 2022. During the 2023 effort, this site was surveyed again. The 2023 site visit prompted an updated site boundary and an updated site form was submitted to the Minnesota Office of the State Archaeologist. This

farmstead site consisted of a combination of standing structures, archaeological features, and a surface artifact scatter. The site is within the ESB, but does not extend into the direct APE. In the original site form, the extant structures were identified as lacking integrity. Since the initial site visit, three buildings have been demolished. The artifacts documented on the surface have been placed in dump locations of mixed time periods, grouped through heavy machinery in pushpiles, and disturbed by agricultural processes. The archaeological component at 21FE0130 has not been evaluated for listing in the NRHP. RCG&A recommends the architectural buildings (FE-AEA-00264) at this property not eligible for listing in the NRHP.

This resource (21FE0130/FE-AEA-00264) is not in the direct APE and will not be impacted by the Project. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

County Ditch No. 4 (FE-PIC-00008), a historical structure, was initially visited as part of another Northern project in 2022. During the 2023 fieldwork, it was more thoroughly documented. County Ditch No. 4 is an active drainage ditch bound by agricultural land. The majority of this ditch is open cut and possesses a steep V-shaped profile. Brome and other grasses covered the banks of the ditch. Survey measured a top width of between 50 and 60 feet and a bottom width of 9-15 feet. Standing water was present at the base of the ditch during survey in fall 2023 but the overall depth was estimated to be 10-12 feet. Based on observations made from public ROW and aerial images, these dimensions are typical of County Ditch No. 4. This ditch also includes two branches: the Colvin Branch and the Klukow Branch. The Klukow Branch was in the ESB and was documented as part of FE-PIC-0008. County Ditch No. 4 is recommended not eligible for listing in the NRHP. Northern will utilize a private driveway that crosses the ditch without improvements. Therefore, the project will have no effect to County Ditch No. 4 (FE-PIC-00008).

Northern will remove a tie-over valve setting (MP 31.21) and install a new tie-in valve setting (MP 34.21) for the Lake Mills to Albert Lea E-line extension project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 34.21. This entire area was within the surveyed ESB. Northern conducted a visual assessment of the 500 foot buffer by walking the areas surrounding the project. The western portion of archaeological site 21FE0130 / inventory property FE-AEA-00264 is within the visual effects area; however, given the distance and mature vegetation surrounding the standing structures at the site, there will not be any effect to the standing structures from the project.

The proposed construction will not have an effect to any Minnesota Standing Structures Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

Elk River 3rd branch line

Archaeology

On November 1-5 and 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability. Shovel testing at 15-meter intervals was planned for surveyed areas with less than 25% surface visibility); no such areas were identified on this project. The survey area included agricultural fields, a tree farm, wetlands and manicured lawn with small stands of trees. Several historical and recent single-family homes and associated outbuildings were within the ESB.

The agricultural fields and tree farm yielded an average surface visibility of 80%. Visibility in the manicured lawns was limited (average 30%) but stands of trees yielded better ground surface visibility (average 55%). The total ESB encompassed 194.59 acres. Roadways as well as inundated and usually inundated areas, a total of 58.92 acres, were excluded from survey. A total of 15.25 acres remains to be surveyed. The remaining 120.42 acres had more than 25% ground surface visibility and was subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical ditches (WA-FLC-00033 and WA-XXX-00002) and ten historical standing structures during the 2023 fieldwork. None of the buildings are in the direct APE. Only one newly recorded property, WA-HGC-00077, is in the 500-foot buffer of the proposed valve setting.

Two historical drainage ditches were newly recorded during the 2023 fieldwork. WA-FLC-00033 is an active drainage ditch constructed in approximately 1949. The ditch is open cut and possesses a steep V-shaped profile. Grasses covered the banks of the ditch. Surveyors measured a varied width between 1.5 and 3 meters. Based on observations made from public ROW and aerial images, these dimensions are typical of this ditch. WA-FLC-00033 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-FLC-00033 via HDD.

WA-XXX-00002, the channelized Hardwood Creek, is known as Judicial Ditch No. 2. Ordered in 1902, Judicial Ditch No. 2 is open cut and possesses a V-shaped profile. Surveyors measured a top width of approximately six meters. Grasses covered the banks of the ditch. While standing water was present within the ditch during survey in fall 2023, the overall depth of the ditch was measured at variable depths between 2 to 5 meters. Based on observations made from the public ROW and aerial images, these dimensions are fairly typical of Judicial Ditch No. 2. WA-XXX-

00002 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-XXX-00002 via HDD.

Northern plans to remove a tie-over valve setting (MP 1.07) and install a new tie-in valve setting (MP 3.45) for the Elk River 3rd branch line project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 3.45. Northern conducted a desktop analysis and visual assessment of the 500-foot buffer by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

Northern identified four built resources on three properties that are potential historic properties (constructed more than 45 years ago) in the 500-foot buffer around the proposed facility. Prior to the 2023 survey, none of the buildings were recorded in the Minnesota Statewide Historic Inventory. One of the buildings was in the ESB and formally recorded during the survey (WA-HGC-00077; 17903 Henna Avenue North); the others (at 17803 Henna Avenue North and 17958 Henna Avenue North) were observed but not formally recorded.

The single-family residence at 17903 Henna Avenue North occupies a rectangular footprint, possesses two stories, is clad in composite siding and brick veneer, and terminates in a side-gable roof sheathed in asphalt shingles. It possesses an attached, single-bay garage along the south elevation. Based on county records, the house was constructed in 1969. Historic exterior materials on this building have been altered with replacements to exterior cladding, window openings and asphalt roof shingles. The public ROW runs between the proposed facility and the property at 17903 Henna Avenue North. Additionally, there are several trees that will obscure views of the proposed facility.

The single-family home and garage at 17803 Henna Avenue North have been substantially altered through additions and renovation. The original house was constructed in the mid-1960s, but, according to county records, extensive changes were made in 1989. The proposed facility is not visible from the property at 17803 Henna Avenue North as it is obscured by distance and a line of mature trees.

There are several buildings on the 17958 Henna Avenue North property. Only the single-family home and one outbuilding are within the 500-foot indirect APE around the proposed facility. The two-story home was constructed around 1880 and has had significant alterations to its exterior. In addition, the house is orientated to the north, while the facility will be constructed to the southeast. The combination of distance and topography, as well as an agricultural field and mature deciduous trees visually buffer the potential historic buildings from the proposed Project.

The proposed aboveground valve setting will not substantively alter the viewshed of the potential historic properties at 17803, 17903, and 17958 Henna Avenue North. Temporary visual impacts on the property during construction will not affect the attributes contributing to the potential significance and integrity of these properties. As such, the proposed Project will not adversely impact the aspects of integrity of these potential historic properties.

The proposed Elk River 3rd branch line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Farmington to Hugo C-line

Archaeology

From July 17 to 20, October 18 and November 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at 5-meter intervals in high probability areas and shovel testing at 15-meter intervals were planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields, wetlands and woodlands associated with the wetlands and pasture.

Ground surface visibility was good in the agricultural fields ranging from 40-100%. Woodland and pastures had lower surface visibility that ranged between 25 and 50%. The total ESB encompassed 172.97 acres. Roadways, existing graveled facility lots, as well as inundated and usually inundated areas, a total of 19.26 acres, were excluded from survey. The remaining 153.71 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical properties in the Farmington to Hugo C-line ESB. They were recorded in the Minnesota Statewide Historic Inventory and assigned designations WA-MYT-031 and WA-MYT-032. WA-MYT-031 is a 1973 single-family residence. The two-story, multi-bay building occupies a rectangular footprint, is clad in composite siding and brick veneer, and terminates in a low-pitched, hipped roof with overhanging eaves sheathed in asphalt shingles. The building features a single-story attached garage and a recessed front porch covered by a secondary hipped roof also sheathed in asphalt shingles.

WA-MYT-032 includes two historical buildings, a house (WA-MYT-028) and a shed (WA-MYT-029). WA-MYT-028 is a 1972 single-family residence. The one-and-one-half story, multi-bay building occupies a rectangular footprint, is clad in vinyl siding and brick veneer, and terminates in a front-gable roof with overhanging eaves sheathed in asphalt shingles. The façade features a secondary, front-gable projection and a recessed porch. The east elevation features a two-bay, integral garage. WA-MYT-029 is a 1972 shed near the house. The single-story shed occupies a rectangular footprint, is clad in wood siding, and terminates in a gambrel roof with overhanging eaves sheathed in asphalt shingles. Both of these properties are recommended not eligible for listing in the NRHP and both are avoided through HDD in the current Project design.

Northern proposes to install a new launcher and associated valves and piping at the existing Hugo compressor station (MP 0.00), as well as install a new tie-in valve setting (MP 1.91) for the

Farmington to Hugo C-line. Aboveground construction for the aboveground tie-in valve setting will not exceed ten feet in height. The potential for adverse visual effects to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the Hugo compressor station and the proposed valve setting at MP 1.91. Northern conducted a visual assessment of these areas by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

One potential historical resource is located in the Hugo compressor station buffer, a house at 10830 180th Street North. This property has not been recorded in the Minnesota Statewide Historic Inventory. According to county records, it was constructed in 1977 and is a split foyer frame home with an attached garage. Significant alterations were made to the house in 2016. This house is set back from 180th Street North approximately 240 feet and is surrounded by trees. The combination of distance, a public ROW (180th Street North), as well as trees and other foliage visually buffer the potential historic building from the proposed project.

The proposed Farmington to Hugo C-line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Tomah branch line loop

Archaeology

Portions of the Tomah branch line loop was surveyed in August 2019, August and November 2021 and most recently surveyed in October and November 2023 and January 2024. Northern completed archaeological field investigations using standard methodology for archaeological surveys. Pedestrian survey was conducted at five-meter or less interval transects following the general direction of the survey corridor. Shovel testing was conducted at 15-meter or less interval. In areas with a greater probability for archaeological sites such as stream crossings, pedestrian survey was conducted at approximately one-meter intervals and shovel testing at less than five-meter intervals.

The survey area was located primarily in agricultural fields, with intermittent wooded areas, residential yards and wetlands. At the time of the field investigation, most of the survey area consisted of harvested fields and plowed corn and soybean fields. Most fields displayed 90-100% surface visibility which allowed field investigation to be conducted using pedestrian survey methods.

Of the total investigated area (124.7 acres), 55.9 acres were investigated using pedestrian survey methods and 55.4 acres were shovel tested. Approximately 13.4 acres were exempted from investigation survey in areas of slope, stream channels, or areas where ground had been disturbed by road and road drainage ditch construction. No prehistoric or historic period Euro-American artifacts or archaeological features were observed in the direct APE.

Aboveground Historical Properties

Northern plans to relocate a branch line receiver on the Tomah branch line loop (MP 3.53). The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the indirect APE was limited to the 500-foot buffer around the valve setting. Aboveground

construction will not exceed eight feet in height. Northern conducted a visual assessment of the indirect APE by walking the areas surrounding the Project and no historical properties were identified.

The proposed construction will not have an effect to any Wisconsin Architecture and History Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

La Crescent compressor station

Archaeology

On September 19, 2023, Northern completed archaeological field investigations using 15-meter interval pedestrian survey in areas of the ESB that were not graveled. The graveled facilities were excluded from survey. The survey area included short and medium grasses and corn fields. Ground surface visibility averaged 25% in grassy areas, but in the corn fields, ground surface visibility averaged 90%.

The total ESB encompassed 3.02 acres. Areas excluded from survey, consisting of graveled access drives and facilities and roadway totaling 1.72 acres. The remaining 1.30 acres averaged more than 25% ground surface visibility and was subjected to pedestrian survey. No archaeological sites or isolated finds were identified in the direct APE.

The current Project design and proposed construction activities will not have direct effects to any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern proposes minor modifications to existing infrastructure at the La Crescent compressor station, including replacing compressor cylinder end caps (currently blind flanges) and adjusting compressor mechanical characteristics to match new operating conditions. While impacts that are subject to review under 36 CFR § 800 may include surficial disturbances caused by topsoil removal, heavy machinery traffic, shallow grading, and spoil dirt management, only vehicular parking is anticipated for this Project component.

The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the existing compressor station lot. Northern conducted a visual assessment of this buffer by examining aerial imagery and observing areas surrounding the project from the public ROW and ESB. No aboveground cultural resources were observed in the 500-foot buffer.

Conclusion and Request for Consultation

To assist in project planning, Northern is gathering information on the locations of cultural resource sites that may be affected by the Project. Northern respectfully requests your review of the attached maps and report and is soliciting feedback on the Project to help ensure that the concerns of the Tribe are identified and properly considered. Northern also requests your input regarding identification of traditional cultural properties in the area and areas of importance to the Tribe that may be affected by the proposed Project.

Northern Natural Gas
Northern Lights 2025 Expansion Project
February 14, 2024

Northern respects that the Tribe has unique expertise in identifying and providing information regarding historic properties with religious or cultural significance which may be affected by the Project. Northern is seeking the Tribe's comments on survey methodology, traditional cultural properties, and traditional cultural landscapes along with areas of importance to the Tribe which should be considered. Northern understands this request for information does not circumvent the government-to-government relationship under Section 106 (36 Code of Federal Regulations Part 800) between the Tribe and the FERC. Please be assured that Northern will keep sensitive Tribal information strictly confidential.

While the regulations for implementing Section 106 (36 Code of Federal Regulations Part 800) allow companies like Northern (and their consultants) to gather information, the FERC is responsible for monitoring compliance with the NHPA and determinations pursuant to Section 106. Additionally, the FERC, not Northern, is responsible for government-to-government consultations with American Indian Tribes. The FERC has not delegated this consultation. The FERC will contact you through a *Notice of Intent to Produce an Environmental Document*. If you would like to communicate directly with the FERC natural gas archaeological staff to discuss its cultural resource review and consultation processes, please feel free to contact Elizabeth Molloy, Tribal Liaison, at 202-502-8771 or Elizabeth.Molloy@ferc.gov.

Thank you in advance for your attention to this Project. Northern would very much appreciate receiving your response within 30 days of the date of this letter. Northern will follow up with you via phone contact or email if no response is received within 30 days. In the interim, should you have questions or need additional information, please contact me at 402-398-7226 or Terry.Plucker@nngco.com or Susan Knabe of Stantec at 920-278-3220 or Susan.Knabe@stantec.com.

Sincerely,



Terry Plucker
Environmental Compliance Manager
Northern Natural Gas Company

Enclosures: RCG&A Cultural Resources Reports
Phase One Cultural Resources Report
Unanticipated Discovery Plans (Minnesota and Wisconsin)

CC: Susan Knabe, Stantec Consulting
Matt Nelson, Northern Natural Gas

Appendix 4C
SHPO Consultation Documentation

From: [Waller, Hiedi](#)
To: ENReviewSHPO@state.mn.us
Cc: [Knabe, Susan](#); Terry.Plucker@nngco.com
Subject: FW: Stantec FTP Confirmation - MN SHPO SUBMITTAL NORTHERN NATURAL GAS-NORTHERN LIGHTS 2025 EXPANSION PROJECT
Date: Wednesday, February 14, 2024 8:04:00 PM

Ms. Coburn,

Northern Natural Gas (Northern) is proposing to construct the Northern Lights 2025 Expansion Project. Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota state laws, that require Northern to determine whether such actions may affect cultural resources. A letter and reports present the results of the investigations and recommendations of the archaeological investigator for the environmental clearance boundaries in Freeborn, Houston and Washington counties, Minnesota have been placed on an FTP site. Please follow the directions below to access the documents.

Based on the results of the archeological background research and survey, the proposed construction activities will not have direct or indirect adverse effect on any previously reported and currently identified archaeological or other cultural resources. In response to study findings, Northern does not recommend any further archaeological or cultural resource investigations be conducted at the proposed Project locations and recommends a finding of "no historic properties affected" for the Project.

Thank you in advance for your attention to this Project. Northern would very much appreciate receiving your response within 30 days of the date of this letter. Northern will follow up with you via phone contact or email if no response is received within 30 days. In the interim, should you have questions or need additional information, please contact Terry Plucker at 402-398-7226 or Terry.Plucker@nngco.com or Susan Knabe of Stantec at 920-278-3220 or Susan.Knabe@stantec.com.

Thank you.

Hiedi Waller

Hiedi Waller, PE
Senior Engineer
Pronouns: she, her, hers
Phone: (262) 643-9161

From: donotreply@secureftp.stantec.com <donotreply@secureftp.stantec.com>
Sent: Wednesday, February 14, 2024 8:28 PM
To: Waller, Hiedi <Hiedi.Waller@stantec.com>
Subject: Stantec FTP Confirmation - MN SHPO SUBMITTAL NORTHERN NATURAL GAS-NORTHERN LIGHTS 2025 EXPANSION PROJECT

Your directory has successfully been created!

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Login name: s0221192735

Password: 3631742

Disk Quota: 20 GB

Expiry Date: 2/21/2024

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1111 South 103rd Street
Omaha, NE 68124

February 15, 2024

Leslie Coburn
Environmental Review Coordinator
State Historic Preservation Office
Administration Building #203
50 Sherburne Ave.
Saint Paul, MN 55155

Re: Northern Natural Gas–Northern Lights 2025 Expansion Project – Freeborn, Houston and Washington counties, Minnesota

Dear Ms. Coburn:

Northern Natural Gas (Northern) is proposing to construct the Northern Lights 2025 Expansion Project. Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Minnesota state laws, that require Northern to determine whether such actions may affect cultural resources. To comply with these requirements, Northern has secured the services of Stantec Consulting Services Inc. (Stantec) to conduct a review of the proposed Project.

Northern is proposing to construct the Project, which will consist of (1) a 3.00-mile extension of its 36-inch-diameter Lake Mills to Albert Lea E-line; (2) a 2.43-mile extension of its 30-inch-diameter Elk River 3rd branch line; (3) a non-contiguous 1.91-mile extension of its 30-inch-diameter Farmington to Hugo C-line; (4) minor modifications to its existing La Crescent compressor station; and (5) aboveground facilities including a launcher, receiver and tie-in valve settings. All Project components are located in various counties in Minnesota.

This letter summarizes the results of the investigations and recommendations of the archaeological investigator for the environmental clearance boundaries in Freeborn, Houston and Washington counties, as described above. The archeological reports from R. Christopher Goodwin & Associates, Inc. (RCG&A) are attached to this letter.

Literature Search

Northern's cultural resources' sub-consultant, RCG&A conducted background research at the Minnesota SHPO to identify previously recorded archaeological and above-grade resources. This study area encompassed the Environmental Survey Boundary (ESB) direct Area of Potential Effects (APE) and indirect APE and included archaeological sites and other cultural resources located in the immediate areas of planned construction along with a one-mile radius of all proposed project activities.

Lake Mills to Albert Lea E-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources on the list of National Register of Historic Places (NRHP) properties are in the indirect APE. One archaeological site, 21FE0130, and Minnesota Statewide Historic Inventory property FE-AEA-00264 extends into the 500-foot buffer around the proposed aboveground valve setting. However, due to distance and mature trees, no effects are anticipated.

Elk River 3rd branch line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Farmington to Hugo C-line

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the proposed aboveground valve setting to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

La Crescent compressor station

Archaeology

No archaeological sites have been previously reported within the direct APE.

Aboveground Historical Properties

Northern used a 500-foot buffer around the La Crescent compressor station to determine potential visual effects. No aboveground historical resources previously listed in the Minnesota Statewide Historic Inventory or on the list of the NRHP properties are in the indirect APE.

Cultural Survey

Following the literature review, Northern's sub-consultant conducted a systematic field survey of the direct APE, which includes the construction ROW (TWS), ETWS, access roads, staging areas,

and the above-grade facility footprints. The survey procedures included the following methods: (1) shovel testing at 15-meter intervals in areas with less than 30% surface visibility, or (2) pedestrian walk-over survey at an interval of five meters or less in agricultural fields with more than 30% surface visibility. Aboveround facilities for the Project will not exceed eight feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the indirect APE was limited to the 500-foot buffer around any proposed aboveground facilities.

The cultural resources survey is 89% complete for the Lake Mills to Albert Lea E-line with additional shovel testing needed on 77.02 acres anticipated in spring 2024. The cultural resource survey for the Elk River 3rd branch line is 92% complete with additional survey needed on 15.25 acres scheduled for spring 2024. Northern cultural resources surveys are 100% complete for the remaining Project components.

Lake Mills to Albert Lea E-line

Archaeology

On August 22, August 23, October 3, and October 23-27, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability and previously recorded cultural resources. Shovel testing at 15-meter intervals was planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields. Shovel testing is pending for selected locations with the potential for buried cultural deposits.

Excluding one farmstead and one hay field, the majority of the survey area consisted of harvested or mature crops with 50 to 100% ground surface visibility. The hay field yielded an average surface visibility of 30%. The total ESB encompassed 678.90 acres. Roadways, inundated, and usually inundated areas, a total of 23.98 acres, were excluded from survey. A total of 77.02 acres remains to be surveyed. The other 591.82 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

A Euro-American archaeological site (21FE0130) also assigned an historic inventory property (FE-AEA-00264) was initially recorded as part of another Northern project in 2022. During the 2023 effort, this site was surveyed again. The 2023 site visit prompted an updated site boundary and an updated site form was submitted to the Minnesota Office of the State Archaeologist. This farmstead site consisted of a combination of standing structures, archaeological features, and a surface artifact scatter. The site is within the ESB, but does not extend into the direct APE. In the original site form, the extant structures were identified as lacking integrity. Since the initial site visit, three buildings have been demolished. The artifacts documented on the surface have been placed in dump locations of mixed time periods, grouped through heavy machinery in pushpiles, and disturbed by agricultural processes. The archaeological component at 21FE0130 has not been evaluated for listing in the NRHP. RCG&A recommends the architectural buildings (FE-AEA-00264) at this property not eligible for listing in the NRHP.

This resource (21FE0130/FE-AEA-00264) is not in the direct APE and will not be impacted by the Project. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

County Ditch No. 4 (FE-PIC-00008), a historical structure, was initially visited as part of another Northern project in 2022. During the 2023 fieldwork, it was more thoroughly documented. County Ditch No. 4 is an active drainage ditch bound by agricultural land. The majority of this ditch is open cut and possesses a steep V-shaped profile. Brome and other grasses covered the banks of the ditch. Survey measured a top width of between 50 and 60 feet and a bottom width of 9-15 feet. Standing water was present at the base of the ditch during survey in fall 2023 but the overall depth was estimated to be 10-12 feet. Based on observations made from public ROW and aerial images, these dimensions are typical of County Ditch No. 4. This ditch also includes two branches: the Colvin Branch and the Klukow Branch. The Klukow Branch was in the ESB and was documented as part of FE-PIC-0008. County Ditch No. 4 is recommended not eligible for listing in the NRHP. Northern will utilize a private driveway that crosses the ditch without improvements. Therefore, the project will have no effect to County Ditch No. 4 (FE-PIC-00008).

Northern will remove a tie-over valve setting (MP 31.21) and install a new tie-in valve setting (MP 34.21) for the Lake Mills to Albert Lea E-line extension project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 34.21. This entire area was within the surveyed ESB. Northern conducted a visual assessment of the 500 foot buffer by walking the areas surrounding the project. The western portion of archaeological site 21FE0130 / inventory property FE-AEA-00264 is within the visual effects area; however, given the distance and mature vegetation surrounding the standing structures at the site, there will not be any effect to the standing structures from the project.

The proposed construction will not have an effect to any Minnesota Standing Structures Inventory or NHRP-listed properties or NHRP-eligible properties within the indirect APE.

Elk River 3rd branch line

Archaeology

On November 1-5 and 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at five-meter intervals was completed in areas identified as high probability. Shovel testing at 15-meter intervals was planned for surveyed areas with less than 25% surface visibility); no such areas were identified on this project. The survey area included agricultural fields, a tree farm, wetlands and manicured lawn with small stands of trees. Several historical and recent single-family homes and associated outbuildings were within the ESB.

The agricultural fields and tree farm yielded an average surface visibility of 80%. Visibility in the manicured lawns was limited (average 30%) but stands of trees yielded better ground surface

visibility (average 55%). The total ESB encompassed 194.59 acres. Roadways as well as inundated and usually inundated areas, a total of 58.92 acres, were excluded from survey. A total of 15.25 acres remains to be surveyed. The remaining 120.42 acres had more than 25% ground surface visibility and was subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The current Project design and proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical ditches (WA-FLC-00033 and WA-XXX-00002) and ten historical standing structures during the 2023 fieldwork. None of the buildings are in the direct APE. Only one newly recorded property, WA-HGC-00077, is in the 500-foot buffer of the proposed valve setting.

Two historical drainage ditches were newly recorded during the 2023 fieldwork. WA-FLC-00033 is an active drainage ditch constructed in approximately 1949. The ditch is open cut and possesses a steep V-shaped profile. Grasses covered the banks of the ditch. Surveyors measured a varied width between 1.5 and 3 meters. Based on observations made from public ROW and aerial images, these dimensions are typical of this ditch. WA-FLC-00033 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-FLC-00033 via HDD.

WA-XXX-00002, the channelized Hardwood Creek, is known as Judicial Ditch No. 2. Ordered in 1902, Judicial Ditch No. 2 is open cut and possesses a V-shaped profile. Surveyors measured a top width of approximately six meters. Grasses covered the banks of the ditch. While standing water was present within the ditch during survey in fall 2023, the overall depth of the ditch was measured at variable depths between 2 to 5 meters. Based on observations made from the public ROW and aerial images, these dimensions are fairly typical of Judicial Ditch No. 2. WA-XXX-00002 is recommended not eligible for listing in the NRHP. The Elk River 3rd branch line will avoid WA-XXX-00002 via HDD.

Northern plans to remove a tie-over valve setting (MP 1.07) and install a new tie-in valve setting (MP 3.45) for the Elk River 3rd branch line project. Aboveground construction will not exceed ten feet in height. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the proposed new valve setting at MP 3.45. Northern conducted a desktop analysis and visual assessment of the 500-foot buffer by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

Northern identified four built resources on three properties that are potential historic properties (constructed more than 45 years ago) in the 500-foot buffer around the proposed facility. Prior to the 2023 survey, none of the buildings were recorded in the Minnesota Statewide Historic Inventory. One of the buildings was in the ESB and formally recorded during the survey (WA-

HGC-00077; 17903 Henna Avenue North); the others (at 17803 Henna Avenue North and 17958 Henna Avenue North) were observed but not formally recorded.

The single-family residence at 17903 Henna Avenue North occupies a rectangular footprint, possesses two stories, is clad in composite siding and brick veneer, and terminates in a side-gable roof sheathed in asphalt shingles. It possesses an attached, single-bay garage along the south elevation. Based on county records, the house was constructed in 1969. Historic exterior materials on this building have been altered with replacements to exterior cladding, window openings and asphalt roof shingles. The public ROW runs between the proposed facility and the property at 17903 Henna Avenue North. Additionally, there are several trees that will obscure views of the proposed facility.

The single-family home and garage at 17803 Henna Avenue North have been substantially altered through additions and renovation. The original house was constructed in the mid-1960s, but, according to county records, extensive changes were made in 1989. The proposed facility is not visible from the property at 17803 Henna Avenue North as it is obscured by distance and a line of mature trees.

There are several buildings on the 17958 Henna Avenue North property. Only the single-family home and one outbuilding are within the 500-foot indirect APE around the proposed facility. The two-story home was constructed around 1880 and has had significant alterations to its exterior. In addition, the house is orientated to the north, while the facility will be constructed to the southeast. The combination of distance and topography, as well as an agricultural field and mature deciduous trees visually buffer the potential historic buildings from the proposed Project.

The proposed aboveground valve setting will not substantively alter the viewshed of the potential historic properties at 17803, 17903, and 17958 Henna Avenue North. Temporary visual impacts on the property during construction will not affect the attributes contributing to the potential significance and integrity of these properties. As such, the proposed Project will not adversely impact the aspects of integrity of these potential historic properties.

The proposed Elk River 3rd branch line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

Farmington to Hugo C-line

Archaeology

From July 17 to 20, October 18 and November 14, 2023, Northern completed archaeological field investigations using pedestrian survey at intervals of 5 and 15 meters. Survey at 5-meter intervals in high probability areas and shovel testing at 15-meter intervals were planned for areas with less than 25% surface visibility; no such areas were identified as the survey area was primarily in agricultural fields, wetlands and woodlands associated with the wetlands and pasture.

Ground surface visibility was good in the agricultural fields ranging from 40-100%. Woodland and pastures had lower surface visibility that ranged between 25 and 50%. The total ESB encompassed 172.97 acres. Roadways, existing graveled facility lots, as well as inundated and

usually inundated areas, a total of 19.26 acres, were excluded from survey. The remaining 153.71 acres had more than 25% ground surface visibility and were subjected to pedestrian survey.

No archaeological sites were previously recorded or identified during the 2023 survey of this project's ESB. No precontact or historic period Euro-American artifacts or archaeological features were observed in the direct APE. The proposed construction activities will not have direct impacts on any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern recorded two historical properties in the Farmington to Hugo C-line ESB. They were recorded in the Minnesota Statewide Historic Inventory and assigned designations WA-MYT-031 and WA-MYT-032. WA-MYT-031 is a 1973 single-family residence. The two-story, multi-bay building occupies a rectangular footprint, is clad in composite siding and brick veneer, and terminates in a low-pitched, hipped roof with overhanging eaves sheathed in asphalt shingles. The building features a single-story attached garage and a recessed front porch covered by a secondary hipped roof also sheathed in asphalt shingles.

WA-MYT-032 includes two historical buildings, a house (WA-MYT-028) and a shed (WA-MYT-029). WA-MYT-028 is a 1972 single-family residence. The one-and-one-half story, multi-bay building occupies a rectangular footprint, is clad in vinyl siding and brick veneer, and terminates in a front-gable roof with overhanging eaves sheathed in asphalt shingles. The façade features a secondary, front-gable projection and a recessed porch. The east elevation features a two-bay, integral garage. WA-MYT-029 is a 1972 shed near the house. The single-story shed occupies a rectangular footprint, is clad in wood siding, and terminates in a gambrel roof with overhanging eaves sheathed in asphalt shingles. Both of these properties are recommended not eligible for listing in the NRHP and both are avoided through HDD in the current Project design.

Northern proposes to install a new launcher and associated valves and piping at the existing Hugo compressor station (MP 0.00), as well as install a new tie-in valve setting (MP 1.91) for the Farmington to Hugo C-line. Aboveground construction for the aboveground tie-in valve setting will not exceed ten feet in height. The potential for adverse visual effects to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the Hugo compressor station and the proposed valve setting at MP 1.91. Northern conducted a visual assessment of these areas by examining aerial imagery and observing areas surrounding the Project from the public ROW and ESB.

One potential historical resource is located in the Hugo compressor station buffer, a house at 10830 180th Street North. This property has not been recorded in the Minnesota Statewide Historic Inventory. According to county records, it was constructed in 1977 and is a split foyer frame home with an attached garage. Significant alterations were made to the house in 2016. This house is set back from 180th Street North approximately 240 feet and is surrounded by trees. The combination of distance, a public ROW (180th Street North), as well as trees and other foliage visually buffer the potential historic building from the proposed project.

The proposed Farmington to Hugo C-line project will not have visual effects to any Minnesota Statewide Historic Inventory properties, NRHP-listed properties, or NRHP-eligible properties within the indirect APE.

La Crescent compressor station

Archaeology

On September 19, 2023, Northern completed archaeological field investigations using 15-meter interval pedestrian survey in areas of the ESB that were not graveled. The graveled facilities were excluded from survey. The survey area included short and medium grasses and corn fields. Ground surface visibility averaged 25% in grassy areas, but in the corn fields, ground surface visibility averaged 90%.

The total ESB encompassed 3.02 acres. Areas excluded from survey, consisting of graveled access drives and facilities and roadway totaling 1.72 acres. The remaining 1.30 acres averaged more than 25% ground surface visibility and was subjected to pedestrian survey. No archaeological sites or isolated finds were identified in the direct APE.

The current Project design and proposed construction activities will not have direct effects to any historical properties or any currently identified archaeological sites or cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion in the NRHP.

Aboveground Historical Properties

Northern proposes minor modifications to existing infrastructure at the La Crescent compressor station, including replacing compressor cylinder end caps (currently blind flanges) and adjusting compressor mechanical characteristics to match new operating conditions. While impacts that are subject to review under 36 CFR § 800 may include surficial disturbances caused by topsoil removal, heavy machinery traffic, shallow grading, and spoil dirt management, only vehicular parking is anticipated for this Project component.

The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the visual effects area was limited to a 500-foot buffer around the existing compressor station lot. Northern conducted a visual assessment of this buffer by examining aerial imagery and observing areas surrounding the project from the public ROW and ESB. No aboveground cultural resources were observed in the 500-foot buffer.

Conclusion and Request for Consultation

Based on the results of the archeological background research and survey, the proposed construction activities will not have direct or indirect adverse effect on any previously reported and currently identified archaeological or other cultural resources. In response to study findings, Northern does not recommend any further archaeological or cultural resource investigations be conducted at the proposed Project locations and recommends a finding of “no historic properties affected” for the Project.

Northern Natural Gas
Northern Lights 2025 Expansion Project
February 14, 2024

In addition, Northern has written an unanticipated discoveries plan (UDP) for construction activities in Minnesota. In the event archaeological materials are encountered during Project construction, Northern will halt construction activities in the vicinity of the find and consult with a qualified archaeologist, FERC and the Minnesota SHPO prior to continuing work. Northern will continue work on the other Project components. A copy of the UDP is included with the submittal and Northern requests Minnesota SHPO review and comment on the UDP.

Thank you in advance for your attention to this Project. Northern would very much appreciate receiving your response within 30 days of the date of this letter. Northern will follow up with you via phone contact or email if no response is received within 30 days. In the interim, should you have questions or need additional information, please contact me at 402-398-7226 or Terry.Plucker@nngco.com or Susan Knabe of Stantec at 920-278-3220 or Susan.Knabe@stantec.com.

Sincerely,



Terry Plucker
Environmental Compliance Manager
Northern Natural Gas Company

Enclosures: RCG&A Cultural Resources Reports
Unanticipated Discoveries Plan

CC: Susan Knabe, Stantec Consulting
Joe Fisher, Northern Natural Gas

RCG&A Cultural Resources Reports

Reconnaissance Cultural Resources Survey of the Proposed Northern Natural Gas Lake Mills to
Albert Lea E-line Project (Northern Lights 2025), Freeborn County, Minnesota

Reconnaissance Cultural Resources Survey of the Proposed Northern Natural Gas Elk River 3rd Branch Line Project (Northern Lights 2025), Washington County, Minnesota

Reconnaissance Cultural Resources Survey of the Proposed Northern Natural Gas Farmington to Hugo C-line Project (Northern Lights 2025), Washington County, Minnesota

Reconnaissance Cultural Resources Survey of the Proposed Northern Natural Gas La Crescent Compressor Station Modifications Project (Northern Lights 2025), Houston County, Minnesota

Unanticipated Discoveries Plan

From: [Waller, Hiedi](#)
To: compliance@wisconsinhistory.org
Cc: [Knabe, Susan](#); Terry.Plucker@nngco.com
Subject: Project Review Submittal Process Northern Natural Gas–Northern Lights 2025 Expansion Project – Monroe County, Wisconsin
Date: Wednesday, February 14, 2024 7:17:00 PM
Attachments: [image001.png](#)
[NL 2025 WI SHPO Final.pdf](#)

Dear Ms. Penkiunas,

Northern Natural Gas (Northern) is proposing to construct the Northern Lights 2023 Expansion Project. Northern is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under the National Historic Preservation Act of 1966 (NHPA). The Project will be completed in compliance with requirements of federal (Sections 106 and 110 of the NHPA) and Wisconsin state laws, that require Northern to determine whether such actions may affect cultural resources. The attached letter, request form, and report present the results of the investigations and recommendations of the archaeological investigator for the environmental clearance boundaries in Monroe County, Wisconsin.

Based on the results of the archeological background research and survey, the proposed construction activities will not have direct or indirect adverse effect on any previously reported and currently identified archaeological or other cultural resources. In response to study findings, Northern does not recommend any further archaeological or cultural resource investigations be conducted at the proposed Project locations and recommends a finding of “no historic properties affected” for the Project.

Thank you in advance for your attention to this Project. Northern would very much appreciate receiving your response within 30 days of the date of this letter. Northern will follow up with you via phone contact or email if no response is received within 30 days. In the interim, should you have questions or need additional information, please contact Terry Plucker at 402-398-7226 or Terry.Plucker@nngco.com or Susan Knabe of Stantec at 920-278-3220 or Susan.Knabe@stantec.com.

Thank you.

Hiedi Waller

Hiedi Waller, PE

Senior Engineer

Pronouns: she, her, hers

Direct: 262 643-9161

Mobile: 414 688-1893

Hiedi.Waller@stantec.com

Stantec

12080 Corporate Parkway Suite 200

Mequon WI 53092-2649 US



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1111 South 103rd Street
Omaha, NE 68124

February 14, 2024

Ms. Daina Penkiunas
State Historic Preservation Office
Historic Preservation Room #308
816 State St.
Madison, WI 53706-1482

Re: Northern Natural Gas–Northern Lights 2025 Expansion Project – Monroe County,
Wisconsin

Dear Ms. Penkiunas,

Northern Natural Gas (Northern) is regulated by the Federal Energy Regulatory Commission (FERC) and is responsible to comply with the National Historic Preservation Act (NHPA). Under Section 106 of NHPA, federal agencies must work with the Wisconsin State Historic Preservation Office (SHPO) to address historic preservation issues when planning projects or issuing permits that may affect cultural resources. These resources include historic properties and archaeological resources listed in or determined eligible for the National Register of Historic Places (NRHP). The SHPO requires that Northern review the proposed actions and determine whether such actions may affect identified cultural resources or properties in vicinity of proposed projects. A completed copy of the “Request for SHPO Comment and Consultation on a Federal Undertaking” form is located in Appendix A.

Northern owns and operates a 14,300-mile natural gas transmission pipeline system and associated aboveground facilities, including pipeline and facilities in Wisconsin. Northern is proposing to construct the Project, a portion of which is in Wisconsin. The Tomah Branch Line Loop Extension will consist of constructing 1.28 miles of new natural gas pipeline, removal and site restoration of an aboveground tie-in valve setting located on the southeast side of Gemini Road, and relocation of the receiver facility and associated valves and piping to the east side of County Road Q. The proposed pipeline centerline, permanent facility footprints, temporary access roads, permanent driveways, and temporary workspaces are depicted within the environmental clearance boundary (ECB) in the attached report. Construction activities for the pipeline will include clearing and grading, trenching and excavation, pipeline installation, backfilling, pipeline pressure testing, and site restoration. Construction activities for the above-grade facilities will include clearing and grading, installation of permanent gravel footprints, erection of aboveground facilities, pipe equipment installation, testing of equipment, and site restoration. With the exception of the new gravel footprints, the Project workspaces will be returned, as near as practicable, to pre-construction conditions. The duration of the Project will be approximately seven months and is scheduled to begin in spring 2025, or as soon as all required permits are obtained.

Northern retained Phase One Archaeological Services, Inc. (Phase One) to conduct cultural resources investigations of the Project component within Wisconsin. A copy of the report of this investigation is located in Appendix B.

Northern developed an Unanticipated Discoveries Plan for the Project. In the event archaeological materials are encountered during Project activities, Northern will halt construction activities in the vicinity of the find and consult with a qualified archaeologist and the SHPO or the Wisconsin Burial Sites Preservation Office prior to continuing work. Northern will continue work on the other Project components. In addition, Northern will notify FERC. A copy of the Unanticipated Discoveries Plan is attached (Appendix C).

Area of Potential Effect

For Northern's Project, the Area of Potential Effect (APE) is defined based on the potential for effect, which may differ for above-grade resources (historic structures and landscapes) and subsurface resources (archaeological sites). The APE typically includes all areas where undertakings could cause changes to the land, structures or their uses whether the change would be direct, indirect, beneficial, or adverse. In addition to areas of ground disturbance, this includes all locations from which elements of the undertaking could be visible.

Northern has adopted the definition of the archaeological APE as the actual area of physical disturbance where construction activities could directly impact archaeological resources. For archaeological resources, the direct APE consists of the ECB, which also includes areas that will be installed using horizontal directional drilling (HDD) methods.

The APE for historic architectural properties includes areas where direct and indirect project impacts have the potential to alter character-defining features of an applicable property's significance and includes areas that have a visual link to the proposed Project such that their landscape setting and viewshed could change because of construction. As excavation and installation of the pipe will be followed by restoration of the disturbed areas back to preconstruction conditions, the potential for adverse visual effect to architecture or other visual resources is minimal. Therefore, the indirect APE was limited to the viewshed of planned above-grade construction.

The direct and indirect APEs for the Project are described further below and in the attached Phase I Report (Appendix B).

Project APE

The direct APE for the 1.28-mile Tomah branch line loop was defined as 124.7 acres located in Monroe County, Wisconsin. The proposed extension will be tied in below ground to the current terminus of the Tomah loop in Section 1, T17N, R4W, Monroe County, Wisconsin. The tie-in valve setting at this location will be removed. The downstream tie-in to its 6-inch-diameter WIB11901 branch line is located in Section 6, T17N, R3W, Monroe County, Wisconsin. The cultural survey within the APE was completed January 2024. The area within the ECB is the direct APE.

Construction of the 1.28-mile Tomah branch line loop will consist of below surface placement areas which will be restored back to previous land use after construction activities are completed.

The indirect APE for the Tomah branch line loop was limited to one 500-foot radius search area around the proposed location for the aboveground facility. The total indirect APE is 17.9 acres.

Literature Search

Northern's cultural resources subconsultant, Phase One, conducted background research at the Wisconsin SHPO to identify previously recorded archaeological and historical resources and structures located within a one-mile study area centered on the Project area.

Archaeology

No archaeological sites have been previously reported within the direct APE.

Above-grade Historical Properties

A single standing structure, a 19th century Greek Revival Farmhouse (AHI # 78410) was previously located on the west side of County Highway Q within the indirect APE. This building was razed and replaced with a modern single-family farmhouse. No other aboveground historical resources previously listed in the Wisconsin Architecture-History Inventory or on the list of the NRHP properties are located in the indirect APE.

Cultural Resources Survey

Between April 2019 and November 2023, Northern conducted systematic field survey of the archaeological APE, which includes the ECB, access roads, and other project facilities (e.g., staging areas). The survey procedures included: (1) shovel testing at 15-meter intervals in areas with less than 25% surface visibility, or (2) pedestrian walk-over survey at an interval of five meters or less in agricultural fields with more than 25% surface visibility. Access to 100 percent of the APE was granted by landowners; therefore, the entire APE was surveyed for cultural resources.

Archaeology

A majority of the survey area consisted of harvested or plowed fields with 90-100% surface visibility. The total ESB encompassed 124.7 acres. Total acreage investigated with shovel tests encompassed 55.4 acres. Areas exempt from shovel testing (roadways, drainage ditches and areas of standing water/water courses) totaled 13.4 acres. The remaining acreage displayed greater than 25% visibility and was subjected to pedestrian survey.

Aboveground Historical Properties

Aboveground facilities (relocation of a branch line receiver) are proposed for the Tomah branch line loop. The potential for adverse visual effect to architecture or other visual resources is minimal; therefore, the indirect APE was limited to the 500-foot buffer around the new valve setting. Above-grade construction will not exceed eight feet in height and is limited to the construction of a new valve setting. Northern conducted a visual assessment of the indirect APE by walking the areas surrounding the Project.

Summary of Findings

The cultural resources survey did not identify any NRHP-listed properties, archaeological sites or other types of cultural resources within the direct APE or within the indirect (visual) APE that will be directly or indirectly subjected to effect by the planned construction.

Recommendations

Based on the results of the investigation, the current Project design and construction activities will not have direct or indirect effects on Historical Properties or any currently identified archaeological or other cultural resources that warrant further investigation and evaluation to determine their possible eligibility for inclusion on the NRHP.

As a result of the investigation, the P.I. reports a finding of “no historic properties affected” and recommends no further archaeological or other cultural resource investigations be required prior to beginning construction as planned.

Request for Concurrence

Northern respectfully requests your review of the enclosed reports and the above findings and recommendations. At your earliest convenience, please advise if you concur with the determination that the proposed Project will have “No Effect” on historic properties and that no further cultural resource or archaeological investigations is required. In the interim, should you have any questions or concerns please contact me (402-398-7226 or terry.plucker@nngco.com) or Susan Knabe of Stantec (920-278-3220 or Susan.Knabe@stantec.com).

Sincerely,



Terry Plucker
Environmental Compliance Manager
Northern Natural Gas Company

Enclosures: Appendix A – Request for SHPO Comment and Consultation on a Federal Undertaking
Appendix B – Phase I Cultural Resource Investigation Results, Northern Natural Gas Tomah Branch Line Loop Project, Rural Sparta Township, Monroe County, Wisconsin
Appendix C - Northern Natural Gas, Northern Lights 2025 Expansion Project, Unanticipated Discoveries Plan

CC: Susan Knabe, Stantec Consulting Services

Appendix A

Request for SHPO Comment and Consultation on a Federal Undertaking

REQUEST FOR SHPO COMMENT AND CONSULTATION ON A FEDERAL UNDERTAKING

Submit one copy with each undertaking for which our comment is requested. Please print or type. Return to:

Wisconsin Historical Society, State Historic Preservation Office, 816 State Street, Madison, WI 53706

Please Check All Boxes and Include All of the Following Information, as Applicable.

I. GENERAL INFORMATION

- This is a new submittal.
 - This is supplemental information relating to Case #: _____, and title: _____
 - This project is being undertaken pursuant to the terms and conditions of a programmatic or other interagency agreement. The title of the agreement is _____
- a. Federal Agency Jurisdiction (Agency providing funds, assistance, license, permit): _____
 - b. Federal Agency Contact Person: _____ Phone: _____
 - c. Project Contact Person: _____ Phone: _____
 - d. Return Address: _____ City: _____ Zip Code: _____
 - e. Email Address: _____
 - f. Project Name: _____
 - g. Project Street Address: _____
 - h. County: _____ City: _____ Zip Code: _____
 - i. Project Location: Township _____, Range _____, East or West , Section _____, Quarter Sections _____
 - j. Project Narrative Description—Attach Information as Necessary.
 - k. Area of Potential Effect (APE). Attach Copy of U.S.G.S. 7.5 Minute Topographic Quadrangle showing APE.

II. IDENTIFICATION OF HISTORIC PROPERTIES

- Historic Properties are located within the project APE per 36 CFR 800.4. Attach supporting materials, per 36 CFR 800.11.
- Historic Properties are not located within the project APE per 36 CFR 800.4. Attach supporting materials, per CFR 800.11.

III. FINDINGS

- No historic properties will be affected (i.e., none is present or there are historic properties present but the project will have no effect upon them). Attach necessary documentation, as described at 36 CFR 800.11.
- The proposed undertaking will have no adverse effect on one or more historic properties located within the project APE under 36 CFR 800.5. Attach necessary documentation, as described at 36 CFR 800.11.
- The proposed undertaking will result in an adverse effect to one or more historic properties and the applicant, or other federally authorized representative, will consult with the SHPO and other consulting parties to resolve the adverse effect per 36 CFR 800.6. Attach supporting documentation as described at 36 CFR 800.11.

Authorized Signature: _____ Date: _____

Type or print name: _____

IV. STATE HISTORIC PRESERVATION OFFICE COMMENTS

- Agree with the finding in section III above.
- Object to the finding for reasons indicated in attached letter.
- Cannot review until information is sent as follows: _____

Authorized Signature: _____ Date: _____

Appendix 4D
Unanticipated Discoveries Plans

Minnesota

I. Introduction

This document outlines the procedures Northern Natural Gas (Northern) will follow to prepare for and address any unanticipated discovery for the proposed Northern Lights 2025 Expansion Project (Project). It provides direction to Northern personnel and their consultants/contractors as to the proper procedure to follow if unanticipated discovery of historic properties or human remains is made during construction. To minimize the potential for the discovery of cultural resources, Northern conducted a detailed archaeological reconnaissance of the proposed Project. To ensure Northern maintains compliance with all federal and state regulations concerning the protection of cultural resources, this Unanticipated Discoveries Plan has been prepared for the Project.

The purpose of this Unanticipated Discoveries Plan is to demonstrate compliance with applicable federal and state laws and regulations regarding cultural resources and human remains, describe to regulatory and review agencies the procedures that will be followed in the event of unanticipated discoveries and to provide guidance to Project personnel. The federal laws that govern cultural resources and human remains include, but are not limited to, the following: particularly 36 CFR Part 800 (2007) of the regulations that implement Section 106 of the National Historic Preservation Act (NHPA) of 1996, as amended; 36 CFR Part 61; Section 3(d) (U.S.C. § 3002) of the Native American Grave Protection and Repatriation Act (25 U.S.C. §§ 3001-3013); and the Archaeological Resource Protection Act (Public Law 96095, 16 U.S.C. 470aa-mm). Minnesota Statute 307.08: Damages; Illegal Molestation of Human Remains; Burial; Cemeteries; Penalty, Authentication, governs human remains.

Cultural materials include man-made objects (prehistoric, historic, and greater than 50 years of age) and features (e.g., remnants of cultural activities).

II. Personnel Responsibilities

The environmental inspector (EI) will be responsible for advising construction contractor personnel on the procedures to follow if an unanticipated discovery is made. Training for construction personnel will be completed as part of the preconstruction on-site training program. The EI will advise the following protocol be followed should operators of equipment involved in grading, stripping, or trenching activities observe any indication of the presence of cultural resources (artifacts or other man-made features), animal bone, or possible human remains:

- A. Stop work immediately.
- B. Contact the EI as soon as possible.
- C. Comply with procedures detailed in the Unanticipated Discoveries Plan.
- D. Treat human remains with dignity and respect.

III. Unanticipated Discovery of Cultural Resources

If such materials are discovered during construction, the following procedures will be followed.

- A. Stop work in the immediate vicinity of the observed cultural materials.
 1. Notify the EI of the discovery.

2. If the EI believes that an unanticipated discovery has been made:
 - a) The EI directs all ground disturbing activities within 25 feet of the area of the discovery to stop.
 - b) The EI will protect and secure the evidence in place by delineating the find with flagging or orange safety fencing around the perimeter of the 25-foot area; construction activity and vehicles will be prohibited within this area.
- B. Minimize movement of vehicles (limit the passage of equipment to only those essential to continue working at the construction site) and equipment within the area immediately surrounding the discovery within the orange safety fencing.
- C. The EI will immediately notify the Northern construction superintendent, as appropriate.
- D. The Northern construction superintendent will immediately notify the designated Northern contact by telephone and follow-up with written confirmation (via email, fax or overnight mail).

Northern Contact:

Terry Plucker –Environmental Compliance Manager

1111 South 103rd Street

Omaha, NE 68124

402-398-7226 (office)

402-332-7081(cell)

Terry.Plucker@nngco.com

- E. Within 24 hours, if possible, a professional archaeologist will examine the location of the discovery, accompanied by the EI.
 1. If the archaeologist determines that the discovery is not a cultural resource, the archaeologist will immediately advise the EI, the Northern contact, the Chief Inspector and/or the Northern construction superintendent, any of whom have the authority to remove the stop-work order. The archaeologist will submit a letter report including photographs of the discovery site to Northern contacts within 15 business days. No further action regarding this procedure is required.
 2. If the archaeologist determines that the discovery is a cultural resource, the archaeologist will immediately advise the EI who will notify Northern contacts. The Northern contact will notify the Federal Energy Regulatory Commission (FERC) and the Minnesota State Historic Preservation Office (SHPO) by telephone, with written confirmation by email, fax or overnight mail.

FERC Contact:

TBD

SHPO Contact:

Kelly Gragg-Johnson
State Historic Preservation Office
Minnesota Historical Society
Administration Building #203
50 Sherburne Ave.
Saint Paul, MN 55155
651-201-3285

Kelly.graggjohnson@state.mn.us

3. If the discovery is Native American, Northern will also notify appropriate Native American tribal groups. Notification will be by telephone, with written confirmation by email, fax, or overnight mail. Notification will be the responsibility of the Northern contact. Tribal contacts are attached in Appendix A.
- F. Notifications to FERC about observations of cultural material will:
1. Describe a scope of work for evaluating the significance of the resource and evaluating the potential Project effects on the resource. A request for authorization to immediately implement the work scope will also be made to FERC and the SHPO.
 2. Invite FERC, the SHPO and identified tribal representatives, when appropriate, to observe the implementation of any proposed work.
 3. All work to evaluate significance and Project effects will be confined to the Project's potential area of impact.
- G. When the evaluation of the cultural resource is complete:
1. Northern will notify FERC and the SHPO by telephone and discuss the archaeologist's opinion regarding the potential significance of the resource.
 2. If the archaeologist believes the resource is not significant, the archaeologist will provide a rationale for the opinion, and request permission from FERC for construction to recommence.
 3. As soon as possible following the field investigation, the archaeologist will provide Northern with a written report describing the results of the fieldwork.
 4. If the resource is believed to be significant, the archaeologist will prepare a proposal for data recovery.
- H. Northern may choose to prepare an analysis of alternatives to data recovery to determine what form of mitigation is preferable.
1. If the alternatives analysis is conducted, Northern will submit, by email, fax or overnight mail, the archaeologist's report and the alternatives analysis to FERC and the SHPO.
 2. If proposed, mitigation measures may be carried out without being impeded or affected by construction, the submittal to FERC will be accompanied by a request that construction around the discovery be permitted to resume. Construction will resume upon FERC authorization.

- I. Upon receipt of authorization from FERC, implementation of mitigation measures will begin immediately.
 1. Northern will advise FERC and the SHPO when all mitigation measures have been completed.
 2. If construction has been halted, Northern will also request authorization from FERC to recommence construction.
 3. Northern will submit a summary report describing the results of the mitigation to FERC and the SHPO within 30 days of notification that mitigation fieldwork has been completed.
 4. If archaeological data recovery is a component of the mitigation plan, a full report will be submitted to FERC and the SHPO in accordance with a schedule to be established in consultation with FERC.

IV. Unanticipated Discovery of Human Remains

Human remains are physical remains of a human body or bodies including, but not limited to, bones, teeth, hair, ashes, and preserved soft tissues (mummified or otherwise preserved) of an individual. Remains may be articulated or disarticulated bones or teeth.

Under no circumstances shall human remains be removed from the site without completing all coordination processes with the local police, the medical examiner, the Minnesota Office of the State Archaeologist (MOSA), the Minnesota Indian Affairs Council (MIAC), the SHPO, Native American representatives, as appropriate, and FERC. Further work at the site will be suspended until all criteria of Section 106 of the NHPA, the Minnesota Private Cemeteries Act (MS 307.08), and other related state and federal regulations have been successfully completed.

- A. Workers will treat all human remains with dignity and respect.
- B. Immediately stop work in the vicinity of the unanticipated discovery involving potential human remains.
- C. Immediately notify the EI of the find.
- D. If the EI believes potential human remains have been found, the EI will stop all ground-disturbing activities within 100 feet of the potential discovery.
 1. Protect and secure the evidence of the discovery.
 2. Delineate the area with flagging or orange safety fencing.
 3. Do not let machinery that was working in the vicinity of the possible human remains leave the area – human remains could be stuck in the tread or to the machinery. Before the machinery can leave, it needs to be inspected by an archaeologist and fully cleaned off. Minimize movement by vehicles and equipment in the immediate vicinity of the discovery.
 4. Limit movement of vehicles in the vicinity of the find to the construction right of way authorized by Northern’s FERC certificate.
 5. The EI will immediately notify Northern’s construction superintendent who will, in turn, immediately notify the Northern Manager – Construction Environmental Compliance, who in turn will notify FERC, the MOSA, and the respective county sheriff’s office contacts:

Northern Contact:

Terry Plucker – Environmental Compliance Manager
1111 South 103rd Street
Omaha, NE 68124
402-398-7226 (office)
402-332-7081 (cell)
Terry.Plucker@nngco.com

FERC Contact:

TBD

MOSA Contact:

Ms. Amanda Gronhovd
Minnesota State Archaeologist
Minnesota Office of the State Archaeologist
328 Kellogg Boulevard
St. Paul, MN 55102
651-201-2263
612-725-2427 (fax)
amanda.gronhovd@state.mn.us

Freeborn County, Minnesota, Sheriff:

Ryan Shea
411 Broadway Ave S
Albert Lea, MN 56007
507-377-5205
ryan.shea@co.freeborn.mn.us

Houston County, Minnesota, Sheriff:

Brian Swedberg
306 S Marshall Street
Caledonia, MN 55921
507-725-2238 Ext 4101
Brian.Swedberg@co.houston.mn.us

Washington County, Minnesota, Sheriff:

Dan Starry
14949 62nd Street North
Stillwater, MN 55082
651-430-6000
sheriff@co.washington.mn.us

- E. Within 24 hours of the discovery, if possible, a professional archaeologist will examine the discovery to determine if the remains are human and have an archaeological association and, if so, if that association is Native American.
 - 1. The services of a physical anthropologist or other qualified professional will be retained if the archaeologist is unable to determine if the remains are human.
- F. If the remains are determined to be non-human and there is no archaeological association, the archaeologist making the determination will immediately advise the EI and/or the Northern construction superintendent, and construction may resume.
 - 1. The archaeologist will submit a letter report including photographs of the discovery site to the Northern contacts within 15 business days of the determination.

- G. If the remains are non-human but are associated with an archaeological site, follow the steps in Section III A through I above.
- H. If the remains are human and not associated with an archaeological context, the Northern construction superintendent will notify Northern's Manager – Construction Environmental Compliance, who in turn will notify FERC, the SHPO, the MOSA, the landowner, and the respective county sheriff's office as listed in Section IV.D.5. It is the responsibility of the sheriff's office to contact the medical examiner.

- I. Human remains found in a prehistoric archaeological context will be assumed to be Native American. If Native American remains are identified, whether or not in an archaeological context, Northern will immediately notify FERC, the SHPO, the MOSA, the MIAC, and the THPO contacts listed in Appendix A.

FERC Contact:

TBD

SHPO Contact:

Kelly Gragg-Johnson
State Historic Preservation Office
Minnesota Historical Society
Administration Building #203
50 Sherburne Ave.
Saint Paul, MN 55155
651-201-3285
Kelly.graggjohnson@state.mn.us

MOSA Contact:

Ms. Amanda Gronhovd
Minnesota State Archaeologist
Minnesota Office of the State Archaeologist
328 Kellogg Boulevard
St. Paul, MN 55102
651-201-2263
612-725-2427 (fax)
amanda.gronhovd@state.mn.us

MIAC Contact:

Ms. Melissa Cerda
Senior Cultural Resources Specialist
Minnesota Indian Affairs Council
161 St. Anthony Avenue Suite 919
St. Paul, MN 55103
651-276-2797
Melissa.cerda@state.mn.us

- J. If human remains are present in a Native American context, Northern will follow the procedures described in Section IV E through I, except as follows:
1. The MOSA and MIAC will be notified that human remains have been found. The notification to FERC and the SHPO will make special note that human remains have been found.

2. Northern will assist MIAC, FERC and the MOSA in notifying the appropriate Native American tribal groups. MIAC is the lead if the remains are located on public, nonfederal land, or private property.
 3. Proposals for site evaluation will give special consideration to the fact that human remains are present. MIAC must approve the consultant and specialists prior to hiring for the burial recovery or site evaluation (per MN Statute 307.08, 3a).
 - a) No conduct of intrusive examination of the immediate area of the remains prior to consultation with FERC, MOSA, MIAC, and the SHPO. MIAC must approve the consultant hired, and all proposed work conducted at the cemetery or burial site prior to work beginning. Per MN Statute 307.08, MIAC directs work on Native American cemetery sites.
 - b) Evaluate the potential for the presence of multiple graves and describe procedures for determining if other unidentified graves may be present.
 - c) Describe efforts made to contact Native American tribes, the results of contacts, and efforts (as feasible) to accommodate the desires of the Native American tribes regarding the treatment of human remains.
 - d) If the discovery was made after pipeline trenching in the vicinity of the discovery has been completed, construction will be permitted to recommence, except within 100 feet of any human remains. The machinery involved in the discovery may not leave the site until an archaeologist or member of MIAC staff have fully cleaned and examined all soils and materials attached to the machinery.
 - e) If the MOSA and MIAC have determined that no burials or cemetery-related materials are present in the area, construction within the 100-foot area of the find will be permitted to proceed when the remains have been removed (or when it has been determined that the remains should be left in place).
 4. Per MN Statute 307.08, if the remains are located on public, nonfederal or private land in Minnesota, the MOSA and MIAC are charged with custody and reburial of any human remains. If remains are on federal land, then the federal process is followed.
 5. Northern will make a good faith effort to accommodate requests from identified Native American tribal groups that they be present during implementation of mitigation measures related to human remains. MIAC is responsible for directing all recovery and/or mitigation work per MN Statute 307.08.
- K. If human remains are present in a non-Native American archaeological context, the procedures described in Section E through J, will be followed except that:
1. Proposals for site evaluation will give special consideration to the fact that human remains are present (i.e., no intrusive examination of the immediate area of the remains; proposals will include an evaluation of the potential for the presence of multiple graves and describe procedures for determining if other unidentified graves may be present).
 2. If law enforcement (sheriff's office or medical examiner) determines that the remains are not part of a crime scene, and that the remains appear to be at least 50 years old, the site will be turned over to the state archaeologist. If the state archaeologist determines that the remains are not Native American, the state archaeologist will direct how the project archaeologist conducts any recovery and analysis efforts.
 3. Unless directed to do otherwise by FERC, or the MOSA, Northern will assume that it is authorized to resume construction when the remains have been removed.

4. Within 15 business days of resuming construction, Northern will provide the MOSA and FERC with a written report describing the removal activities.
5. If the discovery was made after trenching in the vicinity of the discovery has been completed, construction will be permitted to recommence, except within 100 feet of the human remains. The machinery involved in the discovery may not leave the site until an archaeologist or member of MIAC staff have fully cleaned and examined all soils and materials attached to the machinery.
6. Construction within the remaining 100-foot area of the find will be permitted to proceed when the remains have been removed, if the state archaeologist determines that additional burials or cemetery materials are not present (or when it has been determined that the remains should be left in place).

Appendix A, THPO Contacts

Apache Tribe of Oklahoma
Durell Cooper, Chairman
511 East Colorado
Anadarko OK 73005
(405) 247-9493 (work phone)
(405) 247-2763 (work fax)
durell.cooper@apachetribe.org

Cheyenne and Arapaho Tribes, Oklahoma
Max Bear, THPO
700 Black Kettle Boulevard
Concho, OK 73022
(405) 422-7714 (work phone)
(405) 422-7715 (work fax)
mbear@cheyenneandarapaho-nsn.gov

Flandreau Santee Sioux Tribe of South Dakota
Garrie Kills-A-Hundred, THPO
PO Box 283
Flandreau, SD 57028
(605) 864-1236 (work phone)
(605) 997-3878 (work fax)
garrie.killsahundred@FSST.org

Fort Belknap Indian Community of the Fort Belknap Reservation of Montana
Michael Blackwolf, THPO
656 Agency Main Street
Harlem, MT 59526-9455
(406) 353-2295 (work phone)
(406) 353-2840 (work fax)
mblackwolf@fibelknap.org

Iowa Tribe of Kansas and Nebraska
Lance Foster, THPO
3345 Thrasher Road
White Cloud, KS 66094
(785) 595-3258 (work phone)
(785) 595-6610 (work fax)
lfoster@Iowas.org

Lower Sioux Indian Community in the State of Minnesota
Cheyanne St. John, THPO
PO Box 308, Res. Hwy 1
Morton, MN 56270
(507) 697-6321 (work phone)
(507) 697-6310 (work fax)

cheyanne.stjohn@lowersioux.com

Menominee Indian Tribe of Wisconsin
David Grignon, THPO
PO Box 910
Keshena, WI 54135-0910
(715) 799-5258 (work phone)
(715) 799-5295 (work fax)
historicpreservationgroup@mitw.org

Prairie Island Indian Community in the State of Minnesota
Noah White, THPO
5636 Sturgeon Lake Road
Welch MN 55089
(651) 385-4175 (work phone)
(651) 385-4180 (work fax)
noah.white@piic.org

Santee Sioux Nation, Nebraska
Misty Frazier, THPO
425 Frazier Avenue North, Suite 2
Niobrara, NE 68760
(402) 857-3568 (work phone)
(402) 857-2779 (work fax)
ssn.thpo@gmail.com

Sisseton-Wahpeton Oyate of the Lake Traverse Reservation, South Dakota
Dianne Desrosiers, THPO
PO Box 907
Sisseton, SD 57262-0509
(605) 698-3584 (work phone)
(605) 698-4283 (work fax)
dianned@swo-nsn.gov

Spirit Lake Tribe, North Dakota
Kenneth Graywater, Interim Director THPO
PO Box 198
Fort Totten, ND 58335-0359
(701) 766-4031 (work phone)
thpo@spiritlakenation.com

Upper Sioux Community, Minnesota
Samantha Odegard, THPO
PO Box 147, 5722 Travers Lane
Granite Falls, MN 56241-0147
(320) 564-6334 (work phone)
samanthao@uppersiouxcommunity-nsn.gov

Monroe County, Wisconsin

I. Introduction

This document outlines the procedures Northern Natural Gas (Northern) will follow to prepare for and address any unanticipated discovery for the proposed Northern Lights 2025 Expansion Project (Project). It provides direction to Northern personnel and their consultants/contractors as to the proper procedure to follow if unanticipated discovery of historic properties or human remains is made during construction. To minimize the potential for the discovery of cultural resources, Northern conducted a detailed archaeological reconnaissance of the proposed Project. To ensure Northern maintains compliance with all federal and state regulations concerning the protection of cultural resources, this Unanticipated Discoveries Plan has been prepared for the Project.

The purpose of this Unanticipated Discoveries Plan is to demonstrate compliance with applicable federal and state laws and regulations regarding cultural resources and human remains, describe to regulatory and review agencies the procedures that will be followed in the event of unanticipated discoveries and to provide guidance to Project personnel. The federal laws that govern cultural resources and human remains include, but are not limited to, the following: particularly 36 CFR Part 800 (2007) of the regulations that implement Section 106 of the National Historic Preservation Act (NHPA) of 1996, as amended; 36 CFR Part 61; Section 3(d) (U.S.C. § 3002) of the Native American Grave Protection and Repatriation Act (25 U.S.C. §§ 3001-3013); and the Archaeological Resource Protection Act (Public Law 96095, 16 U.S.C. 470aa-mm). Wisconsin Statute 157.70: “Burial sites preservation” governs human remains.

Cultural materials include man-made objects (prehistoric, historic and greater than 50 years of age) and features (e.g., remnants of cultural activities).

II. Personnel Responsibilities

The environmental inspector (EI) will be responsible for advising construction contractor personnel on the procedures to follow if an unanticipated discovery is made. Training for construction personnel will be completed as part of the preconstruction on-site training program. The EI will advise the following protocol be followed should operators of equipment involved in grading, stripping, or trenching activities observe any indication of the presence of cultural resources (artifacts or other man-made features), animal bone, or possible human remains:

- A. Stop work immediately.
- B. Contact the EI as soon as possible.
- C. Comply with procedures detailed in the Unanticipated Discoveries Plan.
- D. Treat human remains with dignity and respect.

III. Unanticipated Discovery of Cultural Resources

If such materials are discovered during construction, the following procedures will be followed.

- A. Stop work in the immediate vicinity of the observed cultural materials.
 1. Notify the EI of the discovery.

2. If the EI believes that an unanticipated discovery has been made:
 - a) The EI directs all ground disturbing activities within 25 feet of the area of the discovery to stop.
 - b) The EI will protect and secure the evidence in place by delineating the find with flagging or orange safety fencing around the perimeter of the 25-foot area; construction activity and vehicles will be prohibited within this area.
- B. Minimize movement of vehicles (limit the passage of equipment to only those essential to continue working at the construction site) and equipment within the area immediately surrounding the discovery within the orange safety fencing.
- C. The EI will immediately notify the Northern construction superintendent, as appropriate.
- D. The Northern construction superintendent will immediately notify the designated Northern contact by telephone and follow-up with written confirmation (via email, fax or overnight mail).

Northern Contact:

Terry Plucker –Environmental Compliance Manager

1111 South 103rd Street

Omaha, NE 68124

402-398-7226 (office)

402-332-7081(cell)

Terry.Plucker@nngco.com

- E. Within 24 hours, if possible, a professional archaeologist will examine the location of the discovery, accompanied by the EI.
 1. If the archaeologist determines that the discovery is not a cultural resource, the archaeologist will immediately advise the EI, the Northern contact, the Chief Inspector and/or the Northern construction superintendent, any of whom have the authority to remove the stop-work order. The archaeologist will submit a letter report including photographs of the discovery site to Northern contacts within 15 business days. No further action regarding this procedure is required.
 2. If the archaeologist determines that the discovery is a cultural resource, the archaeologist will immediately advise the EI who will notify Northern contacts. The Northern contact will notify the Federal Energy Regulatory Commission (FERC) and the Wisconsin State Historic Preservation Office (SHPO) by telephone, with written confirmation by email, fax, or overnight mail.

FERC Contact:

TBD

SHPO Contact:

Daina Penkiunas
State Historic Preservation Office
Wisconsin Historical Society
816 State Street
Madison, WI 53706
608-264-6511

daina.penkiunas@wisconsinhistory.org

3. If the discovery is Native American, Northern will also notify appropriate Native American tribal groups. Notification will be by telephone, with written confirmation by email, fax, or overnight mail. Notification will be the responsibility of the Northern contact. Tribal contacts are attached in Appendix A.
- F. Notifications to FERC about observations of cultural material will:
1. Describe a scope of work for evaluating the significance of the resource and evaluating the potential Project effects on the resource. A request for authorization to immediately implement the work scope will also be made to FERC and the SHPO.
 2. Invite FERC, the SHPO and identified tribal representatives, when appropriate, to observe the implementation of any proposed work.
 3. All work to evaluate significance and Project effects will be confined to the Project's potential area of impact.
- G. When the evaluation of the cultural resource is complete:
1. Northern will notify FERC and the SHPO by telephone and discuss the archaeologist's opinion regarding the potential significance of the resource.
 2. If the archaeologist believes the resource is not significant, the archaeologist will provide a rationale for the opinion, and request permission from FERC for construction to recommence.
 3. As soon as possible following the field investigation, the archaeologist will provide Northern with a written report describing the results of the fieldwork.
 4. If the resource is believed to be significant, the archaeologist will prepare a proposal for data recovery.
- H. Northern may choose to prepare an analysis of alternatives to data recovery to determine what form of mitigation is preferable.
1. If the alternatives analysis is conducted, Northern will submit, by email, fax or overnight mail, the archaeologist's report and the alternatives analysis to FERC and the SHPO.
 2. If proposed, mitigation measures may be carried out without being impeded or affected by construction, the submittal to FERC will be accompanied by a request that construction around the discovery be permitted to resume. Construction will resume upon FERC authorization.

- I. Upon receipt of authorization from FERC, implementation of mitigation measures will begin immediately.
 1. Northern will advise FERC and the SHPO when all mitigation measures have been completed.
 2. If construction has been halted, Northern will also request authorization from FERC to recommence construction.
 3. Northern will submit a summary report describing the results of the mitigation to FERC and the SHPO within 30 days of notification that mitigation fieldwork has been completed.
 4. If archaeological data recovery is a component of the mitigation plan, a full report will be submitted to FERC and the SHPO in accordance with a schedule to be established in consultation with FERC.

IV. Unanticipated Discovery of Human Remains

Human remains are physical remains of a human body or bodies including, but not limited to, bones, teeth, hair, ashes, and preserved soft tissues (mummified or otherwise preserved) of an individual. Remains may be articulated or disarticulated bones or teeth.

Under no circumstances shall human remains be removed from the site without completing all coordination processes with the local police, the medical examiner, the Wisconsin Office of the State Archaeologist (WOSA), the SHPO, Native American representatives, as appropriate, and FERC. Further work at the site will be suspended until all criteria of Section 106 of the NHPA, the 1985 Wisconsin Act 316 (WS 157.70), and other related state and federal regulations have been successfully completed.

- A. Workers will treat all human remains with dignity and respect.
- B. Immediately stop work in the vicinity of the unanticipated discovery involving potential human remains.
- C. Immediately notify the EI of the find.
- D. If the EI believes potential human remains have been found, the EI will stop all ground-disturbing activities within 100 feet of the potential discovery.
 1. Protect and secure the evidence of the discovery.
 2. Delineate the area with flagging or orange safety fencing.
 3. Do not let machinery that was working in the vicinity of the possible human remains leave the area – human remains could be stuck in the tread or to the machinery. Before the machinery can leave, it needs to be inspected by an archaeologist and fully cleaned off. Minimize movement by vehicles and equipment in the immediate vicinity of the discovery.
 4. Limit movement of vehicles in the vicinity of the find to the construction right of way authorized by Northern’s FERC certificate.
 5. The EI will immediately notify Northern’s Environmental Compliance Manager, who in turn will notify FERC, the WOSA, and the Monroe County Sheriff Office contacts:

Northern Contact:

Terry Plucker –Environmental Compliance Manager
1111 South 103rd Street
Omaha, NE 68124
402-398-7226 (office)
402-332-7081(cell)
Terry.Plucker@nngco.com

FERC Contact:

TBD

WOSA Contact:

Dr. Amy Rosebrough
Wisconsin State Archaeologist
Wisconsin Office of the State Archaeologist
816 State Street
Madison, WI 53706
608-264-6496
amy.rosebrough@wisconsinhistory.org

Monroe County, Wisconsin, Sheriff:

Wesley D. Revels
112 S Court Street, Room 500
Sparta, WI 54656
608-269-2117
608-269-8889 (fax)
Sheriff.Reports@co.monroe.wi.us

- E. Within 24 hours of the discovery, if possible, a professional archaeologist will examine the discovery to determine if the remains are human and have an archaeological association and, if so, if that association is Native American.
 - 1. The services of a physical anthropologist or other qualified professional will be retained if the archaeologist is unable to determine if the remains are human.
- F. If the remains are determined to be non-human and there is no archaeological association, the archaeologist making the determination will immediately advise the EI and/or the Northern construction superintendent, and construction may resume.
 - 1. The archaeologist will submit a letter report including photographs of the discovery site to the Northern contacts within 15 business days of the determination.
- G. If the remains are non-human but are associated with an archaeological site, follow the steps in Section III A through I above.
- H. If the remains are human and not associated with an archaeological context, the EI will notify Northern's Environmental Compliance Manager, who in turn will notify FERC, the SHPO, the WOSA, the landowner, and the respective county sheriff's office.

Monroe County, Wisconsin, Sheriff:

Wesley D. Revels
112 S Court Street, Room 500
Sparta, WI 54656
608-269-2117
608-269-8889 (fax)

Sheriff.Reports@co.monroe.wi.us

It is the responsibility of the sheriff's office to contact the medical examiner.

- I. Human remains found in a prehistoric archaeological context will be assumed to be Native American. If Native American remains are identified, whether or not in an archaeological context, Northern will immediately notify FERC, the SHPO, the WOSA, and the THPO contacts listed in Appendix A.

FERC Contact:

TBD

SHPO Contact:

Daina Penkiunas
State Historic Preservation Office
Wisconsin Historical Society
816 State Street
Madison, WI 53706
608-264-6511

daina.penkiunas@wisconsinhistory.org

WOSA Contact:

Dr. Amy Rosebrough
Wisconsin State Archaeologist
Wisconsin Office of the State Archaeologist
816 State Street
Madison, WI 53706
608-264-6496

amy.rosebrough@wisconsinhistory.org

- J. If human remains are present in a Native American context, Northern will follow the procedures described in Section IV E through I, except as follows:
 1. The WOSA will be notified that human remains have been found. The notification to FERC and the SHPO will make special note that human remains have been found.
 2. Northern will assist FERC and the WOSA in notifying the appropriate Native American tribal groups.
 3. Proposals for site evaluation will give special consideration to the fact that human remains are present.
 - a) No conduct of intrusive examination of the immediate area of the remains prior to consultation with FERC, WOSA and the SHPO.
 - b) Evaluate the potential for the presence of multiple graves and describe procedures for determining if other unidentified graves may be present.
 - c) Describe efforts made to contact Native American tribes, the results of contacts, and efforts (as feasible) to accommodate the desires of the Native American tribes regarding the treatment of human remains.
 - d) If the discovery was made after pipeline trenching in the vicinity of the

discovery has been completed, construction will be permitted to recommence, except within 100 feet of any human remains. The machinery involved in the discovery may not leave the site until an archaeologist has fully cleaned and examined all soils and materials attached to the machinery.

- e) If the WOSA has determined that no burials or cemetery-related materials are present in the area, construction within the 100-foot area of the find will be permitted to proceed when the remains have been removed (or when it has been determined that the remains should be left in place).
4. Wisconsin's burial sites laws do not apply to Native American burial sites located on Federal or Tribal land. If remains are on federal land, then the federal process is followed.
 5. Northern will make a good faith effort to accommodate requests from identified Native American tribal groups that they be present during implementation of mitigation measures related to human remains.
- K. If human remains are present in a non-Native American archaeological context, the procedures described in Section E through J, will be followed except that:
1. Proposals for site evaluation will give special consideration to the fact that human remains are present (i.e., no intrusive examination of the immediate area of the remains; proposals will include an evaluation of the potential for the presence of multiple graves and describe procedures for determining if other unidentified graves may be present).
 2. If law enforcement (sheriff's office or medical examiner) determines that the remains are not part of a crime scene, and that the remains appear to be at least 50 years old, the site will be turned over to the state archaeologist. If the state archaeologist determines that the remains are not Native American, the state archaeologist will direct how the project archaeologist conducts any recovery and analysis efforts.
 3. Unless directed to do otherwise by FERC, or the WOSA, Northern will assume that it is authorized to resume construction when the remains have been removed.
 4. Within 15 business days of resuming construction, Northern will provide the WOSA and FERC with a written report describing the removal activities.
 5. If the discovery was made after trenching in the vicinity of the discovery has been completed, construction will be permitted to recommence, except within 100 feet of the human remains. The machinery involved in the discovery may not leave the site until an archaeologist has fully cleaned and examined all soils and materials attached to the machinery.
 6. Construction within the remaining 100-foot area of the find will be permitted to proceed when the remains have been removed, if the state archaeologist determines that additional burials or cemetery materials are not present (or when it has been determined that the remains should be left in place).

Appendix A, THPO Contacts

Flandreau Santee Sioux Tribe of South Dakota
Garrie Kills-A-Hundred, THPO
PO Box 283
Flandreau, SD 57028
(605) 864-1236 (work phone)
(605) 997-3878 (work fax)
garrie.killsahundred@FSST.org

Fort Belknap Indian Community of the Fort Belknap Reservation of Montana
Michael Blackwolf, THPO
656 Agency Main Street
Harlem, MT 59526-9455
(406) 353-2295 (work phone)
(406) 353-2840 (work fax)
mblackwolf@ftbelknap.org

Ho-Chunk Nation of Wisconsin
William Quackenbush, THPO
16250 Helmet Road
Tomah, WI 54660
(715) 284-7181 (work phone)
bill.quackenbush@ho-chunk.com

Kickapoo Tribe of Oklahoma
Darwin Kaskaske, Chairman
105365 South Highway 102
McLoud, OK 74851
(405) 964-7053 (work phone)
(405) 964-3788 (work fax)
darwin.kaskaske@okkt.net

Lac Vieux Desert Band of Lake Superior Chippewa Indians of Michigan
Alina Shively, THPO Director
PO Box 249
Watersmeet, MI 49969
906-358-0137 (work phone)
alina.shively@lvd-nsn.gov

Lower Sioux Indian Community in the State of Minnesota
Cheyanne St. John, THPO
PO Box 308, Res. Hwy 1
Morton, MN 56270
(507) 697-6321 (work phone)
(507) 697-6310 (work fax)
cheyanne.stjohn@lowersioux.com



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Menominee Indian Tribe of Wisconsin
David Grignon, THPO
PO Box 910
Keshena, WI 54135-0910
(715) 799-5258 (work phone)
(715) 799-5295 (work fax)
historicpreservationgroup@mitw.org

Miami Tribe of Oklahoma
Logan York, THPO
PO Box 1326
Miami, OK 74355
918-541-7885 (work phone)
thpo@miamination.com

Prairie Island Indian Community in the State of Minnesota
Noah White, THPO
5636 Sturgeon Lake Road
Welch MN 55089
(651) 385-4175 (work phone)
(651) 385-4180 (work fax)
noah.white@piic.org

Santee Sioux Nation, Nebraska
Misty Frazier, THPO
425 Frazier Avenue North, Suite 2
Niobrara, NE 68760
(402) 857-3568 (work phone)
(402) 857-2779 (work fax)
ssn.thpo@gmail.com

Upper Sioux Community, Minnesota
Samantha Odegard, THPO
PO Box 147, 5722 Travers Lane
Granite Falls, MN 56241-0147
(320) 564-6334 (work phone)
samanthao@uppersiouxcommunity-nsn.gov

Winnebago Tribe of Nebraska
Sunshine Thomas-Bear, THPO
PO Box 687
Winnebago, NE 68071
(402) 922-2631 (work phone)
sunshine.bear@winnebagotribe.com