

Northern Natural Gas Company

Data Response Form For Docket No. CP26-130-000

Ventura to Farmington A-line Abandonment and Capacity Replacement Project (V2F) and Northern Lights 2027 Expansion Project (NL27)

Requesting Party: FERC  
Reference No: FERC-DR1-24  
Requester's Name: Allison King  
Subject: Previously Unfiled IA and MN SHPO  
Correspondence

**Data Request 24 (Resource Report 4 – Cultural Resources):**

All material filed with the Commission containing **location, character, and ownership** information about cultural resources must have the cover and any relevant pages therein clearly labeled in bold lettering: **“CUI//PRIV – DO NOT RELEASE.”**

Provide any previously unfiled correspondence with the Iowa and Minnesota State Historic Preservation Offices (SHPO), including the SHPO’s comments on all survey reports.

**Response:**

On March 4, 2026, Iowa State Historic Preservation Office (SHPO) concurred with the determination of No Historic Properties Affected – No Properties for the Ventura to Farmington A-line Abandonment and Capacity Replacement project (V2F Project). The consultation with Iowa SHPO for the V2F Project component is complete. There is no workspace in Iowa for the NL27 component.

Northern submitted its consultation package to Minnesota SHPO on February 9, 2026. We have received emails and follow up information requests from Minnesota SHPO on the following dates:

- March 17, 2026 – email requesting updated site table and upload of all historical inventories properties; Northern provided the updated site information and revised cover letter April 16, 2026.
- April 22, 2026 – email requesting the Area of Potential Effects (APEs) as a shapefile; Northern provided the shapefiles April 28, 2026.
- May 20, 2026 – email requesting different figures in a specific cultural report; Northern provided different figures June 5, 2026.
- June 4, 2026 – email requesting clarification in a specific cultural report; Northern responded with the clarification June 4, 2026.

All correspondence is attached.

Northern has not yet received concurrence from the Minnesota State Historic Preservation Officer.

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Posted: 06/22/2026

Responsibility: Brian Garcia

**From:** [Waller, Hiedi](#)  
**To:** [Knabe, Susan](#); [Haider, Jessica](#)  
**Subject:** FW: R&C 260241460 - 00060460 - HUD - Hancock - Ventura to Farmington A-Line Abandonment and Capacity Replacement Project, Worth and Hancock Counties, Iowa  
**Date:** Wednesday, March 4, 2026 9:03:57 AM  
**Attachments:** [image001.png](#)

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[Iowa SHPO - No Historic Properties Affected](#)

**Hiedi Waller, PE**  
Senior Engineer  
she, her, hers



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**From:** [marcus.schulenburg@email.iowaeda.com](mailto:marcus.schulenburg@email.iowaeda.com) <[marcus.schulenburg@email.iowaeda.com](mailto:marcus.schulenburg@email.iowaeda.com)>  
**Sent:** Wednesday, March 4, 2026 9:00 AM  
**To:** Waller, Hiedi <[Hiedi.Waller@stantec.com](mailto:Hiedi.Waller@stantec.com)>  
**Cc:** [shpo106@iowaeda.com](mailto:shpo106@iowaeda.com)  
**Subject:** R&C 260241460 - 00060460 - HUD - Hancock - Ventura to Farmington A-Line Abandonment and Capacity Replacement Project, Worth and Hancock Counties, Iowa

You don't often get email from [marcus.schulenburg@email.iowaeda.com](mailto:marcus.schulenburg@email.iowaeda.com). [Learn why this is important](#)

Hiedi Waller:

We have received your submittal for the above referenced federal undertaking. We provide the following response in accordance with Section 106 of the National Historic Preservation Act of 1966 and its implementing regulations 36 CFR 800.

Regarding this project, please see the following comments:

**R&C 260241460 - 00060460 - HUD - Hancock - Ventura to Farmington A-Line Abandonment and Capacity Replacement Project, Worth and Hancock Counties, Iowa** - The Ventura to Farmington A-Line Abandonment and Capacity Replacement Project (Project) involves isolation and abandonment in-place of approximately 105.76 miles of 16-inch-diameter pipeline on Northern's M500 A and 25.35 miles of 16-inch-diameter M500 J pipeline systems (collectively referred to as the A-line) from Ventura, Iowa to Farmington, Minnesota. Northern proposes to disconnect the 16-inch-diameter A-line inside the Ventura compressor station in Hancock County, Iowa and install temporary compression in the Lake Mills compressor station in Worth County, Iowa as part of the Project.

- Concur with the federal agency and/or their designated representative (No Historic Properties Affected - No Properties).
- In future cases please provide a more clearly defined APE. All structures within that APE

must be recorded, even if just at a reconnaissance level regardless of if they are historic or not.

- We would be open to a smaller APE depending on the scope of work for proposed undertakings
- For future submissions please select a determination from the drop-down menu.

You will not receive a hard copy of this email. It is the submitter's responsibility to maintain the official file of record. If you have any questions or comments, please feel free to contact our office.

Best Regards,

Marcus Schulenburg

Archaeologist, State Historic Preservation Office

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Iowa Economic Development Authority 

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## Knabe, Susan

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**From:** Julin, Angela  
**Sent:** Thursday, April 16, 2026 7:59 AM  
**To:** Harrington, Lucy (She/Her/Hers) (ADM)  
**Cc:** Knabe, Susan; Terry.Plucker@nngco.com; nick.mcewin@nngco.com; Manthey Mimbach, Kathleen (ADM)  
**Subject:** RE: Section 106 Review Request: Ventura to Farmington A-Line Abandonment and Capacity Replacement Project: Dakota, Freeborn, and Steele Counties  
**Attachments:** V2F SHPO Cover Letter\_041626.pdf

Hi Lucy, the revised cover letter is attached for your review. Thank you!

**Angela Julin, MA, RPA**  
Senior Archaeologist

Direct: (763) 252-6816  
angela.julin@stantec.com

View my [digital business card](#)



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**From:** Harrington, Lucy (She/Her/Hers) (ADM) <Lucy.Harrington@state.mn.us>  
**Sent:** Tuesday, March 17, 2026 5:18 PM  
**To:** Julin, Angela <Angela.Julin@stantec.com>  
**Cc:** Knabe, Susan <Susan.Knabe@stantec.com>; Terry.Plucker@nngco.com; nick.mcewin@nngco.com; michael.brack@merjent.com; nick.powell@merjent.com  
**Subject:** RE: Section 106 Review Request: Ventura to Farmington A-Line Abandonment and Capacity Replacement Project: Dakota, Freeborn, and Steele Counties

Good afternoon,

We have started review of the February 9<sup>th</sup> submittal and found that it is incomplete and I do not believe meets the documentation standards outlined in the regulations implementing Section 106 ([36 CFR 800.11](#)). Additionally, I am not certain that I have enough information to understand how the undertaking may affect aboveground historic properties specifically. I reached out to Angela, Michael Brack, and Nick Powell about this yesterday because they prepared/submitted the documentation supporting the review (i.e. the survey reports and inventory forms). I am reaching out to you today because I recommend providing a revised cover letter for this project as well as submitting the missing information outlined below. We cannot complete our review without the missing inventory information. If you would like us to proceed with our review without a revised cover letter, it is possible that we will be able to do so, but I am not certain at this time.

The cover letter dated February 9<sup>th</sup> refers to “associated aboveground appurtenances.” The maps of the workspaces enclosed with the submittal do not show the locations of any aboveground appurtenances. Can you provide a map and/or description of where these will be located?

As I mentioned above, I recommend revising the cover letter to meet the documentation standards in the regulations. The documentation standards require that the steps taken to identify historic properties be adequately described, which I believe is covered in the letter and supported by Merjent’s synthetic report enclosed as Attachment A (referenced in the letter as Attachment B). However, there are conflicting lists of different

resources that may be affected by the undertaking in the cover letter and the synthetic report and we are missing information for several resources for which inventory forms were submitted in MnSHIP. It would be helpful if the cover letter could be revised to include which resources are historic properties (pursuant to [36 CFR 800.16\(l\)](#)), which are in the APE for the proposed undertaking, and whether each historic property within the APE will be affected by the undertaking. The cover letter currently does not provide enough information to support a finding of “no historic properties affected.” The tables in the letter indicate that resources that are “unevaluated” (these are presumably resources that we will consider eligible for the purposes of this review only) will be avoided, but does not describe how they will be avoided in the narrative. It is possible that SHPO staff could figure out this information from what has been submitted to date, but considering the incomplete nature of the inventory documentation submitted and the conflicting tables of resources that may be affected by the project, I recommend revising the cover letter.

I have included a table below that is a modified version of Table 5.0-2 from Merjent’s synthetic report that shows the documentation we are missing. I am not certain which of these resources are in the APE, but we expect to receive complete documentation and to date are still missing information from inventoried properties that were originally identified by SWCA as long ago as 2022.

<b>Resource ID</b>	<b>Recording Status</b>	<b>NRHP Status</b>	<b>Record in MnSHIP?</b>
21DK0078	Previously reported, not relocated	Unevaluated	NA
21DK0113	Previously reported, not relocated	Unevaluated	NA
21DK0141	Previously reported, not relocated	Not eligible	NA
21DK0157	Reported in SWCA 2022, relocated in Metcalf 2024	Unevaluated	NA
21DK0158	Reported in SWCA 2022, not relocated in Metcalf 2024	Unevaluated	NA
21DK0159	Reported in SWCA 2022, not relocated in Metcalf 2024	Not eligible	NA
21DK0168	Newly reported	Not eligible	NA
21DKaf	Previously recorded, not relocated	Unevaluated	NA
21DKau	Reported in SWCA 2022, relocated in Metcalf 2024	Not eligible	NA
21FE0130 / FE-AEA-00264	Newly reported	Not eligible	Accepted record. Attachment present. CNE 2024-0848.
21FE0132	Newly reported	Not eligible	NA
21Feag	Newly reported	Unevaluated	NA
DK-EUR-00011	Previously reported, updated	Not eligible	No update. No attachments. Originally documented in 1996.
DK-EUR-00031	Newly reported	Not eligible	Accepted record. No attachments. Documentation by Metcalf 2024.
DK-EUR-00032	Newly reported	Not eligible	Draft record, no attachments. Started by Merjent June 2025.

DK-FMC-00044	Previously reported, updated	Not eligible	No update. Attachment is from original documentation in 2004.
DK-FMC-00045	Previously reported, updated	Not eligible	No update. Attachment is from original documentation in 2004. Marked non-extant in June 2025.
DK-GRV-00004	Previously reported, updated	Not eligible	No update. Attachment is from original documentation in 2008.
DK-GRV-00007	Previously reported, updated	Not eligible	No update. Attachment is printout of AH Inventory DB. SHPO concurred not eligible in 2011.
DK-GRV-00012	Newly reported	Not eligible	Accepted record in MnSHIP missing location and all other information. Note that the inventory number was requested in 2022 (by SWCA) and we are still waiting on the documentation.
DK-GRV-00013	Previously reported, updated	Not eligible	No update. Documentation dates to 2023, and property was concurred not eligible in that year.
DK-GRV-00020	Newly reported	Not eligible	Record submitted by Nick Powell in 2025. No attachment.
DK-GRV-00021	Newly reported	Unevaluated	Record submitted by Nick Powell in 2025. No attachment.
DK-GRV-00022	Newly reported	Not eligible	Record submitted by Nick Powell in 2025. No attachment.
FE-AEA-00265	Newly reported	Not eligible	Accepted record in MnSHIP missing location and all other information. Note that the inventory number was requested in 2022 (by SWCA) and we are still waiting on the documentation.
FE-MER-00009	Newly reported	Unevaluated	Accepted record. Has attachment. Documentation by Metcalf 2024.
FE-MER-00010	Newly reported	Unevaluated	Accepted record. No attachments. Documentation by Metcalf 2024.
FE-MER-00011	Newly reported	Not eligible	Record submitted by Nick Powell in 2025. No attachment.

FE-MER-00012	Newly reported	Not eligible	Record submitted by Nick Powell in 2025. No attachment.
FE-PIC-00001	Previously reported, updated	Not eligible	No update. Attachment is from original recording in 1984.
FE-PIC-00008	Previously reported, updated	Not eligible	Update by RC Goodwin in 2023. Accepted record. CNE 2024-0848.
FE-PIC-00009	Previously reported, updated	Not eligible	No update. Accepted record dates to 2025 prepared by SWCA.
FE-PIC-00011	Newly reported	Not eligible	Record submitted by Nick Powell in 2025. No attachment.
ST-BER-00012	Newly reported	Not eligible	Accepted record. Has attachment. Documentation by Metcalf 2024.
XX-ROD-00027	Previously reported, updated	Not eligible	No update.
XX-ROD-00157	Previously reported, updated	Not eligible	No update.
XX-ROD-00164	Previously reported, updated	Not eligible	No update.
XX-ROD-00178	Previously reported, updated	Not eligible	No update.
XX-RRD-00012	Superseded by XX-RRD-CSP029		NA
XX-RRD-CNW004	Superseded by XX-RRD-CNW010		NA
XX-RRD-CNW010	Previously reported, updated	Not eligible	No update.
XX-RRD-CNW012	Previously reported, updated	Not eligible	No update.
XX-RRD-CNW026	Previously reported, updated	Not eligible	No update.
XX-RRD-CSP003	Duplicate of XX-RRD-CSP029		NA
XX-RRD-CSP029	Previously reported, updated	Not eligible	No update.
XX-RRD-CSP030	Previously reported, updated	Not eligible	No update.
XX-RRD-CSP031	Previously reported, updated	Not eligible	No update.
XX-RRD-CSP038	Previously reported, updated	Not eligible	No update.
XX-RRD-MNS001	Previously reported, updated	Eligible	No update.

Please let me know if you would like to discuss this project further. I would be happy to meet. I understand that this is a complex submittal and I hope that we can achieve clarity and understanding for SHPO staff for our review and for the administrative record.

Thank you,  
Lucy

**Lucy Harrington**

Environmental Review Archaeologist | State Historic Preservation Office  
Pronouns: she/her/hers

**Minnesota Department of Administration**

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Saint Paul, MN 55155  
651-201-3283  
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**From:** Harrington, Lucy (She/Her/Hers) (ADM)  
**Sent:** Friday, February 27, 2026 8:29 PM  
**To:** 'Julin, Angela' <[Angela.Julin@stantec.com](mailto:Angela.Julin@stantec.com)>  
**Cc:** Knabe, Susan <[Susan.Knabe@stantec.com](mailto:Susan.Knabe@stantec.com)>; [Terry.Plucker@nngco.com](mailto:Terry.Plucker@nngco.com); [nick.mcewin@nngco.com](mailto:nick.mcewin@nngco.com); Spong, Amy (ADM) <[amy.spong@state.mn.us](mailto:amy.spong@state.mn.us)>  
**Subject:** RE: Section 106 Review Request: Ventura to Farmington A-Line Abandonment and Capacity Replacement Project: Dakota, Freeborn, and Steele Counties

Good evening,

SHPO intends to provide comments on this submittal, however, we will need additional time to complete our review. We hope to provide comments to you by the end of March.

Thank you,  
Lucy

**Lucy Harrington (she/her) | Environmental Review Archaeologist**

State Historic Preservation Office  
*Minnesota Department of Administration*  
50 Sherburne Avenue, Suite 203  
Saint Paul, Minnesota 55155  
(651) 201-3283 | [lucy.harrington@state.mn.us](mailto:lucy.harrington@state.mn.us)

**Note: I will be out of office from March 3 through March 13, 2026.**

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**From:** Julin, Angela <[Angela.Julin@stantec.com](mailto:Angela.Julin@stantec.com)>

**Sent:** Monday, February 9, 2026 2:48 PM

**To:** MN\_ADM\_ENV Review SHPO <[ENReviewSHPO@state.mn.us](mailto:ENReviewSHPO@state.mn.us)>

**Cc:** Knabe, Susan <[Susan.Knabe@stantec.com](mailto:Susan.Knabe@stantec.com)>; [Terry.Plucker@nngco.com](mailto:Terry.Plucker@nngco.com); [nick.mcewin@nngco.com](mailto:nick.mcewin@nngco.com)

**Subject:** Section 106 Review Request: Ventura to Farmington A-Line Abandonment and Capacity Replacement Project: Dakota, Freeborn, and Steele Counties

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Hello, on behalf of Northern Natural Gas, a cover letter and UDP are attached to supplement your Section 106 review of the Ventura to Farmington A-Line Abandonment and Capacity Replacement Project. The reports listed below include archaeological survey coverage of the entire APE, and have all been submitted on the OSA portal:

1. Phase I Cultural Resources Investigation for the Ventura to Farmington Pipeline Replacement Project, Dakota, Steele, and Freeborn Counties, Minnesota. Elise Poppen, Sam Peterson, Lucy Harrington, and Ella McIntire.
2. A Phase 1 Survey of the Northern Natural Gas Inc. Ventura to Farmington Gas Transmission Pipeline in Dakota, Freeborn, Rice and Steele Counties, Minnesota, (2024 field season), J. Signe Snortland and Jennifer Borresen Lee.
3. Phase I Archaeological and Cultural Resource Investigation Results, Proposed Northern Natural Gas Rochester Project; Olmsted, Freeborn and Mower Counties, Minnesota; and Northern Lights 2019 Expansion Project in Hennepin, Wright, Carver, Le Sueur, Morrison, Rice and Steele Counties, Minnesota. John G. Hodgson
4. Ventura to Farmington A-Line Abandonment and Capacity Replacement Project (V2F): 2025 Supplemental Phase I Cultural Resources Survey Dakota, Freeborn, and Steele Counties, Minnesota. M. L. Brack, Nicholas C. Powell, and Crystal Reedy
5. Reevaluation of Two Previously Reported Single Find Prehistoric Archaeological Sites, 21DK0159 and 21DK0168, Northern Natural Gas Ventura to Farmington A-line Capacity Replacement and Abandonment Project – Faribault M500 D-line, Greenvale and Eureka Townships, Dakota County, Minnesota. John G. Hodgson

The link below provides a figure depicting the project design on an aerial image:

 [Fig1\\_Workspaces\\_V2F\\_172608813\\_20260209.pdf](#)

Thank you for your review, please let me know if you have any questions.

**Angela Julin, MA, RPA**

Senior Archaeologist

Direct: (763) 252-6816

[angela.julin@stantec.com](mailto:angela.julin@stantec.com)

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1111 South 103<sup>rd</sup> Street  
Omaha, NE 68124

April 16, 2026

Lucy Harrington  
State Historic Preservation Office  
Administration Building #203  
50 Sherburne Ave.  
Saint Paul, MN 55155

Re: Northern Natural Gas – Ventura to Farmington A-Line Abandonment and Capacity Replacement Project – Dakota, Freeborn, and Steele counties, Minnesota

Dear Lucy Harrington:

Northern Natural Gas (Northern) is regulated by the Federal Energy Regulatory Commission (FERC) and is subject to review under Section 106 of the National Historic Preservation Act (NHPA). This letter is submitted as early coordination in advance of FERC initiating formal Section 106 consultation (FERC Docket No. CP26-130-000). FERC Docket CP26-130-000 is collectively the Ventura to Farmington A-line Abandonment and Northern Lights 2027 (filed under a separate request to MN SHPO) projects. The purpose of this letter is to request coordination with the Minnesota State Historic Preservation Office (SHPO) for the identification of the Area of Potential Effects (APE) and historic properties in support of an eventual finding of effect. Northern has secured the services of Stantec Consulting Services Inc. (Stantec) to conduct a Section 106 NHPA evaluation for the proposed Ventura to Farmington A-Line Abandonment and Capacity Replacement Project (Project).

Northern is proposing to construct the Project, which will (1) isolate and abandon in-place approximately 105.76 miles of 16-inch-diameter pipeline on Northern's M500 A and 25.35 miles of 16-inch-diameter M500 J pipeline systems (collectively referred to as the A-line) from Ventura, Iowa to Farmington, Minnesota; (2) disconnect the 16-inch-diameter A-line inside the Farmington compressor station; (3) construct three new pipeline extensions consisting of approximately 17.88 miles of 36-inch or 30-inch-diameter pipelines and associated above-ground appurtenances; and (4) install temporary compression at three locations in Freeborn, Steele, and Dakota counties, Minnesota, to evacuate gas from the A-line to an adjacent mainlines. Only the Project components in Minnesota are discussed further in this cover letter.

The APE within which all ground disturbance would occur encompasses all access roads, staging areas, and workspaces (Figure 1). The APE for visual effects is defined as a 500-foot buffer around any proposed above-ground facilities. New above-ground facilities will not exceed 8 feet in height and consist of two aboveground valves constructed within existing facilities (Table 1). Three existing facilities will be removed, which includes the removal of all associated aboveground components.

**Table 1. Above-Ground Facility Modifications**

Existing Facility Name	Proposed Work	Associated Pipeline Segment	Map Page	Approx. MP	County
Lake Mills E-line tie-over valve setting	Facility removal	Lake Mills M500 E-line	3	34.20	Freeborn
Conger MN #1	Install new block valve	Lake Mills M500 E-line	6	35.93	Freeborn
Faribault tie-over valve	Facility removal	Faribault M500 D-line	22	97.37	Dakota
E-Line to D-Line Regulator Station	Install new block valve	Faribault M500 D-line	32	104.54	Dakota
Valve setting	Facility removal	Faribault M500 D-line	32	104.87	Dakota

The Phase I archaeological reconnaissance surveys and architectural history surveys were conducted within an Environmental Survey Boundary (ESB) of approximately 3,924 acres, which encompasses and exceeds the APE. The survey coverage and the relationship of survey areas to the APE has been provided via OneDrive link.

**Identification of Cultural Resources**

Background research and cultural resource field investigations for the Project have been completed at various times between 2015 and 2025 by multiple cultural resources subconsultants, including Bear Creek Archaeology (2015); Phase One Archaeological Services Inc. (2018 and 2025); SWCA Environmental Consultants (2022); Metcalf Archeological Consultants (2024); and Merjent, Inc. (2025). Background research was conducted in person at SHPO and online via the OSA Portal and encompassed a 1-mile radius of all proposed Project activities. All cultural resource survey reports have been submitted on the OSA Portal. A complete list of reports is provided in Table 2.

Archaeological field investigations included pedestrian survey in areas with suitable ground surface visibility, supplemented by shovel testing in areas with poor visibility. Above-ground historic resource field investigations included architectural survey of buildings, structures, and other above-ground historic resources within the ESB and parcels adjacent to the ESB.

**Table 2. Summary of Cultural Resource Surveys**

Project Component - County, State	Year Survey Completed	Survey Company	Associated Cultural Resource Report (MN SHPO Report Number)
<b>PIPELINE DISCONNECT SITES</b>			
A-LINE			
Ventura compressor station (Hancock, IA)	2022	SWCA	Phase I Cultural Resources Investigation for the Ventura to Farmington Pipeline Replacement Project (December 2022)
	2024	Merjent	Phase I Intensive Archaeological Survey for V2F Project (January 2025a)

Northern Natural Gas  
 Ventura to Farmington A-Line Abandonment and Capacity Replacement Project  
 April 16, 2026

<b>Project Component - County, State</b>	<b>Year Survey Completed</b>	<b>Survey Company</b>	<b>Associated Cultural Resource Report (MN SHPO Report Number)</b>
Farmington compressor station (Dakota, MN)	2022	SWCA	Phase I Cultural Resources Investigation for the Ventura to Farmington Pipeline Replacement Project (December 2022; SHPO: MULT-2022-11)
	2024	Metcalf	A Phase 1 Survey of the Northern Natural Gas Inc. Ventura to Farmington Gas Transmission Pipeline in Dakota, Freeborn, Rice and Steele Counties, Minnesota (March 2025; SHPO: MULT-2025-07)
<b>TEMPORARY COMPRESSION SITES</b>			
La Crosse BL MNB73201 Launcher/ABA 05 (Freeborn, MN)	2022	SWCA	Phase I Cultural Resources Investigation for the Ventura to Farmington Pipeline Replacement Project (December 2022; SHPO: MULT-2022-11)
Lake Mills compressor station (Worth, IA)	2015	Bear Creek	Phase I Architectural Evaluation for Properties within One Mile of the Proposed Lake Mills Compressor Station in Bristol and Silver Lake Townships, Worth County, Iowa. Project No. BCA 2178. (2015b)
Owatonna compressor station (Steele, MN)	2018	Phase One	Phase I Archaeological and Cultural Resource Investigation Results, Proposed Northern Natural Gas Rochester Project; Olmsted, Freeborn and Mower Counties, Minnesota; and Northern Lights 2019 Expansion Project in Hennepin, Wright, Carver, Le Sueur, Morrison, Rice and Steele Counties, Minnesota (March 2018; MULT-2018-07)
Northfield #1 (Dakota, MN)	2025	Merjent	Ventura to Farmington A-Line Abandonment and Capacity Replacement Project (V2F): 2025 Supplemental Phase I Cultural Resources Survey Dakota, Freeborn, and Steele Counties, Minnesota (2025b)
<b>PIPELINE FACILITIES</b>			
Lake Mills M500 E-line (Freeborn, MN)	2022	SWCA	Phase I Cultural Resources Investigation for the Ventura to Farmington Pipeline Replacement Project (December 2022; SHPO: MULT-2022-11)
	2024	Metcalf	A Phase 1 Survey of the Northern Natural Gas Inc. Ventura to Farmington Gas Transmission Pipeline in Dakota, Freeborn, Rice and Steele Counties, Minnesota (March 2025; SHPO: MULT-2025-07)
Albert Lea M500 E-line (Steele, MN)	2024	Metcalf	A Phase 1 Survey of the Northern Natural Gas Inc. Ventura to Farmington Gas Transmission Pipeline in Dakota, Freeborn, Rice and Steele Counties, Minnesota (March 2025; SHPO: MULT-2025-07)
Faribault M500 D-line	2022	SWCA	Phase I Cultural Resources Investigation for the Ventura to Farmington Pipeline Replacement Project (December 2022; SHPO: MULT-2022-11)

Project Component - County, State	Year Survey Completed	Survey Company	Associated Cultural Resource Report (MN SHPO Report Number)
(Dakota, MN)	2024	Metcalf	A Phase 1 Survey of the Northern Natural Gas Inc. Ventura to Farmington Gas Transmission Pipeline in Dakota, Freeborn, Rice and Steele Counties, Minnesota (March 2025; SHPO: MULT-2025-07)
	2025	Phase One	Reevaluation of Two Previously Reported Single Find Prehistoric Archaeological Sites, 21DK0159 and 21DK0168, Northern Natural Gas Ventura to Farmington A-line Capacity Replacement and Abandonment Project – Faribault M500 D-line, Greenvale and Eureka Townships, Dakota County, Minnesota

### Cultural Resource Survey Results

The Phase I archaeological reconnaissance survey identified twelve archaeological sites within the ESB, two of which fall within the APE for ground disturbing activities, none of which are recommended as eligible for the National Register of Historic Places (NRHP).

The above-ground historic resource survey identified 40 above-ground historic resources within the ESB, including railroads, roads, drainage ditches, bridges, and one corn crib, none of which are recommended as eligible for the NRHP. Table 3 lists all identified cultural resources within the APE, their eligibility status, and recommendations for minimization of effect. Tables 1 and 2 in Appendix C include all resources identified within the ESB.

**Table 3. Cultural Resources Within the APE**

Site Number	Site Type	Impact Type	Eligibility	Minimization of Effect
21DKaf	Precontact burial mounds	Direct	<i>Unevaluated</i>	Avoidance with HDD
21DK0078	Precontact isolated find	Direct	<i>Unevaluated</i>	Avoidance with HDD
FE-AEA-00264	Historic Farmstead	Visual	<i>Not Eligible</i>	None
FE-MER-00009	Ditch	Direct	<i>Unevaluated</i>	Avoidance with HDD and restoration
FE-MER-00010	Ditch	Direct	<i>Unevaluated</i>	Avoidance with HDD and restoration
FE-PIC-00001	Historic Town Hall	Visual	<i>Not Eligible</i>	None
FE-PIC-00008	Ditch	Direct	<i>Not eligible</i>	None
FE-PIC-00009	Ditch	Direct	<i>Unevaluated</i>	Avoidance with HDD and restoration
XX-LIN-00003	Trunk Highway	Direct	<i>Not eligible</i>	None
XX-ROD-00027	Trunk Highway	Direct	<i>Not eligible</i>	None
XX-ROD-00164	Trunk Highway	Direct	<i>Not eligible</i>	None
XX-RRD-CNW003	Railroad Segment	Direct	<i>Eligible</i>	Avoidance with HDD
XX-RRD-CNW004	Railroad Segment	Direct	<i>Not eligible</i>	None

Site Number	Site Type	Impact Type	Eligibility	Minimization of Effect
XX-RRD-CNW010	Railroad Segment	Direct	<i>Not eligible</i>	None
XX-RRD-CNW012	Railroad Segment	Direct	<i>Not eligible</i>	None
XX-RRD-CSP029	Railroad Segment	Direct	<i>Not eligible</i>	None
XX-RRD-CSP030	Railroad Segment	Direct	<i>Not eligible</i>	None
XX-RRD-CSP031	Railroad Segment	Direct	<i>Not eligible</i>	None
XX-RRD-CSP038	Railroad Segment	Direct	<i>Not eligible</i>	None
XX-RRD-MNS001	Railroad Segment	Direct	<i>Eligible</i>	Avoidance with HDD

Resource XX-LIN-00003 (Trunk Highway 16, including Former Trunk Highway 9) was recorded for a separate undertaking within the APE following the completion of all Project-related surveys. XX-LIN-00003 has been recommended not eligible for the NRHP and work within this resource will consist of a trenchless road crossing.

Resource XX-RRD-CNW003 is within the APE but was not recorded as part of the cultural resource investigations. XX-RRD-CNW003 consists of an unevaluated non-extant railroad segment and is discussed below.

### Assessment and Finding of Effect

Twenty cultural resources are within the APE, including thirteen resources recommended as not eligible, five resources recommended as unevaluated, and two resources recommended as eligible for the NRHP. Potential impacts to cultural resources are discussed below by resource. Horizontal Directional Drill (HDD) entry and exit points are shown on Figure 1. Northern initiated tribal consultation on February 12, 2026, and no responses have been received.

Site **21DKaf** consists of a precontact mound which is currently unevaluated for the NRHP. Northern will minimize effects to the site by installing the pipe under the site via HDD at depths between 36 and 72 feet beneath the site. The HDD entry and exit points are located outside the boundaries of 21DKaf. The HDD method involves no surface disturbance within or adjacent to the resource.

Site **21DK0078** consists of a precontact lithic scatter which is currently unevaluated for the NRHP. Northern will minimize effects to the site by installing the pipe under the site via HDD at depths between 36 and 72 feet beneath the site. The HDD entry and exit points are located outside the boundaries of 21DK0078. The HDD method involves no surface disturbance within or adjacent to the resource.

The proposed pipeline will be installed via HDD across **XX-RRD-MNS001**, an eligible segment of the Minneapolis St. Paul Rochester and Dubuque Electric Traction Company/Minneapolis Northfield and Southern Railway Company railroad. The HDD entry and exit points are located outside the boundaries of XX-RRD-MNS001. The HDD method involves no surface disturbance within or adjacent to the resource. No aboveground facilities are located within or adjacent to this resource; therefore, the Project will have no effect on XX-RRD-MNS001.

The proposed pipeline will be installed via HDD across drainage ditches **FE-MER-009** and **FE-MER-010**. Both resources are currently unevaluated for the NRHP. The HDD entry and exit

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points are located outside of the boundaries of each resource. No surface disturbance will occur within or adjacent to these resources; therefore, Project will have no effect on FE-MER-009 or FE-MER-010.

The proposed pipeline will be installed via HDD across resource **FE-PIC-009**, an unevaluated drainage ditch. The HDD entry and exit points are located outside of the boundaries of this resource. No surface disturbance will occur within or adjacent to this resource; therefore, the Project will have no effect on FE-PIC-009.

The proposed pipeline will be installed via HDD across resource **XX-RRD-CNW003**, an unevaluated non-extant railroad segment. The HDD entry and exit points are located outside of the boundaries of this resource. No surface disturbance will occur within or adjacent to this resource; therefore, the Project will have no effect on XX-RRD-CNW003.

No visual effects are anticipated as previously recorded above-ground historic resources within 500-feet of above-ground facility modifications (FE-AEA-00264 and FE-PIC-00001) are recommended as not eligible for the NRHP.

As effects to unevaluated and eligible resources within the APE will be minimized by utilizing HDD during construction, the Project Principal Investigators recommend a finding of no historic properties affected for the Project pursuant to 36 CFR 800.4(d)(1).

Northern has prepared an Unanticipated Discoveries Plan (UDP) for construction activities in Minnesota, enclosed as Attachment B. In the event archaeological materials or human remains are encountered during construction, Northern will halt construction in the vicinity of the find and consult with a qualified archaeologist, FERC, the Minnesota Indian Affairs Council, and the Minnesota Office of the State Archaeologist prior to resuming work. Northern requests 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](mailto:Terry.Plucker@nngco.com) or Angela Julin of Stantec at 763-252-6816 or [angela.julin@stantec.com](mailto:angela.julin@stantec.com).

Sincerely,



Terry Plucker  
Environmental Compliance Manager  
Northern Natural Gas Company

Enclosures: Attachment A – Ventura to Farmington A-Line Abandonment and Capacity Replacement Project: A Summary and Synthesis of Cultural Resources Investigations and Findings  
Attachment B - Unanticipated Discoveries Plan

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Attachment C – Cultural Resources in ESB Tables

CC: Susan Knabe, Stantec Consulting  
Nick McEwin, Northern Natural Gas

Attachment A

Ventura to Farmington A-Line Abandonment and Capacity Replacement Project: A Summary and Synthesis of Cultural Resources Investigations and Findings (2025 Merjent Summary of Findings Report)

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Attachment B  
Unanticipated Discoveries Plan

## **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 Ventura to Farmington A-Line Abandonment and Capacity Replacement Project (Project). It provides direction to Northern personnel and their consultants/contractors as to the proper procedure to follow if an unanticipated discovery of cultural materials or human remains is made during construction. To minimize the potential for the discovery of unanticipated cultural materials or human remains, 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 and human remains, 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 materials and human remains include, but are not limited to, the following: 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 (MS) 307.08: Damages; Illegal Molestation of Human Remains; Burial; Cemeteries; Penalty, Assessment, governs human remains.

Cultural materials include man-made artifacts (precontact and post-contact objects greater than 50 years of age) and features (e.g., remnants of cultural activities above-ground and below-ground). Human remains include unidentified bones, mortuary features, and/or associated artifacts.

### **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 materials (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. It is a felony to knowingly disturb human remains (MS 307.08).

### **III. Unanticipated Discovery of Cultural Materials**

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](mailto: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 cultural material, 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 cultural material, 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:**

Brad Wazaney, Staff Archaeologist  
Phone: 202-502-6696  
Email: [Bradford.Wazaney@FERC.gov](mailto:Bradford.Wazaney@FERC.gov)

**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](mailto: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 field work.
  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 and can also include mortuary features and associated artifacts.

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 (OSA), 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 OSA, 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](mailto:Terry.Plucker@nngco.com)

**FERC Contact:**

Brad Wazaney, Staff Archaeologist  
Phone: 202-502-6696  
Email: [Bradford.Wazaney@FERC.gov](mailto:Bradford.Wazaney@FERC.gov)

**OSA Contact:**

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](mailto: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](mailto:ryan.shea@co.freeborn.mn.us)

**Steele County, Minnesota, Sheriff:**

Lon Thiele  
2500 Alexander St. SW  
Owatonna, MN 55060  
507-444-3800  
[lon.thiele@SteeleCountyMN.gov](mailto:lon.thiele@SteeleCountyMN.gov)

**Dakota County, Minnesota, Sheriff:**

Joe Leko  
1580 Highway 55  
Hastings, MN 55033  
651-438-4700  
[sheriff@co.dakota.mn.us](mailto:sheriff@co.dakota.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 (i.e., greater than 50 years), the Northern construction superintendent will notify Northern's Environmental Compliance Manager, who in turn will notify FERC, the SHPO, the OSA, 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 precontact archaeological context (i.e., greater than 50 years) 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 OSA, the MIAC, and the Tribal Historic Preservation Officer (THPO) contacts listed in Appendix A.

**FERC Contact:**

Brad Wazaney, Staff Archaeologist  
Phone: 202-502-6696  
Email [Bradford.Wazaney@FERC.gov](mailto:Bradford.Wazaney@FERC.gov)

**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](mailto:Kelly.graggjohnson@state.mn.us)

**OSA Contact:**

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](mailto:amanda.gronhovd@state.mn.us)

**MIAC Contact:**

Isaac Weston  
Cultural Resource Manager  
Minnesota Indian Affairs Council  
161 Rondo Avenue Suite 919  
St. Paul, MN 55103  
651-539-2200  
[isaac.weston@state.mn.us](mailto:isaac.weston@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 OSA 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. Per MS 307.08:
    - a) For identified non-American Indian human remains and burials, OSA is the lead state agency.
    - b) For identified American Indian human remains and burials, MIAC is the lead state agency.
    - c) If ancestry cannot be determined or if identified human remains and burials are of both American Indian and non-American Indian ancestry, OSA and MIAC collaborate as the lead state agencies.
  2. Northern will assist MIAC, FERC and the OSA 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. If the discovery relates to American Indian or probable American Indian, MIAC must approve the consultant and specialists prior to hiring for the burial recovery or site evaluation (per MS 307.08, 3a).
    - a) No conduct of intrusive examination of the immediate area surrounding the human remains prior to consultation with FERC, OSA, MIAC, and the SHPO is allowed. Per MS 307.08, if probable American Indian cemeteries are to be disturbed or probably American Indian remains analyzed, MIAC must approve the professional archaeologist, qualified anthropologist, or other appropriate expert.
    - 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 OSA 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 MS 307.08, if the remains are located on public, nonfederal, or private land in Minnesota, the OSA 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 MS 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 and 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. Per MS 307.08:
    - a) For identified non-American Indian human remains and burials, OSA is the lead state agency.
    - b) For identified American Indian human remains and burials, MIAC is the lead state agency.
    - c) If ancestry cannot be determined or if identified human remains and burials are of both American Indian and non-American Indian ancestry, OSA and MIAC collaborate as the lead state agencies.
  3. Unless directed to do otherwise by FERC, or the OSA, 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 OSA 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).

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**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](mailto: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](mailto: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](mailto: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](mailto:mblackwolf@ftbelknap.org)

Iowa Tribe of Kansas and Nebraska  
Alan Kelley, THPO  
3345-B Thrasher Road  
White Cloud, KS 66094  
(785) 595-3258  
(785) 595-6610 (fax)  
[akelley@iowas.org](mailto:akelley@iowas.org)

Lower Sioux Indian Community in the State of Minnesota  
Cheyanne St. John, THPO  
39527 Reservation Hwy 1  
Morton, MN 56270  
(507) 697-6321 (work phone)  
(507) 697-6310 (work fax)  
[cheyanne.stjohn@lowersioux.com](mailto:cheyanne.stjohn@lowersioux.com)

Menominee Indian Tribe of Wisconsin  
David Grignon, THPO  
W2908 Tribal Office Loop Road  
Keshena, WI 54135-0910  
(715) 799-5258 (work phone)  
(715) 799-5295 (work fax)  
[dgrignon@mitw.org](mailto:dgrignon@mitw.org); [historicpreservationgroup@mitw.org](mailto:historicpreservationgroup@mitw.org)

Minnesota Indian Affairs Council  
Isaac Weston, Cultural Resource Manager  
161 Rondo Avenue, Suite 919  
St. Paul, MN 55103  
(651) 539-2200  
[isaac.weston@state.mn.us](mailto:isaac.weston@state.mn.us)

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](mailto:noah.white@piic.org)

Santee Sioux Nation, Nebraska  
Larry Thomas, Interim THPO  
425 Frazier Avenue North, Suite 2  
Niobrara, NE 68760  
(402) 857-3568 (work phone)  
(402) 857-2779 (work fax)  
[ssn.thpo@gmail.com](mailto:ssn.thpo@gmail.com); [larry.thomas@ohiyacasino.com](mailto:larry.thomas@ohiyacasino.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](mailto:dianned@swo-nsn.gov)

Spirit Lake Tribe, North Dakota  
Kenneth Graywater, THPO  
PO Box 198  
Fort Totten, ND 58335-0359  
(701) 766-4031 (work phone)  
[kjgraywater@spiritlakenation.com](mailto:kjgraywater@spiritlakenation.com); [thpo@spiritlakenation.com](mailto:thpo@spiritlakenation.com)



**Northern Natural Gas**  
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**and Capacity Replacement Project**  
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Upper Sioux Community Pezihutazizi Oyate  
Samantha Odegard, THPO  
PO Box 147, 5722 Travers Lane  
Granite Falls, MN 56241-0147  
(320) 564-6334 (work phone)  
[samanthao@uppersiouxcommunity-nsn.gov](mailto:samanthao@uppersiouxcommunity-nsn.gov)

Attachment C  
Cultural Resources Within ESB

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NOT RELEASE**

## Knabe, Susan

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**From:** Julin, Angela  
**Sent:** Tuesday, April 28, 2026 10:37 AM  
**To:** Harrington, Lucy (She/Her/Hers) (ADM)  
**Cc:** Knabe, Susan; Terry.Plucker@nngco.com; nick.mcewin@nngco.com; Manthey Mimbach, Kathleen (ADM); Way, Ginny (ADM)  
**Subject:** RE: Section 106 Review Request: Ventura to Farmington A-Line Abandonment and Capacity Replacement Project: Dakota, Freeborn, and Steele Counties  
**Attachments:** Visual\_APE\_V2F\_NL27.zip; Direct\_APE\_V2F\_NL27.zip

Hi Lucy, shapefiles are attached, each file has the project areas separated out by component.

**Angela Julin, MA, RPA**  
Senior Archaeologist

Direct: (763) 252-6816  
angela.julin@stantec.com

View my [digital business card](#)



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**From:** Julin, Angela  
**Sent:** Friday, April 24, 2026 10:53 AM  
**To:** 'Harrington, Lucy (She/Her/Hers) (ADM)' <Lucy.Harrington@state.mn.us>  
**Cc:** Knabe, Susan <Susan.Knabe@stantec.com>; Terry.Plucker@nngco.com; nick.mcewin@nngco.com; Manthey Mimbach, Kathleen (ADM) <Kathleen.MantheyMimbach@state.mn.us>; Way, Ginny (ADM) <ginny.way@state.mn.us>  
**Subject:** RE: Section 106 Review Request: Ventura to Farmington A-Line Abandonment and Capacity Replacement Project: Dakota, Freeborn, and Steele Counties

Hi Lucy, we'll have the shapefile of the APE ready for you by Wednesday of next week.

**Angela Julin, MA, RPA**  
Senior Archaeologist

Direct: (763) 252-6816  
angela.julin@stantec.com

View my [digital business card](#)



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**From:** Harrington, Lucy (She/Her/Hers) (ADM) <[Lucy.Harrington@state.mn.us](mailto:Lucy.Harrington@state.mn.us)>  
**Sent:** Wednesday, April 22, 2026 1:57 PM  
**To:** Julin, Angela <[Angela.Julin@stantec.com](mailto:Angela.Julin@stantec.com)>  
**Cc:** Knabe, Susan <[Susan.Knabe@stantec.com](mailto:Susan.Knabe@stantec.com)>; [Terry.Plucker@nngco.com](mailto:Terry.Plucker@nngco.com); [nick.mcewin@nngco.com](mailto:nick.mcewin@nngco.com); Manthey Mimbach, Kathleen (ADM) <[Kathleen.MantheyMimbach@state.mn.us](mailto:Kathleen.MantheyMimbach@state.mn.us)>; Way, Ginny (ADM) <[ginny.way@state.mn.us](mailto:ginny.way@state.mn.us)>  
**Subject:** RE: Section 106 Review Request: Ventura to Farmington A-Line Abandonment and Capacity Replacement Project: Dakota, Freeborn, and Steele Counties

Good afternoon folks,

I just finished a meeting with the architectural historian subject matter expert assigned internally to this project review and she asked if you could provide a shapefile of the APE for the Ventura to Farmington and Northern Lights 2027 projects? If not the APE, could you provide the ESC or ESB as a shapefile?

I've copied Ginny here, she will be reviewing the architectural history information.

Thank you so much,  
Lucy

**Lucy Harrington**

Environmental Review Archaeologist | State Historic Preservation Office

Pronouns: she/her/hers

**Minnesota Department of Administration**

50 Sherburne Avenue

Saint Paul, MN 55155

651-201-3283

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## Knabe, Susan

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**From:** Julin, Angela  
**Sent:** Thursday, June 4, 2026 6:14 PM  
**To:** Harrington, Lucy (She/Her/Hers) (ADM)  
**Cc:** Knabe, Susan; Terry.Plucker@nngco.com; nick.mcewin@nngco.com  
**Subject:** RE: Section 106 Review Request: Ventura to Farmington A-Line Abandonment and Capacity Replacement Project: Dakota, Freeborn, and Steele Counties

Based on the available reports I have, yes the January date appears to be an error.

**Angela Julin, MA, RPA**  
Senior Archaeologist

Direct: (763) 252-6816  
angela.julin@stantec.com

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**From:** Harrington, Lucy (She/Her/Hers) (ADM) <Lucy.Harrington@state.mn.us>  
**Sent:** Thursday, June 4, 2026 5:03 PM  
**To:** Julin, Angela <Angela.Julin@stantec.com>  
**Cc:** Knabe, Susan <Susan.Knabe@stantec.com>; Terry.Plucker@nngco.com; nick.mcewin@nngco.com  
**Subject:** RE: Section 106 Review Request: Ventura to Farmington A-Line Abandonment and Capacity Replacement Project: Dakota, Freeborn, and Steele Counties

Good afternoon,

We are still working on this project review request, but we are nearing the end of our review (finally!).

I am working on putting our formal letter together and I realized that one of your letters to my office references the following report that I can't find:

- *Phase I Intensive Archaeological Survey for V2F Project* prepared by Merjent, Inc. in January 2025

The only Merjent report from 2025 that we have is the following:

- *Ventura to Farmington A-Line Abandonment and Capacity Replacement Project (V2F): 2025 Supplemental Phase I Cultural Resources Survey Dakota, Freeborn, and Steele Counties, Minnesota* prepared by Merjent, Inc. in June 2025

Was the January report reference a typo?

Thank you,  
Lucy

**Lucy Harrington**  
Environmental Review Archaeologist | State Historic Preservation Office  
Pronouns: she/her/hers

**Minnesota Department of Administration**

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---

**From:** Julin, Angela <[Angela.Julin@stantec.com](mailto:Angela.Julin@stantec.com)>

**Sent:** Monday, February 9, 2026 2:48 PM

**To:** MN\_ADM\_ENV Review SHPO <[ENReviewSHPO@state.mn.us](mailto:ENReviewSHPO@state.mn.us)>

**Cc:** Knabe, Susan <[Susan.Knabe@stantec.com](mailto:Susan.Knabe@stantec.com)>; [Terry.Plucker@nngco.com](mailto:Terry.Plucker@nngco.com); [nick.mcewin@nngco.com](mailto:nick.mcewin@nngco.com)

**Subject:** Section 106 Review Request: Ventura to Farmington A-Line Abandonment and Capacity Replacement Project: Dakota, Freeborn, and Steele Counties

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Hello, on behalf of Northern Natural Gas, a cover letter and UDP are attached to supplement your Section 106 review of the Ventura to Farmington A-Line Abandonment and Capacity Replacement Project. The reports listed below include archaeological survey coverage of the entire APE, and have all been submitted on the OSA portal:

1. Phase I Cultural Resources Investigation for the Ventura to Farmington Pipeline Replacement Project, Dakota, Steele, and Freeborn Counties, Minnesota. Elise Poppen, Sam Peterson, Lucy Harrington, and Ella McIntire.
2. A Phase 1 Survey of the Northern Natural Gas Inc. Ventura to Farmington Gas Transmission Pipeline in Dakota, Freeborn, Rice and Steele Counties, Minnesota, (2024 field season), J. Signe Snortland and Jennifer Borresen Lee.
3. Phase I Archaeological and Cultural Resource Investigation Results, Proposed Northern Natural Gas Rochester Project; Olmsted, Freeborn and Mower Counties, Minnesota; and Northern Lights 2019 Expansion Project in Hennepin, Wright, Carver, Le Sueur, Morrison, Rice and Steele Counties, Minnesota. John G. Hodgson
4. Ventura to Farmington A-Line Abandonment and Capacity Replacement Project (V2F): 2025 Supplemental Phase I Cultural Resources Survey Dakota, Freeborn, and Steele Counties, Minnesota. M. L. Brack, Nicholas C. Powell, and Crystal Reedy
5. Reevaluation of Two Previously Reported Single Find Prehistoric Archaeological Sites, 21DK0159 and 21DK0168, Northern Natural Gas Ventura to Farmington A-line Capacity Replacement and Abandonment Project – Faribault M500 D-line, Greenvale and Eureka Townships, Dakota County, Minnesota. John G. Hodgson

The link below provides a figure depicting the project design on an aerial image:

 [Fig1\\_Workspaces\\_V2F\\_172608813\\_20260209.pdf](#)

Thank you for your review, please let me know if you have any questions.

**Angela Julin, MA, RPA**  
Senior Archaeologist

Direct: (763) 252-6816  
[angela.julin@stantec.com](mailto:angela.julin@stantec.com)

**Stantec**

## Knabe, Susan

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**From:** Julin, Angela  
**Sent:** Friday, June 5, 2026 12:46 PM  
**To:** Harrington, Lucy (She/Her/Hers) (ADM)  
**Cc:** Knabe, Susan; Terry.Plucker@nngco.com; nick.mcewin@nngco.com; Manthey Mimbach, Kathleen (ADM)  
**Subject:** RE: Section 106 Review Request: Ventura to Farmington A-Line Abandonment and Capacity Replacement Project: Dakota, Freeborn, and Steele Counties  
**Attachments:** fig4-2\_cultural\_nl\_193705726.pdf; fig4-1\_cultural\_rochester\_193705726.pdf

Hi Lucy, we have located the figures that were not legible and I have attached them here. Let me know if you need anything else. Thanks!

**Angela Julin, MA, RPA**  
Senior Archaeologist

Direct: (763) 252-6816  
angela.julin@stantec.com

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**From:** Harrington, Lucy (She/Her/Hers) (ADM) <Lucy.Harrington@state.mn.us>  
**Sent:** Wednesday, May 20, 2026 9:36 AM  
**To:** Julin, Angela <Angela.Julin@stantec.com>  
**Cc:** Knabe, Susan <Susan.Knabe@stantec.com>; Terry.Plucker@nngco.com; nick.mcewin@nngco.com; Manthey Mimbach, Kathleen (ADM) <Kathleen.MantheyMimbach@state.mn.us>  
**Subject:** RE: Section 106 Review Request: Ventura to Farmington A-Line Abandonment and Capacity Replacement Project: Dakota, Freeborn, and Steele Counties

Good morning,

We are *still* working on this review. I apologize for the delay.

During our review, we noticed that our copy of the Phase One report from 2018 is illegible. The citation is below. Would you be able to provide a legible copy? In particular the legends in the figures in our digital version are the issue. I have looked through our files and I cannot find another copy of this report.

Hodgson, J.G. and M.L. Hernandez 2018 *Phase I Archaeological and Cultural Resource Investigation Results, Proposed Northern Natural Gas Rochester Project; Olmsted, Freeborn and Mower Counties, Minnesota; and Northern Lights 2019 Expansion Project in Hennepin, Wright, Carver, Le Sueur, Morrison, Rice, and Steele Counties, Minnesota.*

Thank you in advance,  
Lucy

**Lucy Harrington**  
Environmental Review Archaeologist | State Historic Preservation Office  
Pronouns: she/her/hers

**Minnesota Department of Administration**

50 Sherburne Avenue

Saint Paul, MN 55155

651-201-3283

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**Figures Filed as CUI//PRIV - DO NOT RELEASE**

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## Knabe, Susan

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**From:** Julin, Angela  
**Sent:** Thursday, June 4, 2026 6:14 PM  
**To:** Harrington, Lucy (She/Her/Hers) (ADM)  
**Cc:** Knabe, Susan; Terry.Plucker@nngco.com; nick.mcewin@nngco.com  
**Subject:** RE: Section 106 Review Request: Ventura to Farmington A-Line Abandonment and Capacity Replacement Project: Dakota, Freeborn, and Steele Counties

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**Angela Julin, MA, RPA**  
Senior Archaeologist

Direct: (763) 252-6816  
angela.julin@stantec.com

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**From:** Harrington, Lucy (She/Her/Hers) (ADM) <Lucy.Harrington@state.mn.us>  
**Sent:** Thursday, June 4, 2026 5:03 PM  
**To:** Julin, Angela <Angela.Julin@stantec.com>  
**Cc:** Knabe, Susan <Susan.Knabe@stantec.com>; Terry.Plucker@nngco.com; nick.mcewin@nngco.com  
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Thank you,  
Lucy

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Pronouns: she/her/hers

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