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September 3, 2013

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September 3, 2013

Mr. Brian P. Kalk, Chairman
North Dakota Public Service Commission
600 East Boulevard Avenue, Department 408
Bismarck, North Dakota 58505-0840

NDSHPO Ref.: 12-1016 PSC/WAPA Basin Electric Power Cooperative Antelope Valley Station to Neseet 345kV Transmission Line
PSC: PU-11-696

Dear Chairman Kalk:

We wish to inform the PSC with respect to the current status of project activity and review for 12-1016 "Basin Electric Power Cooperative Antelope Valley Station to Neseet 345kV Transmission Line." The State Historical Society of North Dakota (SHSND)/North Dakota State Historic Preservation Office (NDSHPO) are presently participating and engaged in on-going consultations with the applicant, Basin Electric Power Cooperative on particular matters that are addressed in the ensuing paragraphs. As the PSC also is undoubtedly aware, the project is an undertaking that is subject to federal regulations and permitting, and with accompanying concurrent review activity by the Western Area Power Administration (WAPA) and the NDSHPO.

The SHSND/NDSHPO received and initially commented on an April 2013 preliminary project cultural resources report: "Basin Electric Cooperative's Antelope Valley Station to Neseet 345kV Transmission Line: A Class II and Class III Cultural Resource Inventory in Dunn, McKenzie, Mercer, Mountrail, and Williams Counties, North Dakota Interim Report." The cultural resources survey is not complete with an estimated 20% of the project corridor yet to be inventoried and reported on for cultural resources. At this point, it is important to reiterate that the project is not complete in terms of overall project cultural resources review and with concurrence on determinations of project effects from either a state or federal regulatory perspective.

As the result of on-going consultations with Basin Electric the following project activities and actions are to take place in the Killdeer Mountain Battlefield core and study areas that address identified cultural resource concerns and potential effects from the project. These are:

- (1) Proposed Electrical Substation will be moved to an alternate approved location outside the Killdeer Mountain Battlefield core area;

(2) Visual effects assessments of the proposed transmission line from the perspective of the overlooking and elevated (a) "Medicine Hole" locality and from the down slope (b) Killdeer Mountain Battlefield State Historic Site (32DU1094) location will be undertaken and reviewed;

(3) Geophysical investigations (using a magnetometer) are proposed along the transmission line route for the 8-mile length of the Killdeer Mountain Battlefield study area treated in the National Park Service American Battlefield documentation. The aim is to identify battlefield-related deposits or artifacts along this stretch of the proposed transmission corridor route. At the present time, no definitive battlefield-related deposits or artifacts have been identified in the transmission line corridor based on the interim cultural resources report; and,

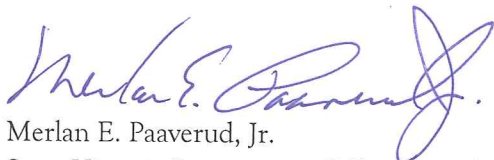
(4) At the proposed structure locations additional archaeological testing work will be undertaken.

It is important to note that in 1993 when the Killdeer Mountain State Historic Site (32DU1094) location was formally recorded with the SHSND/NDSHPO that the full extent of the site boundaries were not defined and established at that time. The 2010 National Park Service Battlefield core study area is based on historic records and did not include a professional archaeological inventory or assessment of subsurface features.

To summarize, the 12-1016 project reporting for cultural resources is incomplete at the present time but the aforementioned activities and actions are to be undertaken and completed. At that future time, following subsequent state and federal review activities, determinations of overall project effect will be made and issued. Best practices dictate that final review activities be undertaken for projects that are complete in order to alleviate the need for later revisions or reroutes.

Thank you for the opportunity to comment on this project. If you have any questions, please contact Fern Swenson fswenson@nd.gov at (701-328-3575), Paul Picha at (701) 328-3574 or ppicha@nd.gov, or Susan Quinnell at (701) 328-3576 or squinnell@nd.gov.

Sincerely,



Merlan E. Paaverud, Jr.
State Historic Preservation Officer (North Dakota)
and
Director, State Historical Society of North Dakota