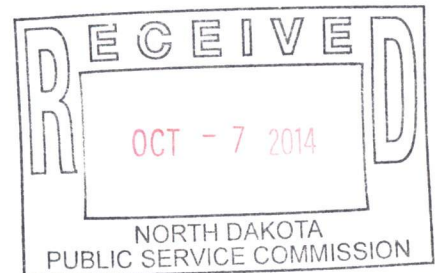


Brian R. Bjella  
100 West Broadway, Suite 250  
P.O. Box 2798  
Bismarck, ND 58502-2798  
701.223.6585  
bbjella@crowleyfleck.com

October 6, 2014



Mr. Darrell Nitschke  
Executive Director  
NORTH DAKOTA PUBLIC  
SERVICE COMMISSION  
600 E. Boulevard Avenue, Dept. 408  
Bismarck, ND 58505-0480

Dear Mr. Nitschke:

In re: Sunflower Wind Project, LLC  
Wind Energy Conversion Facility  
Stark and Morton Counties, North Dakota  
Case No. PU-14-105  
Our File No. 48-357-001

Enclosed please find for filing concurrence letters from WAPA and the State Historical Society of North Dakota regarding the Sunflower Wind Project.

Please call should you have any questions.

Very truly yours,

A handwritten signature in blue ink, appearing to read "B. R. Bjella".

BRIAN R. BJELLA

bw  
Enc.



**STATE  
HISTORICAL  
SOCIETY  
OF NORTH DAKOTA**

Jack Dalrymple  
*Governor of North Dakota*

August 29, 2014

North Dakota  
State Historical Board

Mr. David W. Kluth  
Department of Energy  
WAPA

Calvin Grinnell  
*New Town - President*

South Dakota Maintenance Office  
200 4<sup>th</sup> Street SW  
Huron, SD 57350-2474

A. Ruric Todd III  
*Jamestown - Vice President*

Margaret Puetz  
*Bismarck - Secretary*

ND SHPO REF: 13-1244A WAPA /ND Public Service Commission (PSC Case No. PU-11-601) "Addendum to the Sunflower Wind Project: A Class III Intensive Cultural Resource Inventory and Architectural Visual Impact Inventory in Morton and Stark Counties, North Dakota" and "Sunflower Wind Farm Traditional Cultural Properties Survey in Morton and Stark Counties, North Dakota" -

Albert I. Berger  
*Grand Forks*

Gereld Gemtholz  
*Valley City*

Dear Mr. Kluth,

Diane K. Larson  
*Bismarck*

We reviewed ND SHPO REF: 13-1244A WAPA /ND Public Service Commission (PSC Case No. PU-11-601) Sunflower Wind Project, and concur with your "No Historic Properties Affected" determination provided sites 23MO1379 and 32MO1422, are avoided by the project, and that 32MO1379 has its boundaries verified prior to construction.

Chester E Nelson, Jr.  
*Bismarck*

Sara Otte Coleman  
*Director  
Tourism Division*

Thank you for the opportunity to review this project. If you have any questions please contact Paul Picha, Chief Archaeologist (701) 328-3574 or Susan Quinnell, Review and Compliance Coordinator at (701) 328-3576, e-mail [squinnell@nd.gov](mailto:squinnell@nd.gov)

Kelly Schmidt  
*State Treasurer*

Alvin A. Jaeger  
*Secretary of State*

Sincerely,

Mark Zimmerman  
*Director  
Parks and Recreation  
Department*

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

Grant Levi  
*Director  
Department of Transportation*

Merlan E. Paaverud, Jr.  
*Director*

*Accredited by the  
American Alliance  
of Museums since 1986*



**Department of Energy**  
Western Area Power Administration  
South Dakota Maintenance Office  
200 4th Street SW  
Huron, SD 57350-2474

August 26, 2014

Ms. Susan Quinnell  
Review & Compliance Coordinator  
ND State Historic Preservation Office  
State Historical Society of North Dakota  
North Dakota Heritage Center  
612 East Boulevard Avenue  
Bismarck, ND 58505-0830

RE: Sunflower Wind Farm, (ND SHPO REF: 13-1244 WAPA)

Dear Ms. Quinnell,

Western Area Power Administration (Western), a power-marketing agency of the Department of Energy, has received a request to interconnect the proposed Sunflower Wind Farm with Western's transmission system along its existing Dickinson to Mandan 230-kV transmission line, near Hebron, North Dakota.

In consideration of the effects of this undertaking on cultural resources as per 36 CFR 800.4(b), an intensive Level III cultural resource inventory of the project area was completed by Beaver Creek Archaeology (BCA). It is my understanding that a representative of BCA provided your office with a copy of their cultural resource inventory report titled "*Addendum to the Sunflower Wind Project: A Class III Intensive Cultural Resources Inventory and Architectural Visual Impact Inventory in Morton and Stark Counties, North Dakota.*" In addition, Renegade Services (RS) also conducted a tribal cultural survey within the project area and produced the enclosed report titled, "*Sunflower Wind Farm Traditional Cultural Properties Survey in Morton and Stark Counties, North Dakota.*" These reports are for your review and comment.

Western's Regional Preservation Officer (RPO) has reviewed the above BCA report and provides the following determinations:

Prehistoric lithic scatter 32MO1379 has not been evaluated for listing in the National Register of Historic Places (NRHP). Avoidance of the site with a 50-foot buffer is recommended. The buffer should be verified by an archaeological monitor prior to any construction activity.

Site 32MO1422 consists of an isolated stone feature (cairn) comprised of four stones and has not been evaluated for listing in the NRHP. No artifacts were associated with the feature and its significance as a historic property is questionable; however, avoidance and a 50-foot buffer, verified by a monitor, are recommended.

Historic sites 32MO1415 and 32MO1416, and prehistoric isolated finds 32MOx556, 32MOx557, 32MOx558, 32MOx559, 32MOx560, 32MOx561, 32MOx562, 32SKx376, and 32SKx378 have been determined ineligible for listing on the NRHP.

In addition, prehistoric lithic scatter 32MO1421 and prehistoric isolated finds 32MOx553 and 32MOx554 are located within the project area; however, these three sites have been previously determined ineligible for listing on the NRHP and as such were not resurveyed by BCA.

Western's RPO has also reviewed the RS report and provides the following determinations:

The RS survey did not locate any new cultural sites or features that were distinct from those identified by BCA. RS has agreed with all the recommendations provided by BCA as listed above; Therefore, Western's determinations as described above shall remain the same.

Western asks that the ND SHPO review the reports provided by BCA and concur with the National Register (NR) eligible determinations described above. In addition, Western asks that you concur with the general avoidance stipulations identified above, at the top of page 23 in the BCA report, and reiterated in the RS report. If these stipulations are met by the developer, Western proposes a finding of "**No Historic Properties Affected**" for the Sunflower Wind project.

Additional construction work is not anticipated outside of those areas surveyed and described in the cultural resource reports provided to your office. If additional areas are to be impacted by construction activities, the developer shall insure that these areas are surveyed for cultural resources prior to any construction activities per 36 CFR 800.4.

For cultural resource questions related to the project, please contact David Kluth, Western's Regional Preservation Officer, at (605) 353-2519 or [kluth@wapa.gov](mailto:kluth@wapa.gov).

Sincerely,



David W. Kluth  
Regional Preservation Officer

Enclosure.