

Attn: Jerry Lein
600 E. Boulevard, Dept. 408
Bismarck, ND 58505-0480



Submittal via email to ndpsc@nd.gov
Case Number: PU-14-105

Re: Sunflower Wind Project – Comments to Carlson McCain “As-Built Construction Inspection Report

Dear Mr. Lein,

The Sunflower Wind Project has completed final restoration activities per the requirements set forth in the ND-03_Sunflower_PSC_2014-05-19_Certification of Provisions. The EPC contractor has fully demobilized and the project has been turned over to the onsite operations team.

The remaining activities consist of an 18-month warranty on workmanship by the EPC, the facilitation of vegetation growth throughout the site, and the monitoring (and replanting if necessary) of planted trees per the tree and shrub guidelines.

As documented in the As-Built Construction Inspection Report dated July 31, 2017 by Carlson McCain they identified the following issues to be resolved and recommends that the Commission request the following documentation:

- 1. Monitor grassland revegetation efforts to ensure adequate ground cover for erosion control**
- 2. Monitor tree planting. Replace unsuccessful plantings.**

Sunflower’s response:

1. Due to unusually dry conditions, revegetation of reclaimed areas has not been as successful as expected. During the week of September 20, 2017, the Project remobilized a site restoration team tasked with repairing select minor road washouts and replanting areas that were disturbed during construction which have shown limited signs of seed germination. With the recent increased rainfall, the Project expects these areas to successfully germinate. In the spring, the site will again be inspected to ensure adequate growth has occurred.

2. The PSC approved the Project’s Tree and Shrub Mitigation Plan for the planting of 1,406 trees/shrubs that were planted in the spring of 2017. Per specification number 15 of the Tree and Shrub Mitigation Plan, “The first annual inspection must be at least one year from the anniversary date of the original plantings.” Therefore, the project will complete the first inspection in June of 2018. Based on the unseasonably dry conditions, the Project and landowners have watered the trees/shrubs when possible. Though these efforts were helpful, many of the tree/shrubs do not appear to have survived. Thus, the Project is proactively working with the Stark Billings Soil Conservation District to explore replanting options to ensure the Project achieves a survival rate of 75% at the end of year 3 per the Tree and Shrub Mitigation Plan guidelines.

In the following pages, you will find site photos from our September restoration activities documenting current vegetation growth, soil stabilization, access road improvements, storm water management and reseeded efforts. The Project will also support the reclamation and revegetation inspection next year to be completed by Carlson McCain.

The Project believes the steps listed above will successfully meet the Commissions Guidelines and close-out the construction portion of the Sunflower Wind Project.

If you should have any further questions, please feel free to contact me at information below.

Sincerely,

A handwritten signature in blue ink that reads "Aron Anderson".

Aron Anderson
Senior Project Manager
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612-599-4251

CC:

Jerry Lein
Evelyn Carpenter
Jon Johnson
Pat Caramante









