



December 17, 2019

Ms. Claudia Berg
State Historic Preservation Officer
State Historical Society of North Dakota
North Dakota Heritage Center
612 East Boulevard Avenue
Bismarck, ND 58505-0830

RE: ONEOK Bakken Pipeline, L.L.C.
Tioga Lateral Pipeline Project, Williams County, North Dakota
Request for Cultural Review of NDPSC-Regulated Project

Dear Ms. Berg,

ONEOK Bakken Pipeline, L.L.C. (ONEOK) plans to construct the Tioga Lateral Pipeline Project (Project) consisting of approximately 75 miles of 16-inch-diameter new steel pipeline to transport natural gas liquids (NGLs). The Project originates at the Hess Corporation's Tioga Gas Processing Plant and terminates at an interconnection with ONEOK's Stateline to Riverview NGL pipeline, all located within in Williams County, North Dakota. Construction will begin as early as March 2020 and will be completed in the fourth quarter of 2020. After construction is complete, restoration/reclamation of the right-of-way will continue as necessary. The Project is regulated by the North Dakota Public Service Commission (NDPSC). ONEOK filed its Application for a Corridor Certificate and Route Permit with the NDPSC on November 25, 2019 (PU-19-368).

ONEOK contracted with Beaver Creek Archaeology, Inc. (BCA) to conduct the Class I and III cultural resource investigations for the Project. BCA surveyed a generally 300-foot-wide corridor along the pipeline route and routing variations, for a total survey area of 3,385 acres. Of the 3,385-acre survey area, 1,405 acres had been previously inventoried; therefore, a total of 1,980 acres were covered by the current undertaking. A total of 9 newly identified cultural resources and 23 previously recorded archaeological sites, site leads, and isolated finds were investigated.

Subsequently, ONEOK refined the Project route and defined a Project Area of Potential Effect (APE) for direct effects as a 75-foot wide construction right-of-way (ROW) and extra temporary workspaces with a maximum excavation depth of 10 feet (see attached map set of the APE). Of the 32 cultural resources encountered, 17 sites are within, or immediately adjacent to, the Project APE. ONEOK has routed around unevaluated sites and afforded each site a 100-foot-wide buffer to avoid impacts, where possible. However, nine unevaluated archaeological sites are within areas where it is not feasible to fully avoid sites during Project construction by the recommended 100-foot-wide buffer. At these sites, exclusion fencing would be installed along the edge of workspace to prohibit inadvertent impacts to the site during construction.

The following table lists the 17 sites with the potential to be affected by the APE, National Register of Historic Places (NRHP) recommendations, as well as avoidance recommendations, where applicable. An aerial map set depicting the APE and site distribution is enclosed for your review.

ONEOK, Inc.
100 West Fifth Street
Tulsa, OK 74103
www.oneok.com

Site ID#	Description	NRHP Status	Avoidance Recommendation
32WI2365	Prehistoric – Stone Feature	Unevaluated	Install fencing along the edge of construction workspace
32WI924	Architectural – Bridge	Not Eligible	No avoidance
32WIx662	Historic – Isolated Find	Not Eligible	No avoidance
32WI2364	Historic – Abandoned Farmstead	Not Eligible	No avoidance
32WI2401	Historic – Stone Feature	Unevaluated	Install fencing along the edge of construction workspace
32WI2400	Prehistoric – Stone Feature	Unevaluated	Install fencing along the edge of construction workspace
32WI1737	Historic – Abandoned Farmstead	Not Eligible	No avoidance
32WIx482	Historic – Site Lead; Quarry/Mine	Unevaluated	No avoidance
32WI1736	Architectural – Abandoned Homestead	Not Eligible	No avoidance
32WI1733	Prehistoric – Stone Feature	Unevaluated	Install fencing along the edge of construction workspace Monitors required on-site during all earth moving activities
32WI1732	Prehistoric – Stone Feature	Unevaluated	Install fencing along the edge of construction workspace Monitors required on-site during all earth moving activities
32WI1731	Prehistoric – Stone Feature	Unevaluated	Install fencing along the edge of construction workspace
32WIx691	Prehistoric – Isolated Find	Not Eligible	No avoidance
32WI967	Prehistoric – Stone Feature	Unevaluated	Install fencing along the edge of construction workspace
32WI2216	Prehistoric – Stone Feature	Unevaluated	Install fencing along the edge of construction workspace
32WI2402	Prehistoric – Stone Feature	Unevaluated	Install fencing across the construction workspace upstream/downstream of site Monitors required on-site during all earth moving activities
32WI1202	Architectural – Abandoned Farmstead	Not Eligible	No avoidance

The following avoidance measures are proposed for each unevaluated site (see attached map set of avoidance measures):

- Site 32WI2365: As the site is within 85 feet of the APE, ONEOK proposes to install fencing along the edge of construction workspace to restrict access beyond the fence.
- Site 32WI2401: As the site is within 50 feet of the APE, ONEOK proposes to install fencing along the edge of construction workspace to restrict access beyond the fence.
- Site 32WI2400: As the site is within 79 feet of the APE, ONEOK proposes to install fencing along the edge of construction workspace to restrict access beyond the fence.

- Site 32WI1733: The site is within 12 feet of the APE. ONEOK is constricted by adjacent utilities and other environmentally sensitive areas that preclude a greater avoidance buffer. Therefore, ONEOK is proposing to install fencing along the edge of construction workspace to restrict access and an archeological monitor would be on-site during all earth moving activities.
- Site 32WI1732: The site is within 18 feet of the APE. ONEOK is constricted by adjacent utilities and other environmentally sensitive areas that preclude a greater avoidance buffer. Therefore, ONEOK is proposing to install fencing along the edge of construction workspace to restrict access and an archeological monitor would be on-site during all earth moving activities.
- Site 32WI1731: As the site is within 47 feet of the APE, ONEOK proposes to install fencing along the edge of construction workspace to restrict access beyond the fence.
- Site 32WI967: ONEOK has narrowed the workspace width in order to maintain the widest buffer possible, however, the site is still within 79 feet of the APE. ONEOK proposes to install fencing along the edge of construction workspace to restrict access beyond the fence.
- Site 32WI2216: As the site is within 33 feet of the APE, ONEOK proposed to install fencing along the edge of construction workspace to restrict access beyond the fence.
- Site 32WI2402: The site boundary is within 12.5 feet of the proposed centerline. Due to environmental constraints north of the centerline, i.e., wetland and a collocated pipe south of the centerline, ONEOK is unable to maintain the recommended buffer between the site boundary and the proposed centerline and is therefore proposing to complete a Horizontal Direction Drill (HDD) to keep the centerline and all workspace outside the site boundary. ONEOK will install fencing across the entire construction workspace, both upstream and downstream of the site, to prohibit ground disturbing activities in the site vicinity. Additionally, an archeological monitor will be present during all earth moving activities.

As all significant or unevaluated resources will be avoided, we recommend that the Project will not affect significant archaeological sites and that no additional cultural resource investigations are recommended. A determination of *No Historic Properties Affected* was recommended by BCA for this Project, and ONEOK agrees with the recommendation and is seeking your review and concurrence.

The archaeological Class III survey report documenting the cultural resources survey of the Tioga Project is enclosed. Also enclosed is the Unanticipated Discoveries Plan to be implemented during construction. By this letter, ONEOK respectfully requests the State Historic Preservation Office review both documents and provide written concurrence that the proposed project would not affect properties listed on, or eligible for listing on, the NRHP. A copy of your response will be submitted to the NDPSC to be added to the Project docket.

We appreciate your assistance with this request and look forward to your timely review and comments on this Project. Should you have any questions or require additional information, please contact Kari Krause of Merjent at 612-643-5248 or Kari.Krause@merjent.com, or myself at 918-861-5372 or Beth.Ludwig@oneok.com.

December 17, 2019
Tioga Lateral Project

Sincerely,

ONEOK Bakken Pipeline, L.L.C.

A handwritten signature in blue ink, appearing to be the initials 'BM' followed by a stylized flourish.

Environmental Specialist

Enclosures: Aerial Map Set Depicting Tioga Lateral Pipeline Project Area of Potential Effect
 Aerial Map Set Depicting Proposed Avoidance Measures for Unevaluated Sites
 Tioga Lateral Pipeline Project: A Class III Cultural Resources Survey in Williams County, ND
 Unanticipated Discoveries Plan

Cc: Maddy Krumwiede and Kari Krause, Merjent



December 31, 2019

ONEOK Bakken Pipeline, LLC
100 West Fifth St
Tulsa, OK 74103

ND SHPO Ref.: 20-0151 Tioga Lateral Pipeline Project in portions of 83 sections in Williams County, North Dakota

Dear Sir or Madam,

We reviewed ND SHPO Ref.: 20-0151 Tioga Lateral Pipeline Project in portions of:

County

Williams	155N	98W	2, 7, 8, 9, 10, 11, 17, 18
Williams	155N	99W	13,14,15,16,17,18,19,20,21,22
Williams	155N	100W	4,9,10,14,15,22,23,24
Williams	155N	102W	3, 9, 10, 16, 17, 18, 19
Williams	155N	103W	21,22,23,24,26,27,28
Williams	156N	95W	5, 6, 7, 8
Williams	156N	96W	1,2,3,4,8,9,17,20,29,30
Williams	156N	97W	25,26,32,33,34,35
Williams	156N	98W	34,35
Williams	156N	100W	28,29,30,33
Williams	156N	101W	25,26,27,28,29,30,31,34,35
Williams	156N	102W	34,35,36
Williams	157N	95W	23,24,25,26,35

Williams County, North Dakota and we concur with a determination of "No Historic Properties Affected" for this project provided it takes place in the location and in the manner described in the documentation. However, the Unanticipated Discoveries Plan contains incorrect contact information for NDSHPO that needs to be updated. Page 5 should be:

Lorna Meidinger, Historic Preservation Specialist
North Dakota State Historic Preservation Office
(701) 328-2089
lbmeidinger@nd.gov

and Page 7 should be:

Andrew Clark, Chief Archeologist
North Dakota State Historic Preservation Office
(701) 328-3574
andrewclark@nd.gov

20-0151

December 31, 2019

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Thank you for the opportunity to review this project. Please include the ND SHPO Reference number listed above in further correspondence for this specific project. If you have any questions please contact Lorna Meidinger, Historic Preservation Specialist at (701) 328-2089 or lbmeidinger@nd.gov

Sincerely,

A handwritten signature in blue ink, appearing to read 'L. Meidinger', written over a faint circular stamp.

for Claudia J. Berg
State Historic Preservation Officer
(North Dakota)