



May 17, 2022

Jennifer Bring  
Atwell, LLC  
1250 E Diehl Rd, Ste 300  
Naperville, IL 60563

**ND SHPO Ref.: 22-0020 Badger Wind in portions of 49 sections in Logan and Mountrail Counties, North Dakota**

Dear Ms. Bring,

We reviewed the report for ND SHPO Ref: 22-0020 Badger Wind in portions of 49 sections in Logan and Mountrail Counties, titled "A Class III Cultural Resources Inventory for the Badger Wind Project, Logan and McIntosh Counties, North Dakota." and find this Atwell, LLC report by Elizabeth Wilk, Paul Barber, Jennifer Bring, Tanya Johnson not acceptable for the following reasons:

- NA is not the NDSHPO Reference #, the number for this project is 22-0020.
- The acreage doesn't match.
- The sections incorrect on Manuscript Data Record Form.
- The digital report pages out of order. The digital report should be identical to the hard copy.
- Delete Appendix C: Class III Archaeological Site Forms as they do not belong in the report. Re-label Appendix D as Appendix C and adjust all references.
- Page 9: Zotero citation link broken in second paragraph.
- Provide sketch map to show features, site layout, and spatial relationship to project for all sites.
- NDSHPO will have a difficult time concurring with a Not Eligible recommendation on any site without formal testing or evidence that the archaeological component of the site is destroyed. NRHP evaluation of a historical archaeology site should include a landowner history.

101 PU-22-86 Filed 06/28/2022 Pages: 2  
Exhibit 24 – Additional SHSND correspondence  
Badger Wind, LLC

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- 32LO139: Provide information collected during the current survey including photographs, mapping, artifact descriptions, ground visibility, current land use etc. Do this for all sites in report.
- 32LO163: Given the nature of the site as a dump with recent material, the ND SHPO will concur that the site is not significant. Still provide map and photographs showing current site condition.
- 32LOx73 and 32MTx111: refer to page 19 of the NDSHPO guidelines. <https://www.history.nd.gov/hp/PDFinfo/North-Dakota-SHPO-Guidelines-Manual-for-Cultural-Resource-Inventory-Projects.pdf#page=20>
- How did Atwell consider the potential for buried site potential? What efforts did Atwell take to verify that the site is truly an isolate and not the initial indicator of a larger site?

Thank you for the opportunity to review this report. If you have any questions, please contact either Andrew Clark at (701) 328-3574 or [andrewclark@nd.gov](mailto:andrewclark@nd.gov) or Lorna Meidinger, Historic Preservation Specialist at (701) 328-2089 or [lbmeidinger@nd.gov](mailto:lbmeidinger@nd.gov)

Sincerely,



*for* William D. Peterson, PhD  
State Historic Preservation Officer  
(North Dakota)

22-0020