

**Appendix G – Agency Correspondence**

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May 4, 2023

Andrew Robinson  
State Archaeologist  
Archaeology and Historic Preservation  
State Historical Society of North Dakota  
612 East Boulevard Avenue  
Bismarck, North Dakota 58505-0612

**Atwell, LLC Project No. 22007288**

**Re: Project Review under North Dakota Century Code 44-22-09 for the  
Luverne Wind Upgrade Project  
Steele County, North Dakota**

Dear Mr. Robinson,

Atwell, LLC (Atwell), was contracted by Otter Tail Power Company (OTP) to conduct a Class I literature review for the proposed Luverne Wind Upgrade Project (Project) located in Steele County, North Dakota. The Project includes replacing current wind turbine technology with longer blades and new hub and gearbox with turbine generators being refurbished at 33 wind turbine locations. The existing Luverne Wind turbines are GE 1.5 megawatt [MW] turbines with a 82.5-meter rotor diameter and a total height of 398 feet (121.25 meters), and these will be replaced with new wind turbine technology (GE 1.5 MW turbines with 97-meter rotor diameter and a total height of 128.5 meters). The existing 33 turbine locations remain the same and OTP plans to use the existing turbine structural steel towers, turbine foundations, collection/communication systems, permanent access roads, and other associated facilities whose locations will not change.

During installation of the repowering technology, existing access roads and the gravel ring around the turbines may be temporarily widened to accommodate delivery and staging of components and equipment. A temporary laydown yard will be utilized during the Repower Project. The laydown yard and all the areas where temporary access roads and construction easements will occur were previously used during initial project construction. In all cases, the planned temporary construction areas meet exclusion and avoidance area criteria.

Per the Energy Siting Conversion and Transmission Facility Siting Act (North Dakota Century Code 49-22-09), the Project is subject to review by the State Historical Society of North Dakota (SHSND). The Project



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is located on private land and would not utilize state or federal funds or permits. Therefore, Section 106 of the National Historic Preservation Act would not apply to the Project.

As such, Otter Tail Power Company contracted Atwell, LLC, to conduct cultural resources investigations for the Project in compliance with North Dakota Century Code 49-22-09. Atwell has conducted a Class I Cultural Resources Inventory for the Project. We are providing two bound copies of the final report for the Class I inventory herein for your review and concurrence.

Thank you for your assistance in this matter. If you have any questions or require additional information, please do not hesitate to contact me via telephone (517.231.2053) or by email ([mchouest@atwell-group.com](mailto:mchouest@atwell-group.com))

Sincerely,  
ATWELL, LLC

A handwritten signature in black ink that reads "M J Chouest".

Matthew Chouest, M.A., RPA  
Senior Environmental Consultant

Enclosures:

Class I Cultural Resources Inventory for the Luverne Wind Upgrade Project, Steele County, North  
Dakota