



Wade C. Mann  
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June 12, 2024

*Via Hand Delivery & Electronic Mail*

Mr. Steve Kahl  
North Dakota Public Service Commission  
600 E. Boulevard, Dept. 408  
Bismarck, ND 58505-0480  
[ndpsc@nd.gov](mailto:ndpsc@nd.gov)

In re: Cerilon GTL ND Inc.  
Cerilon GTL North Dakota Project  
Siting Application – Williams County  
Case No. PU-23-325  
OAH File No. 20230374  
Our File No. 201121-000004

Dear Mr. Kahl:

I am writing on behalf of Cerilon GTL ND Inc. (“Cerilon”) to provide additional information regarding cultural resource reporting for the project and to further clarify the filings that have been submitted to date.

Cerilon’s initial Class III Cultural Resources Inventory report was submitted to NDSHPO on April 6, 2023. The initial report has been filed in this case as Docket No. 7 (Bates No. 000514-000585). The NDSHPO replied on May 4, 2023, requesting additional information be added to the report: additional justification for a “not eligible” recommendation, the project’s intent/purpose and that the report expressly note that the Public Service Commission is the lead agency on the project. Docket No. 23.2 (Bates No. 000586). Cerilon submitted a revised report to NDSHPO on May 30, 2023. NDSHPO replied on June 30, 2023, request three additional items be revised in the report: language consistency with NDSHPO standard terminology, an incorrect reference number, and additional project information regarding disturbance and construction near site 32WI1367, the Buford-Trenton Irrigation Canal. The June 30, 2023 letter is enclosed for filing and is marked as Bates No. 000821. A revised report was submitted to NDSHPO on October 12, 2023 that addressed these requests and is located in the case as Docket No. 23.2 (Bates No. 000587-000658). On November 3, 2023, the NDSHPO determined there are no significant sites affected by the Project, provided that site 32WI1367 is avoided. This November 3<sup>rd</sup> letter is docketed in the case as Docket No. 23.2 (Bates No. 000659). Also on November 3, 2023, the NDSHPO issued a second letter determining that Cerilon’s Class III Cultural Resources Inventory report was acceptable. The second November 3, 2023 NDSHPO letter is enclosed for filing and is marked as Bates No. 000822.

BILLINGS BISMARCK BOZEMAN BUTTE CASPER CHEYENNE HELENA KALISPELL MISSOULA SHERIDAN WILLISTON

C R O W L E Y F L E C K . C O M

28 PU-23-325 Filed 06/12/2024 Pages: 4  
Cultural Resource Filing  
Cerilon GTL ND Inc.  
Wade Mann, Crowley Fleck, PLLP

Cerilon 000819

50 PU-23-325 Filed 06/19/2024 Pages: 4  
Exhibit 16 - ND SHPO Supplemental Agency Correspondence Dated 06/30/23, 11/03/23 (Dkt. #28)  
Cerilon GTL ND Inc.

Please feel free to contact me if you have any questions. Thank you.

Sincerely,



Wade C. Mann

WCM/lh

Enc.

|     |                   |                    |                  |             |
|-----|-------------------|--------------------|------------------|-------------|
| cc: | ALJ Hope L. Hogan | (via email & USPS) | Rochelle Harding | (via email) |
|     | John Schuh        | (via email)        | Jeff Pendrel     | (via email) |
|     | Victor Schock     | (via email)        | Erik Edison      | (via email) |
|     | Casey Furey       | (via email)        |                  |             |



June 30, 2023

Veronica Parsell  
Barr Engineering Co.  
4300 MarketPointe Dr, Ste 200  
Minneapolis, MN 58505

**ND SHPO Ref.: 23-0218 CERILON GTL in portions of [T153N R103W Sections 25 and 36] in Williams County, North Dakota**

Dear Veronica,

We reviewed the report for ND SHPO Ref: 23-0218 CERILON GTL in portions of [T153N R103W Sections 25 and 36] in William County, titled "Cerilon GTL ND Site: A Class III Cultural Resource Inventory in Williams County, North Dakota" and find this Juniper Environmental Consultanting report by Rebecca Pace and John G. Morrison needs revisions. Please address the comments below and resubmit the report.

- The report language still needs to be updated to use the State language: significant/no significant sites.
- The Manuscript Data Sheet lists the incorrect reference number, it should be 23-0218.
- The additional project information provided in the cover letter does not allow us to visualize the physical changes to the site and therefore we cannot currently evaluate all the effects on the significant property (32WI1367). How far away from this feature will there be disturbance? How far away will any new structures be built?

Thank you for the opportunity to review this report. If you have any questions, please contact either Andrew Robinson, State Archeologist, at (701) 328-3575 or [andrewrobinson@nd.gov](mailto:andrewrobinson@nd.gov) or Lorna Meidinger, Lead Historic Preservation Specialist at (701) 328-2089 or [lbmeidinger@nd.gov](mailto:lbmeidinger@nd.gov).

Sincerely,

for William D. Peterson, PhD  
Director, State Historical Society of North Dakota

Cc: John Morrison

23-0218



November 3, 2023

Veronica Parsell  
Barr Engineering Co.  
4300 MarketPointe Dr, Ste 200  
Minneapolis, MN 58505

**ND SHPO Ref.: 23-0218 CERILON GTL in portions of [T153N R103W Sections 25 and 36] in Williams County, North Dakota**

Dear Veronica,

We reviewed the report for ND SHPO Ref: 23-0218 CERILON GTL in portions of [T153N R103W Sections 25 and 36] in William County, titled "Cerilon GTL ND Site: A Class III Cultural Resource Inventory in Williams County, North Dakota" and find this Juniper, LLC report by Rebecca Pace and John G. Morrison acceptable. We will add it to our Manuscript Collection.

Thank you for the opportunity to review this report. Please be advised that acceptance of this report does not constitute concurrence with the determinations therein. If you have any questions, please contact either Margie Patton, Research Archeologist, at (701) 328-3576 or [mmpatton@nd.gov](mailto:mmpatton@nd.gov) or Lorna Meidinger, Lead Historic Preservation Specialist, at (701) 328-2089 or [lbmeidinger@nd.gov](mailto:lbmeidinger@nd.gov).

Sincerely,

for William D. Peterson, PhD  
Director, State Historical Society of North Dakota

Cc: John Morrison

23-0218