



June 20, 2025

Badger Wind, LLC.
401 North Michigan Avenue, Suite 501
Chicago, Illinois 60611**Re: Summary Memo: Class III Archaeological Survey for the Badger Wind Project Spring 2025 Expansion Areas (4/21/25 Fieldwork), Logan and McIntosh Counties, North Dakota (ND SHPO Reference #22-0020) File R0031120.00**

Ørsted Onshore North America, LLC (Ørsted) retained Westwood Professional Services, Inc. (Westwood), to conduct an archaeological survey in Spring 2025 in continuing support of developing the Badger Wind Project (Project or Project Area) in Logan and McIntosh counties, North Dakota (**Areas A, B, and C; Exhibit 1 and Exhibit 2**). This fieldwork is an addendum to previous cultural resource work conducted by Westwood (Glaab 2024a and 2024b). The North Dakota State Historic Preservation Office (ND SHPO) requires that cultural resource investigations be conducted by qualified archaeologists who meet the Secretary of the Interior's qualifications as outlined in 36 C.F.R. 61. Westwood archaeologist Rigden Glaab, MA, RPA, who meets these standards and is permitted to work in North Dakota, performed all archaeological fieldwork of the Spring 2025 Project Areas. Ryan Grohnke, RA, served as Cultural Resource Manager for the Project facilitating client interactions and budget management. This summary memo is being provided to Ørsted and ND SHPO to discuss the results of Westwood's Spring 2025 survey. The Project is being conducted at a state-level review to meet the requirements of the Public Service Commission (PSC) as part of the Certificate of Site Compatibility (Site Permit) required under the North Dakota Energy Conversion and Transmission Facility Siting Act.

The cultural resource survey was completed to comply with state permitting requirements. The archaeological survey was conducted within the Area of Potential Effects (APE) of the Project as currently designed. The APE of Spring 2025 areas consists of locations of potential ground disturbance including the proposed expansion of corridors and roads. The APE surveyed by Westwood in April of 2025 is 31 acres. The legal location for the Project is described in **Table 1** below.

Table 1: Legal Location of Areas Inventoried for the Badger Project (Westwood Survey 4/21/25)

Township	Range	Section	County
132 N	71 W	27 and 28	McIntosh
132 N	72 W	11	McIntosh
133 N	71 W	35	Logan

The Project Area has been the subject of several cultural resource literature reviews from 2020 to present on behalf of Ørsted (Bring and Freshwater 2021; Ferriman and Thurman 2022; Thurman and Weston 2022; Wilk et al. 2022). These reviews led to Project-related archaeological fieldwork during five separate surveys (Ferriman and Thurman 2022; Glaab 2024a and 2024b; Thurman and Weston 2022; Wilk et al. 2022). The cumulative effort of the associated literature reviews identified 18 previous inventories, one isolated find, 21 archaeological sites, and one site lead within the overall Project boundary and one-mile buffer. In addition, 578 architectural resources have been identified principally concentrated in the town of Wishek, North Dakota. Ørsted used these data to create the layout, which avoids all known resources in the APE (**Exhibit 1** and **Exhibit 2**). The locations of the Spring 2025 survey areas fall within the boundary of the larger, earlier file searches. There are no previously recorded archaeological sites present in the Spring 2025 areas reviewed for the Project.

Westwood recently performed fieldwork for the Project from 2023 to 2024 (Glaab 2024a and 2024b). Westwood archaeologists identified a total of one new historic site (32LO174) and one new isolated prehistoric find (32LOX76) in the Project APE. Site 32LO174 is a historic farmstead consisting of three structure foundations and associated trash from the 1940s through the 1970s. Isolated Find 32LOX76 is a prehistoric, utilized flake made from Knife River flint (KRF). A second piece of KRF shatter was identified to the northwest of the utilized flake. These resources were recommended *Not Eligible* for inclusion in the National Register of Historic Places (NRHP). No further avoidance measures are recommended on behalf of Ørsted. Westwood received a concurrence letter for these recommendations from the North Dakota SHPO on April 11, 2024 (Reference No. 22-0020).

Updated File Search (June 18, 2025)

On June 10, 2025, Westwood received a letter from the ND SHPO requesting that an updated file search be performed for the three new areas (A, B, and C) associated with the April 21, 2025, survey. The updated file search was conducted by Rigden Glaab, MA, RPA, on June 18, 2025, at the ND SHPO. This review studied a one-mile buffer surrounding each of the three locations (**Areas A, B, and C; Exhibit 1** and **Exhibit 2**). There is one isolated find (32MTx111) and two sites (32MT43 and 32MT450) in the buffer surrounding Area A, which has also been crossed by nine previous cultural resource inventories (**Table 2**). One isolated find (32LOx73) and three sites (32LO33, 32LO110, and 32MT74) are in the buffer of Area B. Seven previous cultural resource surveys cross this location (**Table 3**). Area C has a total of one cultural resource (32MT74) and eight previous cultural resources in its corresponding one-mile buffer (**Table 4**). The cultural sites present in the one-mile buffers of Areas A, B, and C include precontact (e.g., lithic scatters) and postcontact (e.g., railroads, farmsteads) resources. Identified cultural resource inventories were performed for a range of services such as wind development, waterline placement, and transportation projects. *No cultural resources were identified in the direct APE of Areas A, B, and C based on the file search performed by Westwood on June 18, 2025.*

Table 2: Previous Cultural Resource Inventories (One-Mile Buffer, Area A)

Year	Manuscript	Title	Author(s)*
2003	MS 8712	Highways 3 and 13: A Class III Cultural Resource Inventory, McIntosh County, ND	Bluemle, William J. - PA
2013	MS 11407	Logan-McIntosh-Emmons Phase 4 Expansion Project Rural Distribution Lines 2013 Class II-III Cultural Resources Inventories, South Central Regional Water District, North Dakota	Jackson, Carrie F. - CA; Jackson, Michael A. - PA; Rokke, Nathan J. - CA; Toom, Dennis L. - CA; Whitman, Madisson L. - CA
2020	MS 19125	Class III Cultural Resource Survey, Upper Missouri River Basin, North Dakota	Harrell, Bryan - CA; Piscitelli, Matthew - PA
2021	MS 19623	Class I Literature Review and Class II Architectural Reconnaissance Inventory for the Proposed Badger Wind Project in Logan and McIntosh Counties, North Dakota	Ball, Robert - CA; Dickerson, John - PA
2022	MS 19753	A Class III Cultural Resources Inventory for the Badger Wind Project, Logan and McIntosh Counties, North Dakota	Barber, Paul - CA; Bring, Jennifer - CA; Johnson, Tanya - CA; Wilk, Elizabeth - PA
2022	MS 19764	2022 Intensive Cultural Resource Inventory of Targeted Components of the Ørsted North America, Inc., Badger Wind Project Logan and McIntosh Counties, North Dakota	Thurman, Morgan - PA; Weston, Jason D. - CA
2024	MS 20452	Class III Archaeological Survey Badger Wind Project - 2023 Expansion Areas Logan and McIntosh Counties, North Dakota	Glaab, Rigden A. - PA
2024	MS 20516	Class III Archaeological Survey for the Badger Wind Project 2023 Expansion Areas (Addendum Spring 2024 Fieldwork), Logan and McIntosh Counties, North Dakota	Glaab, Rigden A. - PA
2024	MS 20726	Class III Archaeological Survey for the Badger Wind Project 2023 Expansion Areas (Addendum Fall 2024 Fieldwork), Logan and McIntosh Counties, North Dakota	Glaab, Rigden A. - PA

* PA = Primary Author, CA = Contributing Author

Table 3: Previous Cultural Resource Inventories (One-Mile Buffer, Area B)

Year	Manuscript	Title	Author(s)*
2013	MS 14807	May 5th Material Source Area: A Class III Cultural Resource Inventory in McIntosh & Logan Counties, North Dakota	McCann, Eric - PA
2015	MS 15855	2014 Survey Report Addendum: Logan-McIntosh-Emmons Expansion Area 2014 Supplemental Class II-III Rural Distribution Lines Cultural Resources Inventory, South Central Regional Water District, Emmons, Logan, and McIntosh Counties, North Dakota. SCWD Contract No 2013-3	Jackson, Michael A. - PA
2016	MS 17239	CNOB-CNOC-CNOA-2417(051) PCN 21047 41st Ave SE Improvements: A Class III Cultural Resource Inventory in Logan County, North Dakota	Pfennig, Kelene - CA; Yates, Corey - PA
2021	MS 19623	Class I Literature Review and Class II Architectural Reconnaissance Inventory for the Proposed Badger	Ball, Robert - CA; Dickerson, John - PA

		Wind Project in Logan and McIntosh Counties, North Dakota	
2022	MS 19753	A Class III Cultural Resources Inventory for the Badger Wind Project, Logan and McIntosh Counties, North Dakota	Barber, Paul - CA; Bring, Jennifer - CA; Johnson, Tanya - CA; Wilk, Elizabeth - PA
2022	MS 19764	2022 Intensive Cultural Resource Inventory of Targeted Components of the Ørsted North America, Inc., Badger Wind Project Logan and McIntosh Counties, North Dakota	Thurman, Morgan - PA; Weston, Jason D. - CA
2024	MS 20452	Class III Archaeological Survey Badger Wind Project - 2023 Expansion Areas Logan and McIntosh Counties, North Dakota	Glaab, Rigden A. - PA
* PA = Primary Author, CA = Contributing Author			

Table 4: Previous Cultural Resource Inventories (One-Mile Buffer, Area C)

Year	Manuscript	Title	Author(s)*
2013	MS 14407	Logan-McIntosh-Emmons Phase 4 Expansion Project Rural Distribution Lines 2013 Class II-III Cultural Resources Inventories, South Central Regional Water District, North Dakota	Jackson, Carrie F. - CA; Jackson, Michael A. - PA; Rokke, Nathan J. - CA; Toom, Dennis L. - CA; Whitman, Madisson L. - CA
2013	MS 14664	ND05 Salvage Communications Tower: A Class III Intensive Cultural Resource Inventory in McIntosh County, North Dakota	Reiners, Lindsey - PA
2021	MS 19623	Class I Literature Review and Class II Architectural Reconnaissance Inventory for the Proposed Badger Wind Project in Logan and McIntosh Counties, North Dakota	Ball, Robert - CA; Dickerson, John - PA
2022	MS 19753	A Class III Cultural Resources Inventory for the Badger Wind Project, Logan and McIntosh Counties, North Dakota	Barber, Paul - CA; Bring, Jennifer - CA; Johnson, Tanya - CA; Wilk, Elizabeth - PA
2024	MS 20452	Class III Archaeological Survey Badger Wind Project - 2023 Expansion Areas Logan and McIntosh Counties, North Dakota	Glaab, Rigden A. - PA
2024	MS 20516	Class III Archaeological Survey for the Badger Wind Project 2023 Expansion Areas (Addendum Spring 2024 Fieldwork), Logan and McIntosh Counties, North Dakota	Glaab, Rigden A. - PA
2024	MS 20726	Class III Archaeological Survey for the Badger Wind Project 2023 Expansion Areas (Addendum Fall 2024 Fieldwork), Logan and McIntosh Counties, North Dakota	Glaab, Rigden A. - PA
2024	MS 20808	MDU Transmission Line Reconstruction Project: Wishek to Merricourt, Class III Cultural Resource Inventory, McIntosh County, ND	Borchert, Jeani L. - PA
* PA = Primary Author, CA = Contributing Author			

Fieldwork Results

Spring 2025 fieldwork on the Project was carried out April 21, 2025, by Westwood Principal Investigator Rigden Glaab, MA, RPA (**Exhibit 1** and **Exhibit 2**; **Appendix A**). Pedestrian survey was utilized to examine the APE, which are locations of proposed ground disturbance (**Areas A, B, and C**). As noted above, the APE consists of the latest wind development layout as of Spring 2025 and excludes locations previously surveyed.

The methodology for the pedestrian survey involved walking the APE in parallel transects no more than 15 meters apart. If artifacts or features were observed, an intensive pedestrian survey at transects no more than five meters apart was performed over the landform to assist in delineating the site boundaries. No shovel testing was performed due to the excellent ground surface visibility (GSV) across the Project (e.g., 75–95 percent). Locations excluded from survey included wetlands, terrain with a significant slope (greater than 20 percent), and obviously disturbed areas. A total of 31 acres were surveyed during Spring 2025 fieldwork, which includes areas of corridor and road intersection changes/expansions. The Class III Intensive Archaeological Survey of the Project consisted of reviewing minor changes to the design layout that were previously surveyed by Westwood (Glaab 2024a and 2024b). *No cultural resources were identified in the APE.*

ND SHPO requested in the letter from April 21, 2025, a justification for why shovel testing was not performed adjacent to or in the direct location of Isolated Find 32LOx73. This resource, a precontact lithic flake, is *Unevaluated* for the NRHP, and is located to the southeast of Area B. Ørsted has confirmed that Area B avoids Isolated Find 32LOx73 by over 250 feet and it will *not be impacted* by the Project (**Exhibit 2**). In addition, no Project infrastructure will be developed across the location of Isolated Find 32LOx73 and there will be no impacts to this resource. *No further work is recommended by Westwood for the cultural resource survey performed in Areas A, B, and C.*

Recommendations

Westwood did not identify any cultural resources during the addendum survey of Project design changes for the Badger Wind Project in Areas A, B, and C. Fieldwork was conducted over 31 acres on April 21, 2025. Westwood has confirmed that the Project will avoid Isolated Find 32LOx73 by over 250 feet near Area B. No further work is recommended on behalf of Ørsted based on the April 21, 2025, inventory.

Westwood stresses that if construction plans are altered to include areas not previously surveyed, those locations must be examined for cultural resources. Although an archaeological survey was completed, the possibility of unidentified resources remains. If unrecorded archaeological sites are discovered during construction, all ground-disturbing activities in the area should stop and archaeologists should be contacted. Further, if human remains are encountered during construction activities, all ground-disturbing activity must cease, and local law enforcement along with professional archaeologists, must be notified.

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Sincerely,



Rigden Glaab, MA, RPA
Senior Archaeological Principal Investigator

WESTWOOD PROFESSIONAL SERVICES, INC

References Cited

Bring, J., and J. Freshwater

2021 *Badger Wind Project Class I Archaeological Literature Search*. Memorandum on file at Atwell, LLC, Boulder, Colorado.

Ferriman, C., and M. Thurman

2022 Intensive Cultural Resource Inventory of Collection Line Reroutes Associated with the Ørsted North America, Inc., Badger Wind Project in Logan County, North Dakota. Report on file at Cultural Resource Analysts, Inc., Sheridan, Wyoming.

Glaab, R.

2024a Class III Archaeological Survey for the Badger Wind Project 2023 Expansion Areas. Report on file at the North Dakota State Historic Preservation Office, Bismarck.

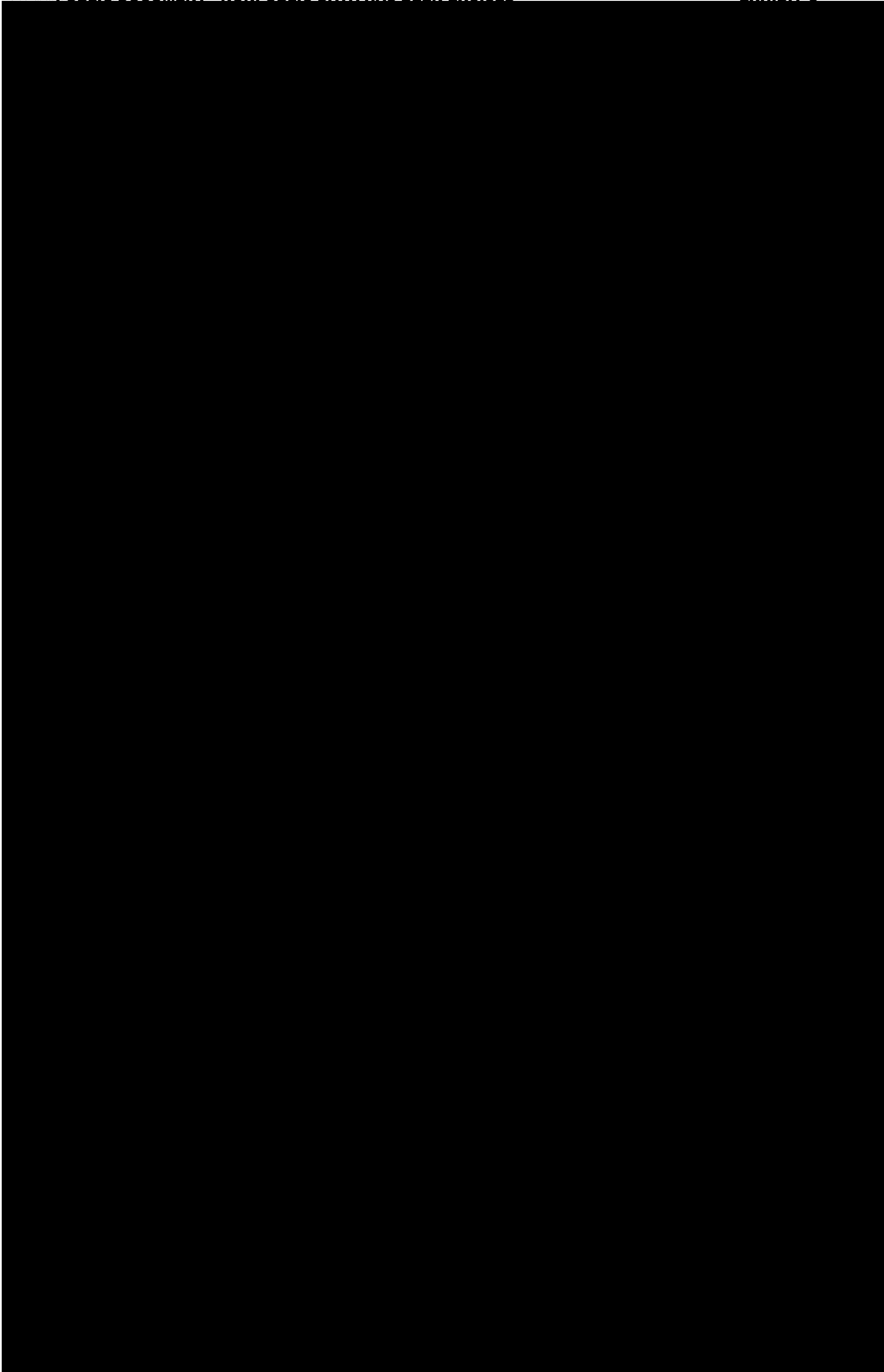
2024b Class III Archaeological Survey for the Badger Wind Project 2023 Expansion Areas (Fall and Spring 2024 Fieldwork [Two Reports]). Report on file at the North Dakota State Historic Preservation Office, Bismarck.

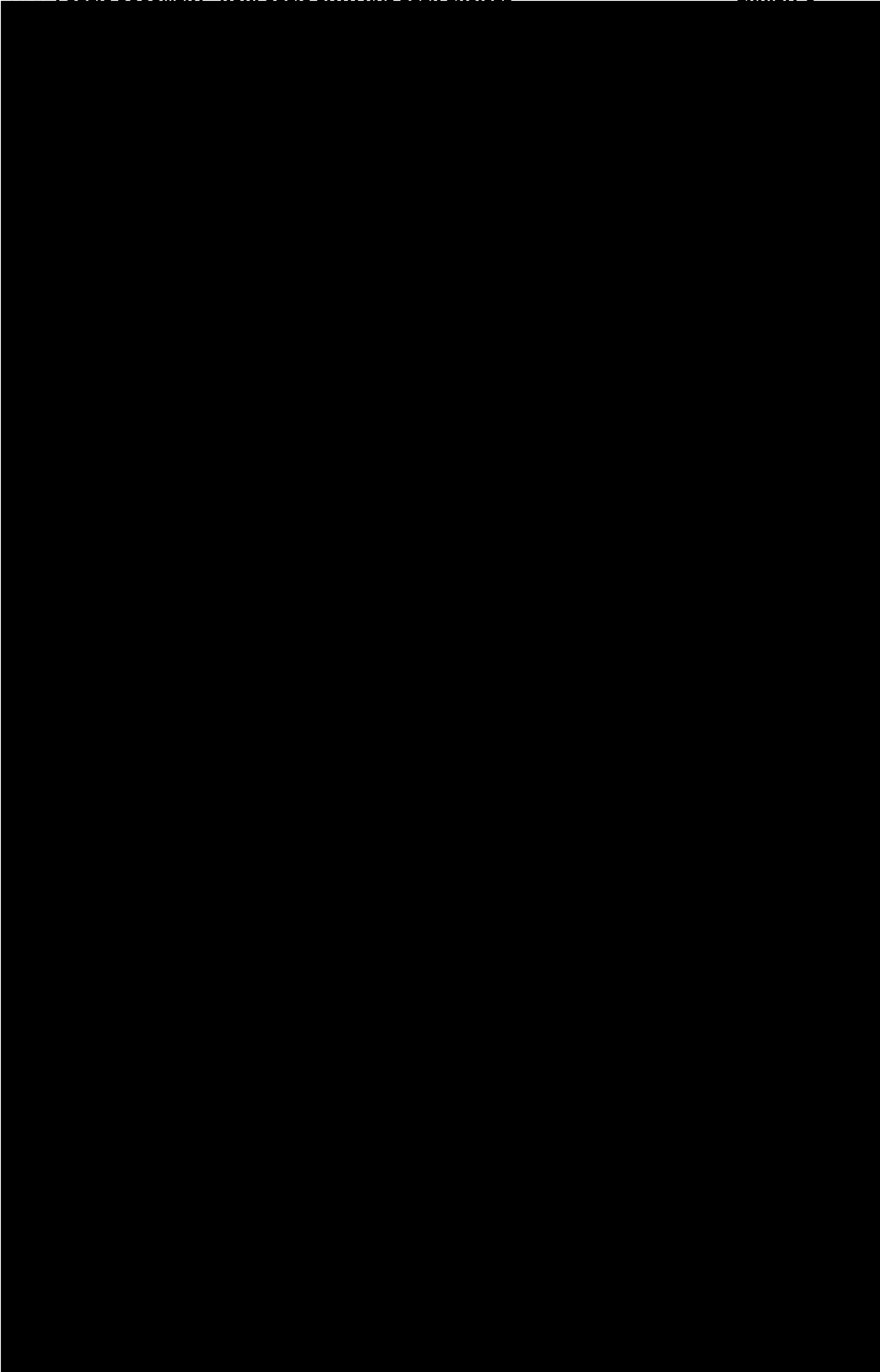
Thurman, M., and J. Weston

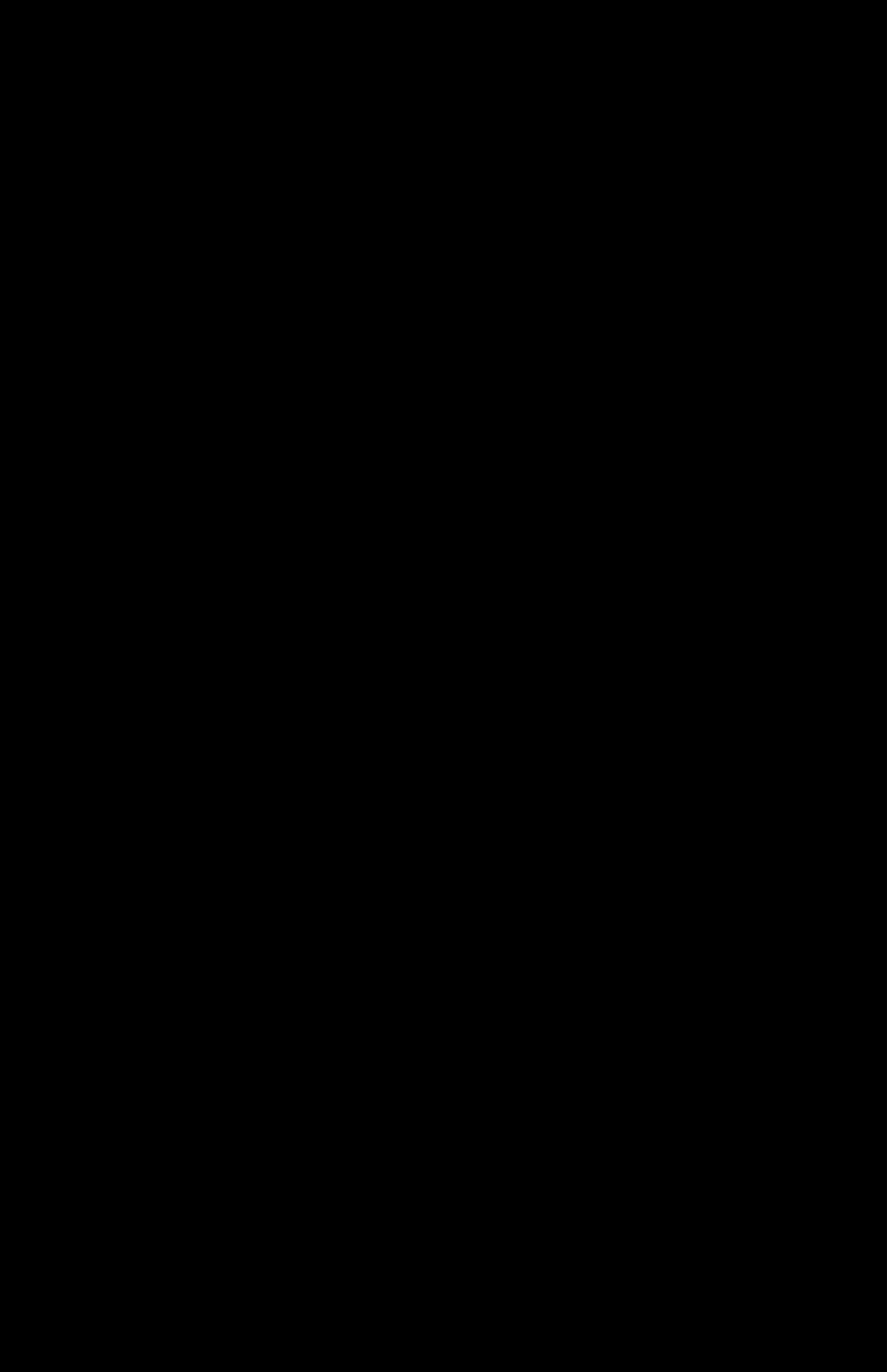
2022 2022 Intensive Cultural Resource Inventory of Targeted Components of the Ørsted North America, Inc., Badger Wind Project, Logan and McIntosh Counties, North Dakota. Report on file at Cultural Resource Analysts, Inc., Sheridan, Wyoming.

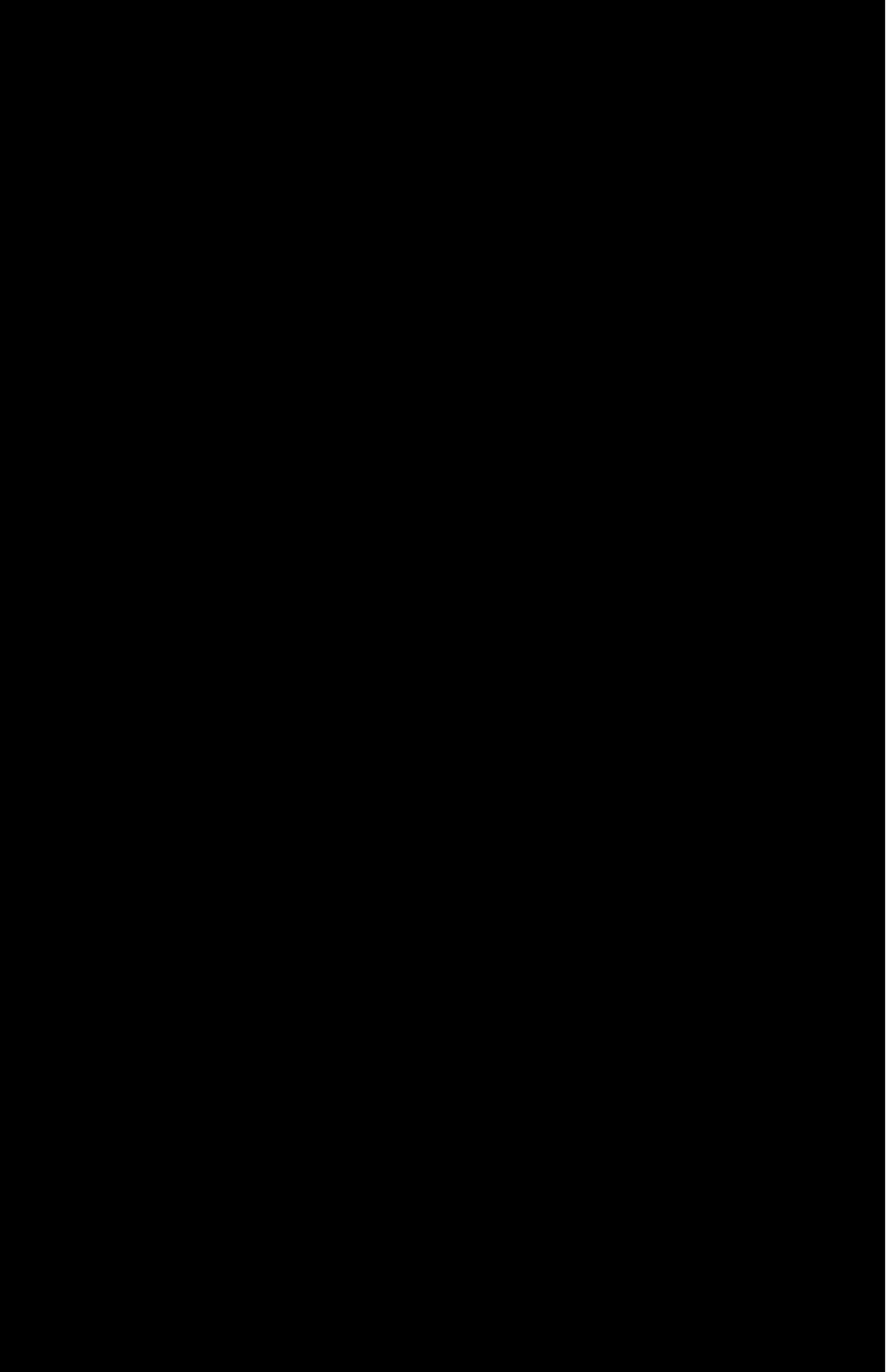
Wilk, E., P. Barber, J. Bring, and T. Johnson

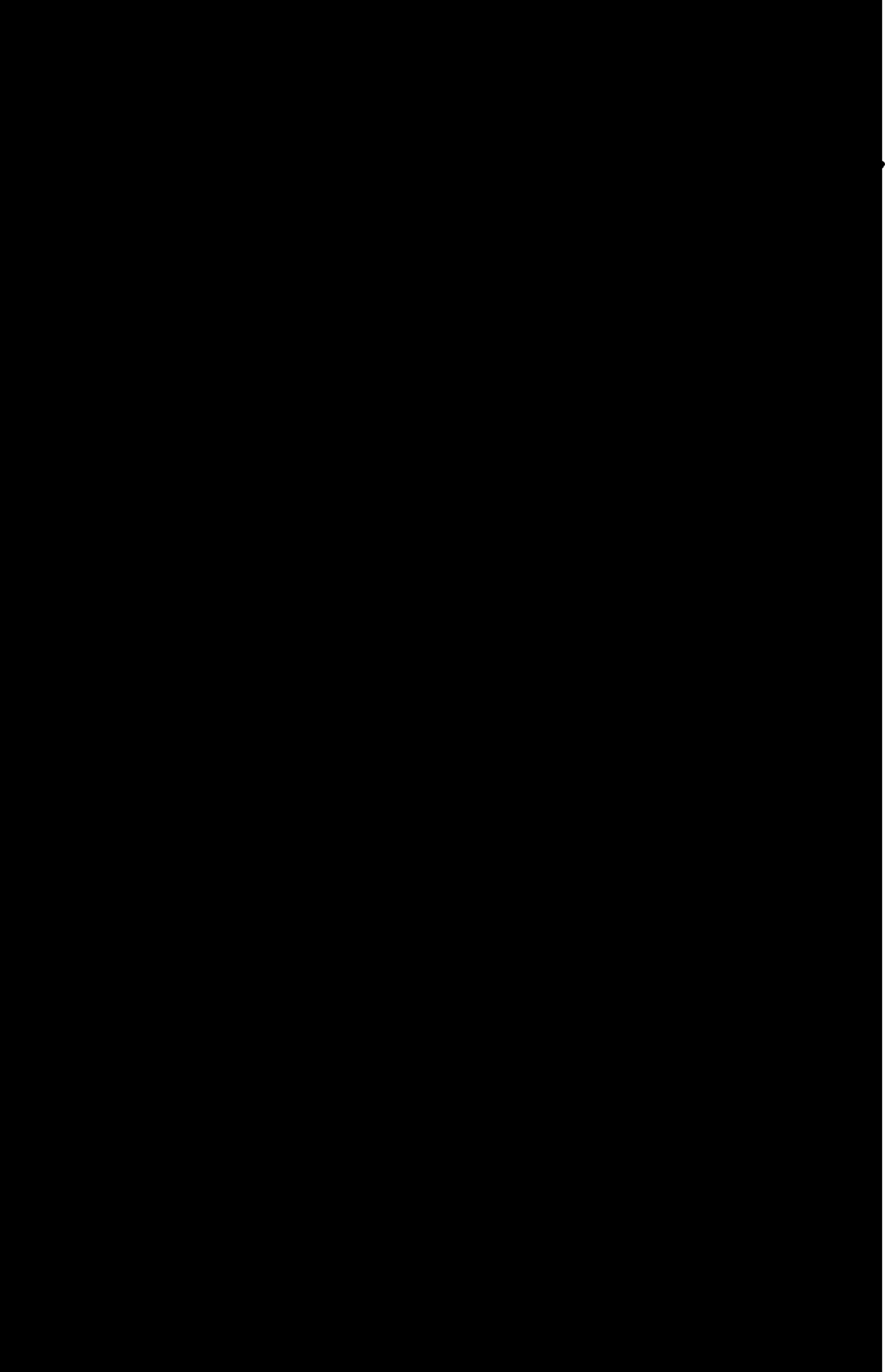
2022 A Class III Cultural Resources Inventory for the Badger Wind Project, Logan and McIntosh Counties, North Dakota. Report on file at Atwell, LLC, Boulder, Colorado.











APPENDIX A

Representative Photos of the Project Area

Badger Wind Project – Spring 2025 Expansion Areas (4/21/25 Survey)

Logan and McIntosh Counties, North Dakota



Photo 1: Overview of the western Project Area, facing north.



Photo 2: Overview of the western Project Area, facing south.



Photo 3: Overview of the central Project Area, facing south.



Photo 4: Overview of the eastern Project Area, facing south.



Photo 5: Overview of the eastern Project Area, facing northwest.