

August 21, 2025

**VIA E-MAIL AND FEDERAL EXPRESS**

Mr. Steven Kahl  
Executive Secretary  
North Dakota Public Service Commission  
600 E. Boulevard, Dept. 408  
Bismarck, ND 58505-0480

**RE: Minnesota Power, an operating division of ALLETE, Inc.  
HVDC Modernization Project – Oliver County  
Siting Application  
Case No. PU-24-381**

Dear Mr. Kahl:

Enclosed for filing in connection with the above-referenced matter are an original and four (4) copies of this letter and the following documents, submitted by Minnesota Power:

1. Certification of Daniel Gunderson, with accompanying Exhibits:
  - a. Certification Exhibit A – Comparison Map;
  - b. Certification Exhibit B – Modification Map;
  - c. Certification Exhibit C – Exclusion and Avoidance Area Review Chart;
  - d. Certification Exhibit D – Dakota Skipper Technical Memo;
  - e. Certification Exhibit E – Addendum Cultural Resources Report;
  - f. Certification Exhibit F – State Historical Society of North Dakota Letters.

A USB flash drive containing GIS data for the modified Corridor and Route is also enclosed. Electronic copies of the above-referenced documents and this letter were filed with the Commission today via e-mail.

If you have any questions, please let me know.

Sincerely,



MOLLIE M. SMITH

MMS/87179951

Enclosures

cc: Adam Renfandt (via e-mail, w/ encls.)  
Dalton Bruce (via e-mail, w/ encls.)  
Dan McCartney (via e-mail, w/ encls.)



5. Consistent with the requirements of NDCC Section 49-22-16.5(3):
  - a. As discussed in the chart attached as **Exhibit C**, construction activities associated with the access road modification will not affect any known exclusion or avoidance areas;
  - b. The modification is approximately one mile outside of the Corridor designated in the Order;
  - c. Minnesota Power will comply with the Commission's Order, laws and rules designating the Corridor and Route; and
  - d. The modification was approved (and requested) by the affected landowners, and Minnesota Power will obtain an access (driveway) permit from Oliver County to construct the access onto Highway 25.
6. Field surveys were conducted for Dakota skipper habitat within the proposed modified access road Corridor. No Dakota skipper habitat was identified and no impact to the species is anticipated. A copy of the Dakota skipper technical report for the modified Corridor is attached as **Exhibit D**
7. Minnesota Power conducted a Class III cultural resource field survey of the portions of the modified Corridor and Route not previously surveyed. A copy of Addendum 2: a Class I and Class III Cultural Resources Inventory of Minnesota Power's HVDC Modernization Project is provided as **Exhibit E**, and a copy of the acceptance letter for the report from the State Historical Society of North Dakota ("SHSND") is attached as **Exhibit F**. As discussed in the report, no cultural resource sites were identified within the modified Corridor or Route. As a result, the access road modification depicted in **Exhibits A and B** will not impact any National Register of Historic Places ("NRHP") eligible, potentially eligible, or unevaluated cultural resource sites.

FURTHER AFFIANT SAYETH NOT.

  
Daniel Gunderson

Subscribed and sworn to before me  
this 18<sup>th</sup> day of August, 2025.

  
Notary Public



**Exhibit A-**

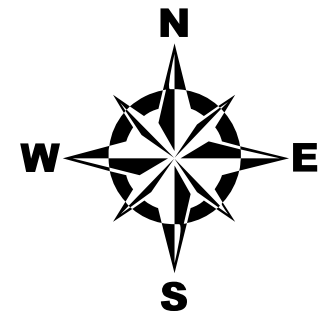
*Corridor Comparison Map*

# Minnesota Power ND HVDC Modernization: Nelson Lake Access

7/11/25

## Legend

- New/Proposed Access Route
- - - PSC Permitted Nelson Lake Access Road
- - - PSC Permitted Access Not Constructed
- ▨ Permitted Nelson Lake Substation
- HVDC Modernization PSC Permit Corridor

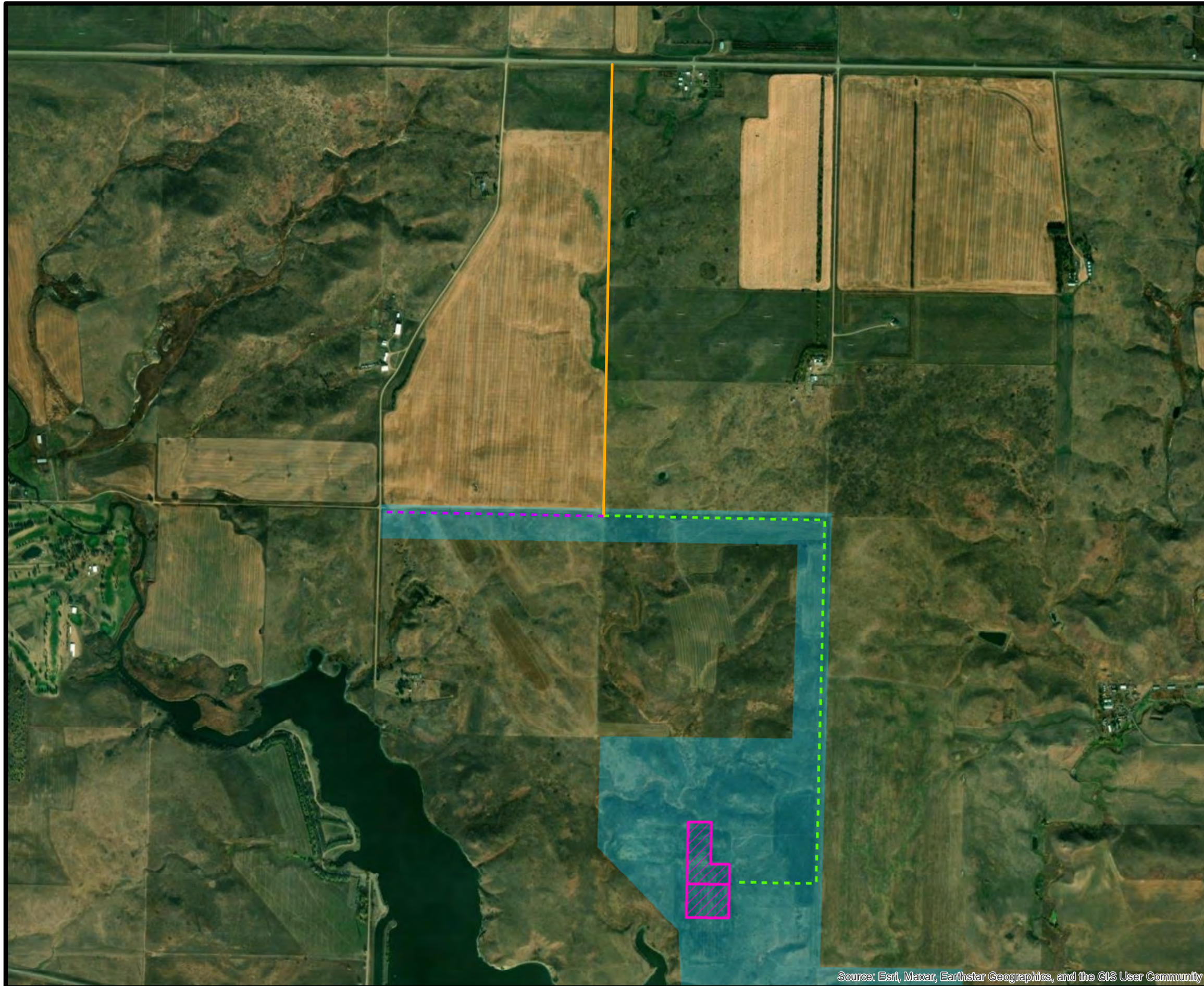


0.8

Miles



AN ALLETE COMPANY







**Exhibit B-**

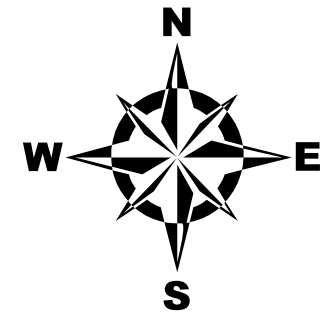
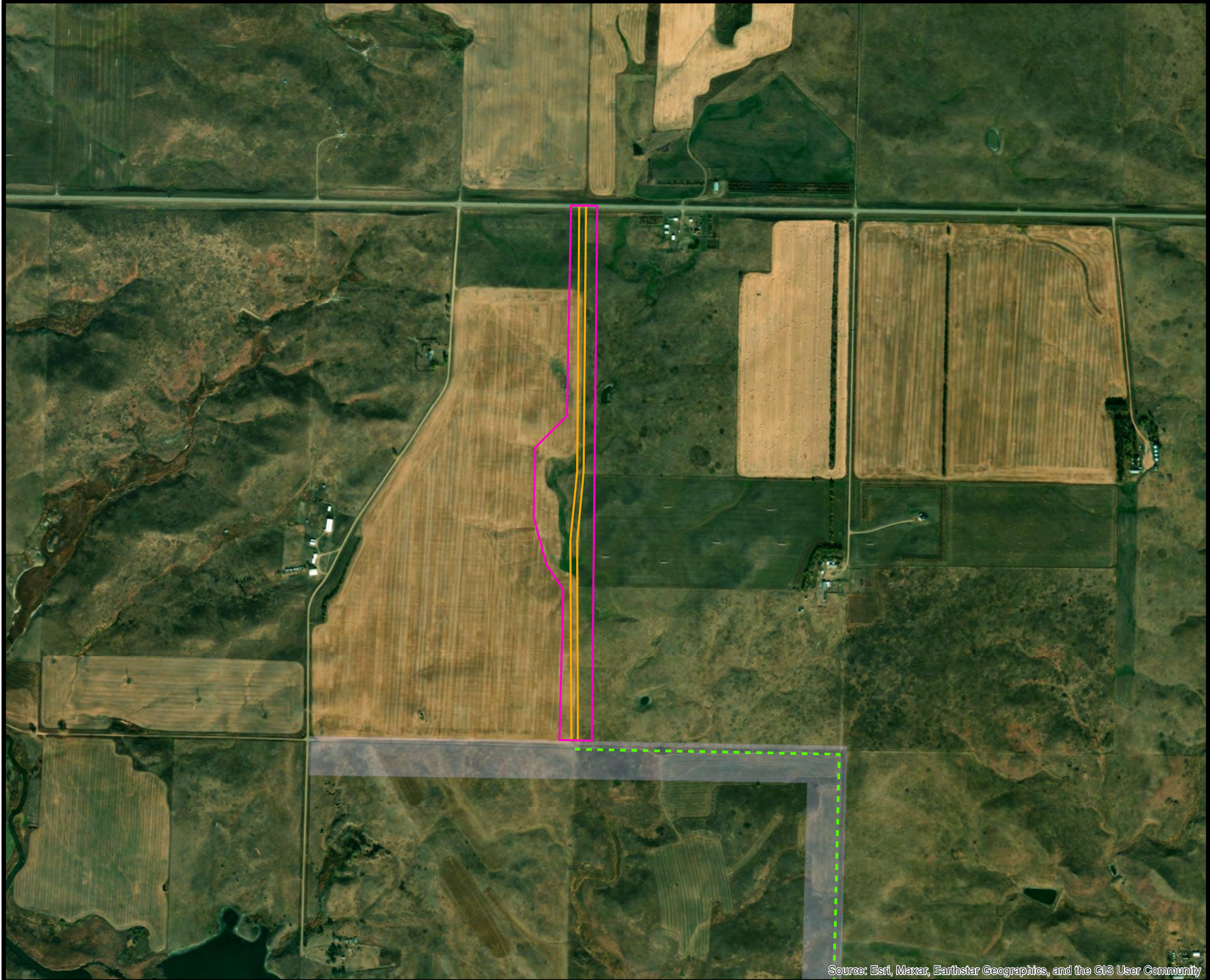
*Road Modification Map*

# Minnesota Power ND HVDC Modernization: Nelson Lake Access

7/23/25

## Legend

-  Proposed Nelson Lake Substation Access Corridor
-  Proposed Nelson Lake Access Road Route
-  Nelson Lake PSC Permit Access Road
-  Nelson Lake PSC Permit Corridor



0.7

Miles



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Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community

**Exhibit C-**

*Exclusion and Avoidance Area Review*

<b>Exclusion Areas</b>			
<b>Transmission Facility Corridor and Route</b>	<b>Present in Corridor or Route</b>	<b>Proposed Buffer</b>	<b>Reference</b>
a. Designated or registered national: parks; memorial parks; historic sites and landmarks; natural landmarks; monuments; and wilderness areas.	Not present within the Proposed Nelson Lake Substation access corridor.	No impacts are anticipated.	gishubdata-ndgov.hub.arcgis.com
b. Designated or registered state: parks; historic sites; monuments; historical markers; archaeological sites; and nature preserves.	Not present within the Proposed Nelson Lake Substation access corridor.	No impacts are anticipated.	See Arc report addendum and SHSC Concurrence
c. County parks and recreational areas; municipal parks; and parks owned or administered by other governmental subdivisions.	Not present within the Proposed Nelson Lake Substation access corridor.	No impacts are anticipated.	gishubdata-ndgov.hub.arcgis.com
d. Areas critical to the life stages of threatened or endangered animal or plant species.	Not present within the Proposed Nelson Lake Substation access corridor.	No impacts are anticipated.	Dakota Skipper technical memo
e. Areas where animal or plant species that are unique or rare to this state would be irreversibly damaged.	Not present within the Proposed Nelson Lake Substation access corridor.	No impacts are anticipated.	Dakota Skipper technical memo
f. Areas within one thousand two hundred feet of the geographic center of an intercontinental ballistic missile (ICBM) launch or launch control facility.	Not present in proximity to the Proposed Nelson Lake Substation access corridor.	No impacts are anticipated.	Not applicable.
g. Areas within 30 feet on either side of a direct line between ICBM launch or launch control facilities to avoid microwave interference.	Not present in proximity to the Proposed Nelson Lake Substation access corridor.	No impacts are anticipated.	Not applicable.

Avoidance Areas				
Transmission Facility Corridor and Route		Present in Corridor or Route	Proposed Buffer	Reference
a.	Designated or registered national: historic districts; wildlife areas; wild, scenic, or recreational rivers; wildlife refuges; and grasslands.	Not present within the Proposed Nelson Lake Substation access corridor.	No impacts are anticipated.	gishubdata-ndgov.hub.arcgis.com
b.	Designated or registered state: wild, scenic, or recreational rivers; game refuges; game management areas; management areas; forests; forest management lands; and grasslands.	Not present within the Proposed Nelson Lake Substation access corridor.	No impacts are anticipated.	gishubdata-ndgov.hub.arcgis.com
c.	Historical resources which are not specifically designated as exclusion or avoidance areas.	Not present within the Proposed Nelson Lake Substation access corridor.	No impacts are anticipated.	See Arc Report Addendum and SHSC Concurrence
d.	Areas which are geologically unstable.	Not present within the Proposed Nelson Lake Substation access corridor	No impacts are anticipated.	ndgs.maps.arcgis.com
e.	Within 500 feet of a residence, school, or place of business.	No residences, schools, or businesses are located within 500 feet of the Nelson Lake Access corridor.	No impacts are anticipated.	Not applicable.
f.	Reservoirs and municipal water supplies.	Not present within the Proposed Nelson Lake Substation access corridor.	No impacts are anticipated.	gishubdata-ndgov.hub.arcgis.com
g.	Water sources for organized rural water districts.	Not present within the Proposed Nelson Lake Substation access corridor.	No impacts are anticipated.	gishubdata-ndgov.hub.arcgis.com
h.	Irrigated land (note – this is no longer part of the siting criteria (NDCC Sec. 49-22-05.1(2))).	Not present within the Proposed Nelson Lake Substation access corridor.	No impacts are anticipated.	Not applicable.
i.	Areas of recreational significance which are not designated as exclusion areas.	Not present within the Proposed Nelson Lake Substation access corridor.	No impacts are anticipated.	Not applicable.

**Exhibit D-**

*Dakota Skipper Technical Memo*



**ENVIRONMENTAL & STATISTICAL CONSULTANTS**

4007 State Street, Suite 109, Bismarck, North Dakota 58503  
Phone: 307-365-3361 ♦ www.west-inc.com

**TECHNICAL MEMORANDUM**  
**CONFIDENTIAL BUSINESS INFORMATION**

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**Date:** August 14, 2025  
**To:** Amanda Bohnenblust, Merjent, Inc.  
**From:** Martin Piorkowski and Sofia Agudelo, Western EcoSystems Technology, Inc.  
**Subject:** Nelson Lake Access Road: Dakota Skipper Habitat Survey

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## INTRODUCTION

Merjent, Inc. (Merjent), was retained by Minnesota Power to complete environmental surveys and associated permitting for the Nelson Lake access road (Project) in central North Dakota. The Project consists of an approximately 3.2-kilometer-long access road, located approximately 5.6 kilometers east of the town on Center in Oliver County, North Dakota (Figure 1). The Project falls within the range of the federally listed Dakota skipper (*Hesperia dacotae*; DASK)<sup>1</sup>. The Dakota skipper is federally threatened with a 4(d) Rule under the Endangered Species Act<sup>2</sup> with designated critical habitat in southeastern and north central North Dakota. Under the 4(d) Rule, take of the DASK is prohibited with certain exceptions that include routine livestock operations and maintenance of recreational trails and rights-of-way.

Merjent contracted Western EcoSystems Technology, Inc (WEST) to conduct pedestrian surveys following the US Fish and Wildlife Service (USFWS) Dakota Skipper Survey Protocol<sup>1</sup>. to assess potential Dakota skipper habitat at the Project. This memo contains the survey methodology and results of the field survey.

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<sup>1</sup> US Fish and Wildlife Service (USFWS). 2024. 2024 Dakota Skipper (*Hesperia dacotae*) Survey Protocol. USFWS, Midwest and Mountain Prairie Regions, Minnesota-Wisconsin, North Dakota, and South Dakota Ecological Services Field Offices. Available online: <https://www.fws.gov/sites/default/files/documents/2024-05/2024-usfws-dakota-skipper-survey-protocol.pdf>

<sup>2</sup> 79 Federal Register (FR) 206: 63672-63748. 2014. Endangered and Threatened Wildlife and Plants; Threatened Species Status for Dakota Skipper and Endangered Species Status for Poweshiek Skipperling; Final Rule. 50 CFR Part 17. Department of the Interior, Fish and Wildlife Service. 79 FR 63672. March 23, 2022. Available online: <https://www.govinfo.gov/content/pkg/FR-2014-10-24/pdf/2014-25190.pdf>

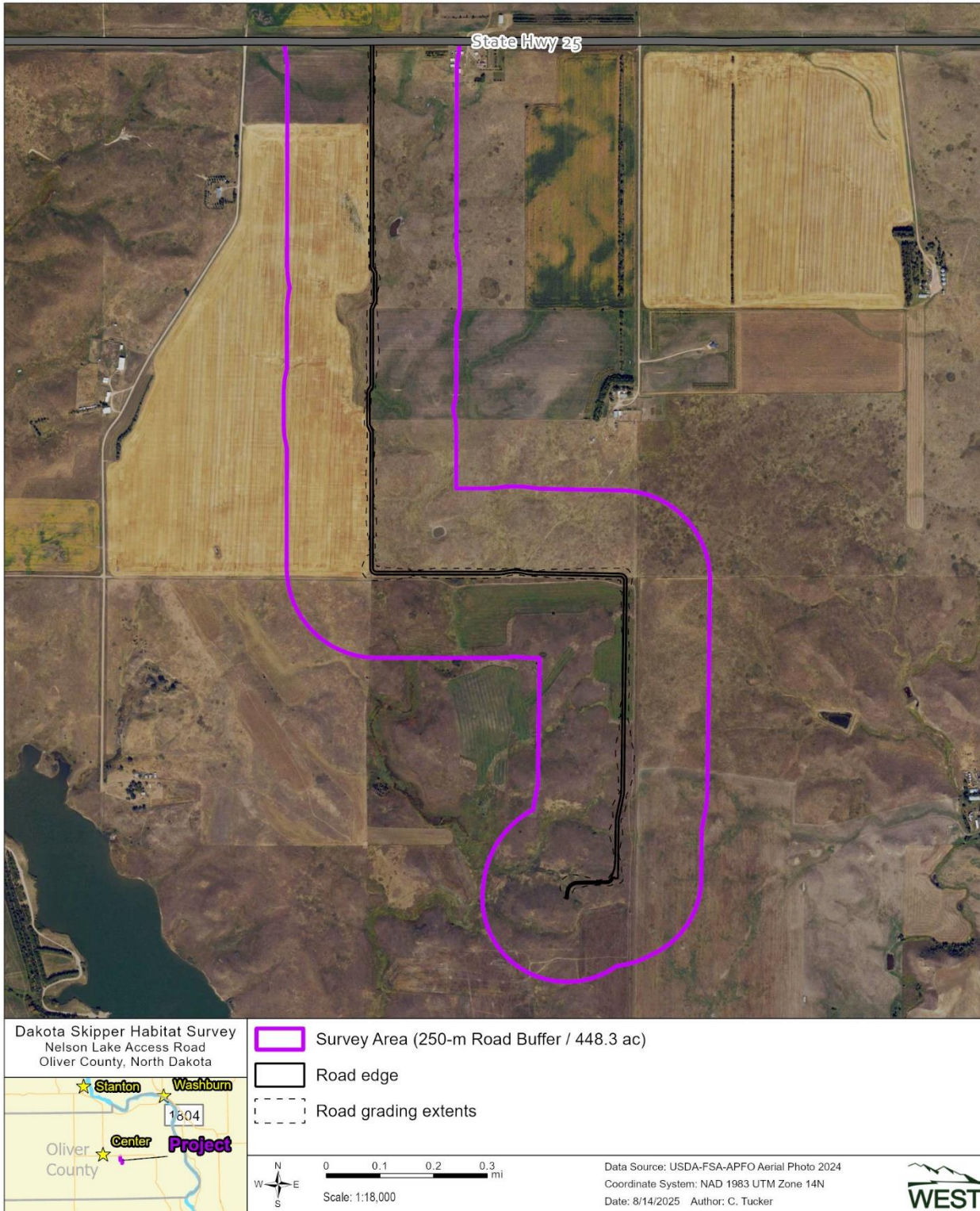


Figure 1. Survey Area for Dakota skipper habitat field survey conducted August 4, 2025, along the Nelson Lake Access Road.

## METHODOLOGY AND RESULTS

A Survey Area of 448.3 acres, defined as a 250-meter buffer either side of the Project centerline was evaluated for Dakota skipper habitat; the Survey Area consists primarily of croplands and herbaceous vegetation based on aerial imagery (Figure 1). Two qualified WEST biologists conducted the field survey on August 4, 2025, starting at highway 25 (Figure 1). The field survey consisted of a pedestrian survey along the entire proposed Nelson Lake Access Road and viewing adjacent land within the Survey Area with binoculars to determine if suitable habitat was present. Suitable Dakota skipper habitat is defined as native grassland habitat that contains one or more primary constituent elements for the species to complete its entire life cycle, including breeding, feeding/foraging, and sheltering behaviors<sup>3</sup>. No patches of suitable Dakota skipper habitat were identified within the Project's Survey Area during the pedestrian field survey (Figure 1).

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<sup>3</sup> US Fish and Wildlife Service (USFWS). 2018. Species status assessment report for the Dakota skipper (*Hesperia dacotae*). 97 pp.

**Exhibit E-**

*Archaeology Report Addendum*

May 7, 2025

Andrew Robinson  
Chief Archaeologist  
State Historical Society of North Dakota  
North Dakota Heritage Center  
612 East Boulevard Avenue  
Bismarck, North Dakota 58505-0830

Re: Minnesota Power  
HVDC Modernization Project, Oliver County, North Dakota  
Addendum Report for 2025 Class I and Class III Inventories (23-0254)

Dear Mr. Robinson:

Minnesota Power, an operating division of ALLETE, Inc., proposes the modernization of the western terminal of the existing Square Butte High Voltage Direct Current (HVDC) system (Project) in Oliver County, North Dakota. The Project is needed to improve the reliability of the transmission system in Minnesota and North Dakota. The enclosed report encompasses the North Dakota portion of the Project, located in Oliver County. The Project will require approval from the North Dakota Public Service Commission to acquire a Certificate of Corridor Compatibility and Transmission Facility Route Permit. In anticipation of compliance with this process, Minnesota Power contracted Merjent to conduct a Class I file search and a Class III intensive cultural resource inventory of the Project area and larger blocks surrounding those areas.

Merjent completed a Class I file search update and an additional Class III pedestrian survey in 2025, and the results are included in the attached report. We have already uploaded a PDF of the report and associated shapefile package of the surveyed area for review via the ND SHPO-run FTP site. Merjent recommends the project be granted a determination of *no significant properties affected* and clearance to proceed as planned. If you have any questions regarding the report contents, please feel free to contact me at [damien.reinhart@merjent.com](mailto:damien.reinhart@merjent.com) or at 612.499.1142.

Sincerely,

A handwritten signature in black ink that reads "Damien Reinhart". The signature is written in a cursive, slightly slanted style.

Damien Reinhart, M.A.  
Principal Investigator

Enclosures: Addendum 2: A Class I and Class III Archaeological Cultural Resources  
Inventory of the HVDC Modernization Project, Oliver County, North Dakota

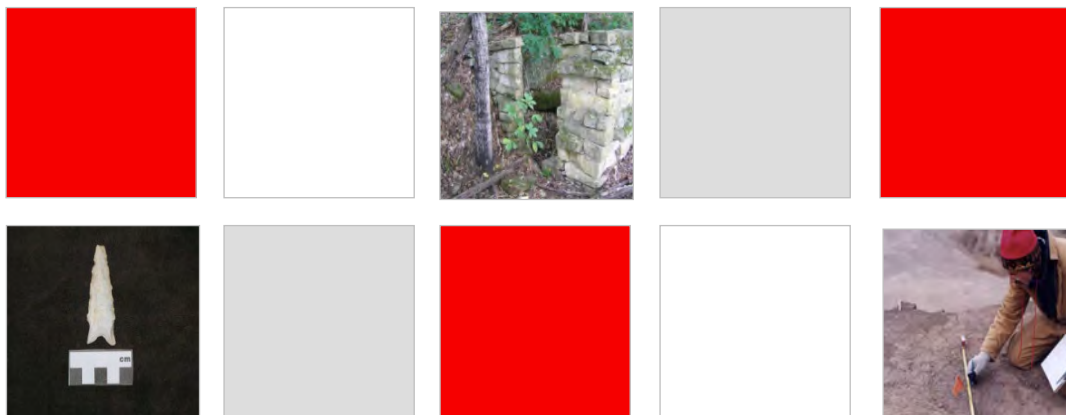
cc: Daniel McCourtney, Minnesota Power  
Dan Flo, Merjent

**MANUSCRIPT DATA RECORD FORM**

1. Manuscript Number: [SHPO assigns]
2. SHPO Reference #:
3. Author(s): Damien Reinhart
4. Title: Addendum 2: A Class I and Class III Cultural Resources Inventory of Minnesota Power's HVDC Modernization Project, Oliver County, North Dakota.
5. Report Date: May 7, 2025
6. Number of Pages: 13
7. Type – I, T, E, O: I  
  
I=Inventory; T=Formal Testing; E=Excavation; O=Other
8. List formally tested or excavated sites (not probes):
9. Acres: 41.3
10. List the legal description\* and study unit. For study unit assignment, use the township tables in the *State Plan*, [http://history.nd.gov/hp/stateplan\\_arch.html](http://history.nd.gov/hp/stateplan_arch.html).  
Study Units: LM, CB, KN, HE, SM, GA, JA, GR, NR, SR, SO, SH, YE

*\*For inventory, formal testing, and excavation projects, list the CLASS III legal locations only.*

<u>County</u>	<u>Township</u>	<u>Range</u>	<u>Section</u>	<u>Study Unit</u>
Oliver	142 N	83 W	20	SM



## Minnesota Power

### Addendum 2: A Class I and Class III Cultural Resources Inventory of Minnesota Power's HVDC Modernization Project Oliver County, North Dakota

PREPARED BY

Merjent, Inc.  
1 Main Street SE, Suite 300  
Minneapolis, Minnesota 55414

**Damien Reinhart, MA**  
Principal Investigator

May 2025

## EXECUTIVE SUMMARY

Minnesota Power, an operating division of ALLETE, Inc., proposes the modernization of the western terminal of the existing Square Butte High Voltage Direct Current (HVDC) system in Oliver County, North Dakota. The HVDC Modernization Project (Project) is needed to improve the reliability of the transmission system in Minnesota and North Dakota. Minnesota Power plans to have the Project in service by 2027. Land cover within the Class III survey area includes agricultural fields, mixed grassland pastures, and short-grass prairie pastures. Construction methods will include site preparation, grading and leveling of soils, and construction of facilities.

Two previous Class III intensive cultural resource inventory investigations were conducted by Merjent, Inc. (Merjent) to support the current Project, the results of which are detailed in, *A Class I and Class III Cultural Resources Inventory of the Minnesota Power HVDC Modernization Project, Oliver County, North Dakota* (Larsen and Reinhart 2024) and *Addendum: A Class I and Class III Cultural Resources Inventory of Minnesota Power's HVDC Modernization Project, Oliver County, North Dakota* (Reinhart 2024). Merjent also conducted evaluative testing at two sites, 32OL445 and 32OL859, and recommended both sites as not eligible for listing in the National Register of Historic Places (NRHP) and no further work needed (Brack 2024). This addendum covers the results of subsequent Class III investigations of a proposed 0.93-mile-long access road encompassing 41.3 additional acres, which was surveyed on March 8, 2025. A total of 2.8 acres were found to occur within previously surveyed areas; however, for continuity, the previously surveyed acreage was included in the current pedestrian survey. The other previously reported Class III surveys were conducted from September 12 to 17 and 19, 2022; July 21 to 23, 2023; and May 23 to 24, July 1, and August 16 to 17, 2024. During the current survey, no new archaeological resources were identified. Merjent recommends the Project be granted a determination of *no significant properties affected*. No further archaeological work is recommended for the Project as planned.

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Appendix A Figures

**ACRONYMS AND ABBREVIATIONS**

HVDC	high voltage direct current
Merjent	Merjent, Inc.
NRHP	National Register of Historic Places
Project	Minnesota Power HVDC Modernization Project
SHSND	State Historical Society of North Dakota
Study Area	Project survey area plus a 1-mile buffer

## 1.0 PROJECT DESCRIPTION

Minnesota Power, an operating division of ALLETE, Inc., proposes the modernization of the western terminal of the existing Square Butte High Voltage Direct Current (HVDC) system in Oliver County, North Dakota. The HVDC Modernization Project (Project) is needed to improve the reliability of the transmission system in Minnesota and North Dakota. The following report encompasses an additional survey conducted for the North Dakota portion of the Project located in Section 20 of Township 142 North, Range 83 West, Oliver County (see Figure 1 in Appendix A). Land cover within the current survey area includes mixed grassland pastures and agricultural fields including stubble and hayfields. Construction methods would include site preparation, grading and leveling of soils, and construction of facilities.

The Project will require approval from the North Dakota Public Service Commission to acquire a Certificate of Corridor Compatibility and Transmission Facility Route Permit. In anticipation of compliance with state law and the North Dakota Public Service Commission permitting process, Minnesota Power contracted Merjent, Inc. (Merjent) to conduct a Class I file search within a 1-mile radius (referred to as the Study Area) of the proposed access road corridor and a Class III intensive cultural resource inventory of the proposed access road corridor (see Figure 1 in Appendix A). Minnesota Power identified an additional survey area north of Nelson Lake for a proposed access road. This corridor, described in this addendum report, was inventoried to identify the presence of historic properties, with the goal of avoiding adverse effects to unevaluated, potentially eligible properties, or those already listed on the National Register of Historic Places (NRHP).

Two previous Class III intensive cultural resource inventory investigations were conducted by Merjent, Inc. (Merjent) to support the current Project, the results of which are detailed in, *A Class I and Class III Cultural Resources Inventory of the Minnesota Power HVDC Modernization Project, Oliver County, North Dakota* (Larsen and Reinhart 2024) and, *Addendum: A Class I and Class III Cultural Resources Inventory of Minnesota Power's HVDC Modernization Project, Oliver County, North Dakota* (Reinhart 2024). Merjent also conducted evaluative testing at two sites, 32OL445 and 32OL859, and recommended both sites as not eligible for listing in the NRHP and no further work needed (Brack 2024). This addendum includes the results of subsequent Class III investigations of a proposed 0.93-mile-long access road and a wider survey area, encompassing 41.3 acres, which was surveyed on March 8, 2025 (see Figures 1 and 3 in Appendix A). A total of 2.8 acres were found to occur within previously surveyed areas; however, for continuity, the previously surveyed acreage was included in the current pedestrian survey. The other previously reported Class III surveys were conducted from September 12 to 17 and 19, 2022; July 21 to 23, 2023; and May 23 to 24, July 1, and August 16 to 17, 2024.

No cultural resources were identified during the current inventory. Merjent recommends the Project be granted a determination of *no historic properties affected*.

## 2.0 ENVIRONMENTAL AND CULTURAL BACKGROUND

The environmental and cultural background for the Project was previously presented in Larsen and Reinhart (2024). A file search was initially completed in August 2022 and updated in July 2023 and May 2024. For this addendum, a February 26, 2025, Class I review revealed two isolated finds and two additional sites within the 1-mile Study Area for the proposed access road. There were no additional previous surveys within the Study Area that were not included in the

previous reports (Larsen and Reinhart 2024; Reinhart 2024). The previous sites include a stone cairn site and a stone circle site (32OL860 and 32OL861) which were identified during surveys for the Dakota Access Pipeline project. Both sites were recommended as unevaluated regarding eligibility for listing in the NRHP. Both sites are currently outside of the Project survey area. The two isolated finds (32OLX54 and 32OLX57) are both precontact isolated finds consisting of chipped stone. Both isolated finds were recommended as not eligible for listing in the NRHP, and both are outside of the current survey area. Photos located in Section 4.0 illustrate the current survey area.

### **3.0 FIELD METHODS**

Throughout all stages of this investigation, Merjent applied industry (cultural resource management) best practices and adhered to the *Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation* (48 Federal Register 44716), and the *North Dakota SHPO Guidelines Manual for Cultural Resource Inventory Projects* (State Historical Society of North Dakota [SHSND] 2020). The field methodology was previously presented in Larsen and Reinhart (2024).

Merjent archaeologist Damien Reinhart served as the principal investigator, advising Minnesota Power, directing all aspects of Merjent's work, and conducting agency coordination. The cultural resource inventory generally consisted of standard Class III methods as outlined in SHSND (2020). Mr. Reinhart conducted the Class III pedestrian inventory on March 8, 2025. Mr. Reinhart located the survey areas using Geographic Information System data in conjunction with a Global Positioning System unit, supplemented with aerial photograph-based paper maps.

The pedestrian survey was conducted within a corridor that surrounds the proposed access road. The survey was conducted in 15-meter intervals in areas with at least 25 percent ground surface visibility. Cultural material, if identified during pedestrian survey, was recorded and left in the field.

Mr. Reinhart took photographs and recorded ground surface conditions on standard field forms. Field forms, photograph logs, and all archival materials are on file at Merjent's office in Minneapolis, Minnesota.

### **4.0 CLASS III SURVEY RESULTS**

The Class III survey area began at Highway 25 and extended south for 0.93 miles to a previously surveyed area (see Figure 3 in Appendix A). The width varied between 275 feet to approximately 600 feet to account for an ephemeral drainage that appears to have been dry for some time, as evidenced by hay stubble. The vegetation consisted of short- and mixed-grass pasture with gently rolling hills in the eastern half of the survey area, with agricultural stubble fields and hayfields along the western half of the corridor (see Photos 4.0-1 and 4.0-2). A small segment toward the middle of the current survey area was partially surveyed for cultural resources for a transmission line project that has since been constructed and passes through the current survey area.



**Photo 4.0-1. Overview of survey area, facing north from south end.**



**Photo 4.0-2. Overview of eastern half of survey area, facing north.**

The ground surface visibility was generally good as the growing season for the various grasses had not yet begun. The average visibility was approximately 50 percent with an abundance of exposed soil from rodent burrowing and eroded surfaces on side slopes. The stubble fields along the western half of the survey area afforded excellent ground surface visibility that averaged 75 percent. No shovel tests were excavated due to the good ground surface visibility. Several modern field clearing piles were noted and photographed along, or near, the fence line. All stones were large and loosely placed, with evidence that they had recently been removed from the adjacent fields (see Photo 4.0-3). Figure 2 in Appendix A depicts the proposed access road corridor on the 1883 to 1884 General Land Office survey maps. A “Road from Mandan to Stanton” is depicted on the historic map, as described in the previous survey reports. There are currently no indications of the road within the Project survey area. The total acreage for the survey area was 41.3 acres. No cultural resources were identified.



Photo 4.0-3. Example of rock pile located along the survey area, facing southeast.

## 5.0 SUMMARY AND RECOMMENDATIONS

This addendum covers the results of the additional Class III investigation of a corridor for a proposed Project access road, encompassing 41.3 acres, which was surveyed on March 8, 2025. During the survey, no cultural resources were identified. Merjent recommends the Project be granted a determination of *no significant properties affected*. No further archaeological work is recommended for the Project as planned.

**6.0 REFERENCES CITED**

- Brack, M. L. 2024. Archaeological Site Testing for Minnesota Power's HVDC Modernization Project, Oliver County, North Dakota. Report prepared on behalf of Minnesota Power by Merjent, Inc., Minneapolis and Submitted to the State Historic Preservation Office, Bismarck.
- Larsen, Stephen, and Damien Reinhart. 2024. A Class I and Class III Cultural Resources Inventory of the Minnesota Power HVDC Modernization Project, Oliver County, North Dakota. Report prepared on behalf of Minnesota Power by Merjent, Inc., Minneapolis and submitted to the State Historic Preservation Office, Bismarck.
- Reinhart, Damien. 2024. Addendum: A Class I and Class III Cultural Resources Inventory of Minnesota Power's HVDC Modernization Project, Oliver County, North Dakota. Report prepared on behalf of Minnesota Power by Merjent, Inc., Minneapolis and submitted to the State Historic Preservation Office, Bismarck.
- State Historical Society of North Dakota (SHSND). 2020. *North Dakota SHPO Guidelines Manual for Cultural Resource Inventory Projects, Revised Edition*. State Historical Society of North Dakota, Archaeology and Historic Preservation Division, Bismarck.

**APPENDIX A**  
**Figures**



**Contains Privileged Information - Do Not Distribute**

0 150 300 Feet  
1:4,200

For Environmental Review Purposes Only



**Figure 3: Survey Results**  
Minnesota Power  
HVDC Modernization Project  
Oliver County, North Dakota

- Project Study Area
- Previous Merjent Survey
- Modern Debris
- Trash Pile and Field Clearing
- Previous Survey

**Exhibit F-**

*State Historical Society Concurrence*



July 10, 2025

Damien Reinhart  
Merjent Inc.  
1 Main Street SE  
Suite 300  
Minneapolis, MN 55414

**SHSND Ref.: 23-0254 HVDC Modernization Project in portions [T141N R83W Sections 2-4 and T142N R83W Sections 26-29, 32-35] in Oliver County, North Dakota**

Dear Damien,

From your submission on behalf of Minnesota Power, it is our determination that there are no significant sites affected by this project in the 41.3 acres within Section 20 Township 142N Range 83W covered by the second addendum report on cultural resources.

Thank you for the opportunity to review this project under North Dakota cultural resources consultation. This letter does not serve as federal agency consultation or SHPO consultation for compliance with Section 106 of the National Historic Preservation Act of 1966, as amended, (36 CFR Part 800), or the National Environmental Policy Act, as amended, (42 U.S.C. §§ 4321- 4347).

If you have any questions, please contact Lorna Meidinger, Lead Historic Preservation Specialist at [lbmeidinger@nd.gov](mailto:lbmeidinger@nd.gov) or (701) 328-2089.

Sincerely,

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

23-0254



July 10, 2025

Damien Reinhart  
Merjent Inc.  
1 Main Street SE  
Suite 300  
Minneapolis, MN 55414

**SHSND Ref.: 23-0254 HVDC Modernization Project in portions [T141N R83W Sections 2-4 and T142N R83W Sections 26-29, 32-35] in Oliver County, North Dakota**

Dear Damien,

We received the addendum report for SHSND Ref: 23-0254 titled "Addendum 2: A Class I and Class III Cultural Resources Inventory of Minnesota Power's HVDC Modernization Project, Oliver County, North Dakota." and find this Merjent, Inc. report by Damien Reinhart 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 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

23-0254