



Attachment F

Updated Wildlife Agency Correspondence



Minnesota Power Longspur Wind Agency Coordination

5/4/2026

Since 2024 Minnesota Power has engaged with United States Fish and Wildlife Service (USFWS), and North Dakota Game and Fish Department for the Longspur Wind Project and associated Longspur Transmission Line Project (Projects). Minnesota Power also coordinated with the North Dakota Department of Agriculture (NDDA). These discussions were to advance the avoidance, minimization, mitigation and voluntary offset measures for the Projects to ensure minimal environmental impact. Furthermore, Minnesota Power and NDDA have executed a Memorandum of understanding to address the possibility of potential indirect adverse impacts that may result from the contraction or operation of Longspur.

Wildlife and Mitigation Correspondence

The following table summarized the correspondence between Minnesota Power and USFWS, NDGFD, and NDDA as well as Western Ecosystems Technology, Inc (WEST). Minnesota Power provided records of correspondence within the Application under section 7 and Appendix C.

Correspondence Date	Summary of correspondence
12/4/24	A meeting between Minnesota Power, USFWS, NDGFD, WEST, Merjent occurred to introduce the Longspur Wind Project and to provide survey results from completed effort addressing Tiers 1-3 of the wind energy guidelines. This meeting was also to gain feedback on proposed studies and next steps.
12/11/24	WEST requested historical eagle nest and sharp-tailed grouse lek data from NDGFD for the Project Area.
5/7/25	WEST and Minnesota Power provided northern long-eared bat presence/ probable absence mist-netting Study Plan for the Project to USFWS for approval.
6/3/25	USFWS approved the northern long-eared bat presence/ probable absence Study Plan for the Project.
6/18/25	Minnesota Power mailed the Project notification letters to the NDGFD, NDDA, and USFWS per Section 69-06-01-05 of the North Dakota Administrative Code.
6/26/25	Minnesota Power receives the response to the Notification Letter from NDDA.



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6/29/25	Minnesota Power received the response to the Notification Letter from NDGFD and included early guidance recommendations of flora and fauna and information requests 100 days prior to the NDPSC hearing date.
10/27/25	Minnesota Power reached out to NDDA regarding voluntary compensatory mitigation strategies for impacts associated with wind infrastructure. Discussions involving timelines to meet and documents to review were discussed over email and over the phone.
10/31/25	Minnesota Power, NDDA, and WEST meet to discuss voluntary compensatory mitigation for Longspur. Minnesota Power was to review voluntary donation and provide a redlined version of the Memorandum of Understanding back to NDDA.
12/9/25	Minnesota Power emailed NDGFD to propose a meeting focused on the current status of surveys, provide an update on the Project, and review any additional requirements.. In a follow up email, Minnesota Power described that a file sharing site will be established, and the site would contain survey reports, spatial files, voluntary offsets, and a Wildlife Conservation Strategy. Minnesota Power also described the proposed contribution to NDDA's compensatory mitigation fund.
12/10/25	Minnesota Power returned the revised MOU to NDDA with an increase in the voluntary donation amount.
1/5/26	After phone calls between Minnesota Power and NDDA, NDDA would provide the MOU and mitigation amount to the Agriculture Commissioner for review.
1/16/25	NDDA provided a revised MOU with minor edits and Minnesota Power returned the file with an edit for signatory.
1/20/25	NDDA provided the MOU with Agriculture Commissioner Goehring's signature for Minnesota Power execution. Minnesota Power returned the fully executed copy.
1/20/2025-1/21/2025	Discussion regarding the MOU filings the NDDA may provide to the NDPSC and intent of the MOU.
1/23/26	Minnesota Power provided NDGFD with the file sharing site, with all files requested, Minnesota Power also provide times for a coordination meeting.
1/29/26	Minnesota Power reached out to USFWS to share biological studies and to invite to a coordination meeting to discuss the studies. USFWS responded letting Minnesota Power know that they could not attend but would like to be on the meeting invite in case federal actions changed and that they would like Minnesota Power to work with North Dakota counterparts (i.e., NDGFD).
1/30/25	Minnesota Power emailed NDDA after discussion over the phone for a wildlife survey update meeting. Minnesota Power could not reschedule the meeting due to conflicts and informed the NDDA a meeting summary will be provided to all invitees.



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2/2/26	Minnesota Power met with NDGFD to reintroduce the Project, provide an overview of all biological studies following the USFWS WEG tiered approach and NDGFD Wind BMPs guidelines. NDDA was invited but could not attend due to scheduling conflicts, and Minnesota Power could not reschedule due to conflicts. USFWS was also invited but could not attend due to federal and Secretary of the Interior guidance and regulations on reviewing wind energy projects.
2/9/26	Minnesota Power provided NDDA, NDGFD and USFWS with meeting notes and presentation.
2/9/2026-2/13/2026	Minnesota Power provided files to NDGFD that were requested at the meeting February 2, 2026 and worked through revision and clarifications of the meeting notes.
2/16/26	Minnesota Power provided the NDGFD an avian offset model for their review based on communication during the February 2, 2026 meeting. Minnesota Power also included the decision analysis tool used for voluntary mitigation offset developed by NDDA. NDDA was included on this email to support a collaborative approach and transparency for effective mitigation and advance the Longspur Wind Project in a way that respects the goals of each agency.
2/19/26	Minnesota Power provided updated meeting minutes based on discussions with NDGFD. Minnesota Power provided all NDGFD requested files or follow ups. NDGFD did not provide any further questions or concerns.
3/13/26	Minnesota Power provided NDGFD an update regarding a removed grassland within the previously provided grassland GIS file, and if NDGFD had any questions or concerns.
3/17/26	Minnesota Power provided the NDDA with an update on the Longspur NDPSC hearing and with an update on grasslands. This update reduced the acres of grasslands potentially impacted by the Project and that Minnesota Power would not alter the previously agreed to offsets described in the MOU.
3/30/26	Minnesota Power provided NDGFD an updated Avian offset calculation due to a reduction in grassland acres, updated meeting notes due to landcover reclassification that conflated with NDGFD Wind BMPs, and the WEST grassland addendum.
4/13/2026	Minnesota Power provided NDGFD with a shapefile containing the updated grassland files.
4/16/2026	Minnesota Power reached out to NDGFD to ensure that they have received the previous emails for the grassland updates.
4/16/2026	NDGFD provided the NDPSC a letter regarding their concerns on the project and a note about the meeting on the 30 th of April.



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4/16/2026	An email describing the concerns GFD stated in the letter was provided to Minnesota Power.
4/16/2026	Minnesota Power thanked the GFD for the confirmation on receipt of the grassland files and asked if the GFD required a new link to the spatial data, studies, and WCS that was provided in January.
4/16/2026	Minnesota Power provided a response to the concerns the GFD provided. No further questions or comments were provided by the NDGFD.
4/30/2026	The April 30, 2026 meeting between NDDA, NDGFD, WEST, and Minnesota Power focused on whether the mitigation proposed for the Longspur Wind Project in Morton County is acceptable given potential wildlife impacts. NDGFD emphasized concerns about how mitigation offsets were calculated, data gaps, and limited access to the WCS, which they view as the most critical document for review, while NDDA expressed confidence that mitigation is generally sufficient and stressed the need for better interagency coordination and a shared understanding of direct and indirect impacts. Discussion centered on improving communication pathways, potentially routing NDGFD comments through NDDA rather than directly to the PSC, clarifying agency roles, ensuring timely notification of project changes, and balancing conservation goals with maintaining working lands. NDGFD ultimately confirmed that the BMPs were met, and did not request any additional information to address its prior PSC letter. Both agencies agreed to continue improving coordination moving forward.

Avoidance and Minimization, and Mitigation Measures

- 1) Conservation Measures Implemented During Site Selection and Project Design.
 - a) Use available data from state and federal agencies, Tier 2 and Tier 3 study results, and other resources to avoid and minimize impacts to wildlife.
 - b) Minimize construction footprints and surface disturbance to reduce wildlife habitat disturbance.
 - c) Use existing county and state rights-of-way for infrastructure whenever possible rather than constructing new roads to minimize disturbance and habitat fragmentation.
 - d) Locate T-Line, to the extent possible, in areas where previous disturbance has occurred, thereby minimizing impacts to trees and associated wildlife.
 - e) Avoid turbine siting and minimize infrastructure within wooded patches.
 - f) Avoid physical disturbance to wooded draws and shelterbelts, to the extent practicable, and minimize tree removal to reduce impacts to bat roosting habitat.
 - g) Avoid USFWS wetland and grassland conservation easements.

- h) Site turbines outside of unbroken grasslands (i.e., native prairie) and, to the extent practicable, design infrastructure to avoid and minimize impacts on these grasslands and wildlife dependent on them, including STGR and other grassland-related SHFC.
 - i) Avoid fatalities associated with overhead power lines by burying collection lines.
 - j) Minimize potential impacts to DASK and monarch butterflies by siting turbines outside of unbroken grasslands (i.e., native prairie) and designing access roads and other infrastructure to avoid these grasslands, to the extent possible.
 - k) Locate access roads and turbines away from wetlands and waterbodies, to the extent possible, and to minimize impacts on aquatic and semiaquatic wildlife species and their habitat.
 - l) Minimize bird strikes and impacts to species of federal or state relevance, such as WHCR, by constructing and marking T-Line in accordance with the APLIC's *Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006* and *Reducing Avian Collisions with Power Lines: The State of the Art in 2012*
 - m) Construct un-guyed permanent MET towers to minimize the potential for avian collisions.
 - n) Avoid turbine placement within 660 ft from previously identified bald eagle nests based on information gathered from Tier 1–3 studies.
 - o) Follow USFWS Region 6 recommended no disturbance buffers, to the extent practicable, for previously identified non-eagle raptor nests.
 - p) Develop and implement a Storm Water Pollution Prevention Plan (SWPPP) to prevent contamination of natural water resources, minimize erosion, storm water runoff, and transport of sediment and other contaminants.
 - q) Comply with Federal Aviation Administration (FAA) hazard lighting standards (2020) and North Dakota Century Code 49-22-16.4 with respect to turbine lighting. Minnesota Power will install a radar-activated Aircraft Detection Lighting System (ADLS), which will minimize the illumination of obstruction lighting.
 - r) Control and monitor the Project using Supervisory Control and Data Acquisition communications technology.
 - s) Prepare a WCS in accordance with the WEG that will be implemented to minimize impacts to avian and bat species during construction and operation of the Project.
- 2) Conservation Measures to be Implemented during Construction.

Construction of the Project is expected to begin as early as 2026 and occur over a period of approximately 15 months (excluding times when the weather prevents construction activities). The following conservation measures will be implemented to avoid or minimize environmental risk, especially focused on avian and bat species during construction:

- a) Use appropriate erosion control measures during construction and operation to minimize and eliminate runoff into waterbodies.
- b) Minimize equipment and vehicle travel on roads or specific construction pathways during construction to reduce wildlife and habitat disturbance.
- c) Limit construction traffic, parking, and laydown areas to previously disturbed lands, to the extent feasible.
- d) Identify and flag areas of native vegetation for construction crews to minimize disturbance in those areas.
- e) Minimize disturbance to STGR by following the BMPs and avoiding installation of collection lines in nesting habitat within one mi of leks during the lekking and nesting season (March 15 – July 15).
- f) Conduct a raptor nest survey prior to the start of construction to identify active raptor nests, and implement no disturbance buffers, to the extent practicable, following USFWS Region 6 guidance while the nest is active.
- g) Develop and implement a site-specific worker training plan during construction to inform workers of the suite of biological resources present on site, including specific protocols for WHCR.
 - i) Instruct employees, contractors, and site visitors to avoid harassment and disturbance of wildlife, especially during reproductive (e.g., courtship and nesting) seasons.
 - ii) Include instruction on identification (ID) and values of plant and wildlife species, significant natural plant community habitats, the issue of micro-trash and its effects, fire protection, and noxious weed control during construction.
 - iii) Conduct WHCR training for the life of the Project that consists of WHCR ID. Any WHCR sightings must be reported to the site manager immediately. All employees and contractors working in the field will be required to participate in WHCR monitoring prior to working on site. In the event a WHCR is observed or reported within one mi of active construction, all construction activities within 1-mi of the reported WHCR will halt until the bird(s) have departed for at least 15 minutes.

- iv) Include an overview of the distribution, general behavior, and ecology of golden and bald eagles. Employees will be informed that they are not authorized to approach, handle, or otherwise move any eagles (or their parts, such as feathers) that might be encountered during construction or operation, whether alive, injured, or deceased. The site manager will be instructed to report any finding of an injured or deceased eagle to Minnesota Power Environmental Staff in order to confirm and report the finding to the USFWS within 24 hours of positive ID.
- h) Perform a visual survey prior to starting work at a location. Any WHCR sightings will be reported to the site manager, who will then report to Minnesota Power environmental staff. No work will commence until cleared by the site manager.
- i) All spills will be reported to Minnesota Power Environmental Staff.
- j) Prevent the spread of noxious weeds during construction and ongoing operations to minimize impacts of natural habitats by implementing the noxious weed management plan appropriately. Any use of pesticides, herbicides, fertilizers, and other chemicals will be in accordance with federal and state laws to minimize drift and other impacts on native habitat.
- k) Limit vehicular speed to 25 mi per hour (mph) on non-public access roads to minimize vehicle collisions with wildlife.
- l) Implement BMPs for fire prevention during construction to minimize wildfire potential.
- m) Develop "good housekeeping" procedures to prohibit scrap heaps and dumps, minimize storage yards, and keep the site clean of debris, garbage, carrion, fugitive trash, or waste.
- n) Coordinate removal of large road-killed animals or other carcasses (e.g., livestock or deer) detected by personnel on or near roads in the Project promptly to avoid attracting eagles or other raptors.
- o) Reclaim disturbed vegetation consistent with the surrounding vegetation types, including a seed mixture approved by the US Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) and the landowner.
- p) Mitigate tree impacts in-kind, as approved by the landowner and consistent with the Public Service Commission (PSC) tree and shrub mitigation specifications.
- q) Conduct tree clearing, if needed, outside of the North Dakota bat active season (November 1 – April 14) to minimize impacts to tree roosting bats.
- r) Identify and avoid spraying areas with high abundance of milkweed that may provide potential suitable habitat for monarch butterflies. Pending upcoming listing decisions for monarch butterflies, contingencies may be necessary to minimize potential impacts to this species.

3) Conservation Measures to be Implemented during Operations

- a) Report any environmental event, such as a wildlife fatality or spill, through Minnesota Power's Wildlife Incident Reporting System.
- b) Feather turbines below the manufacturer's cut-in speeds (wind speeds less than three m/s) from sunset to sunrise during periods when bats are most likely to be present (April 15 – October 31).
- c) Utilize an ADLS that keeps all external lights off at turbines unless aircraft approach the Project. Additionally, the Project will use lighting that has shown to be minimally attractive to birds at night, including use of red, or dual red-and-white, strobe-like or flashing lights with long duration flash intervals that will meet FAA requirements (2020).
- d) Install motion-activated lighting on all buildings and Project infrastructure wherever allowed by safety and/or utility requirements. Lights will be shielded downward to minimize skyward illumination.
- e) Limit vehicle speeds on private roads to 25 mph to avoid wildlife collisions.
- f) Reduce fire hazards from vehicles and human activities (e.g., use of spark arrestors on power equipment, avoid driving vehicles off roads, allow smoking in designated areas only).
- g) Implement a noxious weed control plan in accordance with wind lease agreements.
- h) Implement pest and weed control measures as specified by county, state, and federal requirements.
- i) Conduct one year of PCM for birds and bats at Project.
- j) Do not store parts and equipment that may be used as cover for prey at the base of wind turbines while a turbine is operational.
- k) Coordinate with landowners on a carcass removal program to minimize potential attractants for carrion-feeding raptors.
- l) Report any sightings of WHCR to the operations manager and coordinate with Minnesota Power and follow Minnesota Power reporting requirements for any WHCR observed within one mile of operating turbines.
- m) Provide worker awareness training to all Project employees and contractors working on site for identifying and responding to encounters with sensitive biological resources, including avian and bat species. The training will:

- i) Be conducted by Minnesota Power or their designee
 - ii) Instruct employees, contractors, and site visitors to avoid harassment and disturbance of wildlife, especially during reproductive (e.g., courtship and nesting) seasons
 - iii) Include instruction on identification and values of plant and wildlife species, significant natural plant community habitats, the issue of micro-trash and its effects, fire protection, measures to minimize the spread of weeds during construction, as well as hazardous material spill and containment measures
 - iv) Provide information to contractors and employees on the Project detailing information on potential state and federal special-status animal and plant species that might be discovered at the Project
 - v) Provide WHCR training for the life of the Project; any WHCR sightings within one mi must be reported to the site manager immediately who will implement a shutdown protocol of all turbines within 1-mi of the WHCR sighting. All employees and contractors working in the field will be required to participate in the plan prior to working on site.
 - vi) Include an overview of the distribution, general behavior, and ecology of golden and bald eagles; employees will be informed that they are not authorized to approach, handle, or otherwise move any eagles that might be encountered during construction or operation, whether alive, injured, or deceased; operations personnel will be instructed to report any findings of an injured or deceased eagle to the operations manager, and Minnesota Power will report any injured or deceased eagles to the USFWS within 24 hours of positive ID
- 4) Conservation Measures to be Implemented during Decommissioning.

The lifetime of the Project is expected to be up to 30–35 years, after which it will likely be decommissioned and existing equipment removed. Minnesota Power will file a decommissioning plan, remove foundations and facilities from the landscape, and restore the area to the same physical condition of the area before construction occurred, through the implementation of measures such as:

- a) Explore other alternatives to decommissioning, such as upgrading with new technology to allow the wind energy facility to continue producing energy for many more years.
- b) Remove foundations to a minimum of three ft below grade and cover with soil.
- c) Restore and reclaim disturbed areas to the approximate original topography.

- d) Introduction and spread of invasive species shall be prevented, to the greatest extent practicable.
- e) Spread topsoil over the disturbed areas at a depth similar to that in existence prior to the disturbance.
- f) Reseed disturbed areas according to USDA NRCS guidelines, unless the PSC approves otherwise.
- g) Decommissioning shall follow the BMPs of a SWPPP for the protection of water resources and prevention of erosion.
- h) Overhead transmission line no longer necessary should be removed.
- i) If applicable, petroleum products and chemical releases or leaks shall be remediated

Additional Voluntary Offset Methods

Minnesota Power minimized impacts from the Projects through siting and mitigation measures outlined above. However, Minnesota Power and NDDA executed a Memorandum of Understanding to provide voluntary offsets for potential indirect adverse impacts that may result from the construction or operation of Longspur.

Enclosed:

Exhibit 1. Longspur Minnesota Power – North Dakota Department of Agriculture MOU

Exhibit 2. Records of Correspondence



Exhibit 1

MOU Minnesota Power and NDDA

Memorandum of Understanding
between
Minnesota Power
and
The North Dakota Agriculture Commissioner

1. This Memorandum of Understanding (“MOU”), dated January ~~20~~ 2026, is between Minnesota Power, a division of ALLETE, Inc. (**Minnesota Power**), a Minnesota corporation authorized to do business in North Dakota and as the owner of the Longspur Wind Project (**Longspur Wind**), and the North Dakota Agriculture Commissioner (Agriculture Commissioner), acting on behalf of the State of North Dakota. The Agriculture Commissioner and Minnesota Power are jointly referred to as the “**Parties**”.
2. Since 2023, Minnesota Power has been proactively considering voluntary potential environmental mitigation offsets related to the Longspur Wind Project (**Project**) in coordination with the North Dakota Game and Fish (**NDGFD**) and the Agriculture Commissioner.
3. The Project is an approximate 202.5-megawatt wind energy conversion facility located in Morton County, North Dakota, with a short transmission line in Mercer County. Minnesota Power plans to own, construct, and operate the Project.
4. Longspur Wind has sited the proposed turbine locations of the Project off of unbroken (i.e., native) grasslands, consistent with the recommendations of the NDGFD.
5. By implementing proper siting practices, Longspur Wind represents that the Project will have minimal adverse environmental impacts in accordance with North Dakota Century Code section 49-22-02. However, to address the possibility of potential indirect adverse impacts that may result from the construction or operation of the Project, Longspur Wind has proposed in good faith to provide voluntary compensatory mitigation offsets.
6. Longspur Wind has elected to make a voluntary contribution to the Environmental Impact Mitigation Fund (**Fund**) administered by the Agriculture Commissioner under North Dakota Century Code section 4.1-01-21.1 so that the Agriculture Commissioner can develop and implement mitigation offsets on behalf of Longspur Wind in relation to the Project.
7. Accordingly, Longspur Wind will voluntarily:

Contribute to the Fund pursuant to North Dakota Century Code section 49-22-09.2.

This contribution shall be used by the Agriculture Commissioner for the purposes provided in North Dakota Century Code section 4.1-01-21.1 and for the purpose of the protection and/or restoration of grasslands, wetlands, and other habitats as deemed appropriate. This dollar amount (**\$230,000**) is voluntarily contributed by Longspur Wind as an environmental mitigation offset for potential displacement within 64.8 acres of grassland habitat, as determined in coordination with the Agriculture Commissioner.
8. The Agriculture Commissioner recognizes Longspur Wind’s efforts to avoid and minimize adverse environmental impacts through strategic and ecologically responsible Project and turbine siting as well as through its voluntary mitigation offsets for residual potential indirect environmental impacts.

9. This MOU, and all voluntary commitments made, are contingent upon two milestones:

Milestone 1: Longspur Wind filing a Notice of Intent to Start Construction of the Project with the North Dakota Public Service Commission (PSC), and

Milestone 2: The Project becoming commercially operational.

10. Within thirty (30) days of the Milestone 1, the Parties will determine the financial mechanism for Longspur Wind to transfer the voluntary offset dollars into the Fund and consequently Longspur Wind will transfer to the Fund a minimum of 50% of the total voluntary contribution as stated in paragraph 7 (Seventy-five thousand dollars **(\$115,000)**).

11. At Milestone 2, Longspur Wind will make the final financial voluntary contribution to the Fund, comprising the remainder of its voluntary contribution as stated in paragraph 7. Longspur Wind, in its discretion, may make other payments of its voluntary contribution at other times between Milestone 1 and Milestone 2.

12. After Milestone 1, the Agriculture Commissioner will engage with a mitigation provider(s) to develop mitigation offset plans as to where and what offset mitigation actions will take place. Prior to Milestone 1, the Agriculture Commissioner may, as appropriate, proactively engage in preliminary exploratory discussions with a mitigation provider(s).

13. The Agriculture Commissioner will notify Longspur Wind of the use of the funds that were contributed by Longspur Wind under this MOU. The Agriculture Commissioner will use the contributed funds for the purposes provided in North Dakota Century Code section 4.1-01-21.1. In general, the Agriculture Commissioner will use the contributed funds to:

- Establish, restore, enhance, and/or preserve grassland habitat;
- Enter into non-perpetual, e.g., 35-year, easements/agreements for appropriate acreages on working lands, that are limited in time to the operational life of the Project;
- Purchase proper seed mixes (such as diverse, native perennial grass/forb mix suited for site), and conduct proper restoration/protection measures, management, and maintenance of mitigation offset areas; or
- As practicable, conduct mitigation offsets within the general vicinity of the area, county, or region affected by the Project or within another suitable area of similar habitat within the State as approved by the Agriculture Commissioner. No mitigation offsets may take place outside the State.

14. The Parties recognize that time is of the essence to implement the terms of this MOU. All mitigation offsets are expected to be delivered by the Agriculture Commissioner within 5 years after Milestone 2, following the payment schedule described in paragraphs 10 and 11. Mitigation offset efforts will be prioritized to take place on private land acreage with willing landowners who, as appropriate, will be compensated financially for the initial habitat establishment and for subsequent transition into appropriate conservation use within their respective operations.

15. Longspur Wind may reasonably modify financial mitigation offset estimates if unforeseen circumstances during construction result in significant Project changes (e.g., reduction or increase in turbine

number or change in turbine locations). The Parties will coordinate together as to any substantial estimate modifications.

16. The Agriculture Commissioner will notify the PSC of mitigation efforts made by or on behalf of Longspur Wind under this MOU.

17. It fully is the intent of the Parties to work together in good faith to implement the terms of this MOU so that voluntary environmental mitigation offsets pertinent to this MOU can be established and maintained in a timely, efficient, transparent, cost-effective, and equitable manner. This MOU is effective on the date that it has been signed by both Parties.

MOU acknowledged and entered into on this 26th day of January 2026

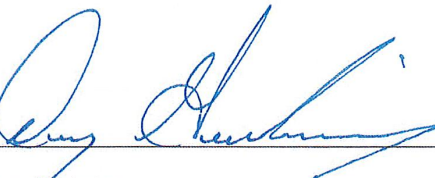
Minnesota Power, a division of ALLETE, Inc.



Kurt Anderson
Director – Environmental & Land Management
ALLETE/Minnesota Power

MOU acknowledged and entered into on this 20th day of January 2026

State of North Dakota



Doug Goehring
Agriculture Commissioner



Exhibit 2

Records of Correspondence

Confidential Business Information

USFWS, NDGFD, WEST, and Minnesota Power – Longspur Wind Project Introduction

Attendees:

USFWS: Hanna Edens
NDGFD: Bruce Kreft, Elisha Mueller
WEST: Martin Piorkowski, Nicholas O’Neil
Merjent: Dan Flo, Mandy Bohnenblust
MN Power/ALLETE: Ben Reister, Scott Monroe, Mitchell Bettenhausen, John Hollingsworth
Chris Aepelbacher, Mike French, Drew Janke, Alex Luman

Location: NDGFD Conference Room & Teams Meeting (Virtual)

Date/Time: December 4, 2024; 10:00 – 11:00 AM (CST)

Summary of Meeting:

Minnesota Power (MN Power) requested a wildlife agency meeting with US Fish and Wildlife Service (USFWS) and North Dakota Game and Fish Department (NDGFD) on December 4, 2024. The objectives of this meeting were to introduce the Longspur Wind Project (Project) in Morton County, North Dakota to the wildlife agencies and to provide survey results from completed studies and to propose upcoming surveys and studies at the Project. Western EcoSystems Technology, Inc. (WEST) added that a secondary objective of this meeting was to gain any feedback on proposed studies and their designs. A PowerPoint presentation accompanied this meeting for visualization of data and proposed survey efforts.

Project Overview and Timeline

- MN Power Introduced the Project to the USFWS and NDGFD and explained that the Project had been under development over the last decade under different Project names. Project development resumed in early 2024 with the intention to file for permits in 2025 with Public Service Commission (PSC) permitting in mid-late 2025. Targeted construction is anticipated in Q2 of 2026 with commercial operations beginning in Q4 2027.
- WEST explained that although there had been wildlife and habitat work completed at the Project previously, these studies were getting older, and that proposed work would use previously collected information to inform new and updated studies at the Project to provide current data within the new Longspur Wind Project area.
- NDGFD asked if MN Power/ALLETE were aware of any impending changes to wind development with changing of federal administration. MN Power/ALLETE could not say for certain but discussed only small changes were observed in 2017 during similar administration changes.

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Previous Study Review

- WEST discussed studies conducted at the Project in 2024 including aerial eagle nest surveys and sharp-tailed grouse lek surveys. Avian use surveys started in September 2024, but no results were discussed during this meeting.
- One aerial survey was conducted within the Project area and a 2-mile buffer of the Project area focused specifically on eagle nests. Two occupied and active bald eagle nests were observed within the 2-mi buffer surrounding the Project but not within the Project area.
- Three rounds of sharp-tailed grouse surveys were conducted following NDGFD Best Management Practices. Thirteen 13 active leks were identified of which six were historic leks from previous survey efforts and seven were new leks. Of the historic leks, none had moved significantly from their originally documented locations.

Proposed Studies with Discussion

- WEST discussed ten proposed and ongoing studies at the Project and a Wildlife Conservation Strategy through early 2026.
 - Following the Wind Energy Guidance (2012), A Tier 2 Site Characterization Study (SCS) is currently in development. NDGFD emphasized that North Dakota's Species of Conservation Priority (SCP) is a tiered level based on funding. WEST indicated that for the SCS the draft Species of Greatest Conservation Need (SGCN; available on the NDGFD website) would be used, and all species of greatest conservation need should be considered when reporting on this analysis. NDGFD stated that the updated State Wildlife Action Plan (SWAP) with the SGCN is expected to be released sometime in mid- to late-2025.
 - Grassland assessment is in development and expands and updates data collected and field verified in 2020. NDFGD was interested in seeing if WEST could discuss grassland conversion rate within the Project using data gathered in 2020 and 2024.
 - The whooping crane habitat assessment will include a more comprehensive approach using the Niemuth Model data layers and an additional Project buffer based on recent literature and to align with habitat stopover assessments in other regions of the migration corridor.
 - Eagle and raptor nest surveys are planned in 2025 following USFWS Region 6 guidance.
 - A second year of sharp-tailed grouse lek surveys are planned in 2025 following NDGFD BMP's using the same design as 2024 surveys.
 - Avian use surveys are ongoing and expected to occur through 2026 for two years of data collection. These surveys cover approximately 36% of the current Project

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area and include both a 10-minute small bird surveys and 60-minute eagle and large bird survey at each survey location. Eagle data will be collected using the data standards described in the Eagle Conservation Plan Guidance.

- General bat activity acoustic surveys are planned for 2025. These will occur using two acoustic units with two microphones each at up to two MET towers. Qualitative review for northern long-eared bat and little brown bat calls are planned. USFWS briefly discussed the intended study design for bat activity surveys with WEST and asked if detectors could be placed lower than 3 meters and if there was a measurable difference between 1.5 and 3 meters. WEST did not know if there were differences between the two heights but indicated that 1.5 meter was typical as it is generally a height that is high enough above grass or crop height to avoid significant insect noise.
- A northern long-eared bat habitat assessment planned for 2025 following current USFWS survey guidance. WEST requested information from USFWS on what habitat features the assessment should include for northern long-eared bat habitat. WEST explained that the Project is on the western edge of the northern long-eared bat range and the previously used 10-acre minimum patch size for habitat may not be the best starting point considering the recently finalized USFWS guidance. USFWS recommended starting with an assessment of where trees are located within the Project and what species/size of tree looked like in these features for further discussion with the USFWS. USFWS referenced a Montana graduate student that had found northern long-eared bats roosting in eight cm willows, which smaller than what is typical for the species. NDGFD acknowledged there is less data on the North Dakota populations compared to the eastern populations.
- Northern long-eared presence/probable absence surveys are planned for 2025 following current survey guidance and results from the NLEB habitat assessment. Study plan will be provided to USFWS prior to survey for approval and authorization.
- Dakota skipper larval habitat surveys are planned for 2025, if infrastructure is proposed within 250m of unbroken grassland, and will follow USFWS 2024 guidance. NDGFD asked what steps WEST and MN Power/ALLETE were taking with siting should critical habitat be found late into construction planning/development. WEST emphasized to the service that the intention of the surveys was to inform avoidance of habitat rather than necessitate presence/absence surveys.
- A Wildlife Conservation Strategy (WCS) is proposed to be developed in mid- to late-2025 and updated with completion of wildlife studies and site development. NDGFD asked that information from wildlife studies be provided to them as soon as possible so that they can submit their comments 30 days prior to the PSC permit

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hearing. USFWS echoed the same request. WEST plans to have a draft WCS 100 days prior to the PSC permit hearing, which should provide adequate time for NDGFD to review and submit their comments. WEST additionally stated that individual reports can be provided as well, if needed.

Timeline and Next Steps

- WEST showed a proposed timeline for studies at the Project as well as next steps to prepare for siting and permitting.
 - WEST proposed upcoming meetings (annual) with the agencies to discuss survey results and avoidance and minimization measures being implemented at the Project. NDGFD asked that the Project's turbine layout be provided once available as well to inform impact avoidance taken by the Project.
 - MN Power/WEST also plans to set up a meeting with the ND Department of Agriculture (NDDA) to introduce the Project and discuss implementation of a voluntary offset strategy.

Additional Discussions

- NDGFD followed up after the presentation to see if the Project is considering mitigation funds with the NDDA or if they would pursue independent mitigation funding. MN Power is waiting to see what guidance is provided by the NDDA before committing to mitigation funding/plans.
- NDGFD asked about considering cumulative impacts going forward. PCM data is dated on existing infrastructure near the Project so effects could be difficult to assess. NDGFD clarified this question was not intended to be addressed or investigated by MN Power, but the Agency is considering if cumulative impacts analysis is warranted or if further investigation is needed.
- USFWS reminded WEST and MN Power that the regal fritillary is proposed for listing through the Endangered Species Act and should be considered when conducting grassland and DASK assessments.
- NDGFD emphasized that they are most interested in the habitat and impacts analysis outlined in their BMPs for permit review/comments. NDGFD suggested that WEST/MN Power complete the avian habitat offset analysis described in those BMPs using site collected data. NDGFD would likely defer to the site-specific data, focused on unbroken grasslands, even if their analysis only included the modeled grassland data.
- NDGFD confirmed that turbine placement should avoid any grasslands within a 2-mile buffer of grouse leks. The goal is to conserve grasslands (i.e., nesting habitat) within 2-miles of leks over concerns of disturbing leks in crop fields as most grouse nest within 2-mile of a lek location. However, NDGFD would prefer avoidance of grasslands wherever

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possible though they provided the opportunity to discuss other options if this was not feasible.

Schedule/Action Items

- WEST and MN Power will be scheduling a meeting with NDDA for discussion of voluntary offsets in the near future (likely before the end of January 2025).
- A copy of the meeting's notes will be provided for review with the wildlife agencies. Additionally, a PDF of the PowerPoint presentation will accompany these meeting notes for reference.



June 29, 2025

Drew Janke
Environmental Compliance Specialist II
Minnesota Power | ALLETE Inc.
20 West Superior Street
Duluth, Minnesota 55802-2093

RE: Proposed Longspur Wind Project, Morton and Mercer County, ND

Dear Drew:

Thank you for reaching out to the North Dakota Game and Fish Department (Department) in request of agency input on the proposed Longspur Wind Project. We would like to use this opportunity to provide some early guidance recommendations and to encourage continued coordination as the project progresses.

First and foremost, native prairie (prairie that has not been plowed or broken in any way) is the most endangered ecosystem in North Dakota and one of the most endangered ecosystems worldwide. As a prairie state, the majority of our native species are linked to and dependent on healthy grasslands. Disturbance, fragmentation, and loss of native prairie have adversely impacted a wide variety of species and these negative impacts only continue to compound as more development takes place across the landscape.

Many of North Dakota's declining resident and migratory species are becoming more and more dependent on the remaining tracts of unbroken prairie. This habitat supports 62 Species of Greatest Conservation Need and 55 Species of Greatest Information Need identified in the Draft North Dakota State Wildlife Action Plan (North Dakota Game and Fish Department, 2025). Grassland dependent species have experienced drastic declines, such as the state bird of North Dakota, the Western Meadowlark, which has decreased by approximately 48% globally and the monarch butterfly which has declined by over 80% since the 1990s. The loss and fragmentation of native prairie in the project area may further negatively impact these declining species, making avoidance and minimization efforts a necessary priority.

Wetlands are another productive wildlife habitat in North Dakota, supporting 39 Species of Greatest Conservation Need and 18 Species of Greatest Information Need, as well as a considerable number of waterfowl, shorebirds and cranes throughout the year. The grassland-wetland mosaic of North Dakota is often referred to as the "Duck Factory" for its high-quality nesting habitat and the vast number of ducks produced. Therefore, it's important to prioritize protecting this productive habitat for both its local and national importance.

Governor
Kelly Armstrong

Director
Jeb Williams

Deputy Director
Casey Anderson

Finally, though the Department believes the best way to protect our species of conservation priority is by taking a habitat-focused approach, we would also like to reiterate the following species-specific concerns.

- Nearly 31% of the entire Sharp-tailed Grouse population falls within North Dakota and declines to the state's population will likely lead to range-wide population declines. Sharp-tailed Grouse are a high-valued upland game bird, and because research indicates that prairie grouse may be adversely affected by energy development, it is vital that lek surveys be conducted to understand the risk associated with development.
- Bats are long-lived, reproduce slowly, and migrate long distances, making them particularly susceptible to wind development. Acoustic surveys should begin at a minimum of two years pre-construction to assess the risk the project poses to local and migrating bat populations.
- The Whooping Crane's migration corridor centers along the east side of the Missouri River. The project falls within the 50% core migration corridor and there is core stopover habitat to the east and south. The U.S. Fish and Wildlife Habitat and Population Evaluation Team's (HAPET) Whooping Crane model should be used to evaluate risk associated with development to migrating Whooping Cranes.
- The Bald Eagle population and number of nest sites is increasing significantly in North Dakota. The number of nest sites has increased from 10 known sites in the year 2000 to more than 350 in the year 2023. Due to the continual increase and selection of non-traditional nest sites, it is possible that Bald Eagle nests may be found anywhere across the state where large trees are present. Therefore, it is recommended that searches for raptor nests be conducted during the breeding season to understand the risk associated with development.

The Department has a number of resources available for the benefit of the developer and consultant, including Best Management Practices (BMPs) (<https://gf.nd.gov/sites/default/files/publications/wind-energy-development-bmp.pdf>) . These BMPS include recommendations for responsible development of both turbines and transmission lines, as well as pre and post construction monitoring recommendations. The Department also has available maps and information on native habitats, priority areas, and sensitive species. Geospatial data can be found here <https://gf.nd.gov/wildlife/data> . Finally, the Department also recommends working with the U.S. Fish and Wildlife Service, as any state recommendations do not relieve the developer of its obligations to comply with any applicable federal regulations.

As we continue to address the challenges of stemming the decline of our state's most sensitive species, we cannot endorse the disturbance, fragmentation, and loss of the remaining high value habitats essential to Species of Greatest Conservation Need without recommending that suitable replacement or offsets be applied back onto the landscape. Ensuring these habitats remain on the landscape is the only way to stem the decline of these species and prevent listings through the Endangered Species Act, which could impact both the state and its citizens. The Department has stressed the importance of following the best available science in determining impacts and voluntary offsets. The best science addressing North Dakota resources are Loesch et al. 2013, Shaffer and Buhl 2016, and Shaffer et al. 2019; these papers should be

used to help guide ALLETE in understanding impacts and developing a voluntary offset package, if one is deemed appropriate. For Further guidance on estimating grassland impacts, there are also resources on the NDGFD website, which can be found at:
<https://gf.nd.gov/sites/default/files/publications/ndgf-desktop-approach-grasslands-2021.pdf> .

As ALLETE moves forward with this project, the Department requests to remain informed. To accurately analyze the project and provide valuable feedback to the PSC, it is important that the Department receives all documents, including wildlife surveys, spatial data, a Wildlife Conservation Strategy (WCS or BBCS), and any voluntary offsets being proposed 100 days prior to the hearing date.

Thank you for the opportunity to provide input. We hope to remain informed as the project moves forward.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce Kreft", with a stylized flourish at the end.

Bruce Kreft
Chief, Conservation and Communications Division

CC. Luke Toso, USFWS
Steven Kahl, ND PSC

Alex Luman (MP)

From: Alex Luman (MP)
Sent: Thursday, January 29, 2026 11:09 AM
To: 'Mueller, Elisha K.'; Martin Piorkowski
Cc: Nick O'Neil
Subject: RE: [EXTERNAL MAIL] RE: Minnesota Power Longspur North Dakota Game and Fish
Attachments: Longspur_WCS_V1_01.29.2026_NoAppendices.pdf; Longspur_WCS_V1_01.29.2026_NoAppendices.docx

Hello Elisha,

Thank you for your patience please see the attached WCS documents without the Appendices. The full WCS is too large to send through email and is in the WEST file Sharing Website you accessed last week, I have attached a direct link. Please let me know if you have any questions on these files or issues accessing the site.

<https://clientcloud.west-inc.com/index.php/s/xSixkwAyFpcl69s>

Thank you,
Alexander Luman
Environmental Compliance Specialist
ALLETE Inc. 30 West Superior Street
Duluth, MN 55802
Cell 218-481-2796

From: Mueller, Elisha K. <ekmueller@nd.gov>
Sent: Friday, January 23, 2026 2:12 PM
To: Martin Piorkowski <mpiorkowski@west-inc.com>; Alex Luman (MP) <aluman@mnpower.com>
Cc: Nick O'Neil <noneil@west-inc.com>
Subject: [EXTERNAL MAIL] RE: Minnesota Power Longspur North Dakota Game and Fish

It came through... I will let you know if I have any issues accessing the documents next week. Thanks!

From: Martin Piorkowski <mpiorkowski@west-inc.com>
Sent: Friday, January 23, 2026 1:49 PM
To: Mueller, Elisha K. <ekmueller@nd.gov>; Alex Luman (MP) <aluman@mnpower.com>
Cc: Nick O'Neil <noneil@west-inc.com>
Subject: Re: Minnesota Power Longspur North Dakota Game and Fish

***** **CAUTION:** This email originated from an outside source. Do not click links or open attachments unless you know they are safe. *****

Elisha,

Please check any junk or trash folder as it sometimes get picked up a spam depending on firewall sensitivity; otherwise please give it 30-60 minutes and see if it comes in. If not please let me know and I'll pull IT directly in to make sure you have access.

Thanks,
Marty



Martin Piorkowski
Senior Biologist, Project Manager

Western EcoSystems Technology, Inc.
w: 307-365-3361 e: mpiorkowski@west-inc.com
a: 4007 State Street, Suite 109, Bismarck, ND 58503



From: Mueller, Elisha K. <ekmueller@nd.gov>
Sent: Friday, January 23, 2026 1:29 PM
To: Alex Luman (MP) <aluman@mnpower.com>
Cc: Martin Piorkowski <mpiorkowski@west-inc.com>; Nick O'Neil <noneil@west-inc.com>
Subject: RE: Minnesota Power Longspur North Dakota Game and Fish

The 2nd would work best. And I have still not received an email to access the file sharing site, just fyi.

Thanks.

From: Alex Luman (MP) <aluman@mnpower.com>
Sent: Friday, January 23, 2026 1:09 PM
To: Mueller, Elisha K. <ekmueller@nd.gov>
Cc: 'Martin Piorkowski' <mpiorkowski@west-inc.com>; 'Nick O'Neil' <noneil@west-inc.com>
Subject: RE: Minnesota Power Longspur North Dakota Game and Fish

You don't often get email from aluman@mnpower.com. [Learn why this is important](#)

***** **CAUTION:** This email originated from an outside source. Do not click links or open attachments unless you know they are safe. *****

Good afternoon Elisha,

Thank you for your patience it took a minute to get it setup and the studies submitted. The file sharing site from WEST was recently sent or is still on its way through email. The Wildlife Conservation Strategy is still being developed and are finalizing that early next week. I will send that separately when it is available. On the file site is eagle nest studies, bat acoustic, habitat, and presence absence surveys, Dakota skipper habitat, grassland, sharp-tailed grouse lek surveys, and whooping crane habitat assessment and associated GIS data. As stated before I would like to have a meeting to go over the previous letter in 2025 and see if you have any questions on the studies or files we provided. If you have any issues accessing the site please let us know and we can assist.

Please see the below dates for a meeting, please let me know what will work best for you:

Thursday 29th of January: 11am-1pm
Friday 30th: 8:30am-12pm
Monday 2nd of February: 2-4pm
Tuesday 3rd: 10-11am
Wednesday 4th: 8-10am, 1-3pm
Thursday 5th: 8-9:30am, 11am-1pm, 3-4pm

Thank you,
Alexander Luman
Environmental Compliance Specialist
ALLETE Inc. 30 West Superior Street
Duluth, MN 55802
Cell 218-481-2796

From: Alex Luman (MP)
Sent: Friday, January 9, 2026 3:06 PM
To: 'ekmueller@nd.gov' <ekmueller@nd.gov>
Cc: 'Martin Piorkowski' <mpiorkowski@west-inc.com>; 'Nick O'Neil' <noneil@west-inc.com>
Subject: RE: Minnesota Power Longspur North Dakota Game and Fish

Good afternoon Elisha,

Thank you for the phone call, as discussed Minnesota Power is finalizing its surveys, and I wanted to be able to share all data requested in the letter from Bruce Kreft on 6-29. This will contain wildlife surveys, spatial data, voluntary offsets, and a Wildlife Conservation Strategy. We are setting up a file sharing site for ease of transfer. Additionally, after receipt of these files I was hoping to schedule a meeting to review. We are anticipating the site to be ready next week and I will supply times we are able to meet for your selection.

Minnesota Power has also proposed to contribute \$230,000 dollars to the North Dakota Department of Agriculture's Grassland Compensatory mitigation for the Longspur Wind Project. This proposal is still pending approval from the NDDA.

Thank you,
Alexander Luman
Environmental Compliance Specialist
ALLETE Inc. 30 West Superior Street
Duluth, MN 55802
Cell 218-481-2796

From: Alex Luman (MP)
Sent: Tuesday, December 9, 2025 1:02 PM
To: 'Bkreft@nd.gov' <Bkreft@nd.gov>; 'ekmueller@nd.gov' <ekmueller@nd.gov>
Cc: Martin Piorkowski <mpiorkowski@west-inc.com>; Nick O'Neil <noneil@west-inc.com>
Subject: Minnesota Power Longspur North Dakota Game and Fish

Good afternoon,

My name is Alexander Luman, and I am with Minnesota Power. I am currently working on the Longspur Wind Project, for which you previously attended meetings and responded to our project introduction letter.

Minnesota Power would like to schedule a meeting with the North Dakota Game and Fish Department to share the current status of our environmental surveys, provide an update on the project, and review any additional requirements.

I will follow up with proposed dates for a meeting.

Thank you for your time and assistance. Please feel free to reach out with any questions

Have a great rest of your day,
Alexander Luman
Environmental Compliance Specialist
ALLETE Inc. 30 West Superior Street
Duluth, MN 55802
Cell 218-481-2796
Office 218-355-3029

Alex Luman (MP)

From: Alex Luman (MP)
Sent: Monday, February 16, 2026 10:03 AM
To: Mueller, Elisha K.; Bialke, Joseph P.
Cc: Miller, Adam M.; Martin Piorkowski; Mitchell Bettenhausen (ACE); John Hollingsworth (ACE)
Subject: Longspur Wind Avian Impact Offset Model
Attachments: Longspur Wind Summary Report.xlsx; Longspur_Avian_Offset_Model_2.12.2026.pdf

Good morning Elisha,

Thank you again for meeting with us on February 2. As discussed, I'm sharing the requested Longspur Wind Avian Offset Model for your review.

Minnesota Power sited the Longspur Wind turbines in areas identified as having low to medium wildlife impact according to the NDGFD Wind Energy Development BMPs. As such, we are providing this memo that outlines the BMPs framework approach and resulting analysis for grassland breeding birds.

I have also included the summary of the Decision Analysis Tool (DAT). This tool was used collaboratively by Minnesota Power, NDDA, and the Agriculture Commissioner to identify voluntary offset mitigation consistent with North Dakota Century Code 49-22-09.2 Mitigating environmental impacts - energy conversion facilities. Minnesota Power executed a memorandum of understanding for this mitigation with the Agriculture Commissioner in January for approximately 64 acres of offset.

There were a few questions during our meeting on February 2, and we wanted to provide additional context. Including NDDA on this communication is intended to support transparent information-sharing and ensure both agencies have visibility into the materials and process.

Minnesota Power remains committed to working collaboratively with both NDDA and NDGFD to support effective mitigation and advance the Longspur Wind Project in a way that respects the goals of each agency.

Please let me know if there are additional questions or if a follow-up discussion would be helpful.

Thank you,
Alexander Luman
Environmental Compliance Specialist
ALLETE Inc. 30 West Superior Street
Duluth, MN 55802
Cell 218-481-2796

Alex Luman (MP)

From: Alex Luman (MP)
Sent: Thursday, February 19, 2026 2:15 PM
To: 'ekmueller@nd.gov'; 'pisakson@nd.gov'; 'bkreft@nd.gov'; 'Bialke, Joseph P.'; 'Miller, Adam M.'
Cc: Martin Piorkowski
Subject: RE: Longspur Wind Biological Studies Meeting Notes
Attachments: Longspur agency meeting notes_20260202_Correction.pdf

Good afternoon all,

I wanted to provide an update based on a discrepancy Elisha identified in the meeting notes. In the *Additional Discussions* section on page three, the notes incorrectly stated that the project was submitted to the PSC on January 30, 2026. Earlier in the document, we correctly noted the submission date as December 30, 2025. I have updated the meeting notes to reflect the correct date, and the revised version is attached.

Additionally, Minnesota Power has provided the Memorandum on grassland impacts along with the requested Avian Impact Offset Model. Minnesota Power is also providing information for the final outstanding action item regarding Bird Flight Diverters. For clarification, Minnesota Power is installing spiral-type Swan Flight Diverters on its 2.5-mile 230 kV transmission line.

Please let me know if you have any questions.

Thank you,
Alexander Luman
Environmental Compliance Specialist
ALLETE Inc. 30 West Superior Street
Duluth, MN 55802
Cell 218-481-2796

From: Alex Luman (MP)
Sent: Monday, February 9, 2026 8:44 AM
To: ekmueller@nd.gov; pisakson@nd.gov; bkreft@nd.gov; Bialke, Joseph P. <bialkej@nd.gov>; Miller, Adam M. <admmiller@nd.gov>
Subject: FW: Longspur Wind Biological Studies Meeting Notes

Good morning all,

I am retrying this email since I received an undeliverable notification the first time. I removed the zip file containing shapefiles for the turbine locations and if this works I will work directly with Elisha so she can receive those.

Please let me know if you have any questions.

Thanks,
Alexander Luman
Environmental Compliance Specialist
ALLETE Inc. 30 West Superior Street
Duluth, MN 55802
Cell 218-481-2796

From: Alex Luman (MP)

Sent: Monday, February 9, 2026 8:32 AM

To: ekmueller@nd.gov; Bialke, Joseph P. <bialkej@nd.gov>; Miller, Adam M. <admmiller@nd.gov>;

hanna_edens@fws.gov; Toso, Luke B <luke_toso@fws.gov>; 'pisakson@nd.gov' <pisakson@nd.gov>; Bkreft@nd.gov

Cc: Martin Piorkowski <mpiorkowski@west-inc.com>; Mandy Bohnenblust <mandy.bohnenblust@merjent.com>; Nick

O'Neil <noneil@west-inc.com>; Mitchell Bettenhausen (ACE) <mbettenhausen@alletecleanenergy.com>; John

Hollingsworth (ACE) <jhollingsworth@alletecleanenergy.com>

Subject: Longspur Wind Biological Studies Meeting Notes

Good morning all,

Thank you for your patience. Please see the attached meeting notes, presentation, and the Longspur Wind Project turbine GIS files.

I also want to note one correction from last week's discussion: for the single turbine sited within unbroken grassland, there are five leks within two miles. Two of those leks fall within the project boundary.

Elisha, An impact analysis for the Longspur Wind Project will be provided later this week. This will follow the KeyWind Energy Development in North Dakota BMPs avian offset model results using Project-specific, field validated grassland data. Please let me know if you have any questions.

Thank you,

Alexander Luman

Environmental Compliance Specialist

ALLETE Inc. 30 West Superior Street

Duluth, MN 55802

Cell 218-481-2796

Alex Luman (MP)

From: Alex Luman (MP)
Sent: Friday, April 17, 2026 10:07 AM
To: 'Mueller, Elisha K.'; Isakson, Patrick T.; Kreft, Bruce L.
Cc: Martin Piorkowski; Mitchell Bettenhausen (ACE)
Subject: RE: [EXTERNAL MAIL] RE: Minnesota Power Longspur Wind Grassland Shift
Attachments: Fig3_Longspur_MortonCo_SUP_Preliminary Layout - Topo.pdf; Longspur PSC Figure 12 Page 14 Map.png

Hello Elisha,

Thank you for including the clarification response in this email chain, please see the comments in blue below. There was a bit of history I was providing to the original email regarding your questions on Leks that doesn't quite match your additional text but provided it before your update for additional context.

Would a meeting prior to the 30th be beneficial to the group to discuss any remaining clarifications?

Thank you,
Alexander Luman
Environmental Compliance Specialist
Minnesota Power/ALLETE Inc.
30 West Superior Street
Duluth, MN 55802
Cell 218-481-2796

From: Mueller, Elisha K. <ekmueller@nd.gov>
Sent: Friday, April 17, 2026 8:20 AM
To: Alex Luman (MP) <aluman@mnpower.com>; Isakson, Patrick T. <pisakson@nd.gov>; Kreft, Bruce L. <bkreft@nd.gov>
Cc: Martin Piorkowski <mpiorkowski@west-inc.com>
Subject: RE: [EXTERNAL MAIL] RE: Minnesota Power Longspur Wind Grassland Shift

Alex,

Below is the email I sent earlier. Any additions to help clarify further in response to your email are in red...

Thanks again for the call and pointing me to where I could find the WCS. Several concerns from reviewing the permit still stand, but I think some clarity within the WCS would be helpful.

[Of course, please let me know if you have any questions. Please also let me know if you have any questions for the studies that were supplied in January on the WEST file sharing site.](#)

First, both the Department and FWS highly value the WCS, and because it stands as a commitment to minimization and mitigation efforts, we highly recommend it be a part of the permit application. We request this because, for example, if a minimization effort (like marking the T line) is put in the WCS, but the WCS is not a part of the official application, it is difficult to guarantee that commitment is official. This makes evaluation of a project and determining if impacts have in fact been minimized, avoided or offset very difficult.

Fully understood we also value the importance, that is why we supplied the WCS to NDGFD and USFWS at least 100 days prior to the PSC hearing and had a meeting with NDGFD and USFWS to discuss the surveys and WCS. Sadly, USFWS could not join or get into the file-sharing site to obtain the survey information due to federal actions but did state the importance of working with your department and we stay committed to supply documents when they are able to receive them.

The conservation methods listed in the application are a few of the ones proposed in the WCS. Longspur plans on submitting the avoidance measures that are listed in the WCS to the PSC but wanted to provide the NDGFD and USFWS with plenty of time to review provide comments; so changes with the document did not confuse staff or the public. The WCS is a living document and should be updated to reflect changes during the course of construction and operations. With no comments, Minnesota Power assumed that the department appreciated the extensive list of avoidance measures and did not have any edits.

Regarding sharp-tailed grouse: the following sentence is from the 2024 final report “*Additionally, surveys followed NDGFD guidance by conducting a survey approximately every 0.5 mi but were constrained to publicly accessible roads and section line roads. However, this left survey gaps primarily within the central portion of the Project area as shown in Figure 3. WEST suggest if lek surveys are completed in subsequent years, additional access may need to be granted or an alternative survey strategy may need to be discussed with NDGFD for more complete coverage of the Study Area*”. Comparing it to the 2025 report, I did not see any significant changes to account for these data gaps. If there is information I am missing, please let me know.

The 2024 survey efforts were conducted to the extent possible given non-participating landowner status, limited public access, and road conditions during spring surveys. The most significant change between the 2024 and 2025 survey efforts is that the entire southern-central portion of the 2024 surveyed area was removed from the Project boundary. No project infrastructure is proposed in that area.

It was only after a thorough review of the permit application and reviewing both 2024 and 2025 surveys side by side that I understood this gap in the data. This was never indicated to us in any meeting or correspondence, and there were no discussions on how to address this gap prior to the 2025 survey year. Therefore, I did not realize until, again, I began a thorough review of the permit application.

Given the extensive suite of surveys, meetings did not focus exclusively on lek surveys. However, lek survey strategies and results were discussed during the 2024 meeting using Figure 3 from the 2024 report, and results were again reviewed during the 2025 meeting. The intent was to provide an overview of all survey efforts to support a thorough and informed review of the submitted reports.

We also have concerns about the risk to Whooping Cranes. I couldn't seem to find anything in the permit application about marking the T line. I see in the WCS it is noted that “*The above-ground T-Line will meet all Avian Power Line Interaction Committee (APLIC) practices (2006, 2012), as practicable.*” Can you clarify if you plan to mark the line? Based on location and analysis, both FWS and the Department would recommend the line be marked.

Yes that was a question you asked in our February meeting, which I thought was from your review of the WCS on an item that states we will mark the transmission line. As documented in our February 19th email, the Project still remains committed to installing yellow spiral-type Swan Flight Diverters on the 2.5-mile 230-kV transmission line. That correspondence also included the corrected meeting notes addressing the application filing date discrepancy.

Regarding avoiding unbroken grasslands – the commitment to avoid this habitat is made several times in the WCS “to the extent possible”. Can you provide clarity on this. Will there be infrastructure, turbines or otherwise, that

will be placed in unbroken grasslands? We can also discuss this further at the meeting, as our last remaining concern regards the impact calculation discrepancies and how these impacts are to be offset.

As stated when providing the update to the grasslands in an earlier email no turbines are sited in grasslands. Associated facilities are proposed in both unbroken and broken grasslands; however, construction timing restrictions during sharp-tailed grouse nesting season, as outlined in the WCS, are proposed for collection lines. Siting of associated facilities considers multiple factors, including wetland delineations, cultural resources, biological surveys, setbacks, and landowner preferences. Landowners are involved in siting decisions to accommodate agricultural operations and other site-specific considerations.

Longspur has taken measurable steps to reduce impacts to unbroken grasslands. For example, during county-level permitting an access road between Turbines 7 and 8 was proposed in unbroken grassland(Attached map); subsequent siting refinements shifted this access to follow a collection line, significantly reducing impacts. This change is reflected in Figure 12, page 14 of the PSC application (Attached map)

Apologies for the long email, but I figured sending this will help facilitate meaningful discussion on the 30th. No worries, I always welcome questions on the surveys and the project.

From: Alex Luman (MP) <aluman@mnpower.com>
Sent: Thursday, April 16, 2026 6:15 PM
To: Mueller, Elisha K. <ekmueller@nd.gov>; Isakson, Patrick T. <pisakson@nd.gov>; Kreft, Bruce L. <bkreft@nd.gov>
Cc: Martin Piorkowski <mpiorkowski@west-inc.com>
Subject: RE: [EXTERNAL MAIL] RE: Minnesota Power Longspur Wind Grassland Shift

******* CAUTION:** This email originated from an outside source. Do not click links or open attachments unless you know they are safe. *****

Hello Elisha,

Thank you for confirming receipt of the materials. Please let me know if you have any questions, or if you would like a new link to the file-sharing site that contains all studies, the WCS, and the spatial data. The original link sent in January should still be accessible for downloading. You previously indicated that the link was working back in January, but I would be more than happy to provide it again for the larger group if helpful.

Based on the letter submitted to the NDPSC today, it appears there may be concerns regarding preconstruction surveys. Since providing the data, and meeting with the department in February, we have not received any additional communication identifying specific issues with the surveys. Could you please elaborate on the concerns so we can better understand them? The items that were requested in the February meeting were supplied within the month, and no concerns were raised.

Minnesota Power remains committed to working collaboratively with the department and would like the opportunity to acknowledge and address any concerns. As noted, the WCS provided in January included several mitigation measures intended to address potential impacts. I did receive your email based on our phone call this morning and will provide a response.

I look forward to our meeting on April 30 and please let me know if you have any questions in the meantime regarding the Longspur project.

Thanks,

Alexander Luman
Environmental Compliance Specialist
Minnesota Power/ALLETE Inc.
30 West Superior Street
Duluth, MN 55802
Cell 218-481-2796

From: Mueller, Elisha K. <ekmueller@nd.gov>
Sent: Thursday, April 16, 2026 9:54 AM
To: Alex Luman (MP) <aluman@mnpower.com>; Isakson, Patrick T. <pisakson@nd.gov>; Kreft, Bruce L. <bkreft@nd.gov>
Cc: Martin Piorkowski <mpiorkowski@west-inc.com>
Subject: [EXTERNAL MAIL] RE: Minnesota Power Longspur Wind Grassland Shift

Hi Alex,

Thank you for the follow up email. I have received the documents and have been going through everything, as well as the permit application. The Department has several concerns and has been trying to coordinate with the Department of Agriculture. It sounds like a meeting has now been set for April 30th, so we look forward to discussing these concerns then.

Elisha

From: Alex Luman (MP) <aluman@mnpower.com>
Sent: Thursday, April 16, 2026 7:32 AM
To: Mueller, Elisha K. <ekmueller@nd.gov>
Cc: Martin Piorkowski <mpiorkowski@west-inc.com>
Subject: Re: Minnesota Power Longspur Wind Grassland Shift

***** **CAUTION:** This email originated from an outside source. Do not click links or open attachments unless you know they are safe. *****

Good morning Elisha,

I am writing to confirm receipt of my previous communication regarding the grasslands information and the avian offset model. Please let me know whether you received these documents and if you have any questions.

Have a great rest of your day,
Alexander Luman

Environmental Compliance Specialist

Minnesota Power/ALLETE Inc.

30 West Superior Street

Duluth, MN 55802

Cell 218-481-2796

From: Alex Luman (MP) <aluman@mnpower.com>
Sent: Tuesday, April 7, 2026 9:04 PM
To: 'Mueller, Elisha K.' <ekmueller@nd.gov>
Cc: mpiorkowski <mpiorkowski@west-inc.com>
Subject: Re: Minnesota Power Longspur Wind Grassland Shift

Hello Elisha,

Sorry for the delay, Zip files cannot be sent forward to you and the previous internal link to send files to you expired I have attached the newest grassland layer. Nothing has changed with the layout, the one broken grassland under turbine three has changed to cropland.

Please let me know if you have any questions.

Have a great day,
Alexander Luman

Environmental Compliance Specialist

Minnesota Power/ALLETE Inc.

30 West Superior Street

Duluth, MN 55802

Cell 218-481-2796

From: Alex Luman (MP)
Sent: Monday, March 30, 2026 11:41 AM
To: 'Mueller, Elisha K.' <ekmueller@nd.gov>
Cc: 'Martin Piorkowski' <mpiorkowski@west-inc.com>
Subject: RE: Minnesota Power Longspur Wind Grassland Shift

Hello Elisha,

Please see the attached updated Avian Offset Model. With this change, the grassland impact is eliminated, removing the only turbine previously affecting grassland habitat. This modification also eliminates any turbine sited on habitat within two miles of a Sharp-tailed Grouse lek. Previously, this turbine was located within two miles of five known leks, which was noted in the meeting summary that has been updated. Finally sharing the addendum for the grassland assessment. A shapefile will be sent forward through the previous method we have been using.

Please let me know if you have any questions.

Thank you,
Alexander Luman
Environmental Compliance Specialist
Minnesota Power/ALLETE Inc.
30 West Superior Street
Duluth, MN 55802
Cell 218-481-2796

From: Alex Luman (MP)
Sent: Friday, March 13, 2026 11:44 AM
To: Mueller, Elisha K. <ekmueller@nd.gov>
Cc: Martin Piorkowski <mpiorkowski@west-inc.com>
Subject: Minnesota Power Longspur Wind Grassland Shift

Hello Elisha,

I wanted to share an update on grasslands for the Longspur Project. As we discussed earlier this year, one turbine location had been identified on what initially appeared to be broken grassland. After further coordination with the project team and the landowner, we confirmed that this area is planted with alfalfa and is regularly hayed.

Based on this management history, nesting habitat does not appear to be present. We plan to provide you with an updated Impact Analysis and shapefile. I've attached the 2025 USDA report from the landowner showing the area classified as cropland and regularly hayed for your reference. Any comments or questions?

Please let me know if you need anything additional.

Thanks,
Alexander Luman
Environmental Compliance Specialist
Minnesota Power/ALLETE Inc.
30 West Superior Street
Duluth, MN 55802
Cell 218-481-2796

Alex Luman (MP)

From: Alex Luman (MP)
Sent: Thursday, April 16, 2026 1:18 PM
To: 'Mueller, Elisha K.'
Subject: RE: [EXTERNAL MAIL] PSC letter

Hello Elisha,

I wanted to thank you for this, and let you know that I am working on a reply to the most recent email you sent.

Thanks
Alexander Luman
Environmental Compliance Specialist
Minnesota Power/ALLETE Inc.
30 West Superior Street
Duluth, MN 55802
Cell 218-481-2796

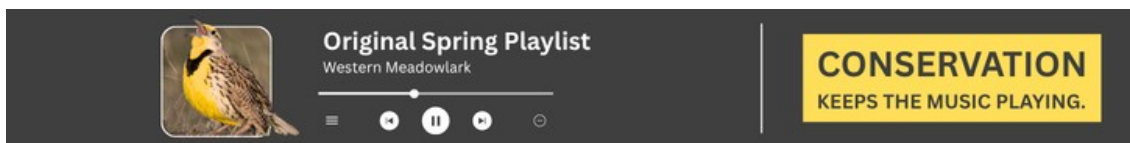
From: Mueller, Elisha K. <ekmueller@nd.gov>
Sent: Thursday, April 16, 2026 10:53 AM
To: Alex Luman (MP) <aluman@mnpower.com>
Subject: [EXTERNAL MAIL] PSC letter

Hi Alex,

Here is the letter that was submitted to the PSC. Let me know if there is anything else I can provide that might be helpful prior to the meeting on the 30th.

[Elisha Mueller](#)
Conservation Biologist

(701) 328-6348 • ekmueller@nd.gov • gf.nd.gov



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USFWS, NDGFD, NDDA, WEST, and Minnesota Power – Longspur Wind Project Introduction

Attendees:

NDGFD: Bruce Kreft, Elisha Mueller, Patrick Isakson
WEST: Martin Piorkowski, Nicholas O’Neil
Merjent: Mandy Bohnenblust
MN Power/ALLETE: Alex Luman, Mitchell Bettenhausen, John Hollingsworth

Location: Teams Meeting (Virtual)
Date/Time: February 2, 2026; 2:30 – 3:30 PM (CST)

Summary of Meeting:

Reintroducing the Project. An invitation was sent to US Fish and Wildlife Service (USFWS) but they were unable to attend due to new guidance/regulations on reviewing Wind Projects. Additionally, an invitation was extended to North Dakota Department of Agriculture (NDDA); however, there were scheduling conflicts that prohibited their attendance and Minnesota Power could not reschedule due to internal scheduling conflicts.

The objectives of this meeting were to reintroduce the Longspur Wind Project (Project) in Morton County, North Dakota to the wildlife agencies and to provide a review of the Project following the USFWS tiered approach (Tiers 1-4) described in the Wind Energy Guidelines including: survey result summaries from completed studies, best management practices and implementation of conservation measures at Project, and a post-construction monitoring study in anticipation to site permitting.

Project Overview and Timeline (A. Luman)

- MN Power provided an overview of their existing presence with Bison Wind. MN Power also provided details for the currently proposed Longspur Wind Project including number of turbines, collection design, and transmission line location that the Project proposes. MN Power provided an overview of the Project timeline with NDGFD and explained that the Project received permits from the Mercer and Morton counties in late 2025 and filed for permitting with the North Dakota Public Service Commission (NDPSC) on December 30th, 2025 and into early 2026. Targeted construction is anticipated in Q2 of 2026 with commercial operations beginning in Q4 2027.

Previous Study Review (M. Piorkowski)

- WEST acknowledged the USFWS Wind Energy Guidance Framework and the NDGFD Wind Energy Development Best Management Practices (BMPs) and how it has been applied to the Project through the various wildlife studies.

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- Tier 1/Tier 2 surveys – Landcover/land use types, land ownership, species of concern (Federal and North Dakota SGCN).
- Tier 3 studies – Whooping crane stopover habitat assessment, avian use surveys (results from Year 1; Year 2 in progress), raptor nest surveys (2 years of surveys following USFWS Region 6 guidance for eagles; no development within USFWS recommended buffers of eagle nests), grassland habitat assessment (no proposed turbines on unbroken grassland), sharp-tailed grouse surveys following guidance from NDGFD (no leks within 1-mi), Dakota skipper larval habitat assessment (no Project infrastructure intersecting DASK larval habitat), northern long-eared bat habitat assessment (13 acres of potentially suitable habitat within the Project Area), NLEB presence, probable absence surveys (USFWS-approved study design; no NLEB captured), bat acoustic activity surveys (no NLEB passes confirmed, relatively low activity observed),
- Wildlife Conservation Strategy – draft is complete and will be updated with wildlife agency input or as additional information becomes available. Conservation measures discussed as described in WCS.
- NDDA Voluntary Conservation Offsets – NDDA signed MOU January 20, 2026, for approximately 64.8 acres of permanently impacted habitat for a 35-year easement.

Future Studies (M. Piorkowski)

- Tier 4: Post-construction Study – Impacts to birds and bats at the Project are expected to be similar to other projects in the area. Twelve months of PCM will occur at the Project to document species composition and estimate avian and bat fatality ranges.

NDGFD Pre-Project Letter (A. Luman)

- A. Luman reviewed the major topics relayed in a letter provided by NDGFD and included sharp-tailed grouse, bat acoustic surveys, whooping crane stopover habitat assessment, and eagle nest surveys. A. Luman mentioned that MN Power proposes not to have a second year of bat acoustical surveys due to the limited NLEB habitat, low activity during acoustical survey and that no bats were captured during presence/absence survey. No other discussion was had on these topics.

Timeline and Next Steps (A. Luman)

- Working with NDGFD on WCS strategies
- Complete avian use study
- Finalize noxious weed management plan with Morton/Mercer counties
- Complete NDPSC permitting

Additional Discussions

- E. Muller asked if an impact assessment (avian offset model) was done for the Project or would be provided as outlined in the NDGFD BMPs and Shaffer and Buhl 2016. Indicated they would still be running the grassland impact analysis to be included in their letter to

Confidential Business Information

PSC site permitting. E. Muller requested a Project layout for their purpose of running the impact analysis. A. Luman and M. Piorkowski responded that the avian offset analysis was not intended to be formalized at this time as the Project used the NDDA Decision Analysis Tool (DAT) to discuss voluntary environmental offset contributions with NDDA. MN Power will provide a Project layout with the meeting notes. MN Power will also provide the NDGFD with a memorandum outlining the avian offset model results using Project-specific, field validated grassland data.

- E. Muller asked for clarification on 64.8 acres of permanently impacted habitat despite no turbines on grassland habitats (one turbine is located on broken grasslands). P. Isakson asked for a brief summary of the NDDA model and M. Piorkowski provided a brief description of the inputs used in the NDDA DAT including number of turbines, location within the State, distribution within the NDGFD “key native wildlife and habitat areas”.
- E. Muller identified that they recommended turbines in nesting habitat be sited two miles or further away from leks and asked how many leks were within two miles of the one turbine in the broken grassland habitat. M. Piorkowski stated that no other leks were within two miles. **(CORRECTED from previous notes)** A shift in the grassland status removed the only turbine sited within nesting habitat. This change in status ensures that no turbines are sited in nesting habitat within two miles of a Lek. After further coordination with the project team and the landowner, we confirmed that this area is planted with alfalfa and is regularly hayed.
- E. Muller asked if project would be using a buffer to avoid DASK habitat and possible distance of infrastructure to nearest potentially suitable DASK habitat. M. Piorkowski discussed previous USFWS guidance, requesting avoiding habitat, not requiring a specific buffer.
- E. Muller asked for a reminder on proposed infrastructure being developed and whether transmission line being developed would be marked with bird flight diverters. A. Luman stated that they would follow all APLIC standards but would need to follow-up on the installation of bird flight diverters specifically.
- E. Muller asked for reminder on when project was submitted to NDPSC for permitting (January 30, 2026) **(Corrected from previous notes)** The Project submitted it's application on December 30, 2025.

Schedule/Action Items

- MN Power to send Project layout to NDGFD. - Completed
- MN Power to provide meeting notes to all attendees. - Completed
- MN Power to review APLIC Standards on including Bird Flight Diverters. - Completed
- MN Power to provide a memorandum on grasslands. - Completed

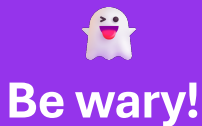
Alex Luman (MP)

From: Bialke, Joseph P. <bialkej@nd.gov>
Sent: Thursday, October 30, 2025 2:25 PM
To: Alex Luman (MP)
Cc: Miller, Adam M.; Mitchell Bettenhausen (ACE); Drew Janke (MP); Kevin Shelley
Subject: [EXTERNAL MAIL] Grassland Compensatory Mitigation for Longspur Wind Project - Teams call tomorrow afternoon (Friday) at 2:00 pm - October 31

Attachments: Mitigation Program Statutes (effective March 27, 2025).pdf; mitigation fund admin rules - eff 7.1.24.pdf; NDDA working lands mitigation program conservation easement deed (8.21.2025).pdf; BADGER - ND Dept of Ag MOU (Grassland and Wetland Impact).docx; Letter to PSC.pdf; NDDA - Badger Wind MOU dtd 2.29.24_MDC_Final.pdf; Letter to PSC Commissioner Christmann, dtd 12.29.23 re Oliver Wind IV Project.pdf; NDDA-Oliver Wind IV MOU (Final).pdf; Longspur Wind Project Notice - North Dakota Department of Agriculture Mitigation Program

Importance: High

Follow Up Flag: Follow up
Flag Status: Completed



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Happy Cyber Security Awareness Month! Continue to be 'Cyber Smart' by thinking twice before you click links, download attachments, or reply with personal information unless you recognize the sender and know the content is safe.

Alex

Thanks for the below email and our congenial phone conversation this morning.

As discussed, we welcome your interest in the North Dakota Department of Agriculture (NDDA) Working Lands Mitigation Program.

Additionally, thank you for your verbal open public records request to the NDDA. I am responding back to you on behalf of NDDA.

In your open public records request, you requested, in summary:

- a template document/MoU examples related to recent program participation of wind power energy companies in the NDDA Working Lands Mitigation Program

Attached are documents responsive to your request. Any charges or fees associated with NDDA responding to this request for open public records are waived.

For your additional reference, I have also attached corresponding letters from Agriculture Commissioner Goehring to the ND Public Service Commission in relation to the Badger and Oliver Wind Projects, as well as relevant ND statutes and administrative rules. I also attached a word document of a previous finalized MOU.

Moreover, earlier this year the Legislature granted the Agriculture Commissioner the authority to purchase and hold easements on behalf the State (see attached applicable mitigation program ND statutes). Additionally, we are in the process of amending our administration rules accordingly. We'd be happy to discuss these potential administrative rule amendments with you.

We have also created a sample draft conservation easement template (attached). We strived to make it concise, straightforward, and easy to understand – with an emphasis on continuing working lands.

Additionally, we extended our consulting services contract with West Eco Systems Technology through current fiscal biennium. West will be able to provide us technical expertise as we continue to develop and implement our program. I've cc'ed Kevin Shelly from West on this email. We hope he can be on the call tomorrow afternoon.

Now that the Agriculture Commissioner has statutory authority to purchase and hold conservation easements, beginning in the Spring, 2026, we intend to locate, negotiate, and purchase a number of long-term conservation easements in and around North Dakota (using funds from the Mitigation fund you have indicated you wish to contribute to). As you know, these conservation easements are to be limited in duration to the life of the energy facility, as close to the energy facility as feasibly possible, be working lands conservation easements, and, as appropriate, be similar habitat (i.e., grasslands to grasslands, wetlands to wetlands).

In relation to your specific project, if you happen to know of any landowners in the areas of Morton and Mercer counties who might have land suitable for a working lands conservation easement, we are absolutely open to making contact with them – either later on this winter or early next spring.

Thank you and I look forward to chatting with you tomorrow (Friday) afternoon at 2:00 pm.

All the best,

Dutch

J.P. “Dutch” Bialke

General Counsel/Senior Policy Advisor

Special Assistant Attorney General

ND Department of Agriculture

600 E. Boulevard Ave. Dept. 602 | Bismarck, ND 58505

P: 701.328.1496 | F: 701.328.4567

bialkej@nd.gov | www.ndda.nd.gov



From: Alex Luman (MP) <aluman@mnpower.com>
Sent: Wednesday, October 29, 2025 8:35 PM
To: Bialke, Joseph P. <bialkej@nd.gov>
Cc: Miller, Adam M. <admiller@nd.gov>; -Info-DOA Energy Reclamation <energyreclamation@nd.gov>; Mitchell Bettenhausen (ACE) <mbettenhausen@alletecleanenergy.com>
Subject: RE: [EXTERNAL MAIL] RE: Request for Meeting ? Grassland Compensatory Mitigation for Longspur Wind Project

***** **CAUTION:** This email originated from an outside source. Do not click links or open attachments unless you know they are safe. *****

Hello Dutch,

Apologies I was away from the office and have been having issues with my cell phone so your call might have not gone through.

I think teams would be the best option for this. I have provided times for the next week. Please let me know if any of these times work.

Thursday 30th: 2pm-2:30
Friday 31st: 2pm-2:30
Monday 3rd 11am-12, 3:30-4
Tuesday 4th: 9:30am-10, 3:30-4
Thursday 6th : 11am-12, 3:30-4

Thank you,
Alexander Luman
Environmental Compliance Specialist I
ALLETE Inc. 30 West Superior Street
Duluth, MN 55802
Cell 218-481-2796
Office 218-355-3029

From: Bialke, Joseph P. <bialkej@nd.gov>
Sent: Tuesday, October 28, 2025 3:01 PM
To: Alex Luman (MP) <aluman@mnpower.com>
Cc: Miller, Adam M. <admiller@nd.gov>; -Info-DOA Energy Reclamation <energyreclamation@nd.gov>; Mitchell Bettenhausen (ACE) <mbettenhausen@alletecleanenergy.com>
Subject: [EXTERNAL MAIL] RE: Request for Meeting ? Grassland Compensatory Mitigation for Longspur Wind Project

You don't often get email from bialkej@nd.gov. [Learn why this is important](#)


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Alex

I tried calling you on your provided phone numbers, but was only able to leave you a quick voice message.

Thank you for your detailed email. Yes, we'd like to work with you.

Please let me know a time to call, or feel free to call me at my below phone number.

Also, if you wish, we could meet on teams or in person.

All the best,

Dutch

J.P. "Dutch" Bialke

General Counsel/Senior Policy Advisor

Special Assistant Attorney General

ND Department of Agriculture

600 E. Boulevard Ave. Dept. 602 | Bismarck, ND 58505

P: 701.328.1496 | F: 701.328.4567

bialkej@nd.gov | www.ndda.nd.gov



From: Alex Luman (MP) <aluman@mnpower.com>

Sent: Monday, October 27, 2025 2:51 PM

To: -Info-DOA Energy Reclamation <energyreclamation@nd.gov>

Cc: Mitchell Bettenhausen (ACE) <mbettenhausen@alletecleanenergy.com>

Subject: Request for Meeting ? Grassland Compensatory Mitigation for Longspur Wind Project

You don't often get email from aluman@mnpower.com. [Learn why this is important](#)

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Good morning to Whom it May Concern,

My name is Alex Luman, and I'm an Environmental Compliance Specialist with ALLETE, Inc. We are currently working on the Longspur Wind project located in Morton County, North Dakota. As part of our commitment to responsible development and habitat stewardship, we are seeking to engage with the North Dakota Department of Agriculture to discuss compensatory mitigation strategies for impacts associated with wind infrastructure. We have finalized expected turbine impacts and have provided below our summary of mitigation.

Project Summary Report

Wind Project Design & Compensatory Mitigation Cost

North Dakota Working Lands Mitigation Fund

Wind Project Name:	Longspur Wind	Report Date:
Developer:	Minnesota Power	Expected PSC Filing Date:
Company PM:	Alex Luman, Mitchell Bettenhausen	Consultant PM:

PROJECT DESIGN & SITING SUMMARY

Item		Item
County/Counties	Morton	# Turbines: Developed
ND Region	SW	#Turbines: Mixed
Project Capacity	202.5	# Turbines: Natural
# Turbines	45	# Turbines: Unbroken
MW per Turbine	4.50	

WIND PROJECT IMPACTS & COMPENSATORY MITIGATION PROJECT(S) DESIGN

Wind Project Impacts		Compensatory Mitigation Des
Total Footprint: ac	64.80	Land Cover Cost Basis
Footprint: ac/turbine	1.44	Easement % Cost Basis
Footprint: ac/mw	0.32	Mitigation Method
Environmental Debits	83.52	Habitat Mitigation Goal*

SUGGESTED CONTRIBUTION TO COVER PROJECTED COST OF COMPENSATORY MITIGATION

Item		Item
Mitigation of Similar Habitat		Mitigation of Dissimilar Habitat
Projected Cost :	\$146,678	Projected Cost:

*Cost increase associated with dissimilar, low habitat

We would appreciate the opportunity to meet with a member of your team to explore mitigation options and ensure alignment with state expectations and best practices. To support this discussion, we've attached maps outlining the current and proposed infrastructure for the Longspur Project.

Please let us know your availability for a meeting in the coming weeks. We are happy to accommodate your schedule and can meet virtually or in person as appropriate.

Thank you for your time and consideration. We look forward to collaborating with you on this important matter.

Thank you,

Alexander Luman
Environmental Compliance Specialist I
ALLETE Inc. 30 West Superior Street
Duluth, MN 55802
Cell 218-481-2796
Office 218-355-3029

Alex Luman (MP)

From: Alex Luman (MP)
Sent: Monday, March 16, 2026 3:42 PM
To: 'Bialke, Joseph P.'
Cc: Miller, Adam M.; Mitchell Bettenhausen (ACE)
Subject: RE: [EXTERNAL MAIL] MOU signed by ND Agriculture Commissioner Goehring - Grassland Compensatory Mitigation for Longspur Wind Project
Attachments: Notice of Filing and Notice of Hearing.pdf; T-3 Grassland Shift.pdf

Hello Dutch,

I wanted to update you on the Longspur Project. The PSC finalized our hearing date and that will be on the 18th of May, please see the attachment for more details. One additional detail for the project is a change in one grassland status. Previously the project had sited one turbine on broken grassland, after further coordination with the project team and the landowner, we confirmed that this area is planted with alfalfa and is regularly hayed, we are reclassifying this grassland as cropland.

I've attached the 2025 USDA report from the landowner showing the area classified as cropland and regularly hayed for your reference. Any comments or questions? We are not looking to change the mitigation just wanted to share this update of reducing environmental impact.

Thank you,
Alexander Luman
Environmental Compliance Specialist
Minnesota Power/ALLETE Inc.
30 West Superior Street
Duluth, MN 55802
Cell 218-481-2796

From: Bialke, Joseph P. <bialkej@nd.gov>
Sent: Wednesday, January 21, 2026 2:56 PM
To: Alex Luman (MP) <aluman@mnpower.com>
Cc: Miller, Adam M. <admiller@nd.gov>; Mitchell Bettenhausen (ACE) <mbettenhausen@alletecleanenergy.com>
Subject: RE: [EXTERNAL MAIL] MOU signed by ND Agriculture Commissioner Goehring - Grassland Compensatory Mitigation for Longspur Wind Project

Alex

Thanks for our congenial and professional conversation this afternoon. Always great to talk with you.

As we discussed, at the end of paragraph 10 of the MOU, it has a typo in which it says both "(Seventy-five thousand dollars" and "(\$115,000)". As we further discussed, it was intended to read "(one hundred fifteen thousand dollars (\$115,000))"

Given that paragraph 10 earlier says that Longspur will transfer to the fund a minimum of 50% of the total voluntary contribution as stated in para 7 (total of which is \$230,000 – 50% of which would be \$115,000), and that in paragraph 11, it says that Longspur may make other payments as voluntary contributions at other times, the typo does not appear to change the intent or overall import of the MOU, as per the mutual understanding of the parties.

Please email me back and confirm that you concur with the above understanding that, pursuant to the MOU, Longspur will still make two contributions to the fund, \$115K at milestone 1 and \$115K at milestone 2, totaling \$230K. Upon your email concurrence, no further action would be required.

Many thanks and I look forward to hearing from you.

All the best,

Dutch

J.P. "Dutch" Bialke

General Counsel/Senior Policy Advisor

Special Assistant Attorney General

ND Department of Agriculture

600 E. Boulevard Ave. Dept. 602 | Bismarck, ND 58505

P: 701.328.1496 | F: 701.328.4567

bialkej@nd.gov | www.ndda.nd.gov



From: Alex Luman (MP) <aluman@mnpower.com>

Sent: Tuesday, January 20, 2026 4:33 PM

To: Bialke, Joseph P. <bialkej@nd.gov>

Cc: Miller, Adam M. <admiller@nd.gov>; Kevin Shelley <kshelley@west-inc.com>; Mitchell Bettenhausen (ACE) <mbettenhausen@alletecleanenergy.com>

Subject: RE: [EXTERNAL MAIL] MOU signed by ND Agriculture Commissioner Goehring - Grassland Compensatory Mitigation for Longspur Wind Project

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Hello Dutch,

Thank you very much for your help throughout this process. Minnesota Power appreciates the opportunity to be able to support North Dakota in addition to providing excellent projects. Milestone one, which will be the first payment Minnesota Power estimates to be at the end of quarter two and possibly into quarter three of 2026. As we get closer to that time period I will reach out to connect on the payment process, confirm status of project, and simply connect.

Please see the attached signed MOU from Minnesota Power. Is there any formal letter or document that comes out of this for state filing?

Have a great rest of your day,
Alexander Luman
Environmental Compliance Specialist
ALLETE Inc. 30 West Superior Street
Duluth, MN 55802
Cell 218-481-2796

From: Bialke, Joseph P. <bialkej@nd.gov>
Sent: Tuesday, January 20, 2026 3:52 PM
To: Alex Luman (MP) <aluman@mnpower.com>
Cc: Miller, Adam M. <admiller@nd.gov>; Kevin Shelley <kshelley@west-inc.com>; Mitchell Bettenhausen (ACE) <mbettenhausen@alletecleanenergy.com>
Subject: [EXTERNAL MAIL] MOU signed by ND Agriculture Commissioner Goehring - Grassland Compensatory Mitigation for Longspur Wind Project
Importance: High

Alex

Thanks for your patience!

Commissioner Goehring approved and signed the MOU this afternoon, without any further changes. Attached is the signed MOU.

Please have Director Anderson (or someone else authorized by Minnesota Power) sign the attached MOU. Then return the MOU, now signed by both parties, back to me.

The MOU is effective once signed by both parties.

Thank you for your professional collaboration on this mitigation agreement. Looking forward to continuing to work with you as the Longspur Wind Project progresses.

All the best,

Dutch

J.P. "Dutch" Bialke

General Counsel/Senior Policy Advisor
Special Assistant Attorney General
ND Department of Agriculture
600 E. Boulevard Ave. Dept. 602 | Bismarck, ND 58505
P: 701.328.1496 | F: 701.328.4567
bialkej@nd.gov | www.ndda.nd.gov



From: Alex Luman (MP) <aluman@mnpower.com>
Sent: Friday, January 16, 2026 12:35 PM
To: Bialke, Joseph P. <bialkej@nd.gov>
Cc: Miller, Adam M. <admiller@nd.gov>; Kevin Shelley <kshelley@west-inc.com>; Mitchell Bettenhausen (ACE) <mbettenhausen@alletecleanenergy.com>
Subject: RE: [EXTERNAL MAIL] FW: Grassland Compensatory Mitigation for Longspur Wind Project

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Hello Dutch,

Thank you for providing the updated MOU, as discussed over the phone the only revision is the signatory from Minnesota Power. Please let me know if you have any questions.

Have a great rest of your day and weekend,
Alexander Luman
Environmental Compliance Specialist
ALLETE Inc. 30 West Superior Street
Duluth, MN 55802
Cell 218-481-2796

From: Bialke, Joseph P. <bialkej@nd.gov>
Sent: Friday, January 16, 2026 10:32 AM
To: Alex Luman (MP) <aluman@mnpower.com>
Cc: Miller, Adam M. <admiller@nd.gov>; Kevin Shelley <kshelley@west-inc.com>; Mitchell Bettenhausen (ACE) <mbettenhausen@alletecleanenergy.com>
Subject: [EXTERNAL MAIL] FW: Grassland Compensatory Mitigation for Longspur Wind Project

Alex

Good talking with you this morning. Attached is the updated draft proposed MOU, with minor edits we discussed.

Please give it a final review before I present it to Agriculture Commissioner Goehring.

All the best,

Dutch

J.P. "Dutch" Bialke

General Counsel/Senior Policy Advisor
Special Assistant Attorney General
ND Department of Agriculture
600 E. Boulevard Ave. Dept. 602 | Bismarck, ND 58505
P: 701.328.1496 | F: 701.328.4567
bialkej@nd.gov | www.ndda.nd.gov



From: Alex Luman (MP) <aluman@mnpower.com>
Sent: Wednesday, December 10, 2025 9:47 AM
To: Bialke, Joseph P. <bialkej@nd.gov>
Cc: Miller, Adam M. <admiller@nd.gov>; Kevin Shelley <kshelley@west-inc.com>; Mitchell Bettenhausen (ACE) <mbettenhausen@alletecleanenergy.com>
Subject: Grassland Compensatory Mitigation for Longspur Wind Project

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Good morning Dutch,

Minnesota Power has been reevaluating its donation, last time we talked it was going to be an approximate \$150,000 donation through the conserve method, now Minnesota Power is looking to donate approximately \$230,000 through the enhance measure. We have been updating our Memorandum of Understanding to reflect the change and wanted to provide it to you for any final edits you may have. Please see the attached MOU for your review.

Thank you,
Alexander Luman
Environmental Compliance Specialist
ALLETE Inc. 30 West Superior Street
Duluth, MN 55802
Cell 218-481-2796
Office 218-355-3029

Alex Luman (MP)

From: Bialke, Joseph P. <bialkej@nd.gov>
Sent: Thursday, April 2, 2026 4:05 PM
To: Kreft, Bruce L.
Cc: Goehring, Doug C.; Williams, Jeb R.; Bodine, Thomas H.; Miller, Adam M.; Alex Luman (MP); Kevin Shelley; Reinke, Jody L.
Subject: [EXTERNAL MAIL] RE: Longspur Impact Analysis
Attachments: Notice of Filing and Notice of Hearing.pdf; Longspur_Avian_Offset_Model_2.12.2026.pdf; Longspur Wind Summary Report.xlsx

Importance: High

Follow Up Flag: Follow up
Flag Status: Completed

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EXTERNAL
MAIL**

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Bruce

I spoke with Commissioner Goehring. He'll meet with you in relation to Longspur mitigation.

It may be beneficial for representatives from Longspur and West to also attend the meeting, to provide input as necessary.

The meeting probably won't occur until towards the end of the month though, due to the Commissioner's schedule and given that the PSC hearing isn't until May 18.

I understand that Longspur has already provided you their offset model and wind summary report – but I've attached them again, just in case you don't have copies.

Please let me know if you need anything else.

All the best,

Dutch

J.P. "Dutch" Bialke
General Counsel/Senior Policy Advisor
Special Assistant Attorney General
ND Department of Agriculture

600 E. Boulevard Ave. Dept. 602 | Bismarck, ND 58505
P: 701.328.1496 | F: 701.328.4567
bialkej@nd.gov | www.ndda.nd.gov



Alex Luman (MP)

From: Alex Luman (MP)
Sent: Tuesday, April 14, 2026 4:37 PM
To: 'Bialke, Joseph P.'; Kreft, Bruce L.; Kevin Shelley
Cc: Goehring, Doug C.; Williams, Jeb R.; Bodine, Thomas H.; Miller, Adam M.; Reinke, Jody L.; Mitchell Bettenhausen (ACE); Martin Piorkowski
Subject: RE: [EXTERNAL MAIL] Longspur Wind mitigation mtg - Thurs, April 30, 2026, at 11:00 am, Capitol Building, 6th Floor Conf Rm

Hello Dutch,

Thank you for confirming the meeting date, time, and location. Minnesota Power will attend in person.

At this time, I believe all materials relevant to the Longspur Wind mitigation discussion have been provided to the participating departments. However, if there are any documents the group would like reviewed in advance of the meeting, please let me know and I would be happy to circulate them.

We appreciate the coordination and look forward to the discussion.

Have a great rest of your day,
Alexander Luman
Environmental Compliance Specialist
Minnesota Power/ALLETE Inc.
30 West Superior Street
Duluth, MN 55802
Cell 218-481-2796

From: Bialke, Joseph P. <bialkej@nd.gov>
Sent: Tuesday, April 14, 2026 10:45 AM
To: Kreft, Bruce L. <bkreft@nd.gov>; Alex Luman (MP) <aluman@mnpower.com>; Kevin Shelley <kshelley@west-inc.com>
Cc: Goehring, Doug C. <goehring@nd.gov>; Williams, Jeb R. <jwilliam@nd.gov>; Bodine, Thomas H. <tbodine@nd.gov>; Miller, Adam M. <admmiller@nd.gov>; Reinke, Jody L. <jodyreinke@nd.gov>
Subject: [EXTERNAL MAIL] Longspur Wind mitigation mtg - Thurs, April 30, 2026, at 11:00 am, Capitol Building, 6th Floor Conf Rm

Bruce/Alex/Kevin

The meeting regarding mitigation relating to the Longspur Wind Energy Project is scheduled for Thursday, April 30, 2026, at 11:00 am, Capitol Building, 6th Floor Conference Room.

Thank you for your patience. I'll be sending out a calendar invite later today.

Please let me know if you have any questions or need any further information.

All the best,

Dutch

J.P. “Dutch” Bialke

General Counsel/Senior Policy Advisor
Special Assistant Attorney General
ND Department of Agriculture
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From: Bialke, Joseph P.
Sent: Thursday, April 2, 2026 4:05 PM
To: Kreft, Bruce L. <bkreft@nd.gov>
Cc: Goehring, Doug C. <goehring@nd.gov>; Williams, Jeb R. <jwilliam@nd.gov>; Bodine, Thomas H. <tbodine@nd.gov>; Miller, Adam M. <admmiller@nd.gov>; Alex Luman (MP) <aluman@mnpower.com>; Kevin Shelley <kshelley@west-inc.com>; Reinke, Jody L. <jodyreinke@nd.gov>
Subject: RE: Longspur Impact Analysis
Importance: High

Bruce

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