

Overview – Keystone Pipeline Project Cultural Resource Surveys and Reports

Cultural Resource Surveys and Reports

Construction and operation of the Keystone Pipeline Project (Keystone) may affect cultural resources protected under the National Historic Preservation Act (NHPA), and by individual State legislation. During 2006, Keystone initiated contact with the State Historic Preservation Officer (SHPO) in each state to identify known cultural resource sites, and to develop survey plans. Keystone submitted records searches and research designs to each state for review and approval. Agency coordination documentation and survey protocols were filed by Keystone with the Department of State (DOS) on September 15, 2006.

Cultural resource field surveys along the proposed Mainline pipeline right-of-way were initiated in the spring and summer of 2006, and were completed in the fall of 2006. These surveys were conducted along the pipeline route alignment that was filed with the DOS on September 15, 2006. Additional field surveys will be conducted during the spring and summer of 2007 to survey pipeline reroutes, pump stations, certain pipe storage yards and contractor yards, access roads, and pipeline segments where access was not previously available. Field surveys will be conducted along the Cushing Extension and on pump station sites, pipe storage yards and contractor yards associated with the extension in early 2007.

Keystone reached an agreement with Kinder Morgan to purchase the cultural resources survey reports for the proposed Rockies Express Pipeline (REX) segment that will be located parallel to the Keystone pipeline route in Nebraska, Kansas, and Missouri. The Rockies Express reports and concurrence letters received from the SHPO in each state were included in the November 17, 2006, supplemental filing.

Keystone initiated discussions with the Nebraska, Kansas, and Missouri SHPOs to define a process for incorporating the REX survey results into the Keystone project. Keystone prepared maps of its proposed construction surface disturbance footprint in relation to the REX cultural resources survey corridor. These maps documented the portion of the REX survey corridor that includes the proposed Keystone surface disturbance. The SHPOs reviewed this submittal and provided concurrence letters for the portion of the Keystone Project located within the REX survey corridor. The concurrence letters are included in this supplemental filing.

Keystone will document proposed surface disturbance located outside the REX survey corridor and will conduct field surveys in these areas. The results will be submitted to the SHPOs in a separate Keystone report, as agreed to by the SHPOs.

Included in this filing are six binders:

- Binder 1: North Dakota Cultural Resources Report.
- Binder 2: South Dakota Cultural Resources Report.
- Binder 3: Nebraska Cultural Resources Report.
- Binder 4: Kansas Cushing Research Design/SHPO concurrence letter; Keystone/REX Co-locate transmittals and SHPO concurrence.
- Binder 5: Missouri Interim Cultural Resources/Site Testing Report.
- Binder 6: Illinois Cultural Resources Report, Site Testing Report, and Corps of Engineers Letter Report.

These reports contain results of the pedestrian survey along the Mainline pipeline right-of-way in North/South Dakota, Nebraska, Missouri, and Illinois. Site testing to determine National Register eligibility was conducted in North Dakota, Missouri, and Illinois. The results of site testing in Missouri and Illinois can be found in the testing reports included in this filing; results of testing in North Dakota will be included in the March filing. All potentially eligible sites in South Dakota and Nebraska were avoided by reroutes; therefore, no site testing was conducted in these states. Also included in this filing is the revised Kansas Cushing research design, Keystone/REX co-location transmittals, including maps, and SHPO

concurrence. All of the information contained in this filing will be reviewed by the SHPOs and the DOS and will provide documentation for the Environmental Impact Statement.

As stated previously, Keystone will file cultural resource survey reports in early 2007 for the Cushing Extension, as well as Mainline reroutes, ancillary facilities, and any additional site testing (if required).

Table 1 outlines the process for the collection and submission of cultural resource data.

The cultural resource reports filed herewith identify a number of sites in each state that have either not been evaluated for eligibility for listing on the National Register of Historic Places (NRHP) or have been determined potentially NRHP-eligible, based on preliminary field investigations and testing. The cultural resource reports for each state recommend that a finding of no impact is appropriate, if Keystone agrees to avoid the unevaluated or potentially eligible sites. Keystone commits to avoid each of the sites in question. Table 2 lists the sites, along with the type of site and the avoidance measures that Keystone commits to undertake to avoid each of those sites.

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Table 1 - Keystone Pipeline Project – Cultural Resources Field Surveys and Report Completion Plan – January 2007

State	Survey Status	September 2006 DOS Filing	November 2006 DOS Filing	January 2007 DOS Filing	Supplemental Reports
North Dakota	Field Survey Completion Status as of January 2007: <ul style="list-style-type: none">• Pedestrian Survey – 88%• Site Testing – 100% Spring 2007 – follow up surveys as needed for reroutes and ancillary sites.	Cultural resources record search; Survey protocols and survey areas.	Keystone Cultural Resources Status Report (pedestrian survey results and site forms, site testing methodology).	Compilation of 2006 surveys (pedestrian and geomorphological surveys).	March 2007 Site testing report. May or June 2007 Reports will include survey results for any pipeline reroutes and ancillary facilities, and site testing (if required).
South Dakota	Completion Status as of January 2007: <ul style="list-style-type: none">• Pedestrian Survey – 86%• Site Testing – no sites Spring 2007 – follow up surveys as needed for reroutes and ancillary sites.	Cultural resources record search; Survey protocols and survey areas.	Keystone Cultural Resources Status Report (pedestrian survey results and site forms, site testing methodology).	Compilation of 2006 surveys (pedestrian and geomorphological surveys).	May or June 2007 Reports will include survey results for any pipeline reroutes and ancillary facilities, and site testing (if required).

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Nebraska	<p>Mainline Completion Status as of January 2007:</p> <ul style="list-style-type: none"> • Pedestrian Survey – 97% • Site Testing – no sites <p>Spring 2007 – Mainline follow up surveys; Cushing Extension.</p>	Cultural resources record search; Survey protocols and survey areas.	<p>Keystone Cultural Resources Status Report (pedestrian survey results and site forms).</p> <p>Rockies Express (REX) Cultural Surveys in NE (pedestrian survey results and SHPO concurrence for segments where REX and Keystone are co-located).</p>	<p>Compilation of 2006 surveys (pedestrian and geomorphological surveys).</p> <p>Map documentation of Keystone proposed construction ROW overlap with REX cultural resource survey areas and SHPO concurrence.</p>	<p>March 2007</p> <p>Mainline field survey status report for any areas outside REX survey areas.</p> <p>Cushing Extension field surveys – status report.</p> <p>May or June 2007</p> <p>Reports will include Mainline survey results for pipeline reroutes and ancillary facilities, and site testing (if required).</p> <p>Cushing Extension – Pedestrian survey results; site testing (if required).</p>

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Kansas	<p>Field Survey Completion Status as of January 2007:</p> <ul style="list-style-type: none"> • Mainline Pedestrian Survey – 99% • Mainline Site Testing – 0% • Cushing Extension – 0% <p>2007 Spring – Mainline Follow up surveys; Cushing Extension.</p>	Cultural resources record search; Survey protocols and survey areas.	REX Cultural Surveys in KS (pedestrian survey results and SHPO concurrence for segments where REX and Keystone are co-located).	<p>Map documentation of Keystone proposed construction ROW overlap with REX cultural resource survey areas and SHPO concurrence.</p> <p>Cushing Extension Revised research design (maps included) and SHPO concurrence.</p>	<p>March 2007</p> <p>Mainline field survey status report for any areas outside REX survey area.</p> <p>Cushing Extension field surveys – status report.</p> <p>May or June 2007</p> <p>Reports will include Mainline survey results for pipeline reroutes and ancillary facilities, and site testing (if required).</p> <p>Cushing Extension – Pedestrian survey results; site testing (if required).</p>
Missouri	<p>Field Survey Completion Status as of January 2007:</p> <ul style="list-style-type: none"> • Mainline Pedestrian Survey – 85% • Mainline Site Testing – 44% 	Cultural resources record search; Survey protocols and survey areas.	Keystone Cultural Resources Status Report (pedestrian and geomorphological survey results and site forms)	<p>Compilation of 2006 surveys (pedestrian and geomorphological surveys and site testing).</p> <p>Map documentation</p>	<p>May or June 2007</p> <p>Reports will include Mainline survey results for pipeline reroutes and ancillary facilities, and site testing (if required).</p>

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	Spring 2007 – Follow up surveys for reroutes and ancillary sites.		REX Cultural Surveys in MO (pedestrian survey results and SHPO concurrence for segments where REX and Keystone are co-located.	of Keystone proposed construction ROW overlap with REX cultural resource survey areas and SHPO concurrence.	required).
Illinois	Field Survey Completion Status as of January 2007: <ul style="list-style-type: none"> • Pedestrian Survey – 89% • Site Testing –33% Spring 2007 – Follow up surveys for reroutes and ancillary sites.	Cultural resources record search; Survey protocols and survey areas.	Keystone Cultural Resources Status Report (pedestrian survey results and site forms).	Compilation of 2006 surveys (pedestrian and geomorphological surveys, and site testing).	May or June 2007 Mainline survey results for pipeline reroutes and ancillary facilities, and site testing (if required).
Oklahoma	Spring 2007 Pedestrian and geomorphological surveys; site testing, if required.	Cultural resources record search; Survey protocols and survey areas.	No information filed.	No information filed.	March 2007 Cushing Extension field surveys – status report. May or June 2007 Cushing Extension survey results for pipeline reroutes, ancillary facilities; site testing, if required.

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Table 2. Potentially Eligible Cultural Resource Sites and Reroute/Avoidance Status

	MP	Site Number	Site Type	Mitigation
North Dakota	March CL – MP 163.4	32BA170	Unevaluated Prehistoric lithic scatter	Rerouted to avoid site Reroute to be surveyed in 2007
	March CL – MP 20.6	32PB202	Unevaluated Prehistoric lithic scatter	Rerouted to avoid site Reroute to be surveyed in 2007
South Dakota	March CL – MP 265.3	39DA71	Archaeological rock cairn	Rerouted to avoid site Reroute to be surveyed in 2007
	March CL – MP 416.8	39YYK77	Archaeological rock cairn	Rerouted to avoid site Reroute to be surveyed in 2007
	March CL – MP 418.0	39YK79	Prehistoric artifact scatter	Rerouted to avoid site Reroute to be surveyed in 2007
Nebraska	June CL – MP 452.9	25CD21	Prehistoric field camp	Rerouted to avoid site
	March CL – MP 542.1	25CX7	Historic cabin	Rerouted to avoid site
	June CL – MP 570.0	25SW53	Prehistoric field camp	Rerouted to avoid site
	June CL – MP 568.0	25SW54	Prehistoric field camp	Rerouted to avoid site
	June CL – MP 696.6	25SA79	Farmstead	Rerouted to avoid site
Missouri	March CL – MP 999.3	JM – 20 23SC1054	Prehistoric field camp	Reroute pending. Subject to completion of testing
	September CL – MP 984.8	ARG-MO-26	Prehistoric field camp	Rerouted to avoid site Reroute to be surveyed in 2007
Illinois	March CL – MP 1064.9	JM-3	Prehistoric field camp (tested eligible)	Reduced construction ROW to avoid site
	March CL – MP 1051.2	JM-13	Prehistoric field camp	Rerouted to avoid site Reroute to be surveyed in 2007
	March CL – MP 1067.6	11FY20/RBM- 1/ARG-2	Prehistoric field camp	Keystone evaluating the use of HDD to pass under the site