

Overview – Keystone Pipeline Project Cultural Resource Surveys and Reports

March 2007

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 Keystone 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 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 REX reports and concurrence letters received from the SHPO in each state were included in the November 17, 2006, supplemental filing. Site testing along the REX corridor is ongoing and results will be provided when available.

Keystone initiated discussions with the Nebraska, Kansas, and Missouri SHPOs to define a process for incorporating the REX survey results into the Keystone Pipeline 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 were included in the January 2007 supplemental filing.

Keystone documented proposed surface disturbance located outside the REX survey corridor and began field surveys of these areas in January 2007. The status of surveys conducted to date along deviations from the REX corridor will be submitted to the SHPOs in a separate Keystone report and are included in this filing.

Results of the pedestrian survey along the Mainline pipeline right-of-way in North/South Dakota, Nebraska, Missouri, and Illinois were submitted to the North/South Dakota, Nebraska, and Missouri SHPOs. As directed by the Illinois SHPO, the survey report will not be submitted to the SHPO until survey is completed along the Illinois segment of the Mainline. The Nebraska and North Dakota SHPOs have concurred with the findings in the cultural resources survey reports. The North Dakota SHPO will not provide NRHP determinations until requested in writing by the DOS. Copies of the letters from the North Dakota and Nebraska SHPOs are included in this filing. Concurrence from the South Dakota and Missouri SHPOs is pending and will be submitted in a supplemental filing.

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 January 2007 supplemental filing. Two sites were tested in North Dakota, and both sites were recommended as ineligible. Results of testing in North Dakota will be included in this filing. Site testing

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has not yet been conducted at two sites in Missouri due to lack of access. All potentially eligible sites in South Dakota and Nebraska were avoided by reroutes; therefore, no site testing was conducted in these states. With the exception of Illinois, the site testing reports were submitted to SHPOs for review and concurrence. A copy of the North Dakota SHPO letter is included in this filing. Concurrence on the Missouri site testing report is pending and will be included in a supplemental filing.

Cushing Extension

Pedestrian survey along the Cushing Extension in Nebraska, Kansas, and Oklahoma began in January 2007. To date, survey of the Nebraska segment is complete; surveys in Kansas and Oklahoma are ongoing and scheduled for completion in summer 2007. The status reports for survey conducted to date are included in this filing and will be submitted to the Nebraska, Kansas, and Oklahoma SHPOs. Keystone will file cultural resource status reports for remaining segments of the Cushing Extension, as well as addendum reports for Mainline reroutes, ancillary facilities, and any additional site testing (if required) in the next supplemental filing.

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

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

State	Survey Status	September 2006 DOS Filing	November 2006 DOS Filing	January 2007 DOS Filing	March 2007 DOS Filing	Supplemental Reports
North Dakota	<p>Field Survey Completion Status as of March 2007:</p> <ul style="list-style-type: none"> • Pedestrian Survey – 88% • Site Testing – 100% <p>Spring 2007 – follow up surveys as needed for reroutes and ancillary sites.</p>	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).	<p>SHPO Concurrence, 2 sites.</p> <p>Site testing report, 2 sites, February 2007.</p> <p>SHPO Concurrence on Class I-III report submitted to DOS January 2007.</p> <p>Site Forms Errata submitted to DOS January 2007.</p> <p>Transmittal Letters to Tribes</p>	<p>May or June 2007</p> <p>Reports will include survey results for pipeline reroutes and ancillary facilities, and site testing (if required).</p>
South Dakota	<p>Completion Status as of March 2007:</p> <ul style="list-style-type: none"> • Pedestrian Survey – 86% • Site Testing – no sites <p>Spring 2007 – follow up surveys as needed for reroutes and ancillary sites.</p>	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).	<p>Transmittal Letter for 2006 Survey Reports</p> <p>Transmittal Letter - 15 site forms recorded in 2006 survey reports</p> <p>Transmittal Letters to Tribes</p>	<p>May or June 2007</p> <p>Reports will include survey results for pipeline reroutes and ancillary facilities, and site testing (if required).</p>

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Nebraska	<p>Mainline Completion Status as of March 2007:</p> <ul style="list-style-type: none"> • Pedestrian Survey – 97% • Site Testing – no sites • Cushing Extension 100% <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>	Cushing Extension field surveys – status report.	<p>May or June 2007</p> <p>Reports will include Keystone 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>
Kansas	<p>Field Survey Completion Status as of March 2007:</p> <ul style="list-style-type: none"> • Mainline Pedestrian Survey – 99% • Mainline Site Testing – 0% • Cushing Extension – 100% <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>Mainline field survey status report for any areas outside REX survey area.</p> <p>Cushing Extension field surveys – status report.</p> <p>Cushing Extension Tribal Letters.</p>	<p>May or June 2007-</p> <p>Reports will include Keystone 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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Missouri	<p>Field Survey Completion Status as of March 2007:</p> <ul style="list-style-type: none"> • Mainline Pedestrian Survey – 79% • Mainline Site Testing – 44% <p>Spring 2007 – Follow up surveys for reroutes and ancillary sites.</p>	Cultural resources record search; Survey protocols and survey areas.	<p>Keystone Cultural Resources Status Report (pedestrian and geomorphological survey results and site forms)</p> <p>REX Cultural Surveys in MO (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 and site testing).</p> <p>Map documentation of Keystone proposed construction ROW overlap with REX cultural resource survey areas and SHPO concurrence.</p>	<p>SHPO Concurrence on 2006 Phase II (11 Sites) Report</p> <p>REX Deviations Phase I Cultural Survey status report.</p>	<p>May or June 2007</p> <p>Reports will include Keystone Mainline survey results for pipeline reroutes and ancillary facilities, and site testing (if required).</p>
Illinois	<p>Field Survey Completion Status as of March 2007:</p> <ul style="list-style-type: none"> • Pedestrian Survey – 89% • Site Testing – 33% <p>Spring 2007 – Follow up surveys for reroutes and ancillary sites.</p>	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).	Wood River Terminal Pump Station survey status report.	<p>May or June 2007</p> <p>Keystone Mainline survey results for pipeline reroutes and ancillary facilities, and site testing (if required).</p>

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Oklahoma	Spring 2007 Pedestrian and geomorphological surveys; site testing, if required. • Cushing Extension – 81%	Cultural resources record search; Survey protocols and survey areas.	No information filed.	No information filed.	Cushing Extension field surveys – status report. Cushing Extension Revised research design (maps included) and SHPO concurrence. Cushing Extension Tribal Letters	May or June 2007 Cushing Extension survey results for pipeline reroutes, ancillary facilities; site testing, if required.