



Illinois Department of Natural Resources

JB Pritzker, Governor
Colleen Callahan, Director

www.dnr.illinois.gov

Mailing address: State Historic Preservation Office, 1 Old State Capitol Plaza, Springfield, IL 62701

Various County PLEASE REFER TO: SHPO LOG #011112019
Various Counties
Rock Island, Whiteside, Bureau, LaSalle, Grundy & Will Counties
FERC
Categorical Exclusion, Annual summary of pipeline maintenance projects - Alliance Pipeline LP Jan. 2020-Dec. 2020

December 5, 2019

William B. Brett
Enbridge Texas Eastern Transmission, LP
890 Winter Street, Suite 300
Waltham, MA 02451

Dear Mr. Brett:

We have reviewed the documentation submitted for the referenced project(s) in accordance with 36 CFR Part 800.4. Based upon the information provided, no historic properties are affected. We, therefore, have no objection to the undertaking proceeding as planned.

Please retain this letter in your files as evidence of compliance with section 106 of the National Historic Preservation Act of 1966, as amended. It does not pertain to any discovery during construction, nor is it a clearance for purposes of the Illinois Human Skeletal Remains Protection Act (20 ILCS 3440).

If you are an applicant, please submit a copy of this letter to the state or federal agency from which you obtain any permit, license, grant, or other assistance. If further assistance is needed contact Jeff Kruchten, Chief Archaeologist at 217/785-1279 or Jeffery.kruchten@illinois.gov.

Sincerely,

Robert F. Appleman
Deputy State Historic
Preservation Officer



November 13, 2019

Bob Appleman
Acting Division Manager Historic Preservation
Deputy State Historic Preservation Officer
Illinois Historic Preservation Agency, Preservation Services Division
IDNR-One Natural Resources Way
Springfield, Illinois 62702-1271

**RE: Alliance Pipeline, L.P.
Historic and Archaeological Categorical Exclusion Agreement for Pipeline
Construction/Maintenance Activities in Illinois**

Dear Mr. Appleman:

Alliance Pipeline, LP ("Alliance") owns and operates natural gas transmission pipeline and related facilities in North Dakota, Minnesota, Iowa and Illinois. Specifically, in the state of Illinois, Alliance owns and operates approximately 123.3 miles of pipeline, one compressor station, six new metering and regulating ("M&R") stations, seven delivery point interconnects, as well as other ancillary aboveground facilities located along the pipeline right-of-way ("ROW"). Accordingly, Alliance is responsible for maintaining the structural integrity and ensuring the safety and reliability of its natural gas transmission facilities and routinely monitors, inspects, and maintains its pipelines in accordance with Federal regulations.

In accordance with the Federal Energy Regulatory Commission's ("FERC") Blanket Certification process for pipeline facilities, certain construction and maintenance activities require consultations with Federal and state regulatory agencies, particularly those with jurisdiction over federally and state protected species and state historic and cultural resources. The majority of these activities occur within the existing pipeline right-of-way that was previously disturbed during the installation of the pipeline or within fenced-in aboveground facilities such as compressor stations, metering and regulating ("M&R") stations, and valve sites. These areas are typically accessible via the use of existing access roads, public roads, and the pipeline ROW.

In an effort to streamline the permitting and project review process for these routine construction and maintenance activities, Alliance is respectfully requesting a categorical exclusion ("CATEX") agreement with the Illinois Historic Preservation Agency, Preservation Services Division, office of the State Historic Preservation Officer ("SHPO"), for the period of January 1, 2020 through December 31, 2020 for pipeline construction and maintenance activities in Illinois. By establishing a CATEX agreement with Alliance, certain routine construction and maintenance activities will be allowed to occur on a project-by-project basis without additional agency consultation. The standard CATEX agreement (attached) would be renewed on an annual basis to allow for a reexamination of the agreements to determine if, based on past performance, any changes are necessary.

There are a number of mutual benefits for both Alliance and the Illinois SHPO associated with a CATEX agreement. Some examples include:

- Streamlining the review process for minor projects that do not require any construction activities outside the existing FERC Certificated ROW;
- Reducing paperwork and time expenditures on regulatory staff for minor projects that have no impacts to protected resources;

- Provides a clear understanding between Alliance and the Illinois SHPO as to when consultations will be required; and
- Allows Alliance to address pipeline maintenance and minor construction projects in a timely manner in compliance with Federal regulations;

In summary, Alliance is requesting the establishment of a CATEX agreement with the Illinois SHPO for calendar year 2020 for routine pipeline construction and maintenance activities performed annually on Alliance Pipeline existing facilities. A copy of the Alliance standard CATEX agreement is provided with this letter and describes the circumstances and conditions where consultations will and will not be required for routine pipeline construction and maintenance activities. In addition to the CATEX agreement, we have provided a map showing the location of the Alliance facilities by county in Illinois (see Attachment 1). If the Illinois is amenable and concurs with the CATEX agreement please sign and return the enclosed agreement to:

*Alliance Pipeline, LP
Attn: William Brett
890 Winter Street, Suite 300
Waltham, MA 02451*

We greatly appreciate your consideration of this request. If you have any questions, require any additional information, or desire to discuss the agreement further, please contact Gregory R. Dubell at 401-288-6322 or via email at gdubell@palinc.com

Sincerely,

A handwritten signature in black ink, appearing to read 'William Brett', written in a cursive style.

William Brett
Manager
Environment Projects US

**HISTORIC AND ARCHAEOLOGICAL REVIEW PROCEDURES FOR
PROJECTS IN ILLINOIS – JANUARY 1, 2020 THROUGH DECEMBER 31, 2020**

ALLIANCE PIPELINE, LP

1. Where the Alliance Pipeline, LP (Alliance) right-of-way (ROW) is maintained (i.e., periodic mowing) and has been previously disturbed by the original installation, then, for the following types of projects, there will be no contact with the Illinois Historic Preservation Agency – Preservation Services Division, the office of the State Historic Preservation Officer (SHPO):
 - a. construction and other activities on existing ROW, including the installation and maintenance, relocation, replacement, or abandonment and removal of receipt and delivery taps, meters, regulators, valves, pipe, points of delivery (POD), and other auxiliary pipeline facilities, as well as investigatory activities within existing, previously disturbed ROW;
 - b. construction maintenance, relocation, replacement and/or abandonment projects within existing, previously-disturbed, and generally fenced compressor and metering and regulating (M&R) stations, yards and gas processing plants, and the installation of field compressors or dehydrators on an existing ROW;
 - c. use of existing access roads and existing ROW as access to all construction and/or maintenance projects including minor maintenance or upgrades such as adding gravel, re-grading, and side trimming (pruning) of trees; and
 - d. the acquisition of existing facilities by lease or purchase (no new ROW required).
2. A transmittal letter is required to serve as documentation of consultation with the Illinois SHPO for projects not in the categories described in Stipulation 1:
 - a. Alliance will provide the Illinois SHPO with a project description, a project map, a summary of its cultural resources review, and any other material helpful to the SHPO in making its recommendations for the project.
3. For projects located on Federal lands, the land managing agency or lead federal agency will be consulted.

Identification of Historic Properties

In the unlikely event that an archaeological site is identified in the process of undertaking any of the activities listed above, ground disturbance will cease, and Alliance will confer with the Illinois SHPO. For other construction and maintenance activities beyond the horizontal and vertical limits of prior ground disturbance, Alliance will put forth an adequate effort to identify historic properties within the area of potential effect and begin consultation with the Illinois SHPO as required under Section 106 of the National Historic Preservation Act of 1966, as amended (36 CFR 800).

Reporting

Alliance will provide the Illinois SHPO a summary of all the projects completed under this agreement on an annual basis, including USGS quadrangle maps showing the location(s) of all projects identified in the summary report. This report shall be submitted by January 31st.



11/13/19

William B. Brett
Manager, Environmental Construction Permitting
Alliance Pipeline, LP

Bob Appleman
Deputy State Historic Preservation Officer
Illinois SHPO

