Hub City Energy Park

Aberdeen, South Dakota

Application for an Energy Conversion Facility Permit

Docket EL26-XXX

Appendix B – Stakeholder and Agency Consultations

October 2026

APPENDIX B – STAKEHOLDER AND AGENCY CONSULTATIONS

- Federal Aviation Administration ("FAA")
- Local Review Committee
- Public Open House Materials
- South Dakota Department of Agriculture and Natural Resources ("SD DANR")
- South Dakota Department of Transportation ("SD DOT")
- South Dakota Game, Fish, & Parks ("SD GFP")
- South Dakota State Historic Preservation Office ("SD SHPO")
- Tribes
- United States Army Corps of Engineers ("USACE")
- United States Department of Agriculture ("USDA") Natural Resources Conservation Service ("NRCS")
- United States Fish and Wildlife Service ("USFWS")
- Map included with Consultation Letters

FEDERAL AVIATION ADMINISTRATION (FAA)

- 8/31/26 – Letter from NorthWestern to FAA Dakota/Minnesota Airports District
- 8/31/26 – Letter from NorthWestern to FAA Obstruction Evaluation/Airport Airspace Analysis (OEAAA)
- 9/1/26 – Email response from FAA OEAAA to NorthWestern

NorthWestern Energy
Delivering a Bright Future

August 31, 2026

Sent Via Email (david.p.anderson@faa.gov)

Dave Anderson
Assistant Manager – Dakota/Minnesota Airports District
Federal Aviation Administration – Dakota/Minnesota Airports District
2301 University Drive, Building 23B
Bismarck, ND 58504

Re: NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy
Hub City Energy Park

Dear Dave Anderson:

NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy ("NorthWestern") is developing the Hub City Energy Park (the "Project") adjacent to and to the north of its existing Aberdeen Generating Station ("AGS") near Aberdeen, South Dakota. The purpose of this letter is: (i) to introduce and provide an overview of the Project and (ii) to solicit any initial direction that you may have on the Project ahead of the provision of additional, detailed information.

The Project will consist of three (3) natural gas combustion turbines ("CTs") in simple cycle configuration totaling 131 MW (gross). The Project will be located on approximately 176 acres of NorthWestern-owned property in Section 25, Township 123 North, Range 64 West of the 5th P.M., to the south of the City of Aberdeen, South Dakota in Brown County – please see Attachment 1 for the Project location. The Project development was initiated as a result of NorthWestern's Integrated Resource Plan for South Dakota and the Southwest Power Pool ("SPP") Expedited Resource Adequacy Study ("ERAS") Procedures, both of which identified the need for additional capacity to maintain and improve electric grid reliability.

Subject to ongoing development, the Project plans to connect to a nearby interstate pipeline for the supply of natural gas, interconnect to the electric grid at 115 kV at the existing AGS Siebrecht substation, tie into the municipal water system for water needs, and connect to the municipal sewer system.

NorthWestern Energy has advanced various aspects of Project development and plans to submit an Energy Conversion Facility construction permit application to the South Dakota Public Utilities Commission ("Commission") in September 2026. Project construction is currently planned to begin in late 2027 or early 2028, with the Project planned to be operational in 2030. In support of the Project, NorthWestern has:

1. Submitted an Interconnection Request to SPP under the ERAS Procedures in October 2025 and expects the Project Generator Interconnection Agreement to be fully executed no later than September 2026;
2. Executed a procurement contract for the supply of the CTs for the Project, including backend selective catalytic reduction and oxidation catalyst systems for emissions control;
3. Submitted a Notice of Intent to apply for an Energy Conversion Facility construction permit to the Commission pursuant to SDCL § 49-41B-5 and ARSD ch. 20:10:22:02 (Docket No. EL25-038);
4. Secured the Project site;
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7. Held a Project open house in Aberdeen, South Dakota in July 2026.

NorthWestern plans to send additional correspondence with information specific to your agency in the near future. Understanding that detailed feedback will be dependent upon this future information, NorthWestern would welcome and appreciate any feedback, insights, or recommendations in the interim regarding the ongoing development of the Project or measures to be taken, in general.

Your consideration of this important NorthWestern Project is very much appreciated.

Sincerely,

Joshua Follman

Josh Follman
Project Director
Joshua.Follman@northwestern.com
O 406-498-3617

Cc: Ben Sorensen, Technical Advisor (benjamin.sorensen@northwestern.com)
Seamus Lucostic, Project Manager (seamus.lucostic@northwestern.com)
Scott Leigh, Consultant (scott.leigh@aionenergyllc.com)

Attachments

Attachment 1 Project Site Location Map

August 31, 2026

Sent Via Email (OEGroup@faa.gov)

FAA Manager for OE/AAA
Federal Aviation Administration – Obstruction Evaluation/Airport Airspace Analysis
10101 Hillwood Parkway
Fort Worth, TX 76177

Re: NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy
Hub City Energy Park

Dear FAA Manager for OE/AAA:

NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy ("NorthWestern") is developing the Hub City Energy Park (the "Project") adjacent to and to the north of its existing Aberdeen Generating Station ("AGS") near Aberdeen, South Dakota. The purpose of this letter is: (i) to introduce and provide an overview of the Project and (ii) to solicit any initial direction that you may have on the Project ahead of the provision of additional, detailed information.

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Sincerely,

Joshua Follman

Josh Follman
Project Director
Joshua.Follman@northwestern.com
O 406-498-3617

Cc: Ben Sorensen, Technical Advisor (benjamin.sorensen@northwestern.com)
Seamus Lucostic, Project Manager (seamus.lucostic@northwestern.com)
Scott Leigh, Consultant (scott.leigh@aionenergyllc.com)

Attachments

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Scott Leigh

From: 9-AJO-AWA-OEGroup (FAA) <OEGroup@faa.gov>
Sent: Tuesday, September 1, 2026 9:56 AM
To: joshua.follman@northwestern.com
Cc: Sorensen, Benjamin; Scott Leigh; Lucostic, Seamus; Bonrud, Pam
Subject: RE: NorthWestern Energy Hub City Energy Park Announcement

You don't often get email from oegroup@faa.gov. Learn why this is important

Good morning, Joshua,

The FAA requests you electronically file (E-file) at https://oeaaa.faa.gov . E-filing is the preferred method of submitting an aeronautical study as it is the fastest and most accurate method of submission. E-filing immediately assigns an Aeronautical Study Number (ASN) to your project and establishes an electronic communications link with the FAA that allows you to obtain project status and notifications directly from the website.

To submit a new filing, go to https://oeaaa.faa.gov/oeaaa/oe3a/main/#/home and click on the right side of the screen where it says “Registration” if you have never used the site or “Login” if you already have a username/password. Go ahead and log in. From this screen, click on the left side of the page where it says “Home”. Then go to the right side of the screen and click “File a FAA 7460-1 or 7460-2 Notice”. Select the first form, 7460-1, and select “Notice of New Construction/alteration/existing” (see note #3) from the drop-down menu, click next. If you have a previous filing, put in the ASN, if not, click next. Choose a sponsor and representative, if you do not have one already in the system, please add new and click next once both are added. Select your structure type and name your structure, click save and next. Put in your latitude and longitude (See Note #4), site elevation and total structure height above ground (not including the site elevation). Fill in the rest of the information on the screen and click “Save and Next”. The next screen will ask for the duration and what kind of marking and light you’re requesting, please select and click “Save and Next”. Now you are at the review screen, if everything looks good, please hit submit.

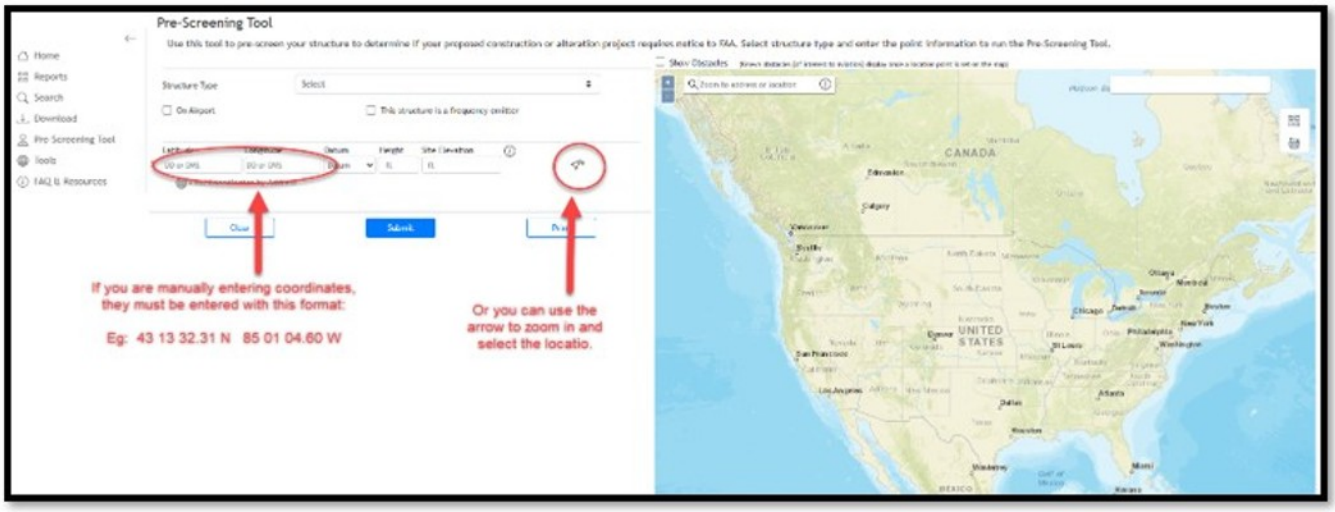
Note 1: You do not need to add frequencies if your structure is not emitting frequencies.

Note 2: If you are filing for construction equipment / cranes that will be moving around the property, please file a work box using the structure type of either “Crane” or “Stationary construction equipment”, but you will need to file for each corner of the work area separately. So you will end up with 4 filings.

Note 3: Select new construction for all new builds and all construction equipment/cranes. Select existing for any permanent structure that has never been filed before but it is already built. Select alteration for any permanent structure that already has been filed but you are changing some aspect of the original filing. You must have the prior filing ASN to select alteration or you will not be able to complete the filing.

Note 4: Coordinates must be in degrees minutes and seconds, if it is in decimal degrees, you must convert prior to inputting. A conversion tool can be located using this link: https://www.fcc.gov/media/radio/dms-decimal.

Please utilize the Obstruction Evaluation / Airport Airspace Analysis (OE3A) Pre-Screening Tool to determine if your permanent and/or temporary structure requires filing. You will need the structure type, coordinates of the proposed structured in degrees, minutes, seconds to the hundredth of a second if able (DD/MM/SS.SS) format, site elevation (SE) and above ground level (AGL) height.



Thank you.

From: Follman, Joshua <Joshua.Follman@northwestern.com>
Sent: Monday, August 31, 2026 6:09 PM
To: 9-AJO-AWA-OEGroup (FAA) <OEGroup@faa.gov>
Cc: Sorensen, Benjamin <Benjamin.Sorensen@northwestern.com>; Scott Leigh <scott.leigh@aionenergyllc.com>; Lucostic, Seamus <Seamus.Lucostic@northwestern.com>; Bonrud, Pam <Pam.Bonrud@northwestern.com>
Subject: NorthWestern Energy Hub City Energy Park Announcement

> You don't often get email from joshua.follman@northwestern.com. Learn why this is important

CAUTION: This email originated from outside of the Federal Aviation Administration (FAA). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

FAA Manager for OE/AAA –

Hello, my name is Josh Follman with NorthWestern Energy, please find the attached Project Overview and map showing our new Generation project in Aberdeen South Dakota.

The attached will give you a brief description and overview of our status, in addition there will be more information released in the coming months, if you have any questions feel free to reach out.

Thank you,

Josh

This message is for the named person's use only. It may contain confidential, proprietary or legally privileged information. No confidentiality or privilege is waived or lost by any mistransmission. If you receive this message in error, please immediately delete it and all copies of it from your system, destroy any hard copies of it and notify the sender. You must not, directly or indirectly, use, disclose, distribute, print, or copy any part of this message if you are not the intended recipient. NorthWestern Corporation and its subsidiaries each reserve the right to monitor all e-mail communications through its network.

LOCAL REVIEW COMMITTEE

- 8/31/26 – Letter from NorthWestern to Aberdeen Public School District 06-1
- 8/31/26 – Letter from NorthWestern to the Brown County Commission
- 8/31/26 – Letter from NorthWestern to the City of Aberdeen
- 8/31/26 – Letter from NorthWestern to Warner School District 06-5

August 31, 2026

Sent Via Email (aaron.schultz@k12.sd.us)

Aaron Shultz
Aberdeen Public School District 06-1
1224 South 3rd Street
Aberdeen, SD 57401

Re: NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy
Hub City Energy Park

Dear Aaron Shultz:

NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy ("NorthWestern") has issued the following correspondence to various entities, agencies and tribes regarding the Hub City Energy Park (the "Project," and formerly known as "Aberdeen III Generating Station"). NorthWestern plans to submit an Energy Conversion Facility construction permit application to the South Dakota Public Utilities Commission (Docket EL25-038), and provides this correspondence for Local Committee Review member awareness.

NorthWestern appreciates your consideration of the Project, and would welcome any feedback you have related to the Project.

Sincerely,

Joshua Follman

Josh Follman
Project Director
Joshua.Follman@northwestern.com
O 406-498-3617

Cc: Pam Bonrud, Director Government & Regulatory Affairs (pam.bonrud@northwestern.com)
Ben Sorensen, Technical Advisor (benjamin.sorensen@northwestern.com)
Seamus Lucostic, Project Manager (seamus.lucostic@northwestern.com)
Scott Leigh, Consultant (scott.leigh@aionenergyllc.com)

Agency/Entity Consultation Letter Template

Re: NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy Hub City Energy Park

To Whom it May Concern:

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Josh Follman
Project Director
Joshua.Follman@northwestern.com
O 406-498-3617

Cc: Ben Sorensen, Technical Advisor (benjamin.sorensen@northwestern.com)
Seamus Lucostic, Project Manager (seamus.lucostic@northwestern.com)
Scott Leigh, Consultant (scott.leigh@aionenergyllc.com)

Attachments

Attachment 1 Project Site Location Map

August 31, 2026

Sent Via Email (duanesutton@yahoo.com)

Duane Sutton
Brown County Commission
25 Market Street
Aberdeen, SD 57401

Re: NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy
Hub City Energy Park

Dear Duane Sutton:

NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy ("NorthWestern") has issued the following correspondence to various entities, agencies and tribes regarding the Hub City Energy Park (the "Project," and formerly known as "Aberdeen III Generating Station"). NorthWestern plans to submit an Energy Conversion Facility construction permit application to the South Dakota Public Utilities Commission (Docket EL25-038), and provides this correspondence for Local Committee Review member awareness.

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Project Director
Joshua.Follman@northwestern.com
O 406-498-3617

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Agency/Entity Consultation Letter Template

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O 406-498-3617

Cc: Ben Sorensen, Technical Advisor (benjamin.sorensen@northwestern.com)
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Scott Leigh, Consultant (scott.leigh@aionenergyllc.com)

Attachments

Attachment 1 Project Site Location Map

August 31, 2026

Sent Via Email (ron.wager@aberdeensd.gov)

Ron Wager
City of Aberdeen
123 South Lincoln Street
Aberdeen, SD 57401

Re: NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy
Hub City Energy Park

Dear Ron Wager:

NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy ("NorthWestern") has issued the following correspondence to various entities, agencies and tribes regarding the Hub City Energy Park (the "Project," and formerly known as "Aberdeen III Generating Station"). NorthWestern plans to submit an Energy Conversion Facility construction permit application to the South Dakota Public Utilities Commission (Docket EL25-038), and provides this correspondence for Local Committee Review member awareness.

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Josh Follman
Project Director
Joshua.Follman@northwestern.com
O 406-498-3617

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Seamus Lucostic, Project Manager (seamus.lucostic@northwestern.com)
Scott Leigh, Consultant (scott.leigh@aionenergyllc.com)

Attachments

Attachment 1 Project Site Location Map

August 31, 2026

Sent Via Email (leah.haaland@k12.sd.us)

Leah Haaland
Warner School District 06-5
110 1st Ave SW PO Box 20
Warner, SD 57479

Re: NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy
Hub City Energy Park

Dear Leah Haaland:

NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy ("NorthWestern") has issued the following correspondence to various entities, agencies and tribes regarding the Hub City Energy Park (the "Project," and formerly known as "Aberdeen III Generating Station"). NorthWestern plans to submit an Energy Conversion Facility construction permit application to the South Dakota Public Utilities Commission (Docket EL25-038), and provides this correspondence for Local Committee Review member awareness.

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O 406-498-3617

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7. Held a Project open house in Aberdeen, South Dakota in July 2026.

NorthWestern plans to send additional correspondence with information specific to your agency in the near future. Understanding that detailed feedback will be dependent upon this future information, NorthWestern would welcome and appreciate any feedback, insights, or recommendations in the interim regarding the ongoing development of the Project or measures to be taken, in general.

Your consideration of this important NorthWestern Project is very much appreciated.

Sincerely,

Josh Follman
Project Director
Joshua.Follman@northwestern.com
O 406-498-3617

Cc: Ben Sorensen, Technical Advisor (benjamin.sorensen@northwestern.com)
Seamus Lucostic, Project Manager (seamus.lucostic@northwestern.com)
Scott Leigh, Consultant (scott.leigh@aionenergyllc.com)

Attachments

Attachment 1 Project Site Location Map

PUBLIC OPEN HOUSE

- Materials presented by NorthWestern on July 15, 2026



Aberdeen 3 Project Update
July 15, 2026

Agenda / Discussion Topics

1. Introductions
2. Project Overview
3. Status
4. Roundtable / Questions

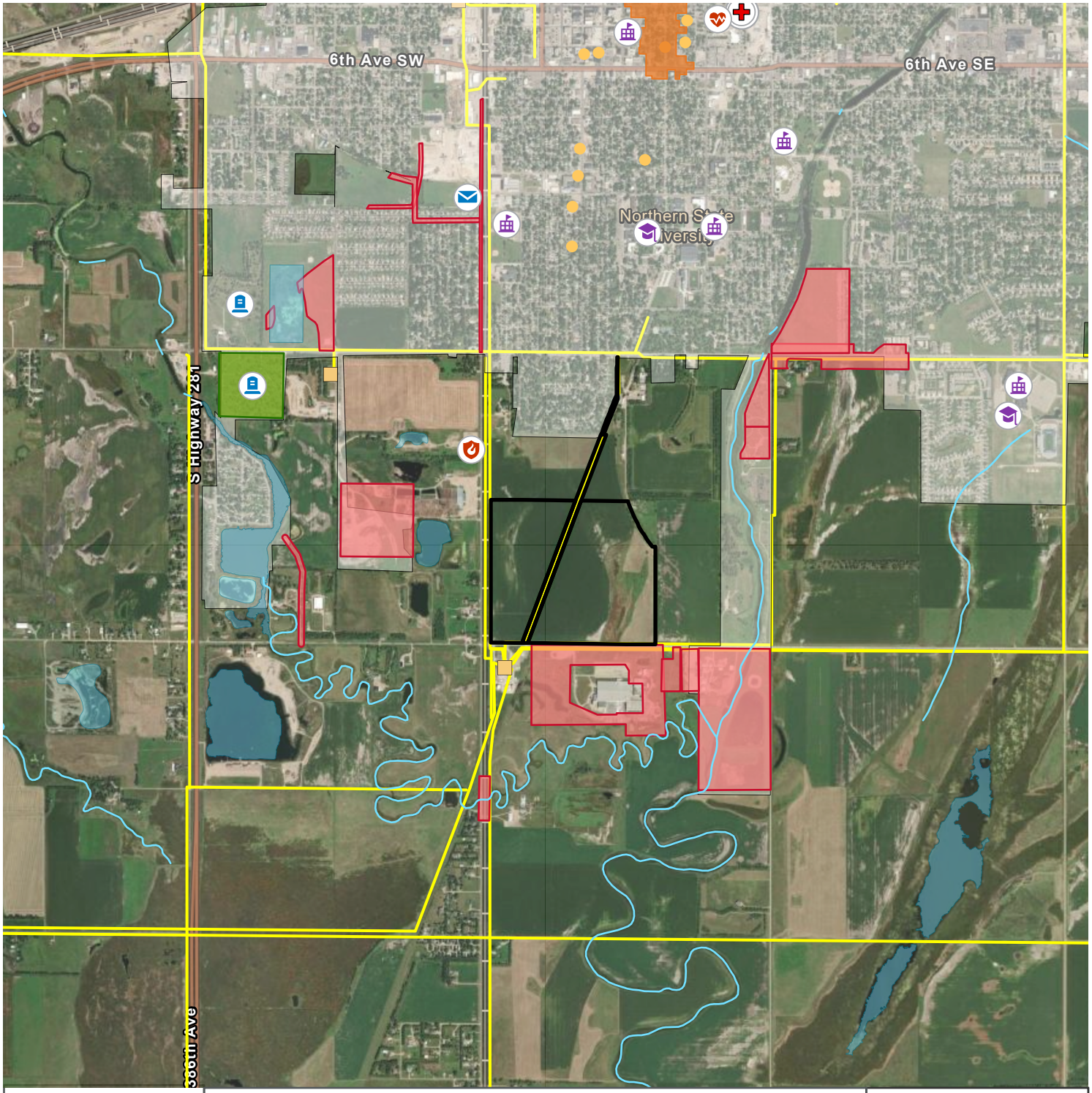
NWPS Aberdeen 3 (AB3)

Overview

- 3x0 simple cycle CT project
- Adjacent to existing Aberdeen Generating Station (AGS)
- 115 kV electrical interconnection
- Natural gas only
- Low water use
- Improve capacity position and system reliability

Status

- Combustion turbine technology
- Land owned and re-zoned
- Electrical interconnection
- Environmental/field studies
- Permitting in process



ABERDEEN 3
ABERDEEN, SD

N

0 0.25 0.5
MILES

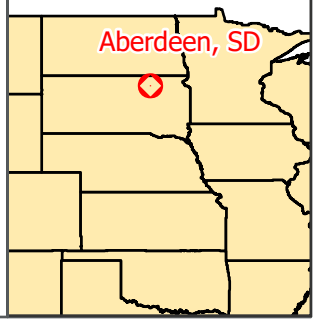
NorthWestern Energy
Delivering a Bright Future

HDR

- Project Location
- Cultural Surveys
- Waterbodies
- Riverside Memorial Park
- Historic District
- Municipal Boundary

Local Sites

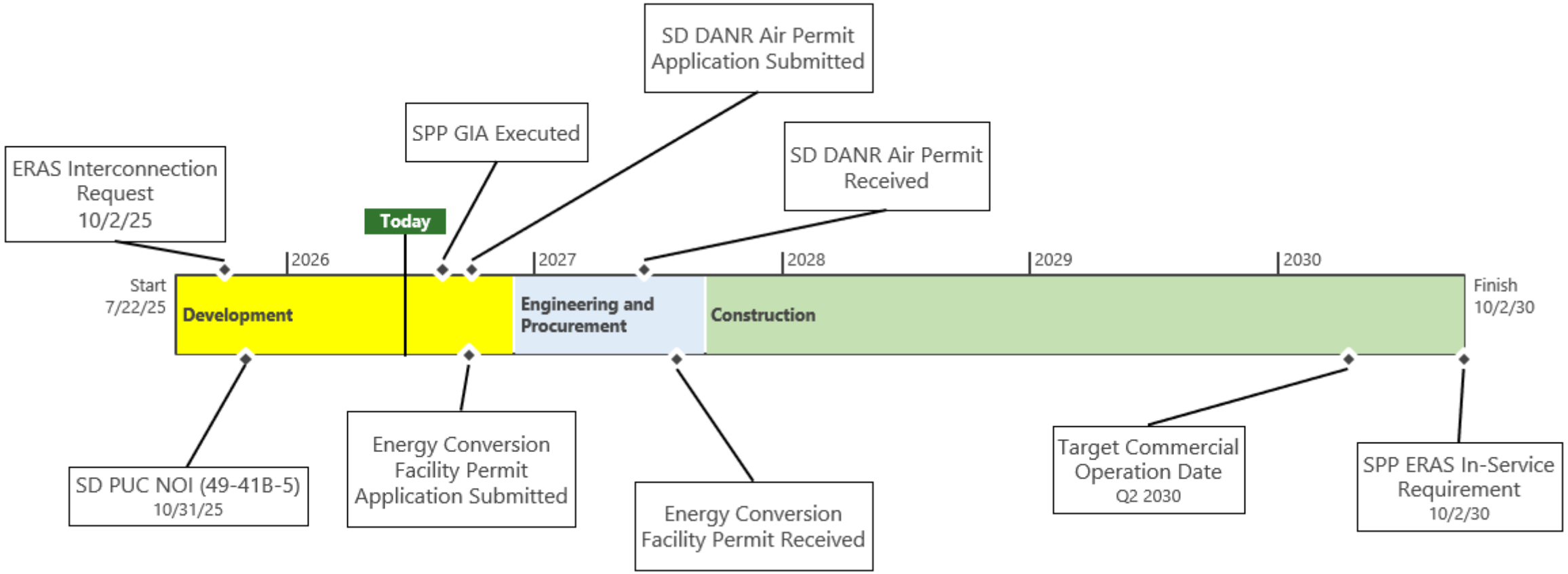
- School
- School: Middle School
- School: High School
- College / University
- Technical / Trade School
- Ambulance Service
- Fire Station / EMS Station
- Post Office
- Hospital / Medical Center
- Cemetery
- Aviation Facilities
- Rivers & Streams



\\SXF-SRV01\ENGIS\PROJECTS\NORTHWESTENERGY\10450080_NWE_MYSTERYRANCH\7.2_WIP\APRX\NWE_MYSTERYRANCH_DH.APRX DATE: 6/9/2026



AB3 Summary Timeline



Roundtable / Closeout

- Near term activities
- Additional discussion

SOUTH DAKOTA DEPARTMENT OF AGRICULTURE AND NATURAL RESOURCES (SD DANR)

- 8/11/26 – Pre-Application Meeting between NorthWestern and SD DANR Air Quality Division and One-Stop Permitting
- 8/31/26 – Letter from NorthWestern to the SD DANR Air Quality Division
- 8/31/26 – Letter from NorthWestern to the SD DANR One-Stop Permitting Contact

NorthWestern Energy
Delivering a Bright Future

August 31, 2026

Sent Via Email (Kyrik.Rombough@state.sd.us)

Kyrik Rombough
Air Quality Program Administrator
South Dakota Department of Agriculture and Natural Resources
523 E. Capitol Ave
Pierre, SD 57501

Re: NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy
Hub City Energy Park

Dear Kyrik Rombough,

NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy ("NorthWestern") is developing the Hub City Energy Park (the "Project") adjacent to and to the north of its existing Aberdeen Generating Station ("AGS") near Aberdeen, South Dakota. The purpose of this letter is: (i) to introduce and provide an overview of the Project and (ii) to solicit any initial direction that you may have on the Project ahead of the provision of additional, detailed information.

The Project will consist of three (3) natural gas combustion turbines ("CTs") in simple cycle configuration totaling 131 MW (gross). The Project will be located on approximately 176 acres of NorthWestern-owned property in Section 25, Township 123 North, Range 64 West of the 5th P.M., to the south of the City of Aberdeen, South Dakota in Brown County – please see Attachment 1 for the Project location. The Project development was initiated as a result of NorthWestern's Integrated Resource Plan for South Dakota and the Southwest Power Pool ("SPP") Expedited Resource Adequacy Study ("ERAS") Procedures, both of which identified the need for additional capacity to maintain and improve electric grid reliability.

Subject to ongoing development, the Project plans to connect to a nearby interstate pipeline for the supply of natural gas, interconnect to the electric grid at 115 kV at the existing AGS Siebrecht substation, tie into the municipal water system for water needs, and connect to the municipal sewer system.

NorthWestern Energy has advanced various aspects of Project development and plans to submit an Energy Conversion Facility construction permit application to the South Dakota Public Utilities Commission ("Commission") in September 2026. Project construction is currently planned to begin in late 2027 or early 2028, with the Project planned to be operational in 2030. In support of the Project, NorthWestern has:

1. Submitted an Interconnection Request to SPP under the ERAS Procedures in October 2025 and expects the Project Generator Interconnection Agreement to be fully executed no later than September 2026;
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Sincerely,

Joshua Follman

Josh Follman
Project Director
Joshua.Follman@northwestern.com
O 406-498-3617

Cc: Ben Sorensen, Technical Advisor (benjamin.sorensen@northwestern.com)
Seamus Lucostic, Project Manager (seamus.lucostic@northwestern.com)
Scott Leigh, Consultant (scott.leigh@aionenergyllc.com)
Laura Weber, Consultant (laura.weber@jacobs.com)

Attachments

Attachment 1 Project Site Location Map

NorthWestern Energy
Delivering a Bright Future

August 31, 2026

Sent Via Email (Ashley.Brakke@state.sd.us)

Ashley Brakke
One-Stop Permitting Contact
South Dakota Department of Agriculture and Natural Resources
523 E. Capitol Ave
Pierre, SD 57501

Re: NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy
Hub City Energy Park

Dear Ashley Brakke,

NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy ("NorthWestern") is developing the Hub City Energy Park (the "Project") adjacent to and to the north of its existing Aberdeen Generating Station ("AGS") near Aberdeen, South Dakota. The purpose of this letter is: (i) to introduce and provide an overview of the Project and (ii) to solicit any initial direction that you may have on the Project ahead of the provision of additional, detailed information.

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Your consideration of this important NorthWestern Project is very much appreciated.

Sincerely,

Josh Follman
Project Director
Joshua.Follman@northwestern.com
O 406-498-3617

Cc: Ben Sorensen, Technical Advisor (benjamin.sorensen@northwestern.com)
Seamus Lucostic, Project Manager (seamus.lucostic@northwestern.com)
Scott Leigh, Consultant (scott.leigh@aionenergyllc.com)

Attachments

Attachment 1 Project Site Location Map

SOUTH DAKOTA DEPARTMENT OF TRANSPORTATION

- 8/31/26 – Letter from NorthWestern to SD DOT – Aeronautics Commission
- 8/31/26 – Letter from NorthWestern to SD DOT – Aberdeen Region
- 9/1/26 – Email from SD DOT – Aberdeen Region to NorthWestern
- 9/15/26 – Email from NorthWestern to SD DOT – Aberdeen Region

August 31, 2026

Sent Via Email (jack.dokken@state.sd.us)

Jack Dokken
South Dakota Department of Transportation – Aeronautics Commission
700 E Broadway Ave
Pierre, SD 57501

Re: NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy
Hub City Energy Park

Dear Jack Dokken:

NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy ("NorthWestern") is developing the Hub City Energy Park (the "Project") adjacent to and to the north of its existing Aberdeen Generating Station ("AGS") near Aberdeen, South Dakota. The purpose of this letter is: (i) to introduce and provide an overview of the Project and (ii) to solicit any initial direction that you may have on the Project ahead of the provision of additional, detailed information.

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Sincerely,

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Project Director
Joshua.Follman@northwestern.com
O 406-498-3617

Cc: Ben Sorensen, Technical Advisor (benjamin.sorensen@northwestern.com)
Seamus Lucostic, Project Manager (seamus.lucostic@northwestern.com)
Scott Leigh, Consultant (scott.leigh@aionenergyllc.com)

Attachments

Attachment 1 Project Site Location Map

August 31, 2026

Sent Via Email (mark.peterson@state.sd.us)

Mark Peterson
Aberdeen Region Engineer
South Dakota Department of Transportation
2735 US Highway 12
Aberdeen, SD 57401

Re: NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy
Hub City Energy Park

Dear Mark Peterson:

NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy ("NorthWestern") is developing the Hub City Energy Park (the "Project") adjacent to and to the north of its existing Aberdeen Generating Station ("AGS") near Aberdeen, South Dakota. The purpose of this letter is: (i) to introduce and provide an overview of the Project and (ii) to solicit any initial direction that you may have on the Project ahead of the provision of additional, detailed information.

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Joshua Follman

Josh Follman
Project Director
Joshua.Follman@northwestern.com
O 406-498-3617

Cc: Ben Sorensen, Technical Advisor (benjamin.sorensen@northwestern.com)
Seamus Lucostic, Project Manager (seamus.lucostic@northwestern.com)
Scott Leigh, Consultant (scott.leigh@aionenergyllc.com)
Jenna Elswick, Transportation Planner (jenna.elswick@hdrinc.com)

Attachments

Attachment 1 Project Site Location Map

Scott Leigh

From: Follman, Joshua <Joshua.Follman@northwestern.com>
Sent: Tuesday, September 15, 2026 2:47 PM
To: Peterson, Mark (DOT)
Cc: benjamin.sorensen; Scott Leigh; Lucostic, Seamus; Bonrud, Pam
Subject: RE: NorthWestern Energy Hub City Energy Park Announcement

Mark:

Impacts to State of South Dakota ROW are not anticipated as a result of construction / operations at the generation site. However, the Project natural gas lateral route from the nearby Northern Border Pipeline has yet to be determined. Should the natural gas lateral route consider any State of South Dakota ROW, NorthWestern will request additional consultation.

NorthWestern would like to note that the Project will have heavy haul activities associated with equipment deliveries, and that these activities and any associated requirements will be coordinated separately by equipment suppliers and subcontractors.

NorthWestern appreciates your continued consideration of the Project.

Regards,
Josh

From: Peterson, Mark (DOT) <Mark.Peterson@state.sd.us>
Sent: Tuesday, September 1, 2026 6:57 AM
To: Follman, Joshua <Joshua.Follman@northwestern.com>
Cc: Sorensen, Benjamin <Benjamin.Sorensen@northwestern.com>; Scott Leigh <scott.leigh@aionenergyllc.com>; Lucostic, Seamus <Seamus.Lucostic@northwestern.com>; Bonrud, Pam <Pam.Bonrud@northwestern.com>
Subject: [EXTERNAL] RE: NorthWestern Energy Hub City Energy Park Announcement

CAUTION: This Email is from an EXTERNAL source outside of NorthWestern Energy.
The Original Sender of this email is Mark.Peterson@state.sd.us.
Are you expecting the message? Is this different from the message sender displayed above?
Do not click on links or open attachments unless you are sure you recognize the sender and you know the contents are safe.
If you believe the email to be malicious and/or phishing email, please use the **Report Phish** button.

Will any of this impact state right of way?

Mark Peterson
Aberdeen Region Engineer | South Dakota Department of Transportation
Better Lives Through Better Transportation
2735 W. Highway 12
Aberdeen SD 57401
O: 605-626-2244 | C: 605-380-8983 | F: 605-626-7875
dot.sd.gov

From: Follman, Joshua <Joshua.Follman@northwestern.com>
Sent: Monday, August 31, 2026 5:48 PM
To: Peterson, Mark (DOT) <Mark.Peterson@state.sd.us>
Cc: Sorensen, Benjamin <Benjamin.Sorensen@northwestern.com>; Scott Leigh <scott.leigh@aionenergyllc.com>; Lucostic, Seamus <Seamus.Lucostic@northwestern.com>; Bonrud, Pam <Pam.Bonrud@northwestern.com>
Subject: [EXT] NorthWestern Energy Hub City Energy Park Announcement

Mark -

Hello, my name is Josh Follman with NorthWestern Energy, please find the attached Project Overview and map showing our new Generation project in Aberdeen South Dakota.

The attached will give you a brief description and overview of our status, in addition there will be more information released in the coming months, if you have any questions feel free to reach out.

Thank you,

Josh

This message is for the named person's use only. It may contain confidential, proprietary or legally privileged information. No confidentiality or privilege is waived or lost by any mistransmission. If you receive this message in error, please immediately delete it and all copies of it from your system, destroy any hard copies of it and notify the sender. You must not, directly or indirectly, use, disclose, distribute, print, or copy any part of this message if you are not the intended recipient. NorthWestern Corporation and its subsidiaries each reserve the right to monitor all e-mail communications through its network.

SOUTH DAKOTA GAME, FISH, PARKS (SD GFP)

- 8/31/26 – Letter from NorthWestern to SD GFP
- 9/2/26 – NorthWestern (via HDR) Natural Heritage Program Data Request
- 9/3/26 – Email from SD GFP to NorthWestern
- 9/8/26 – SD GFP Environmental Review Tool (ERT) Results
- 9/21/26 – Email from NorthWestern (via HDR) to SD GFP for Environmental Review

NorthWestern Energy
Delivering a Bright Future

August 31, 2026

Sent Via Email (Mandy.Pearson@state.sd.us)

Mandy Pearson
Senior Wildlife Biologist
South Dakota Department of Agriculture and Natural Resources
523 E. Capitol Ave
Pierre, SD 57501

Re: NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy
Hub City Energy Park

Dear Mandy Pearson,

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Sincerely,

Joshua Follman

Josh Follman
Project Director
Joshua.Follman@northwestern.com
O 406-498-3617

Cc: Ben Sorensen, Technical Advisor (benjamin.sorensen@northwestern.com)
Seamus Lucostic, Project Manager (seamus.lucostic@northwestern.com)
Scott Leigh, Consultant (scott.leigh@aionenergyllc.com)
Alex Brazeal, Environmental Project Manager (alex.brazeal@hdrinc.com)

Attachments

Attachment 1 Project Site Location Map

From: info@gfp.sd.us
To: Koeckeritz, Emma
Cc: John.Weidler@state.sd.us; Mandy.Pearson@state.sd.us
Subject: Natural Heritage Program Data Request
Date: Wednesday, September 2, 2026 2:56:34 PM

You don't often get email from info@gfp.sd.us. Learn why this is important

WARNING: [EXTERNAL] This email originated from outside of the organization and the email sender cannot be verified. Do not click links or open attachments unless you recognize the sender and know the content is safe.

South Dakota - Game, Fish, and Parks

Natural Heritage Program Data Request

A new form was just submitted from the http://gfp.sd.gov/ website with the following information:

ID:	299
Agency/Org/Business:	HDR
Name:	Emma Koeckeritz
Address:	51 Broadway North, Suite 300 Fargo, ND 58102
Email:	emma.koeckeritz@hdrinc.com
Phone:	701-552-9946
Fax:	
URL:	
Element or Subject:	I am working on a generating station project for Northwestern Energy, and the project is located within Section 25, Township 123N, Range 64W in Brown County, SD. I can provide a KMZ or Shapefile if emailed.
Type of Data:	I am specifically looking for any information on previously recorded Bald Eagle nest sites in the area.
Purpose of Request:	Data to assist in the environmental review portion of the project.

Scott Leigh

From: Pearson, Mandy <Mandy.Pearson@state.sd.us>
Sent: Thursday, September 3, 2026 4:38 PM
To: joshua.follman@northwestern.com
Cc: Sorensen, Benjamin; Scott Leigh; Lucostic, Seamus; Bonrud, Pam
Subject: RE: NorthWestern Energy Hub City Energy Park Announcement

You don't often get email from mandy.pearson@state.sd.us. Learn why this is important

Hi Josh,

Thank you for reaching out to inform us of this project. I will keep an eye out for more project information from you in the future.

If you could also upload your project to our Environmental Review Tool at https://ert.gfp.sd.gov/, once your project location finalizes, that would really help us understand the footprint of the project by cross-referencing the project area to our Nongame Conservation Database and other data sources.

Please let me know if you have any questions.

Thanks,

Mandy Pearson | *Senior Wildlife Biologist*
Nongame Conservation & Environmental Review
South Dakota Game, Fish, and Parks
4130 Adventure Trail | Rapid City, SD 57702
605.394.6052 | mandy.pearson@state.sd.us

From: Follman, Joshua <Joshua.Follman@northwestern.com>
Sent: Monday, August 31, 2026 4:47 PM
To: Pearson, Mandy <Mandy.Pearson@state.sd.us>
Cc: Sorensen, Benjamin <Benjamin.Sorensen@northwestern.com>; Scott Leigh <scott.leigh@aionenergyllc.com>; Lucostic, Seamus <Seamus.Lucostic@northwestern.com>; Bonrud, Pam <Pam.Bonrud@northwestern.com>
Subject: [EXT] NorthWestern Energy Hub City Energy Park Announcement

Mandy -

Hello, my name is Josh Follman with NorthWestern Energy, please find the attached Project Overview and map showing our new Generation project in Aberdeen South Dakota.

The attached will give you a brief description and overview of our status, in addition there will be more information released in the coming months, if you have any questions feel free to reach out.

Thank you,

Josh

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Environmental Review Report

Project Information

Report Generation Date:	9/8/2026 04:34:43 PM
Project ID:	2026-09-08-2877
Project Title:	Northwest Energy Aberdeen Generating Station III
User Project Number(s):	
Project Type:	Energy Production/Storage/Transfer, Power plants
Project Activities:	None Selected
County(s):	Brown
Township/Range/Section(s):	123N064W25
Watershed(s) HUC8:	None
Latitude/Longitude:	45.434092 / -98.488889

Contact Information

Organization:	HDR
Contact Name:	Emma Koeckeritz
Contact Phone:	7015529946
Contact Email:	emma.koeckeritz@hdrinc.com
Contact Address:	51 North Broadway Suite 300 Fargo ND 58102
Submitted On Behalf Of:	

Project Description

NorthWestern Energy Public Service Corporation d/b/a (NorthWestern Energy) is planning to develop Aberdeen Generating Station III; a new, three-unit nominal 131 megawatt (MW) simple-cycle combustion turbine facility (Project). The Project is adjacent to the existing Aberdeen Generating Station south of Aberdeen, SD and will interconnect to the electric grid at 115 kV via a new, on-site substation and will be fed natural gas from a nearby interstate pipeline. The Project covers approximately 176 acres within Section 25, Township 123N, Range 64W in Brown County, SD.

Introduction

The vision of South Dakota Department of Game, Fish and Parks (SDGFP) is to conserve our state's outdoor heritage to enhance the quality of life for current and future generations. SDGFP has a state-wide mission to serve and connect people and families to the outdoors through effective management of our state's parks, fisheries and wildlife resources. SDGFP strives to prevent or minimize unnecessary damage to species and their habitats by offering possible mitigation measures.

Disclaimer

The information provided in this report can only be used as a site clearance letter if no conflicts with sensitive wildlife resources were detected. This information provides an indication of whether or not public or protected lands and sensitive resources are known or likely to be located near the proposed project's location. **The information generated in this report does not replace Endangered Species Act consultation obligations with the U.S. Fish and Wildlife Service (USFWS) for federal listed species.**

A majority of the sensitive species records in the report originate from the South Dakota Nongame Conservation Database (SDNCD). The SDNCD tracks species at risk and certain unique habitats. These species may be monitored because they are rare, indicative of a vulnerable habitat type, or are are legally designated as state or federal threatened or endangered species. Rare species are those that are declining and restricted to limited habitat, peripheral to a jurisdiction, isolated or disjunct due to geographic or climatic factors or classified as such due to lack of survey data. A list of monitored species can be found at https://gfp.sd.gov/natural-heritage-program/. Many places in South Dakota have not been surveyed for rare or protected species and habitats and the absence of a species from a proposed project area does not preclude its presence. **Accuracy of species lists, report information and project recommendations should be verified after 90 days**.

This project was flagged for further review by South Dakota Game, Fish and Parks. This report is considered a draft for informational purposes only, and is not to be used for environmental clearances. Staff from South Dakota Game, Fish and Parks may contact you within 30 days to follow up.

Project Type Recommendations
Revegetation

- Disturbance to native vegetation should be kept to a minimum.
- Any disturbed area should be revegetated using native seed sources.
    - The Natural Resources Conservation Service Plant Materials Center in Bismarck, ND may serve as a good source of information on which native plantings may be best suited to specific needs: https://www.nrcs.usda.gov/plant-materials/cp/releases
- Develop a long-term plan for preventing the introduction or establishment of non-native/invasive plants within the project area

Legal Obligations

South Dakota Endangered and Threatened Species Law

This state law (Chapter 34A-8) defines nongame, threatened and endangered species and wildlife and describes the relevant authorities of the Game, Fish and Parks Secretary and Commission. The SDGFP Commission may list, delist or change the status of state threatened or endangered species. Take of state threatened or endangered species is prohibited except for certain, authorized purposes or to protect life or property. This state law also prohibits the reintroduction of a species on the federal list of threatened or endangered species that is considered extirpated from the state, unless authorized by the South Dakota Legislature. More information about obtaining a state endangered take authorization is available here: https://gfp.sd.gov/forms/endangeredspecies/

Aquatic Invasive Species

South Dakota Administrative Rule 41:10:04:02 forbids the possession and transport of aquatic invasive species (AIS). Any construction vehicles, vessels, or equipment that will come into contact with surface waters in South Dakota that have previously been used outside of the state or in and AIS positive water within South Dakota must be thoroughly power washed with hot water (>140°F) and completely dried for a minimum of 7 days prior to use. All attached dirt, mud debris and vegetation must be removed and all compartments and tanks capable of holding standing water shall be drained and dry. This applies, but is not limited to, all equipment, pumps, lines, hoses and holding tanks. The list of AIS positive waters is available at https://sdleastwanted.sd.gov/ or by calling 605-223-7706.

Federal Laws

The following federal laws contribute to the conservation and management of fish and wildlife resources in the United States: Endangered Species Act, Bald and Golden Eagle Protection Act,

Migratory Bird Treaty Act, Clean Water Act, and the Fish and Wildlife Coordination Act. The National Environmental Policy Act (NEPA) requires compliance with these statutes and regulations.

Contact Information

U.S. Fish and Wildlife Service, Ecological Services Field Office
420 S. Garfield Ave, Suite 400
Pierre, South Dakota 57501
605-224-8693

U.S. Army Corp of Engineers, South Dakota Regulatory Office
28563 Powerhouse Road
Pierre, South Dakota 57501
605-224-8531

Bald and Golden Eagle Protection Act

The Bald and Golden Eagle Protection Act (16 U.S.C. 668–668d) provides for the protection of the bald eagle (*Haliaeetus leucocephalus*) and golden eagle (*Aquila chrysaetos*). Under this federal act, “take of eagles, their parts, nests or eggs is prohibited unless a permit is issued for certain purposes and under certain circumstances as long as the authorized take is compatible with the preservation of eagles. Disturbance resulting in injury, decreased productivity, or nest abandonment by substantially interfering with normal breeding, feeding or sheltering behavior is also considered take. Eagle nests are protected under this law, whether active or inactive. T**his report does not replace consultation with the USFWS regarding the protection of bald and golden eagles.**

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (16 U.S. C. 703-712) provides international protection to migratory bird species included in treaties among the United States, Great Britain, Mexico and Japan. This federal act prohibits the taking, killing, possession and transportation (among other actions) of migratory birds, their eggs, parts, and nests, unless specifically permitted by regulations. This act has no provisions for allowing unauthorized take. Work closely with the USFWS to identify protective measures to avoid migratory bird take. A list of migratory bird species protected under this act can be found at 50 CFR 10.13. Introduced bird species are not protected under this Act. **This report does not replace consultation with the USFWS regarding the protection of migratory bird species.**

Endangered Species Act

The Endangered Species Act (16 U.S.C. 1531–1544) provides protections for native plant and animal species that are in danger of becoming extinct. Under Section 9, it is unlawful for the “take” of a listed species. This is defined as “... to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect or attempt to engage in any such conduct”. However, a permit may be issued for take that is the result of an otherwise legal activity. Please contact the USFWS to determine if a permit is needed.
The USFWS is in charge of the protection of listed species and their critical habitat. Similarly, other federal agencies are also directed to conserve listed species and ensure their actions do not jeopardize a listed species existence or destroy or adversely modify critical habitat. As such, under Section 7, federal agencies should consult with the USFWS to ensure compliance with this Act.
This report does not replace consultation with the USFWS regarding listed species.

Clean Water Act

The intent of the Clean Water Act (33 U.S.C. 1251 et seq.) is “to restore and maintain the chemical, physical, and biological integrity of the Nation’s waters”. We recommend that proper planning take place to first and foremost avoid impacts to wetlands, streams, and associated riparian corridors. If dredge or fill materials will be placed into waterways or wetlands, the U.S. Army Corps of Engineers Regulatory Office should be contacted to determine if a 404 permit is needed.

Fish and Wildlife Coordination Act

The Fish and Wildlife Coordination Act (15 U.S.C. 661-667e) provides habitat protection by requiring a federal agency to consult with the USFWS and SDGFP (i.e. the state fish and wildlife agency) whenever an agency is proposing to control or modify a stream or other body of water. The intent of this consultation is to conserve wildlife resources by preventing habitat loss or damage.

Table 1. Special Status Species Documented within 1 Miles of Project Vicinity

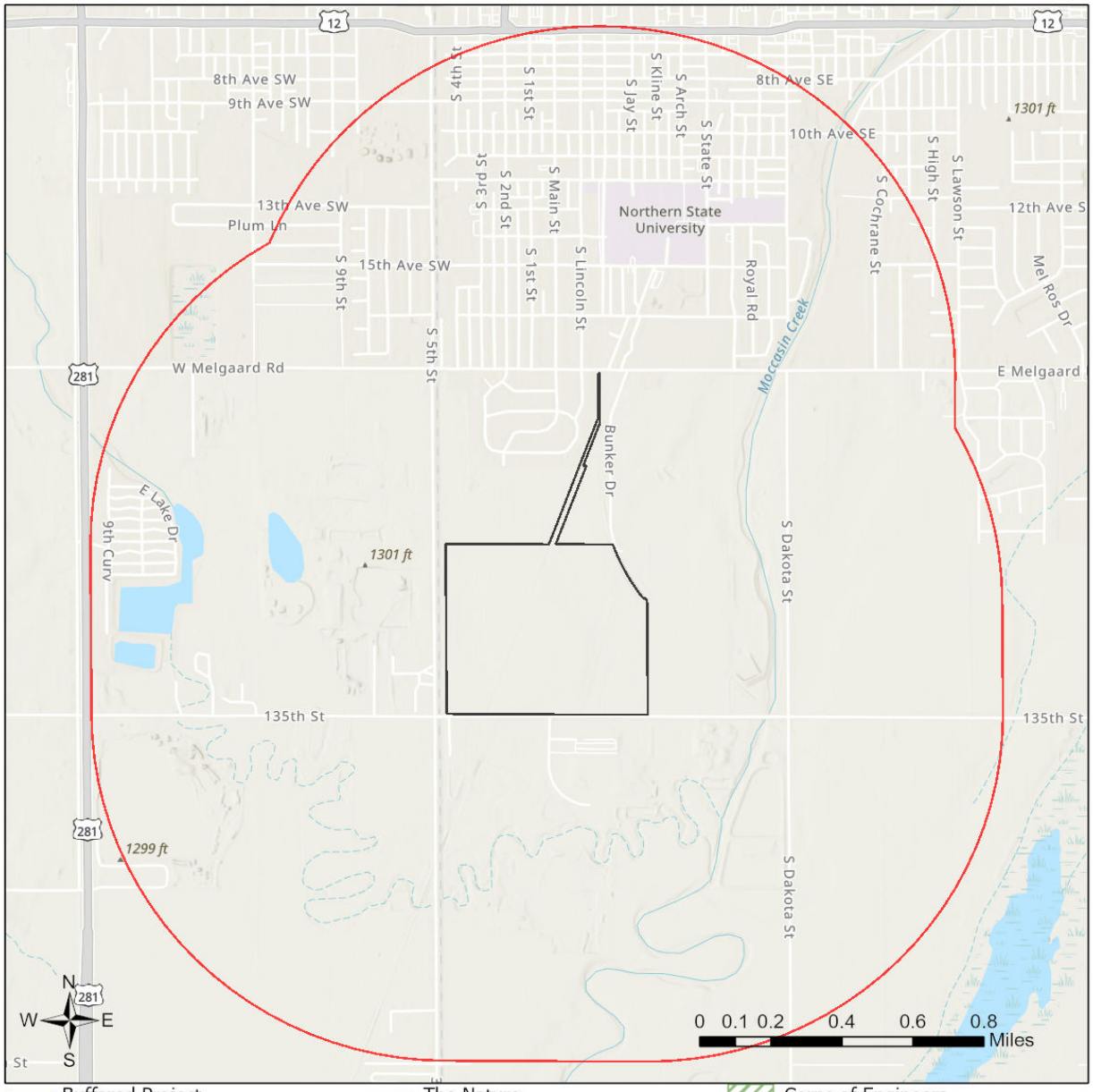
Scientific Name	Common Name	Taxonomic Group	Federal Status*	State Status*	Global Rank*	State Rank*	SGCN	Last Obs Date
Butorides virescens	Green Heron	Vertebrate Animal			G4	S2B	No	2009-07-01

SGCN = Species of Greatest Conservation Need, LE = Federally Endangered, LT = Federally Threatened, SE = State Endangered, ST = State Threatened. For definitions of State and Global rank status, please see: https://gfp.sd.gov/rare-animals/ or https://gfp.sd.gov/rare-plants/.

No Protected Lands were detected within the project vicinity.

Northwest Energy Aberdeen Generating Station III

Topo Basemap with Land Ownership

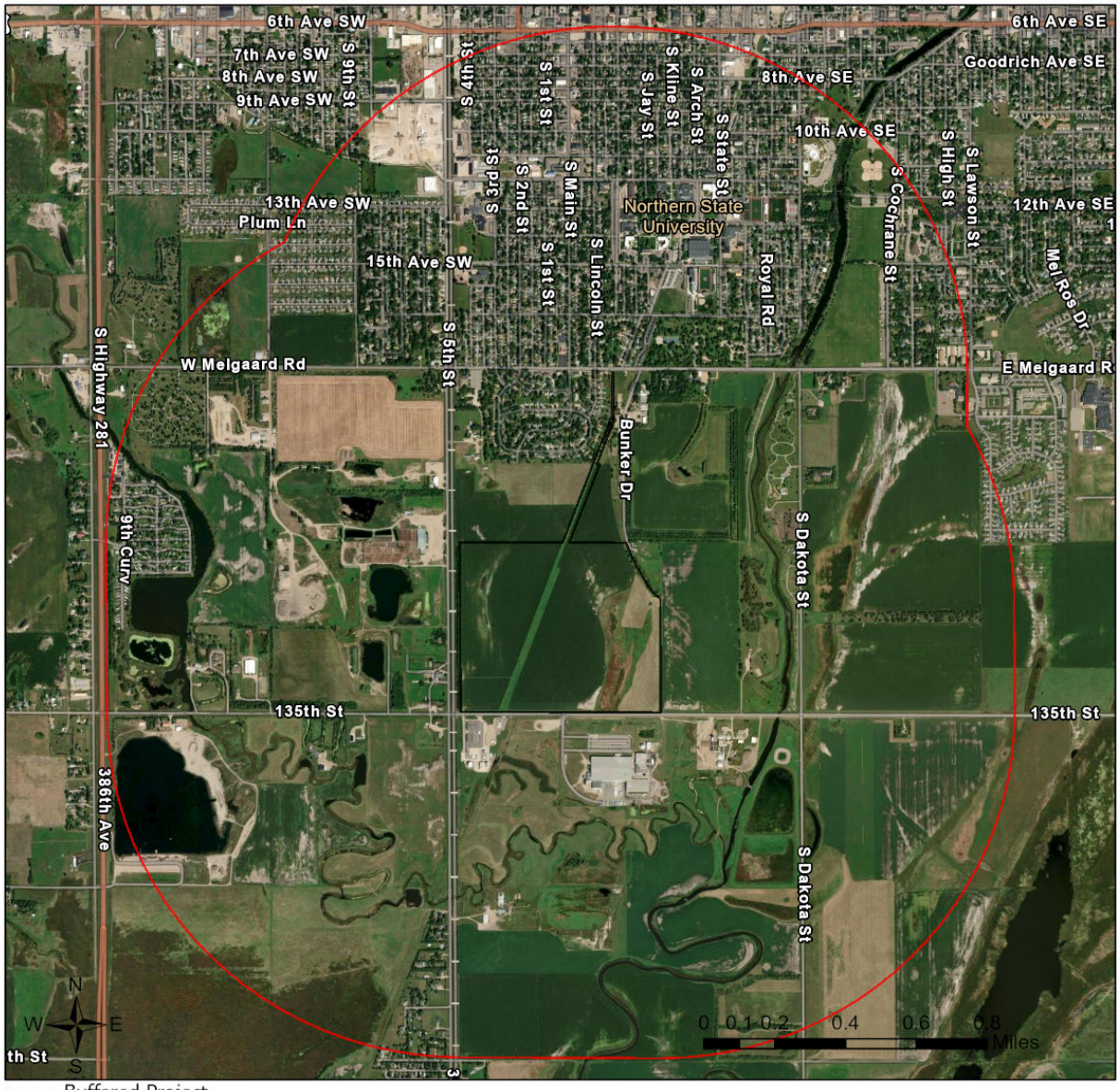


- Buffered Project Boundary
- Project Boundary
- Game Production Areas
- SD Parks and Rec Areas
- School and Public Lands
- The Nature Conservancy Lands
- National Forest
- National Grassland
- Bureau of Land Management
- Bureau of Reclamation
- Corps of Engineers
- National Fish Hatchery
- National Park Service
- USFWS Wildlife Refuge
- Waterfowl Production Area

Esri, NASA, NGA, USGS, FEMA
City of Aberdeen, South Dakota Game Fish and Parks, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, US Census Bureau, USDA, USFWS

Northwest Energy Aberdeen Generating Station III

Imagery Basemap with Locator Map



Buffered Project Boundary

Project Boundary



Esri, TomTom, Garmin, FAO, NOAA, USGS, EPA, USFWS
Vantor
City of Aberdeen, South Dakota Game Fish and Parks, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, US

Scott Leigh

From: Brazeal, Alex <Alex.Brazeal@hdrinc.com>
Sent: Monday, September 21, 2026 4:23 PM
To: Pearson, Mandy
Cc: joshua.follman@northwestern.com; Lucostic, Seamus; benjamin.sorensen; Scott Leigh; Shuler, Carrie
Subject: NWPS Hub City Energy Park
Attachments: Northwest_energy_aberdeen_g_9335_9645.pdf

Hello Mandy,

NorthWestern Energy Public Service Corporation d/b/a (NorthWestern Energy) is planning to develop the Hub City Energy Park, a new, three-unit nominal 131 megawatt (MW) gross simple cycle combustion turbine facility (Project). The Project is adjacent to the existing Aberdeen Generating Station south of Aberdeen, SD and will interconnect to the electric grid at 115 kV via a new, on-site substation and will be fed natural gas from a nearby interstate pipeline. The Project covers approximately 176 acres within Section 25, Township 123N, Range 64W in Brown County, SD.

HDR, Inc (HDR) is supporting environmental permitting for the Project and recently submitted a request for review using the ERT. The ERT report (attached) flagged the need for further review, and I am reaching out to schedule a time to discuss the Project.

Is there a day and time in the next two weeks which works best to connect? I can follow with a Teams invite.

Thank you,

Alex T. Brazeal
Environmental Project Manager
HDR
3231 Greensboro Drive, Suite 200
Bismarck, ND 58503
C 701.934.7830
D 701.557.9731

alex.brazeal@hdrinc.com
hdrinc.com/follow-us

SOUTH DAKOTA STATE HISTORIC PRESERVATION OFFICE (SD SHPO)

- 8/31/26 – Letter from NorthWestern to SD SHPO
- 9/2/26 – Email from SD SHPO to NorthWestern
- 9/30/26 – Letter from SD SHPO to NorthWestern

NorthWestern Energy
Delivering a Bright Future

August 31, 2026

Sent Via Email (Katie.Wasley@state.sd.us)

Katie Wasley
Review and Compliance Coordinator
South Dakota State Historic Preservation Office
900 Governors Dr.
Pierre, SD 57501

Re: NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy
Hub City Energy Park

Dear Katie Wasley,

NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy ("NorthWestern") is developing the Hub City Energy Park (the "Project") adjacent to and to the north of its existing Aberdeen Generating Station ("AGS") near Aberdeen, South Dakota. The purpose of this letter is: (i) to introduce and provide an overview of the Project and (ii) to solicit any initial direction that you may have on the Project ahead of the provision of additional, detailed information.

The Project will consist of three (3) natural gas combustion turbines ("CTs") in simple cycle configuration totaling 131 MW (gross). The Project will be located on approximately 176 acres of NorthWestern-owned property in Section 25, Township 123 North, Range 64 West of the 5th P.M., to the south of the City of Aberdeen, South Dakota in Brown County – please see Attachment 1 for the Project location. The Project development was initiated as a result of NorthWestern's Integrated Resource Plan for South Dakota and the Southwest Power Pool ("SPP") Expedited Resource Adequacy Study ("ERAS") Procedures, both of which identified the need for additional capacity to maintain and improve electric grid reliability.

Subject to ongoing development, the Project plans to connect to a nearby interstate pipeline for the supply of natural gas, interconnect to the electric grid at 115 kV at the existing AGS Siebrecht substation, tie into the municipal water system for water needs, and connect to the municipal sewer system.

NorthWestern Energy has advanced various aspects of Project development and plans to submit an Energy Conversion Facility construction permit application to the South Dakota Public Utilities Commission ("Commission") in September 2026. Project construction is currently planned to begin in late 2027 or early 2028, with the Project planned to be operational in 2030. In support of the Project, NorthWestern has:

1. Submitted an Interconnection Request to SPP under the ERAS Procedures in October 2025 and expects the Project Generator Interconnection Agreement to be fully executed no later than September 2026;
2. Executed a procurement contract for the supply of the CTs for the Project, including backend selective catalytic reduction and oxidation catalyst systems for emissions control;
3. Submitted a Notice of Intent to apply for an Energy Conversion Facility construction permit to the Commission pursuant to SDCL § 49-41B-5 and ARSD ch. 20:10:22:02 (Docket No. EL25-038);
4. Secured the Project site;
5. Completed desktop and field surveys for wetlands/waterbodies, habitat/threatened and endangered species, cultural resources, and noise;
6. Initiated an engineer, procure, construct request for proposal process and is in the process of evaluating proposals; and
7. Held a Project open house in Aberdeen, South Dakota in July 2026.

NorthWestern plans to send additional correspondence with information specific to your agency in the near future. Understanding that detailed feedback will be dependent upon this future information, NorthWestern would welcome and appreciate any feedback, insights, or recommendations in the interim regarding the ongoing development of the Project or measures to be taken, in general.

Your consideration of this important NorthWestern Project is very much appreciated.

Sincerely,

Joshua Follman

Josh Follman
Project Director
Joshua.Follman@northwestern.com
O 406-498-3617

Cc: Ben Sorensen, Technical Advisor (benjamin.sorensen@northwestern.com)
Seamus Lucostic, Project Manager (seamus.lucostic@northwestern.com)
Scott Leigh, Consultant (scott.leigh@aionenergyllc.com)
Amy Leuchtmann, Project Archaeologist (amy.leuchtmann@hdrinc.com)

Attachments

Attachment 1 Project Site Location Map

Scott Leigh

From: Wasley, Katie <Katie.Wasley@state.sd.us>
Sent: Wednesday, September 2, 2026 9:28 AM
To: joshua.follman@northwestern.com
Cc: Sorensen, Benjamin; Scott Leigh; Lucostic, Seamus; Bonrud, Pam
Subject: RE: NorthWestern Energy Hub City Energy Park Announcement

You don't often get email from katie.wasley@state.sd.us. Learn why this is important

Good Morning Josh,

Thank you for providing the initial information regarding this project. I have entered this information into our Electronic Review & Compliance (ERC) system and we will get a response back out to you within the next 30 days.

Thank you,

Katie Wasley
Review & Compliance Coordinator

SOUTH DAKOTA STATE HISTORICAL SOCIETY
katie.wasley@state.sd.us
605-773-2906 | 900 Governors Drive, Pierre | history.sd.gov

From: Follman, Joshua <Joshua.Follman@northwestern.com>
Sent: Monday, August 31, 2026 5:43 PM
To: Wasley, Katie <Katie.Wasley@state.sd.us>
Cc: Sorensen, Benjamin <Benjamin.Sorensen@northwestern.com>; Scott Leigh <scott.leigh@aionenergyllc.com>; Lucostic, Seamus <Seamus.Lucostic@northwestern.com>; Bonrud, Pam <Pam.Bonrud@northwestern.com>
Subject: [EXT] NorthWestern Energy Hub City Energy Park Announcement

Katie -

Hello, my name is Josh Follman with NorthWestern Energy, please find the attached Project Overview and map showing our new Generation project in Aberdeen South Dakota.

The attached will give you a brief description and overview of our status, in addition there will be more information released in the coming months, if you have any questions feel free to reach out.

Thank you,

Josh

This message is for the named person's use only. It may contain confidential, proprietary or legally privileged information. No confidentiality or privilege is waived or lost by any mistransmission. If you receive this message in error, please immediately delete it and all copies of it from your system, destroy any hard copies of it and notify the sender. You must not, directly or indirectly, use, disclose, distribute, print, or copy any part of this message if you are not the intended recipient. NorthWestern Corporation and its subsidiaries each reserve the right to monitor all e-mail communications through its network.

September 30, 2026

Joshua Follman
NorthWestern Energy
11 West Park
Butte, Montana 59701

SDCL 1-19A-11.1 Consultation
Project: 260902001S – NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy Hub City Energy Park
Location: Brown
PUC - South Dakota Public Utilities Commission

Dear Mr. Follman,

Thank you for the opportunity to comment on the above referenced project pursuant to SDCL 1-19A-11.1. SDCL 1-19A-11.1 outlines a specific process that must be followed prior to any governmental action, including the issuance of permits, that may harm any historic property that is included in the National or State Registers of Historic Places. The South Dakota Office of the State Historic Preservation Officer (SHPO) would like to provide the following comments concerning effect of the proposed project on the non-renewable cultural resources of South Dakota.

On September 2, 2026, the SHPO received your introductory letter dated August 31, 2026, and a map of the proposed project area regarding the above-referenced project for the development of the Hub City Energy Park, which would consist of three (3) natural gas combustion turbines in simple cycle configuration totaling 131 MW (gross) located south of Aberdeen in Brown County, South Dakota.

As a project seeking a permit from the South Dakota Public Utilities Commission (PUC), the project will be subject to the permitting requirements of the PUC in addition to SDCL 1-19A11.1. Outlined in the Administrative Rules of South Dakota (ARSD) at 20:10:22:23, the applicant seeking a permit from the South Dakota PUC shall include an identification and analysis of the proposed project, which includes “a forecast of the impact on landmarks and cultural resources of historic, religious, archaeological, scenic, natural, or other cultural significance."

To assist NorthWestern Public Service Corporation (NorthWestern) in meeting the requirements of the South Dakota PUC permit Application, SHPO recommends that the applicant:

1. Please provide a copy of the original official record search from the Archaeological Research Center that identifies the previously recorded cultural resources within one mile of the proposed project area.

2. In your August 31, 2026, introductory letter, it was noted the NorthWestern has completed

desktop and field surveys in regards to cultural resources. Please provide a copy of the field survey report and associated shapefiles for SHPO to review.

3. Conduct an analysis of the visual effects that the energy park will have on cultural resources within one mile of the project area.

4. Contact Tribal Historic Preservation Officers and Tribal governments that indicated an interest in cultural resources within or near the project area concerning the project's potential effects on Traditional Cultural Properties associated with American Indian Tribes and/or properties of religious and cultural significance to them

Once the additional information has been obtained regarding historic properties and cultural resources which could be affected by the proposed project, please submit that information to SHPO for review and comment under SDCL 1-19A-11.1.

Please note that this letter does not relieve the responsible party/parties of requirements regarding compliance with any other historic preservation laws. Should the project ever be federally funded, licensed, permitted, or approved, the project would be considered a federal undertaking for which the responsible federal agency must comply with Section 106 of the National Historic Preservation Act of 1966, as amended

Should you require any additional information, please contact Katie Wasley at Katie.Wasley@state.sd.us or at 605-773-2906. Your concern for the non-renewable cultural heritage of our state is appreciated.

Sincerely,
Garry Guan
State Historic Preservation Officer

Katie Wasley
Review & Compliance Coordinator

TRIBAL CONSULTATION

- 9/1/26 – Letter from NorthWestern to Crow Creek Sioux Tribe
- 9/1/26 – Letter from NorthWestern to Cheyenne River Sioux Tribe
- 9/1/26 – Letter from NorthWestern to Flandreau Santee Sioux Tribe
- 9/1/26 – Letter from NorthWestern to Lower Brule Sioux Tribe
- 9/1/26 – Letter from NorthWestern to Oglala Sioux Tribe
- 9/1/26 – Letter from NorthWestern to Rosebud Sioux Tribe
- 9/1/26 – Letter from NorthWestern to Standing Rock Sioux Tribe
- 9/1/26 – Letter from NorthWestern to Sisseton Wahpeton Oyate Tribe
- 9/1/26 – Letter from NorthWestern to Yankton Sioux Tribe

NorthWestern Energy
Delivering a Bright Future

September 1, 2026

Sent Via Email (peterlengkeek@yahoo.com)

Peter Lengkeek
Chairman
Crow Creek Sioux Tribe
PO Box 50
Ft. Thompson, SD 57339

Re: NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy
Hub City Energy Park

Dear Chairman Lengkeek,

NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy ("NorthWestern") is developing the Hub City Energy Park (the "Project") adjacent to and to the north of its existing Aberdeen Generating Station ("AGS") near Aberdeen, South Dakota. The purpose of this letter is: (i) to introduce and provide an overview of the Project and (ii) to solicit any feedback that you may have on the Project.

The Project will consist of three (3) natural gas combustion turbines ("CTs") in simple cycle configuration totaling 131 MW (gross). The Project will be located on approximately 176 acres of NorthWestern-owned property in Section 25, Township 123 North, Range 64 West of the 5th P.M., to the south of the City of Aberdeen, South Dakota in Brown County – please see Attachment 1 for the Project location. The Project development was initiated as a result of NorthWestern's Integrated Resource Plan for South Dakota and the Southwest Power Pool ("SPP") Expedited Resource Adequacy Study ("ERAS") Procedures, both of which identified the need for additional capacity to maintain and improve electric grid reliability.

Subject to ongoing development, the Project plans to connect to a nearby interstate pipeline for the supply of natural gas, interconnect to the electric grid at 115 kV at the existing AGS Siebrecht substation, tie into the municipal water system for water needs, and connect to the municipal sewer system.

NorthWestern Energy has advanced various aspects of Project development and plans to submit an Energy Conversion Facility construction permit application to the South Dakota Public Utilities Commission ("Commission") in September 2026. Project construction is currently planned to begin in late 2027 or early 2028, with the Project planned to be operational in 2030. In support of the Project, NorthWestern has:

1. Submitted an Interconnection Request to SPP under the ERAS Procedures in October 2025 and expects the Project Generator Interconnection Agreement to be fully executed no later than September 2026;

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NorthWestern would welcome and appreciate any feedback, insights or recommendations regarding the ongoing development of the Project or measures to be taken, in general.

Your consideration of this important NorthWestern Project is very much appreciated.

Sincerely,

Joshua Follman

Josh Follman
Project Director
Joshua.Follman@northwestern.com
O 406-498-3617

Cc: Pam Bonrud, Director Government & Regulatory Affairs (pam.bonrud@northwestern.com)
Ben Sorensen, Technical Advisor (benjamin.sorensen@northwestern.com)
Seamus Lucostic, Project Manager (seamus.lucostic@northwestern.com)
Scott Leigh, Consultant (scott.leigh@aionenergyllc.com)

Attachments

Attachment 1 Project Site Location Map

NorthWestern Energy
Delivering a Bright Future

September 1, 2026

Sent Via Email (chairmanlebeau@crstmail.com)

Ryman LeBeau
Chairman
Cheyenne River Sioux Tribe
PO Box 590
Eagle Butte, SD 57625

Re: NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy
Hub City Energy Park

Dear Chairman LeBeau,

NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy ("NorthWestern") is developing the Hub City Energy Park (the "Project") adjacent to and to the north of its existing Aberdeen Generating Station ("AGS") near Aberdeen, South Dakota. The purpose of this letter is: (i) to introduce and provide an overview of the Project and (ii) to solicit any feedback that you may have on the Project.

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NorthWestern would welcome and appreciate any feedback, insights or recommendations regarding the ongoing development of the Project or measures to be taken, in general.

Your consideration of this important NorthWestern Project is very much appreciated.

Sincerely,

Joshua Follman

Josh Follman
Project Director
Joshua.Follman@northwestern.com
O 406-498-3617

Cc: Pam Bonrud, Director Government & Regulatory Affairs (pam.bonrud@northwestern.com)
Ben Sorensen, Technical Advisor (benjamin.sorensen@northwestern.com)
Seamus Lucostic, Project Manager (seamus.lucostic@northwestern.com)
Scott Leigh, Consultant (scott.leigh@aionenergyllc.com)

Attachments

Attachment 1 Project Site Location Map

NorthWestern Energy
Delivering a Bright Future

September 1, 2026

Sent Via Email (ryan.killsahundred@fsst-nsn.gov)

Ryan Kills-A-Hundred
President
Flandreau Santee Sioux Tribe
PO Box 283
Flandreau, SD 57028

Re: NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy
Hub City Energy Park

Dear President Kills-A-Hundred,

NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy ("NorthWestern") is developing the Hub City Energy Park (the "Project") adjacent to and to the north of its existing Aberdeen Generating Station ("AGS") near Aberdeen, South Dakota. The purpose of this letter is: (i) to introduce and provide an overview of the Project and (ii) to solicit any feedback that you may have on the Project.

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2. Executed a procurement contract for the supply of the CTs for the Project, including backend selective catalytic reduction and oxidation catalyst systems for emissions control;
3. Submitted a Notice of Intent to apply for an Energy Conversion Facility construction permit to the Commission pursuant to SDCL § 49-41B-5 and ARSD ch. 20:10:22:02 (Docket No. EL25-038);
4. Secured the Project site;
5. Completed desktop and field surveys for wetlands/waterbodies, habitat/threatened and endangered species, cultural resources, and noise;
6. Initiated an engineer, procure, construct request for proposal process and is in the process of evaluating proposals; and
7. Held a Project open house in Aberdeen, South Dakota in July 2026.

NorthWestern would welcome and appreciate any feedback, insights or recommendations regarding the ongoing development of the Project or measures to be taken, in general.

Your consideration of this important NorthWestern Project is very much appreciated.

Sincerely,

Joshua Follman

Josh Follman
Project Director
Joshua.Follman@northwestern.com
O 406-498-3617

Cc: Pam Bonrud, Director Government & Regulatory Affairs (pam.bonrud@northwestern.com)
Ben Sorensen, Technical Advisor (benjamin.sorensen@northwestern.com)
Seamus Lucostic, Project Manager (seamus.lucostic@northwestern.com)
Scott Leigh, Consultant (scott.leigh@aionenergyllc.com)

Attachments

Attachment 1 Project Site Location Map

NorthWestern Energy
Delivering a Bright Future

September 1, 2026

Sent Via Email (BoydGourneau@lowerbrule.net)

Boyd Gourneau
Chairman
Lower Brule Sioux Tribe
PO Box 187
Lower Brule, SD 57548

Re: NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy
Hub City Energy Park

Dear Chairman Gourneau,

NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy ("NorthWestern") is developing the Hub City Energy Park (the "Project") adjacent to and to the north of its existing Aberdeen Generating Station ("AGS") near Aberdeen, South Dakota. The purpose of this letter is: (i) to introduce and provide an overview of the Project and (ii) to solicit any feedback that you may have on the Project.

The Project will consist of three (3) natural gas combustion turbines ("CTs") in simple cycle configuration totaling 131 MW (gross). The Project will be located on approximately 176 acres of NorthWestern-owned property in Section 25, Township 123 North, Range 64 West of the 5th P.M., to the south of the City of Aberdeen, South Dakota in Brown County – please see Attachment 1 for the Project location. The Project development was initiated as a result of NorthWestern's Integrated Resource Plan for South Dakota and the Southwest Power Pool ("SPP") Expedited Resource Adequacy Study ("ERAS") Procedures, both of which identified the need for additional capacity to maintain and improve electric grid reliability.

Subject to ongoing development, the Project plans to connect to a nearby interstate pipeline for the supply of natural gas, interconnect to the electric grid at 115 kV at the existing AGS Siebrecht substation, tie into the municipal water system for water needs, and connect to the municipal sewer system.

NorthWestern Energy has advanced various aspects of Project development and plans to submit an Energy Conversion Facility construction permit application to the South Dakota Public Utilities Commission ("Commission") in September 2026. Project construction is currently planned to begin in late 2027 or early 2028, with the Project planned to be operational in 2030. In support of the Project, NorthWestern has:

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NorthWestern would welcome and appreciate any feedback, insights or recommendations regarding the ongoing development of the Project or measures to be taken, in general.

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Sincerely,

Joshua Follman

Josh Follman
Project Director
Joshua.Follman@northwestern.com
O 406-498-3617

Cc: Pam Bonrud, Director Government & Regulatory Affairs (pam.bonrud@northwestern.com)
Ben Sorensen, Technical Advisor (benjamin.sorensen@northwestern.com)
Seamus Lucostic, Project Manager (seamus.lucostic@northwestern.com)
Scott Leigh, Consultant (scott.leigh@aionenergyllc.com)

Attachments

Attachment 1 Project Site Location Map

NorthWestern Energy
Delivering a Bright Future

September 1, 2026

Sent Via Email (fstarcomesout@oglala.org)

Frank Star Comes Out
President
Oglala Sioux Tribe
PO Box 2070
Pine Ridge, SD 57770

Re: NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy
Hub City Energy Park

Dear President Star Comes Out,

NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy ("NorthWestern") is developing the Hub City Energy Park (the "Project") adjacent to and to the north of its existing Aberdeen Generating Station ("AGS") near Aberdeen, South Dakota. The purpose of this letter is: (i) to introduce and provide an overview of the Project and (ii) to solicit any feedback that you may have on the Project.

The Project will consist of three (3) natural gas combustion turbines ("CTs") in simple cycle configuration totaling 131 MW (gross). The Project will be located on approximately 176 acres of NorthWestern-owned property in Section 25, Township 123 North, Range 64 West of the 5th P.M., to the south of the City of Aberdeen, South Dakota in Brown County – please see Attachment 1 for the Project location. The Project development was initiated as a result of NorthWestern's Integrated Resource Plan for South Dakota and the Southwest Power Pool ("SPP") Expedited Resource Adequacy Study ("ERAS") Procedures, both of which identified the need for additional capacity to maintain and improve electric grid reliability.

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NorthWestern Energy has advanced various aspects of Project development and plans to submit an Energy Conversion Facility construction permit application to the South Dakota Public Utilities Commission ("Commission") in September 2026. Project construction is currently planned to begin in late 2027 or early 2028, with the Project planned to be operational in 2030. In support of the Project, NorthWestern has:

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Sincerely,

Joshua Follman

Josh Follman
Project Director
Joshua.Follman@northwestern.com
O 406-498-3617

Cc: Pam Bonrud, Director Government & Regulatory Affairs (pam.bonrud@northwestern.com)
Ben Sorensen, Technical Advisor (benjamin.sorensen@northwestern.com)
Seamus Lucostic, Project Manager (seamus.lucostic@northwestern.com)
Scott Leigh, Consultant (scott.leigh@aionenergyllc.com)

Attachments

Attachment 1 Project Site Location Map

NorthWestern Energy
Delivering a Bright Future

September 1, 2026

Sent Via Email (kathleen.woodenknife@rst-nsn.gov)

Kathleen Wooden Knife
President
Rosebud Sioux Tribe
PO Box 430
Rosebud, SD 57570

Re: NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy
Hub City Energy Park

Dear President Wooden Knife,

NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy ("NorthWestern") is developing the Hub City Energy Park (the "Project") adjacent to and to the north of its existing Aberdeen Generating Station ("AGS") near Aberdeen, South Dakota. The purpose of this letter is: (i) to introduce and provide an overview of the Project and (ii) to solicit any feedback that you may have on the Project.

The Project will consist of three (3) natural gas combustion turbines ("CTs") in simple cycle configuration totaling 131 MW (gross). The Project will be located on approximately 176 acres of NorthWestern-owned property in Section 25, Township 123 North, Range 64 West of the 5th P.M., to the south of the City of Aberdeen, South Dakota in Brown County – please see Attachment 1 for the Project location. The Project development was initiated as a result of NorthWestern's Integrated Resource Plan for South Dakota and the Southwest Power Pool ("SPP") Expedited Resource Adequacy Study ("ERAS") Procedures, both of which identified the need for additional capacity to maintain and improve electric grid reliability.

Subject to ongoing development, the Project plans to connect to a nearby interstate pipeline for the supply of natural gas, interconnect to the electric grid at 115 kV at the existing AGS Siebrecht substation, tie into the municipal water system for water needs, and connect to the municipal sewer system.

NorthWestern Energy has advanced various aspects of Project development and plans to submit an Energy Conversion Facility construction permit application to the South Dakota Public Utilities Commission ("Commission") in September 2026. Project construction is currently planned to begin in late 2027 or early 2028, with the Project planned to be operational in 2030. In support of the Project, NorthWestern has:

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NorthWestern would welcome and appreciate any feedback, insights or recommendations regarding the ongoing development of the Project or measures to be taken, in general.

Your consideration of this important NorthWestern Project is very much appreciated.

Sincerely,

Joshua Follman

Josh Follman
Project Director
Joshua.Follman@northwestern.com
O 406-498-3617

Cc: Pam Bonrud, Director Government & Regulatory Affairs (pam.bonrud@northwestern.com)
Ben Sorensen, Technical Advisor (benjamin.sorensen@northwestern.com)
Seamus Lucostic, Project Manager (seamus.lucostic@northwestern.com)
Scott Leigh, Consultant (scott.leigh@aionenergyllc.com)

Attachments

Attachment 1 Project Site Location Map

NorthWestern Energy
Delivering a Bright Future

September 1, 2026

Sent Via Email (steve.sittingbear@standingrock.org)

Steve Sitting Bear
Chairman
Standing Rock Sioux Tribe
PO Box D
Ft. Yates, ND 58538

Re: NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy
Hub City Energy Park

Dear Chairman Sitting Bear,

NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy ("NorthWestern") is developing the Hub City Energy Park (the "Project") adjacent to and to the north of its existing Aberdeen Generating Station ("AGS") near Aberdeen, South Dakota. The purpose of this letter is: (i) to introduce and provide an overview of the Project and (ii) to solicit any feedback that you may have on the Project.

The Project will consist of three (3) natural gas combustion turbines ("CTs") in simple cycle configuration totaling 131 MW (gross). The Project will be located on approximately 176 acres of NorthWestern-owned property in Section 25, Township 123 North, Range 64 West of the 5th P.M., to the south of the City of Aberdeen, South Dakota in Brown County – please see Attachment 1 for the Project location. The Project development was initiated as a result of NorthWestern's Integrated Resource Plan for South Dakota and the Southwest Power Pool ("SPP") Expedited Resource Adequacy Study ("ERAS") Procedures, both of which identified the need for additional capacity to maintain and improve electric grid reliability.

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Sincerely,

Joshua Follman

Josh Follman
Project Director
Joshua.Follman@northwestern.com
O 406-498-3617

Cc: Pam Bonrud, Director Government & Regulatory Affairs (pam.bonrud@northwestern.com)
Ben Sorensen, Technical Advisor (benjamin.sorensen@northwestern.com)
Seamus Lucostic, Project Manager (seamus.lucostic@northwestern.com)
Scott Leigh, Consultant (scott.leigh@aionenergyllc.com)

Attachments

Attachment 1 Project Site Location Map

NorthWestern Energy
Delivering a Bright Future

September 1, 2026

Sent Via Email (chairman@swo-nsn.gov)

J. Garret Renville
Chairman
Sisseton Wahpeton Oyate Tribe
PO Box 509
Agency Village, SD 57262

Re: NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy
Hub City Energy Park

Dear Chairman Renville,

NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy ("NorthWestern") is developing the Hub City Energy Park (the "Project") adjacent to and to the north of its existing Aberdeen Generating Station ("AGS") near Aberdeen, South Dakota. The purpose of this letter is: (i) to introduce and provide an overview of the Project and (ii) to solicit any feedback that you may have on the Project.

The Project will consist of three (3) natural gas combustion turbines ("CTs") in simple cycle configuration totaling 131 MW (gross). The Project will be located on approximately 176 acres of NorthWestern-owned property in Section 25, Township 123 North, Range 64 West of the 5th P.M., to the south of the City of Aberdeen, South Dakota in Brown County – please see Attachment 1 for the Project location. The Project development was initiated as a result of NorthWestern's Integrated Resource Plan for South Dakota and the Southwest Power Pool ("SPP") Expedited Resource Adequacy Study ("ERAS") Procedures, both of which identified the need for additional capacity to maintain and improve electric grid reliability.

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NorthWestern would welcome and appreciate any feedback, insights or recommendations regarding the ongoing development of the Project or measures to be taken, in general.

Your consideration of this important NorthWestern Project is very much appreciated.

Sincerely,

Joshua Follman

Josh Follman
Project Director
Joshua.Follman@northwestern.com
O 406-498-3617

Cc: Pam Bonrud, Director Government & Regulatory Affairs (pam.bonrud@northwestern.com)
Ben Sorensen, Technical Advisor (benjamin.sorensen@northwestern.com)
Seamus Lucostic, Project Manager (seamus.lucostic@northwestern.com)
Scott Leigh, Consultant (scott.leigh@aionenergyllc.com)

Attachments

Attachment 1 Project Site Location Map

NorthWestern Energy
Delivering a Bright Future

September 1, 2026

Sent Via Email (cknudsen@yanktonsiouxtribe.net)

Chelaine Knudsen
Chairwoman
Yankton Sioux Tribe
PO Box 1153
Wagner, SD 57380

Re: NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy
Hub City Energy Park

Dear Chairwoman Knudsen,

NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy ("NorthWestern") is developing the Hub City Energy Park (the "Project") adjacent to and to the north of its existing Aberdeen Generating Station ("AGS") near Aberdeen, South Dakota. The purpose of this letter is: (i) to introduce and provide an overview of the Project and (ii) to solicit any feedback that you may have on the Project.

The Project will consist of three (3) natural gas combustion turbines ("CTs") in simple cycle configuration totaling 131 MW (gross). The Project will be located on approximately 176 acres of NorthWestern-owned property in Section 25, Township 123 North, Range 64 West of the 5th P.M., to the south of the City of Aberdeen, South Dakota in Brown County – please see Attachment 1 for the Project location. The Project development was initiated as a result of NorthWestern's Integrated Resource Plan for South Dakota and the Southwest Power Pool ("SPP") Expedited Resource Adequacy Study ("ERAS") Procedures, both of which identified the need for additional capacity to maintain and improve electric grid reliability.

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NorthWestern would welcome and appreciate any feedback, insights or recommendations regarding the ongoing development of the Project or measures to be taken, in general.

Your consideration of this important NorthWestern Project is very much appreciated.

Sincerely,

Joshua Follman

Josh Follman
Project Director
Joshua.Follman@northwestern.com
O 406-498-3617

Cc: Pam Bonrud, Director Government & Regulatory Affairs (pam.bonrud@northwestern.com)
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Scott Leigh, Consultant (scott.leigh@aionenergyllc.com)

Attachments

Attachment 1 Project Site Location Map

UNITED STATES ARMY CORPS OF ENGINEERS (USACE)

- 8/31/26 – Letter from NorthWestern to USACE
- 9/3/26 – Letter from USACE to NorthWestern
- 9/22/26 – Jurisdictional Determination (JD) Request from NorthWestern (via HDR) to USACE
    - Wetland Delineation Report
    - Engineering Form 6247
- 9/25/26 – USACE receipt confirmation of NorthWestern JD Request

August 31, 2026

Sent Via Email (SDRegulatoryMailbox@usace.army.mil)

United States Army Corps of Engineers – South Dakota Office
28563 Powerhouse Road
Pierre, SD 57501

Re: NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy
Hub City Energy Park

USACE South Dakota District Office Team:

NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy ("NorthWestern") is developing the Hub City Energy Park (the "Project") adjacent to and to the north of its existing Aberdeen Generating Station ("AGS") near Aberdeen, South Dakota. The purpose of this letter is: (i) to introduce and provide an overview of the Project and (ii) to solicit any initial direction that you may have on the Project ahead of the provision of additional, detailed information.

The Project will consist of three (3) natural gas combustion turbines ("CTs") in simple cycle configuration totaling 131 MW (gross). The Project will be located on approximately 176 acres of NorthWestern-owned property in Section 25, Township 123 North, Range 64 West of the 5th P.M., to the south of the City of Aberdeen, South Dakota in Brown County – please see Attachment 1 for the Project location. The Project development was initiated as a result of NorthWestern's Integrated Resource Plan for South Dakota and the Southwest Power Pool ("SPP") Expedited Resource Adequacy Study ("ERAS") Procedures, both of which identified the need for additional capacity to maintain and improve electric grid reliability.

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7. Held a Project open house in Aberdeen, South Dakota in July 2026.

NorthWestern plans to send additional correspondence with information specific to your agency in the near future. Understanding that detailed feedback will be dependent upon this future information, NorthWestern would welcome and appreciate any feedback, insights, or recommendations in the interim regarding the ongoing development of the Project or measures to be taken, in general.

Your consideration of this important NorthWestern Project is very much appreciated.

Sincerely,

Joshua Follman

Josh Follman
Project Director
Joshua.Follman@northwestern.com
O 406-498-3617

Cc: Ben Sorensen, Technical Advisor (benjamin.sorensen@northwestern.com)
Seamus Lucostic, Project Manager (seamus.lucostic@northwestern.com)
Scott Leigh, Consultant (scott.leigh@aionenergyllc.com)
Alex Brazeal, Environmental Project Manager (alex.brazeal@hdrinc.com)

Attachments

Attachment 1 Project Site Location Map

DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, OMAHA DISTRICT
SOUTH DAKOTA REGULATORY OFFICE
28563 POWERHOUSE ROAD, ROOM 118
PIERRE, SOUTH DAKOTA 57501-6174

September 2, 2026

Subject: NorthWestern Energy's Hub City Energy Park

NorthWestern Energy
Attention: Josh Follman
11 East Park
Butte, Montana 59701

Dear Mr. Follman,

This letter is in response to your inquiry dated August 31, 2026, which provided preliminary information on the Hub City Energy Park, in the City of Aberdeen, Brown County, South Dakota.

Corps Regulatory Offices administers Section 404 of the Clean Water Act. Section 404 of the Clean Water Act regulates the discharge of dredge or fill material (temporarily or permanently) in waters of the United States. Waters of the United States may include, but are not limited to, rivers, streams, ditches, coulees, lakes, ponds, and their adjacent wetlands. Fill material includes, but is not limited to, rock, sand, soil, clay, plastics, construction debris, wood chips, overburden from mines or other excavation activities and materials used to create any structure or infrastructure in waters of the United States.

If any portion of the project requires a Section 404 preconstruction notification, please complete and submit the enclosed Department of the Army permit application (ENG Form 6082). If you are unsure if an authorization is required, you may still submit a preconstruction notification; include a project location map, description of work, and construction methodology. To submit a preconstruction notification, you may use the Regulatory Request System (https://rrs.usace.army.mil/rrs) or email a complete ENG Form 6082 to SDRegulatoryMailbox@usace.army.mil. If you have any questions or need any assistance, please feel free to contact this office at the above Regulatory Office email address or telephone at (605) 224-8531. Please refer to project number NWO-2026-01237-PIE in all correspondence. Please split large attachments (>25 MB) into multiple emails if need be. You can obtain additional information about the

Regulatory Program and download forms from our website:
https://www.nwo.usace.army.mil/Missions/Regulatory-Program/South-Dakota/

Sincerely,



Nathan Morey
South Dakota Regulatory Office
Section Chief

Enclosure

September 21, 2026

Nathan Morey, Section Chief
USACE – SD Regulatory Office
28563 Powerhouse Road
Pierre, SD 57501

RE: (NWO-2026-01237-PIE) Hub City Energy Park, Aberdeen, Brown County, South Dakota

Dear Mr. Morey,

NorthWestern Energy Public Service Corporation d/b/a (NorthWestern Energy) is planning to develop the Hub City Energy Park, a new, three-unit nominal 131 megawatt (MW) gross simple cycle combustion turbine facility (Project). The Project is adjacent to the existing Aberdeen Generating Station south of Aberdeen, SD and will interconnect to the electric grid at 115 kV via a new, on-site substation and will be fed natural gas from a nearby interstate pipeline. The Project covers approximately 176 acres within Section 25, Township 123N, Range 64W in Brown County, SD.

Northwestern Energy contracted HDR, Inc (HDR) to complete aquatic resource delineations to confirm or refute the presence of aquatic resources, define boundaries, and document conditions that would guide whether the resource meets the current WOTUS definition for the Project. A field delineation of aquatic resources was completed by HDR on April 9th and May 7th, 2026, and resulted in six aquatic resources for a total of approximately 30.2 acres.

Please see the enclosed Request for Corps Jurisdictional Determination (JD) and the aquatic resources delineation report with required information per Regulatory Guidance Letter 16-01. We kindly request an Approved Jurisdictional Determination (AJD) of delineated wetlands for the Project.

We understand that AJD requests are typically of lower priority compared to permit applications. However, we respectfully request that this AJD be expedited, considering the spirit of Executive Order 14156 – Declaring a National Energy Emergency, issued on January 20, 2025. Section 3 of the Order directs federal agencies to “use all relevant lawful emergency and other authorities available to them to expedite the completion of all authorized and appropriated infrastructure, energy, environmental, and natural resources projects.” Furthermore, Section 4 specifically calls upon the Secretary of the Army, acting through the Assistant Secretary for Civil Works, to promptly consult and take appropriate action under emergency Army Corps permitting provisions.

The Project directly supports the expansion of domestic energy generation and grid reliability—objectives explicitly prioritized under the Executive Order. Should the wetland be a Water of the U.S., the AJD would be a prerequisite for a permit application tied to an energy infrastructure

hdrinc.com 3231 Greensboro Drive, Suite 200, Bismarck, ND 58503-5413
(701) 557-9701

project. As such, we believe this Project qualifies for emergency consideration for which the Corps could exercise its emergency authorities to expedite the AJD process.

If you have any questions, comments, or need additional information, please feel free to contact me directly at 701-934-7830, or alex.brazeal@hdrinc.com.

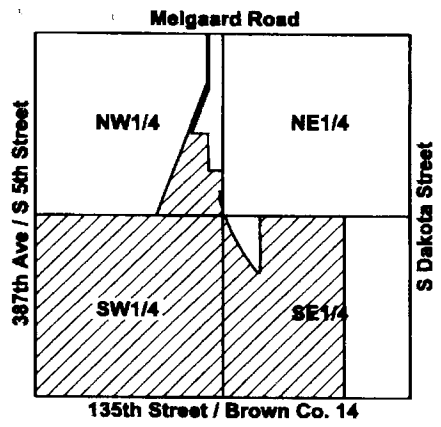
Sincerely,

HDR Engineering, Inc.



Alex T. Brazeal

Environmental Project Manager
Enclosures
CC: Josh Follman, NorthWestern Energy
Seamus Lucostic, NorthWestern Energy
Ben Sorensen, NorthWestern Energy
Scott Leigh, Aion Energy



AREA MAP N.T.S.
SECTION 25, T123N, R64W
BROWN CO.

PLAT SHOWING

NWE GENERATION ADDITION

IN SECTION 25, TOWNSHIP 123 NORTH, RANGE 64 WEST OF THE 5th P.M., BROWN COUNTY, SOUTH DAKOTA

REGISTERED PROFESSIONAL LAND SURVEYOR
REG. NO. 15575
JAMIE L. SPRENGER
SOUTH DAKOTA
01/24/2025

Section Line
East Melgaard Road
NW Cor. Sec. 25-123-64
(Found Mag Nail)
N: 591,135.85
E: 2,354,722.75
Replat of Gorder's Fourth Addition
(Not a Part of this Plat)
Lot 1,
Young's South Park Addition
(Not a Part of this Plat)
Lot 2,
Young's South Park Addition
(Not a Part of this Plat)
Lot 1,
Parkview Nursery Addition
(Not a Part of this Plat)
Lot 1,
Latt-Northwestern-Young Addition
(Not a Part of this Plat)
Lot 2,
Latt-Northwestern-Young Addition
(Not a Part of this Plat)
the 844' next North of the S1200' of the W368' of Lot 4 in Culbert's Subdivision, also the W570.5' of the S1200' of Lot 4, Culbert's Subdivision including that portion of Lot B located South of Bitz First Subdivision
(Not a Part of this Plat)
Lot 2
Outlot A,
Northwestern Public Service Co.
Outlot A & Outlot B
in the NW1/4 of Sec. 25-123-64
(Vacated by this Plat)
Bunker Drive
(Existing 30'
Access Easement)
(124MR, P.296)
Lot 2,
Hogg's First Subdivision
(Not a Part of this Plat)
Lot 3,
Latt-Northwestern-Young Addition
(Vacated by this Plat)
W1/4 Cor. Sec. 25-123-64
(Set Mag Nail w/Washer
Stamped LS 15575)
N: 588,494.82
E: 2,354,747.93
S1200' of Lot 4,
Culbert's Subdivision
except the W570.5'
(Not a Part of this Plat)
Lot 5
(Contains 13.85 Acres±)
Center of Sec. 25-123-64
(Found Original Stone)
N: 588,515.08
E: 2,357,387.23
100' Railroad
Right-of-Way
20'
20'
670.5'
387th Avenue / S 5th Street
40' Wide
Access Easement
1/4 Line
Weis Addition
(Not a Part
of this Plat)
Portion of Hall's Outlot 1
(Vacated by this Plat)
Outlot 1, Northwestern-Young Outlots (Vacated by this Plat)
Outlot 2, Northwestern-Young Outlots (Vacated by this Plat)
Outlot A & Outlot B (Vacated by this Plat)
Outlot B, Northwestern Public Service Co. Outlot A & Outlot B
Lot 1
(Contains 63.08 Acres±)
Outlot A,
Northwestern Public Service Co.
Outlot A & Outlot B
in the SW1/4 of Sec. 25-123-64
(Vacated by this Plat)
Lot 2
(Contains 10.21 Acres±)
N 00°32'26" W 2,641.52
N 00°49'25" W 2,641.55
Portion of Hall's Outlot 1
(Vacated by this Plat)
Lot 4
(Contains 70.16 Acres±)
Gardens Lot 1
Aberdeen Creek Side Subdivision
(Not a Part of this Plat)
℄ Burlington Northern Santa Fe Railroad Mainline
Previsously called the
SW1/4 West of the
Chicago and
Northwestern Railroad
and Milwaukee Right
of Way
Lot 3
(Contains 103.01 Acres±)
Previsously called the SW1/4
East of the Chicago and
Northwestern Railroad and
Milwaukee Right of Way
Previsously called the SE1/4
except land deeded
1/4 Line
Section Line
40' Wide
Access Easement
100' Railroad
Right-of-Way
In-Place Access
In-Place Access
In-Place Access
In-Place Access
In-Place Access
75'
75'
Section Line
135th Street / Brown Co. Hwy 14WA
SW Cor. Sec. 25-123-64
(Set Mag Nail w/Washer
Stamped LS 15575)
N: 585,853.57
E: 2,354,773.12
S1/4 Cor. Sec. 25-123-64
(Found Rebar)
N: 585,874.06
E: 2,357,425.19
0
500'
SCALE IN FEET

IMEG
3314 Milwaukee Avenue NE
Suite 2
Aberdeen, SD 57401
PH: 605.225.3494
www.imegcorp.com

BASIS OF BEARINGS
State Plane Grid
South Dakota North Zone (4001)
NAD '83 (2011) US Survey Feet
Distances are GROUND
Coordinates are GRID

LEGEND
● FOUND PROPERTY PIN
○ PIN SET w/CAP LS 15575
☒ CALCULATED CORNER

PLAT SHOWING

NWE GENERATION ADDITION

IN SECTION 25, TOWNSHIP 123 NORTH, RANGE 64 WEST OF THE 5th P.M., BROWN COUNTY, SOUTH DAKOTA

REGISTERED PROFESSIONAL LAND SURVEYOR
REG. NO. 15575
JAMIE L. SPRENGER
SOUTH DAKOTA
01/24/2025

BASIS OF BEARINGS

State Plane Grid
South Dakota North Zone (4001)
NAD '83 (2011) US Survey Feet
Distances are GROUND
Coordinates are GRID

LEGEND

- ● FOUND PROPERTY PIN
- ○ PIN SET w/CAP LS 15575
- ⊠ CALCULATED CORNER

W1/4 Cor. Sec. 25-123-64
(Set Mag Nail w/Washer Stamped LS 15575)
N: 588,494.82
E: 2,354,747.93

100' Railroad Right-of-Way

670.5'

N 89°33'27" E 2,639.89'

20'

20'

N 89°33'27" E 1,549.73'

40' Wide Access Easement

Culbe... except the ... (Not a Part of thi...

S 1...

Lot 5
(Contains 13.85 Acres±)

Center of Sec. 25-123-64
(Found Original Stone)
N: 588,515.08
E: 2,357,387.23

N 89°33'36" E 2,620.43'

C3

L7

1/4 Line

N 89°33'27" E 820.22'

N 89°33'36" E 27.06'

N 89°33'36" E 1,178.29'

889.94'

K. Weis Addition (Not a Part of this Plat)

E1/4 Cor. Sec. 25-123-64
(Found Nail)
N: 588,535.20
E: 2,360,007.33

L=940.93'
R=2,880.00'
CB=S 29°27'47" E
CH=936.75'

Lot 1
(Contains 63.08 Acres±)

Lot 2
(Contains 10.21 Acres±)

N 89°32'03" E 44.64'

S 19°42'01" W 2,760.33'

N 19°41'39" E 2,760.22'

Lot 3
(Contains 103.01 Acres±)

Lot 4
(Contains 70.16 Acres±)

℄ Burlington Northern Sante Fe Railroad Mainline

N 00°32'26" W 2,641.52'

387th Avenue / S 5th Street

N 01°04'10" W 2,591.67'

S 00°55'41" E 1,772.76'

N 00°55'41" W 2,591.89'

S 00°57'31" E 2,592.58'

Gardens Lot 1
Aberdeen Creek Side Subdivision
(Not a Part of this Plat)

1/4 Line

Section Line

40' Wide Access Easement

100' Railroad Right-of-Way

SW Cor. Sec. 25-123-64
(Set Mag Nail w/Washer Stamped LS 15575)
N: 585,853.57
E: 2,354,773.12

104.08'

In-Place Access

570.82'

In-Place Access

In-Place Access

1,787.69'

In-Place Access

523.93'

1,179.68'

In-Place Access

50' R-o-W

SE Cor. Sec. 25-123-64
(Found Rebar)
N: 585,892.72
E: 2,360,052.35

Section Line

75'

75'

Section Line

135th Street / Brown Co. Hwy 14WA

S 89°33'26" W 2,652.93'

S 89°35'35" W 2,627.48'

S1/4 Cor. Sec. 25-123-64
(Found Rebar)
N: 585,874.06
E: 2,357,425.19

0 400'
SCALE IN FEET

IMEG
3314 Milwaukee Avenue NE
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PLAT SHOWING

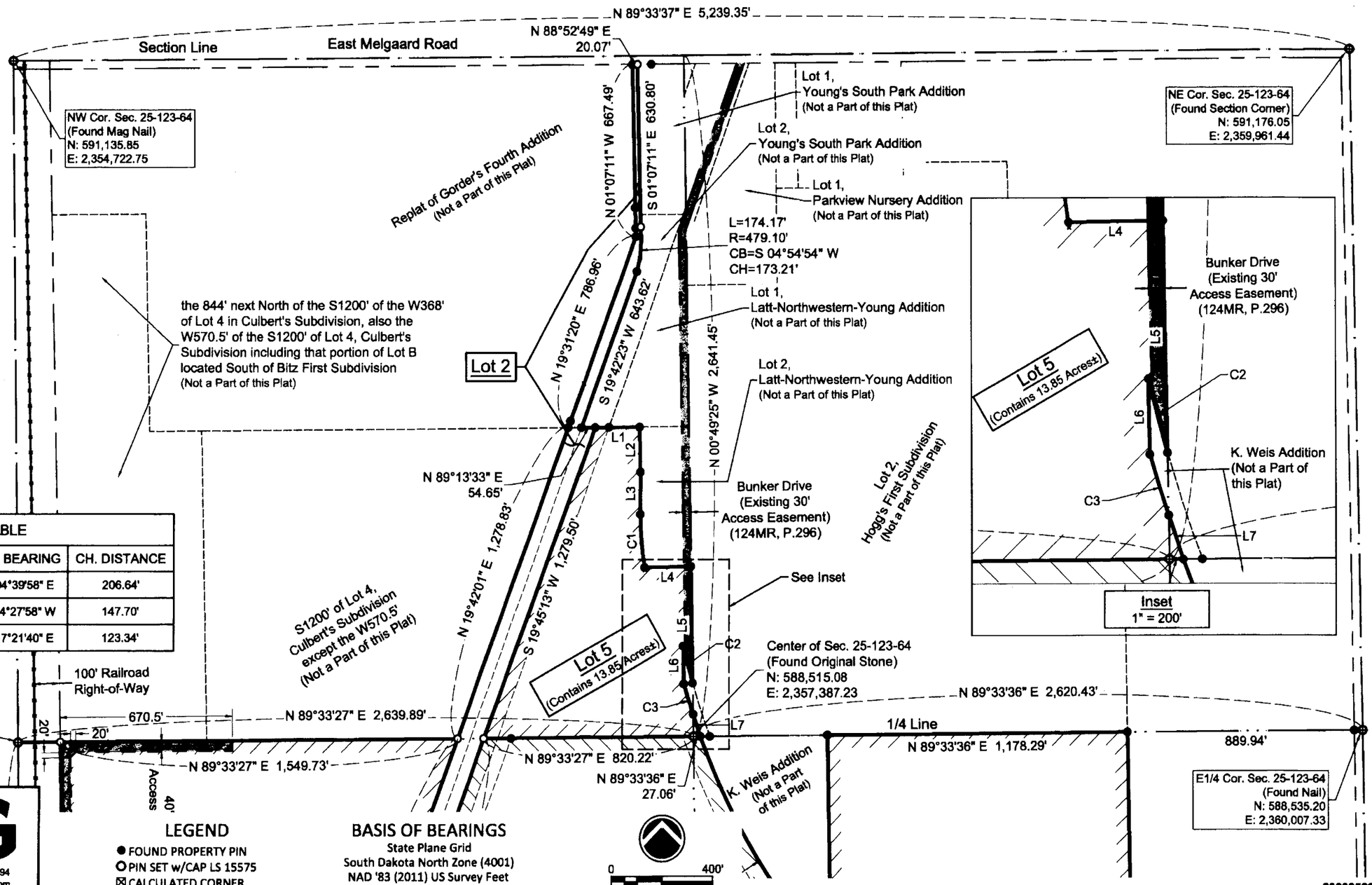
NWE GENERATION ADDITION

IN SECTION 25, TOWNSHIP 123 NORTH, RANGE 64 WEST OF THE 5th P.M., BROWN COUNTY, SOUTH DAKOTA

REGISTERED PROFESSIONAL LAND SURVEYOR
REG. NO.
15575
JAMIE L. SARGENT
SOUTH DAKOTA
01/24/2025

LINE TABLE		
LINE	BEARING	DISTANCE
L1	N 89°36'27" E	171.88'
L2	S 01°04'37" E	174.57'
L3	S 00°07'37" W	163.96'
L4	N 89°07'20" E	185.25'
L5	S 00°56'33" E	450.57'
L6	S 00°52'58" E	146.63'
L7	S 18°24'18" E	90.13'

CURVE TABLE				
CURVE	LENGTH	RADIUS	CH. BEARING	CH. DISTANCE
C1	206.88'	1,236.53'	S 04°39'58" E	206.64'
C2	147.72'	2,845.00'	N 14°27'58" W	147.70'
C3	123.35'	2,728.16'	S 17°21'40" E	123.34'



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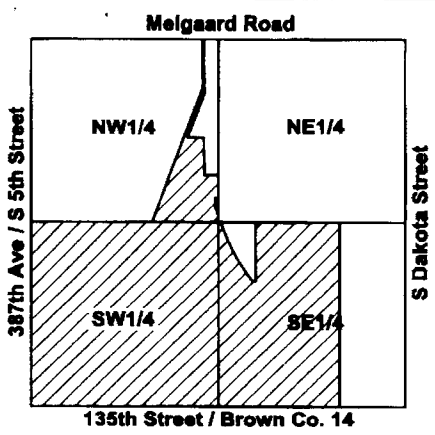
LEGEND
- ● FOUND PROPERTY PIN
- ○ PIN SET w/CAP LS 15575
- ☒ CALCULATED CORNER

BASIS OF BEARINGS
State Plane Grid
South Dakota North Zone (4001)
NAD '83 (2011) US Survey Feet
Distances are GROUND
Coordinates are GRID

PLAT SHOWING

NWE GENERATION ADDITION

IN SECTION 25, TOWNSHIP 123 NORTH, RANGE 64 WEST OF THE 5th P.M., BROWN COUNTY, SOUTH DAKOTA



AREA MAP N.T.S.
SECTION 25, T123N, R64W
BROWN CO.

0 500'
SCALE IN FEET

REGISTERED PROFESSIONAL LAND SURVEYOR
REG. NO. 15575
JAMIE L. SPRENGER
SOUTH DAKOTA
1/24/2025

Section Line
East Melgaard Road
NW Cor. Sec. 25-123-64
(Found Mag Nail)
N: 591,135.85
E: 2,354,722.75
Lot 2
Bunker Drive
(Existing 30'
Access Easement)
(124MR, P.296)
Floodplain Zone X
W1/4 Cor. Sec. 25-123-64
(Set Mag Nail w/Washer
Stamped LS 15575)
N: 588,494.82
E: 2,354,747.93
100' Railroad
Right-of-Way
670.5'
20'
20'
Lot 5
(Contains 13.85 Acres±)
Center of Sec. 25-123-64
(Found Original Stone)
N: 588,515.08
E: 2,357,387.23
Floodway Zone AE
1/4 Line
387th Avenue / S 5th Street
40' Wide
Access Easement
Lot 1
(Contains 63.08 Acres±)
Floodplain Zone AE
Lot 2
(Contains 10.21 Acres±)
Floodplain Zone X
Lot 4
(Contains 70.16 Acres±)
Lot 3
(Contains 103.01 Acres±)
1/4 Line
Floodplain Zone AE
Burlington Northern Santa Fe Railroad Mainline
Section Line
40' Wide
Access Easement
100' Railroad
Right-of-Way
In-Place Access
In-Place Access
In-Place Access
In-Place Access
In-Place Access
75'
75'
Section Line
135th Street / Brown Co. Hwy 14WA
SW Cor. Sec. 25-123-64
(Set Mag Nail w/Washer
Stamped LS 15575)
N: 585,853.57
E: 2,354,773.12
S1/4 Cor. Sec. 25-123-64
(Found Rebar)
N: 585,874.06
E: 2,357,425.19

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BASIS OF BEARINGS
State Plane Grid
South Dakota North Zone (4001)
NAD '83 (2011) US Survey Feet
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LEGEND
- ● FOUND PROPERTY PIN
- ○ PIN SET w/CAP LS 15575
- ☒ CALCULATED CORNER

FLOODPLAIN
BASE FLOOD ELEVATION = 1295.2
- ZONE AE FLOODWAY
- ZONE AE FLOODPLAIN
- ZONE X-SHADED

PLAT SHOWING

NWE GENERATION ADDITION

IN SECTION 25, TOWNSHIP 123 NORTH, RANGE 64 WEST OF THE 5th P.M., BROWN COUNTY, SOUTH DAKOTA

OWNER'S CERTIFICATE

#EXCEPT RR R-o-W

The Don Young Real Estate Limited Partnership, a South Dakota limited partnership (an undivided one-half interest), does hereby certify that it is the owner of

- the Southwest Quarter (SW1/4) of Section 25, Township 123 North, Range 64 West of the 5th P.M., Brown County, South Dakota, including Outlot 2, Northwestern-Young Outlots that lies in the SW1/4 of Section 25 and Northwestern Public Service Co. Outlot B of the plat entitled Northwestern Public Service Co. Outlot A and Outlot B in the SW1/4 of Section 25, Township 123 North, Range 64 West of the 5th P.M., Brown County, South Dakota;
- the Southeast Quarter (SE1/4) of Section 25, Township 123 North, Range 64 West of the 5th P.M., Brown County, South Dakota, including Hall's Outlot 1, located in Section 25, Township 123 North, Range 64 West of the 5th P.M., Brown County, South Dakota, EXCEPT Gardens Lot 1 and Witte Lot 1, Aberdeen Creek Side Subdivision in the E1/2 of Section 25-T123N-R64W of the 5th P.M., Brown County, South Dakota;
- Lot 3, Latt-Northwestern-Young Addition to the City of Aberdeen, in the NW1/4 of Section 25, Township 123 North, Range 64 West of the 5th P.M., Brown County, South Dakota;
- Northwestern Public Service Co. Outlot B of the plat entitled Northwestern Public Service Co. Outlot A and Outlot B in the SW1/4 of Section 25, Township 123 North, Range 64 West of the 5th P.M., Brown County, South Dakota;
- Outlot 2, Northwestern-Young Outlots that lies in the SW1/4 of Section 25, Township 123 North, Range 64 West of the 5th P.M., Brown County, South Dakota;

and that it has caused the same to be surveyed and platted as shown on the attached plat which shall be hereinafter known and described as **"NWE GENERATION ADDITION IN SECTION 25, TOWNSHIP 123 NORTH, RANGE 64 WEST OF THE 5TH P.M., BROWN COUNTY, SOUTH DAKOTA"** and that development of this land shall conform to all existing applicable zoning, subdivision and sediment control regulations.

By this plat, the Don Young Real Estate Limited Partnership, a South Dakota Limited Parternship (an undivided one-half interest), does hereby DEDICATE an ACCESS EASEMENT to run with the land for INGRESS to and EGRESS from "the S1200 feet of Lot 4, Culbert's Subdivision, except the W570.5 feet" AND "the 844 feet next North of the S1200 feet of the W368 feet of Lot 4, Culbert's Subdivision, also the W570.5 feet of the S1200 feet of Lot 4, Culbert's Subdivision, including that portion of Lot B located South of Bitz First Subdivision", on or over the strip of land designated hereon as the 40' Wide Access Easement.

By this plat, the Don Young Real Estate Limited Partnership, a South Dakota Limited Partnership (an undivided one-half interest), does hereby vacate "Hall's Outlot 1, located in Section 25, Township 123 North, Range 64 West of the 5th P.M., Brown County, South Dakota as filed for record on November 15, 1971 at 11:00 A.M., and duly recorded Book No. 2 and designated as Plat No. 160 .

By this plat, the Don Young Real Estate Limited Partnership, a South Dakota Limited Partnership (an undivided one-half interest), does hereby vacate "Lot 3, Latt-Northwestern-Young Addition to the City of Aberdeen, in the NW1/4 of Section 25, Township 123 North, Range 64 West of the 5th P.M., Brown County, South Dakota as filed for record on October 31, 2011 at 1:36 P.M., and duly recorded as Plat No. 2813 .

By this plat, the Don Young Real Estate Limited Partnership, a South Dakota Limited Partnership (an undivided one-half interest), does hereby vacate "Northwestern Public Service Co. Outlot B of the plat entitled Northwestern Public Service Co. Outlot A and Outlot B in the SW1/4 of Section 25, Township 123 North, Range 64 West of the 5th P.M., Brown County, South Dakota as filed for record on November 29, 1965 at 2:00 P.M., and duly recorded as Plat No. 443 .

By this plat, the Don Young Real Estate Limited Partnership, a South Dakota Limited Partnership (an undivided one-half interest), does hereby vacate "Outlot 2, Northwestern-Young Outlots that lies in the SW1/4 of Section 25, Township 123 North, Range 64 West of the 5th P.M., Brown County, South Dakota as filed for record on October 31, 2011 at 1:25 P.M., and duly recorded as Plat No. 2812 .

Owner: Don Young Real Estate Limited Partnership
a South Dakota Limited partnership

Donald Young Member
Print Name & Title

Donald Young
Signature

Signed this 24 day of January, 2025.

COUNTY OF BROWN)
) SS
STATE OF SOUTH DAKOTA)

On this the 24th day of January, 2025, before me, a notary public, the undersigned officer, personally appeared, who acknowledge himself/herself to be the member, of the Don Young Real Estate Limited Partnership, and that he/she as such member, being authorized to do so, executed the forgoing instrument for the proposed therein contained, by signing the name of the Don Young Real Estate Limited Partnership, by himself/herself as member.

In witness whereof I hereunto set my hand and official seal.

My Commission Expires: June 6, 2025

Notary Public

CHELSEY S. SHERIDAN NOTARY Seal PUBLIC STATE OF SOUTH DAKOTA

OWNER'S CERTIFICATE

#EXCEPT RR R-o-W

I, Harlan D. Young (an undivided one-half interest), do hereby certify that I am the owner of

- the Southwest Quarter (SW1/4) of Section 25, Township 123 North, Range 64 West of the 5th P.M., Brown County, South Dakota, including Outlot 2, Northwestern-Young Outlots that lies in the SW1/4 of Section 25 and Northwestern Public Service Co. Outlot B of the plat entitled Northwestern Public Service Co. Outlot A and Outlot B in the SW1/4 of Section 25, Township 123 North, Range 64 West of the 5th P.M., Brown County, South Dakota;
- the Southeast Quarter (SE1/4) of Section 25, Township 123 North, Range 64 West of the 5th P.M., Brown County, South Dakota, including Hall's Outlot 1, located in Section 25, Township 123 North, Range 64 West of the 5th P.M., Brown County, South Dakota, EXCEPT Gardens Lot 1 and Witte Lot 1, Aberdeen Creek Side Subdivision in the E1/2 of Section 25-T123N-R64W of the 5th P.M., Brown County, South Dakota;
- Lot 3, Latt-Northwestern-Young Addition to the City of Aberdeen, in the NW1/4 of Section 25, Township 123 North, Range 64 West of the 5th P.M., Brown County, South Dakota;
- Northwestern Public Service Co. Outlot B of the plat entitled Northwestern Public Service Co. Outlot A and Outlot B in the SW1/4 of Section 25, Township 123 North, Range 64 West of the 5th P.M., Brown County, South Dakota;
- Outlot 2, Northwestern-Young Outlots that lies in the SW1/4 of Section 25, Township 123 North, Range 64 West of the 5th P.M., Brown County, South Dakota;

and that I have caused the same to be surveyed and platted as shown on the attached plat which shall be hereinafter known and described as **"NWE GENERATION ADDITION IN SECTION 25, TOWNSHIP 123 NORTH, RANGE 64 WEST OF THE 5TH P.M., BROWN COUNTY, SOUTH DAKOTA"** and that development of this land shall conform to all existing applicable zoning, subdivision and sediment control regulations.

By this plat, I, Harlan D. Young (an undivided one-half interest), do hereby DEDICATE an ACCESS EASEMENT to run with the land for INGRESS to and EGRESS from "the S1200 feet of Lot 4, Culbert's Subdivision, except the W570.5 feet" AND "the 844 feet next North of the S1200 feet of the W368 feet of Lot 4, Culbert's Subdivision, also the W570.5 feet of the S1200 feet of Lot 4, Culbert's Subdivision, including that portion of Lot B located South of Bitz First Subdivision", on or over the strip of land designated hereon as the 40' Wide Access Easement.

By this plat, Harlan D. Young (an undivided one-half interest), does hereby vacate "Hall's Outlot 1, located in Section 25, Township 123 North, Range 64 West of the 5th P.M., Brown County, South Dakota as filed for record on November 15, 1971 at 11:00 A.M., and duly recorded Book No. 2 and designated as Plat No. 160 .

By this plat, Harlan D. Young (an undivided one-half interest), does hereby vacate "Lot 3, Latt-Northwestern-Young Addition to the City of Aberdeen, in the NW1/4 of Section 25, Township 123 North, Range 64 West of the 5th P.M., Brown County, South Dakota as filed for record on October 31, 2011 at 1:36 P.M., and duly recorded as Plat No. 2813 .

By this plat, Harlan D. Young (an undivided one-half interest), does hereby vacate "Northwestern Public Service Co. Outlot B of the plat entitled Northwestern Public Service Co. Outlot A and Outlot B in the SW1/4 of Section 25, Township 123 North, Range 64 West of the 5th P.M., Brown County, South Dakota as filed for record on November 29, 1965 at 2:00 P.M., and duly recorded as Plat No. 443 .

By this plat, Harlan D. Young (an undivided one-half interest), does hereby vacate "Outlot 2, Northwestern-Young Outlots that lies in the SW1/4 of Section 25, Township 123 North, Range 64 West of the 5th P.M., Brown County, South Dakota as filed for record on October 31, 2011 at 1:25 P.M., and duly recorded as Plat No. 2812 .

Owner: Harlan D. Young

Signature

Signed this 24 day of January, 2025.

COUNTY OF BROWN)
) SS
STATE OF SOUTH DAKOTA)

On this the 24th day of January, 2025, before me, a notary public, the undersigned officer, personally appeared, Harlan D. Young , known to me or satisfactorily proven to be the person whose name is subscribed to the within instrument and acknowledged to me that he/she executed the same for the purposes therein contained.

In witness whereof I hereunto set my hand and official seal.

My Commission Expires: June 6, 2025

Notary Public

CHELSEY S. SHERIDAN NOTARY Seal PUBLIC STATE OF SOUTH DAKOTA

PLAT SHOWING

NWE GENERATION ADDITION

IN SECTION 25, TOWNSHIP 123 NORTH, RANGE 64 WEST OF THE 5th P.M., BROWN COUNTY, SOUTH DAKOTA

OWNER'S CERTIFICATE

NorthWestern Corporation, a Delaware Corporation, d/b/a NorthWestern Energy, f/k/a Northwestern Public Service Company, does hereby certify that it is the owner of

- Northwestern Public Service Co. Outlot A of the plat entitled Northwestern Public Service Co. Outlot A & Outlot B in the Northwest Quarter (NW1/4) of Section Twenty-Five (25), Township One Hundred Twenty-Three (123) North, Range Sixty-Four (64) West of the 5th P.M., Brown County, South Dakota;
- Northwestern Public Service Co. Outlot A of the plat entitled Northwestern Public Service Co. Outlot A & Outlot B in the Southwest Quarter (SW1/4) of Section Twenty-Five (25), Township One Hundred Twenty-Three (123) North, Range Sixty-Four (64) West of the 5th P.M., Brown County, South Dakota;
- Outlot One (1), Northwestern-Young Outlots in the West Half (W1/2) of Section Twenty-Five (25), Township One Hundred Twenty-Three (123) North, Range Sixty-Four West of the 5th P.M., City of Aberdeen, Brown County, South Dakota,

and that it has caused a portion of the same to be surveyed and platted as shown on the attached plat which shall be hereinafter known and described as "NWE GENERATION ADDITION IN SECTION 25, TOWNSHIP 123 NORTH, RANGE 64 WEST OF THE 5TH P.M., BROWN COUNTY, SOUTH DAKOTA" and that development of this land shall conform to all existing applicable zoning, subdivision and sediment control regulations.

By this plat, NorthWestern Corporation, a Delaware Corporation, d/b/a NorthWestern Energy, f/k/a Northwestern Public Service Company, does hereby vacate "Northwestern Public Service Co. Outlot A, of the plat entitled Northwestern Public Service Co. Outlot A & Outlot B in the NW1/4 of Section 25, Township 123 North, Range 64 West of the 5th P.M., Brown County, South Dakota as filed for record on November 29, 1965 at 2:00 P.M., and duly recorded as Plat No. 443.

By this plat, NorthWestern Corporation, a Delaware Corporation, d/b/a NorthWestern Energy, f/k/a Northwestern Public Service Company, does hereby vacate "Northwestern Public Service Co. Outlot A, of the plat entitled Northwestern Public Service Co. Outlot A & Outlot B in the SW1/4 of Section 25, Township 123 North, Range 64 West of the 5th P.M., Brown County, South Dakota as filed for record on November 29, 1965 at 2:00 P.M., and duly recorded as Plat No. 443.

By this plat, NorthWestern Corporation, a Delaware Corporation, d/b/a NorthWestern Energy, f/k/a Northwestern Public Service Company, does hereby vacate "Outlot 1, Northwestern-Young Outlots in the City of Aberdeen, in the W1/2 of Section 25, Township 123 North, Range 64 West of the 5th P.M., Brown County, South Dakota as filed for record on October 31, 2011 at 1:25 P.M., and duly recorded as Plat No. 2812.

Owner: NorthWestern Corporation, a Delaware Corporation,
d/b/a NorthWestern Energy,
f/k/a Northwestern Public Service Company

Robert Gehm, Sr. Real Estate Representative
Print Name & Title

Signature

Signed this 24th day of January, 2025.

COUNTY OF BROWN)
) SS
STATE OF SOUTH DAKOTA)

On this the 24th day of January, 2025, before me, a notary public, the undersigned officer, personally appeared, who acknowledge himself/herself to be the Sr. RE Rep., of NorthWestern Corporation, and that he/she as such Sr. RE Rep., being authorized to do so, executed the forgoing instrument for the proposed therein contained, by signing the name of NorthWestern Corporation, by himself/herself as Sr. RE Rep.

In witness whereof I hereunto set my hand and official seal.

My Commission Expires: June 4, 2025

Notary Public

CHELSEY S. SHERIDAN NOTARY PUBLIC STATE OF SOUTH DAKOTA Seal

SURVEYOR'S CERTIFICATE

I, Jamie L. Sprenger, Registered Land Surveyor, in the State of South Dakota, do hereby certify that, at the request of the owners, I have surveyed and platted "NWE GENERATION ADDITION IN SECTION 25, TOWNSHIP 123 NORTH, RANGE 64 WEST OF THE 5TH P.M., BROWN COUNTY, SOUTH DAKOTA" as shown on the attached plat, that I have found and/or set iron pins as indicated thereon, and that said survey and plat are true and correct.

Signed this 24TH day of JANUARY, 2025.

REGISTERED PROFESSIONAL LAND SURVEYOR REG. NO. 15575 JAMIE L SPRENGER SOUTH DAKOTA 01/24/2025

IMEG
3314 Milwaukee Avenue NE
Suite 2
Aberdeen, SD 57401
PH: 605.225.3494
www.imegcorp.com

HIGHWAY APPROVAL

The location of the in-place access roads, is hereby approved. Any change in the in-place access shall require addition approval.

Signed this 18 day of FEBRUARY, 2025.

DIRK Rogers Supt. Brown Co.
Print Name and Title

Signature

COUNTY PLANNING COMMISSION APPROVAL

I hereby certify that the following is a correct copy of the resolution duly passed by the County Planning Commission of Brown County, South Dakota, at a meeting held on the 18th day of February, 2025.

David Wolth
Secretary of County Planning Commission, Brown County, South Dakota

"Be it resolved by the County Planning Commission of Brown County, South Dakota, that the plat showing "NWE GENERATION ADDITION IN SECTION 25, TOWNSHIP 123 NORTH, RANGE 64 WEST OF THE 5TH P.M., BROWN COUNTY, SOUTH DAKOTA" having been examined is hereby approved in accordance with the provisions of SDCL of 1967, Chapter 11-6, and any amendments.

COUNTY COMMISSION APPROVAL

I hereby certify that the following is a correct copy of the resolution duly passed by the County Commission of Brown County, South Dakota, at a meeting held on the 25 day of February, 2025.

Lynn Heupel
County Auditor, Brown County, South Dakota

"Be it resolved by the County Commission of Brown County, South Dakota, that the plat showing "NWE GENERATION ADDITION IN SECTION 25, TOWNSHIP 123 NORTH, RANGE 64 WEST OF THE 5TH P.M., BROWN COUNTY, SOUTH DAKOTA" having been examined is hereby approved in accordance with the provisions of SDCL of 1967, Chapter 11-3, and any amendments thereof."

TREASURER'S CERTIFICATE

I hereby certify that all taxes which are liens upon any of the lands included in the attached plat are shown by the record of my office to be fully paid.

Signed this 13 day of February, 2025.

JoAnn Sheffield, deputy
County Treasurer, Brown County, South Dakota

DIRECTOR OF EQUALIZATION CERTIFICATE

I hereby certify that I have received a copy of this plat this 13th day of February, 2025.

Jillian Klein
Director of Equalization, Brown County, South Dakota

REGISTER OF DEEDS' CERTIFICATE

Filed for record this 26TH day of February, 2025, at 2:23 O'clock P M., and duly recorded as Hanging Plat No. 4041.

Cindy Woodford, Chief Deputy
Register of Deeds, Brown County, South Dakota

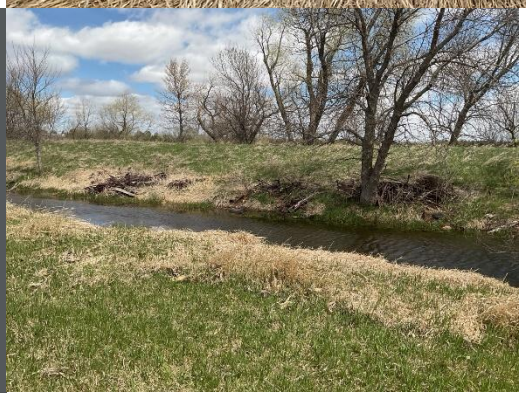
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BOOK: 2 PLAT
PAGE: 4041

2025/02/26 02:23:06 PM

MARIANN MALSOM, REGISTER OF DEEDS
BROWN COUNTY, SOUTH DAKOTA

Recording Fee: $ 60.00
Return To: FILED





Wetland Delineation Report

NorthWestern Energy – Hub City Energy Park

Brown County, South Dakota

May 2026

Prepared by HDR Engineering:

Alex Brazeal

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Attachments

Attachment A: Antecedent Precipitation
Attachment B: Wetland Determination Data Forms
Attachment C: Photographs

Introduction

NorthWestern Energy Public Service Corporation d/b/a (NorthWestern Energy) is planning to develop the Hub City Energy Park; a new, three-unit nominal 131 megawatt (MW) simple cycle combustion turbine facility (Project). The Project is adjacent to the existing Aberdeen Generating Station south of Aberdeen, SD and will interconnect to the electric grid at 115 kV via a new, on-site substation and will be fed natural gas from a nearby interstate pipeline. The Project covers approximately 176 acres within Section 25, Township 123N, Range 64W in Brown County, SD (Study Area; **Figure 1**).

A wetland delineation of the Study Area was completed on April 9th and May 7th, 2026, by Alex Brazeal of HDR Engineering.

Methodology

A desktop evaluation of the Study Area was completed prior to the field delineation to identify areas of potential wetlands. The desktop evaluation included a review of the following data sources:

- U.S. Geological Survey (USGS) National Hydrography Dataset (NHD) (USGS, 2023).
- U.S. Fish and Wildlife Service (USFWS)The National Wetland Inventory (NWI) – Version 2.0 (USFWS, 2023).
- U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Hydric soil classification from Web Soil Survey (Soil Survey Staff, 2025).
- U.S. Army Corps of Engineers (USACE) Antecedent Precipitation Tool (APT) (USACE, 2025).
- A time series of aerial imagery available on Google Earth.

Suspected wetland areas identified from both the desktop evaluation and field observations were sampled to confirm the presence or absence of wetland conditions. An area was considered a wetland if it met the three USACE-defined requisite criteria, hydrophytic vegetation, hydric soils, and wetland hydrology, as provided in the *Corps of Engineers Wetlands Delineation Manual* (Manual; USACE 1987) and the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Great Plains Region* (Supplement; USACE 2010). Sample point locations and wetland boundaries were collected using an EOS Arrow 100 global navigation satellite system (GNSS) producing sub-meter horizontal accuracy.

Photographs were taken to characterize the general landform, document site conditions, and represent wetland or upland conditions at each sample point location.

Results

Desktop Evaluation

The NWI included seven palustrine emergent wetlands within the Study Area (**Figure 2**). Web Soil Survey indicated two predominantly hydric soils and seven predominantly nonhydric soils with hydric inclusions (**Table 1**; **Figure 2**). The time series review of aerial imagery showed changes in land use over time which has affected the hydrology of the Study Area to include several areas of human-made depressional wetland features (e.g. road ditches, impoundments, cultivation).

Table 1. Summary of Soils

Map Unit Name	Map Unit Symbol	Percent Hydric	Acres	Percent of Study Area
Aberdeen-Nahon silty clay loams, 0 to 2 percent slopes	G472A	2.0	77.2	43.8
Harmony-Aberdeen silty clay loams, 0 to 2 percent slopes	G866A	2.0	55.3	31.4
Nahon-Aberdeen-Exline silt loams, 0 to 2 percent slopes	G851A	2.0	29.2	16.5
Tonka silt loam, silty substratum, 0 to 1 percent slopes	G007A	94.0	7.7	4.4
Bearden silt loam, 0 to 2 percent slopes	G431A	11.0	5.2	2.9
Aberdeen-Urban land complex, 0 to 2 percent slopes	G649A	3.0	1.3	0.7
Renshaw-Fordville loams, 0 to 2 percent slopes	G274A	2.0	0.5	0.3
		Total	**176.4**	**100**

Field Delineation

The APT indicated that conditions were normal at the time of the delineation on April 9th and drier than normal on May 7th (**Attachment A)**. Wetland determination data forms are included in **Attachment B**. Photographs are included in **Attachment C**.

Delineated Wetlands

Wetland 1 is a shallow, depressional wetland located in a harvested agricultural field. Overland runoff from the adjacent uplands provides the primary source of hydrology and flows southwest into the east road ditch of 387th Avenue.

Wetland 2 is a depressional wetland located in a fallow agricultural field. Hydrology is provided to this wetland via overland runoff from the surrounding uplands and flows south into Wetland 6b.

Wetland 3 is a wetland fringe located adjacent to an open water feature. This wetland feature formed within an excavated ditch of a former railroad. This area receives surface water from the northwest and drains south into Wetland 4.

Wetland 4 is a grass buffer located along the eastern edge of the Study Area. This wetland was seemingly formed from previous excavation and grading to form the ditch of a historic roadway and receives overland flow from the surrounding uplands and W-3 to the north. Surface water within W-4 flows south before exiting the Study Area to the east via the 135th Street road ditch. Upland sample points taken east of this W-4 identified multiple field approaches that do not contain culverts. These areas provide upland breaks along the flow path between the Study Area and Moccasin Creek to the east.

Wetland 5 is located within the north road ditch of 135th Street. This area receives overland flow from the surrounding uplands and drain east into W-6a. There was no observed continuous surface connection between W-5 and W-6a due to the absence of culverts through the upland field approach.

Wetland 6a/6b are also located within the north road ditch of 135th Street and connected via culvert. Surface water from W-5 to the west and W-2 to the north flows into this area.

Table 2. Aquatic Resource Summary

Aquatic Resource	Latitude (Dec. Deg.)	Longitude (Dec. Deg.)	Cowardin Classification	Area (acres)
Wetland 1	45.43499517	-98.49304134	PEM1A	3.70
Wetland 2	45.43315798	-98.48540058	PEM1C	23.94
Wetland 3	45.43592951	-98.48390453	PEM1Cx	0.58
Wetland 4	45.43042926	-98.48332787	PEM1Cx	0.82
Wetland 5	45.43050121	-98.4931478	N/A	0.34
Wetland 6a	45.43048399	-98.49077298	N/A	0.42
Wetland 6b	45.43046693	-98.48816995	N/A	0.43
			Total	30.23

Upland Sampling Points

Upland sampling points were recorded at several locations within the Study Area within NWI features and to evaluate the presence or absence of a continuous surface connection to Moccasin Creek, a Water of the United States (WOTUS).

09U – Upland sampling point observed and recorded within an NWI wetland feature identified during the desktop evaluation. This sampling point, recorded in a cultivated and harvested crop field displayed problematic vegetation and lack of hydric soils and hydrology indicators.

10U – Recorded at field approach and documented lack upland conditions and lack of continuous surface connection via culvert from delineated Wetland 5 and Wetland 6a.

11U – Sampling point recorded at field approach and documented upland conditions as well as a lack of culvert or other conveyance of surface water from Wetland 2 to Wetland 4.

12U – Sampling point located at a field approach documenting upland conditions and lack of continuous surface connection via culvert from Wetland 4 to the east toward Moccasin Creek.

Conclusion

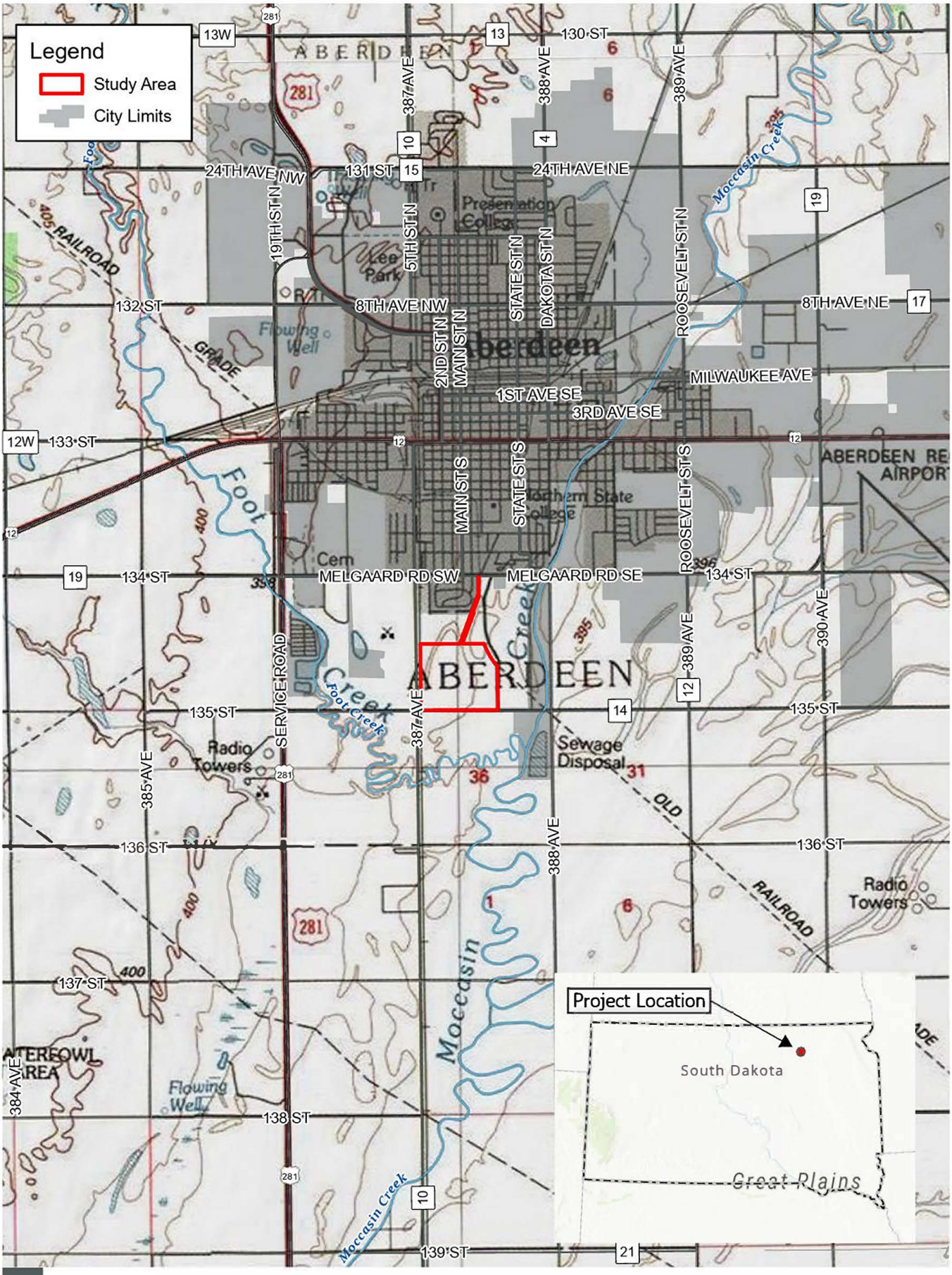
Six (6) wetlands totaling 30.23 acres were delineated within the Study Area. There is no apparent continuous surface connection from any of the delineated wetlands within the Study Area to Moccasin Creek or other WOTUS per the clarification on the definition of "continuous surface connection" provided in the memorandum released by the Environmental Protection Agency (EPA) on March 12th, 2025 (**Figure 3**).[1]

This report, along with the accompanying geographic information system (GIS) spatial data should be used to identify avoidance and minimization opportunities where practicable and to quantify unavoidable impacts to wetlands as a result of future project development. Data provided in this report may be used for planning purposes as well as to assist the USACE in determining the jurisdictional status of wetlands within the Study Area.

If the wetlands are determined non-jurisdictional at the federal level, they remain waters of the State as defined in SDCL 34A-2-2(12) and discharge of any pollutant, including fill that would impair the wetland is subject to regulatory requirements at the state level under ARSD 74:51:01:11. Compliance with ARSD 74:51:01:11 can be achieved through coordination with DANR in accordance with their Grace Permit memorandum dated June 5, 2025.

[1] https://www.epa.gov/system/files/documents/2025-03/2025cscguidance.pdf

Figure 1. Project Location



NorthWestern Energy
Delivering a Bright Future

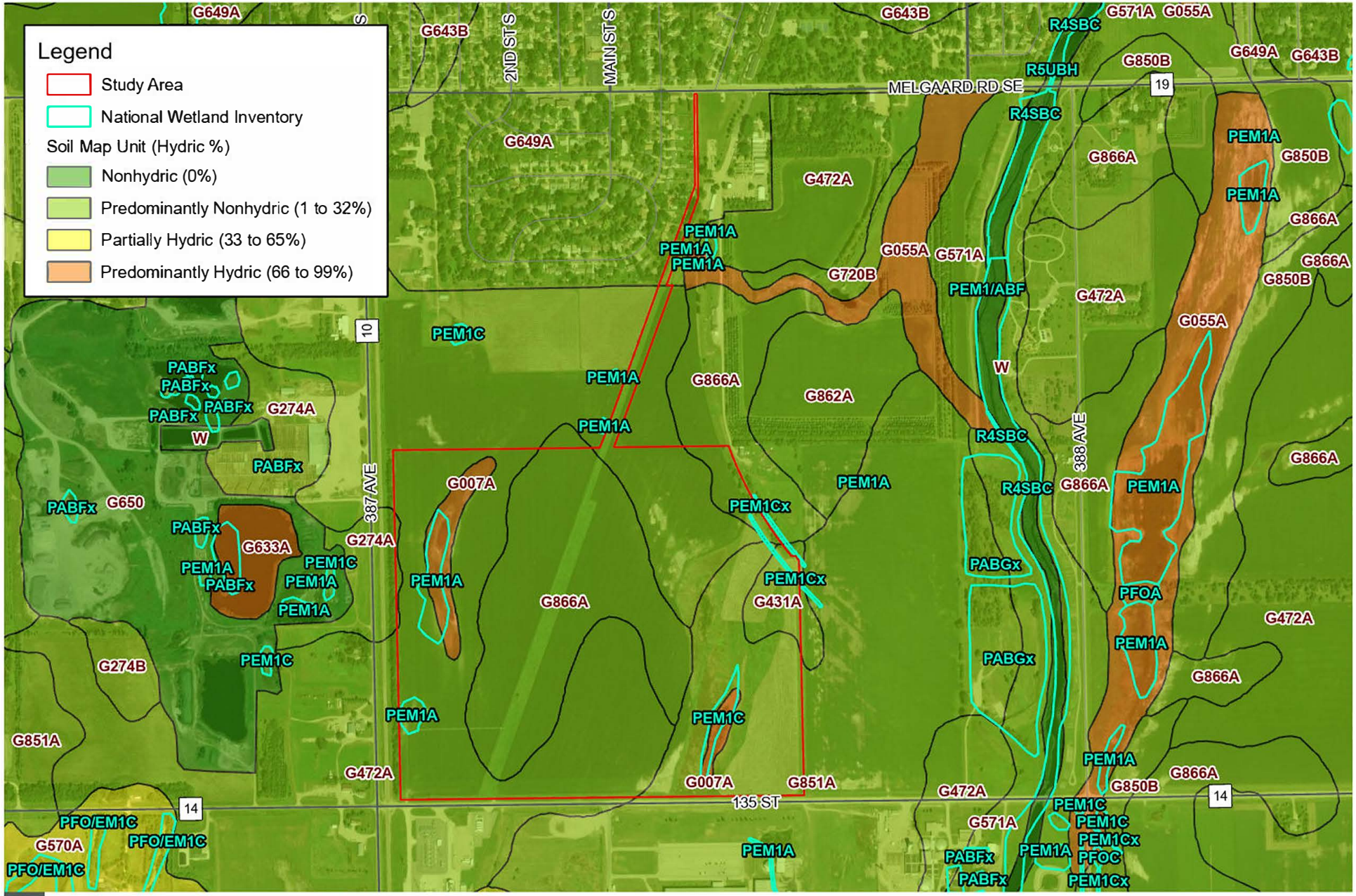
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PROJECT LOCATION MAP

Hub City Energy Park, Brown County, SD

NORTHWESTERN ENERGY

Figure 2. National Wetland Inventory & Hydric Soils



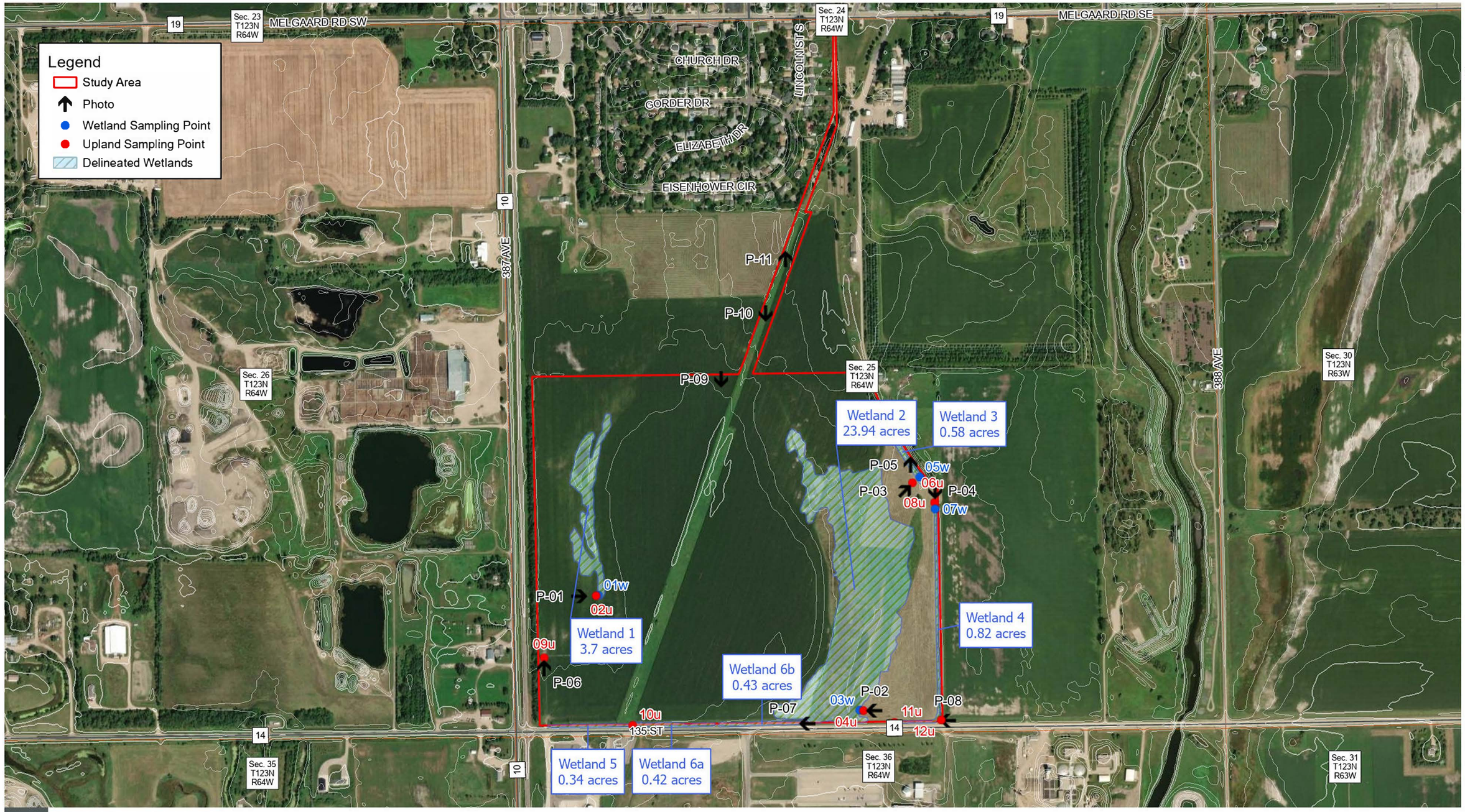
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HYDRIC SOILS AND NATIONAL WETLAND INVENTORY MAP

Hub City Energy Park, Brown County, SD

NORTHWESTERN ENERGY

Figure 3. Aquatic Resources Delineation Map



0 700 Feet

*Elevation contours derived from 3DEP elevation data (2-foot intervals)

AQUATIC RESOURCES DELINEATION MAP

Hub City Energy Park, Brown County, SD

NORTHWESTERN ENERGY

\\SXFPISRV01\ENGIS\PROJECTS\NORTHWESTENERGY\10450080_NWE_MYSTERYRANCH7.2_WIP\APRX\NWE_MYSTERYRANCH_WETLAND_DELINEATION.APRX DATE: 5/15/2026

References

Cowardin, L. M.; Carter, V.; Golet, F. C.; LaRoe, E. T. (1979). *Classification of Wetlands and Deepwater Habitats of the United States.* Washington, D.C.: United States Department of Interior, Fish and Wildlife Service Report No. FWS/OBS/-79/31.

Environmental Laboratory. (1987). *Corps of Engineers Wetlands Delineation Manual. Technical Report Y-87-1.* Vicksburg, MS: U.S. Army Corps of Engineers.

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USACE. (2010). *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Great Plains Region (Version 2.0).* Vicksburg, MS: U.S. Army Engineer Research and Development Center.

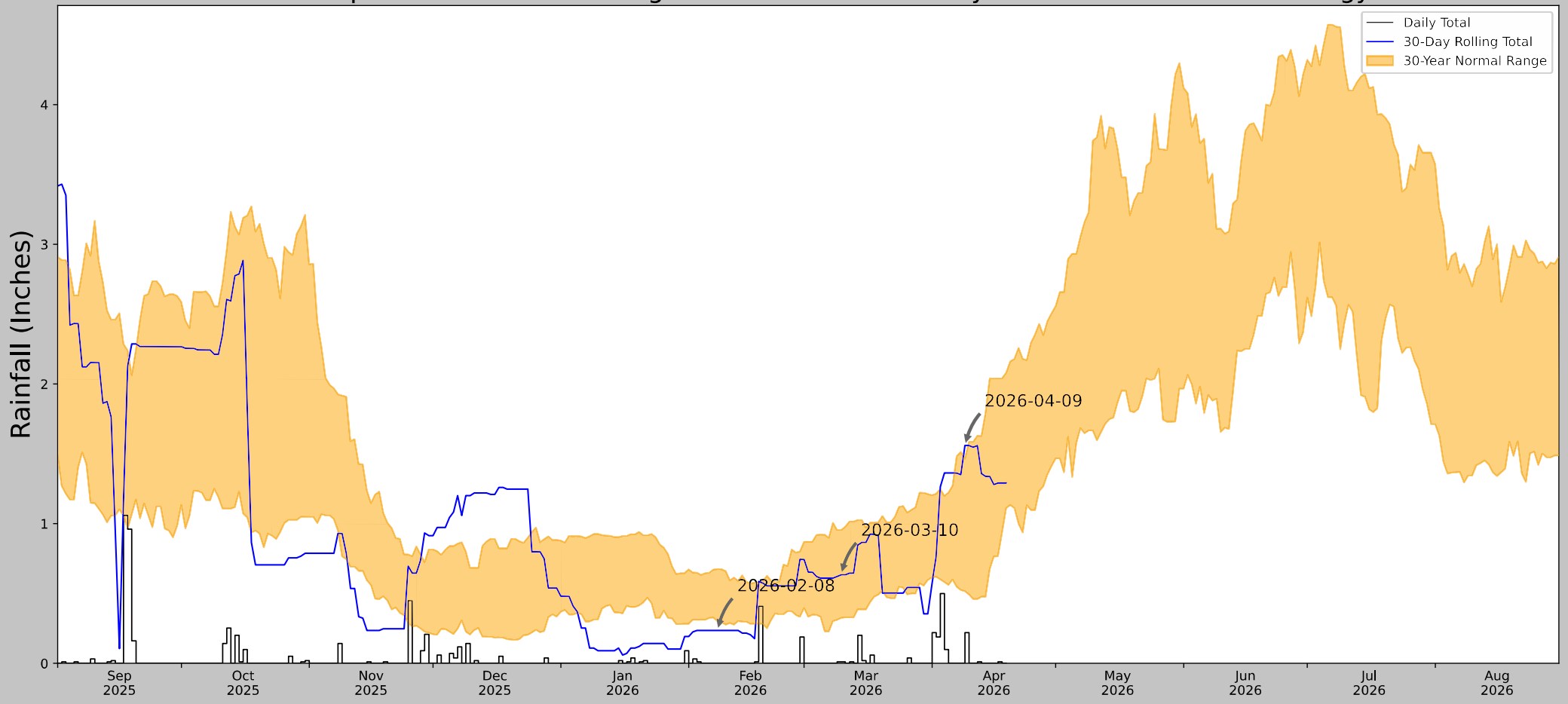
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Attachment A: Antecedent Precipitation

Antecedent Precipitation vs Normal Range based on NOAA's Daily Global Historical Climatology Network



Coordinates	45.43285, -98.48558
Observation Date	2026-04-09
Elevation (ft)	1292.493
Drought Index (PDSI)	Moderate wetness (2026-03)
WebWIMP H_2O Balance	Wet Season

30 Days Ending	30th %ile (in)	70th %ile (in)	Observed (in)	Wetness Condition	Condition Value	Month Weight	Product
2026-04-09	0.516929	1.465748	1.559055	Wet	3	3	9
2026-03-10	0.325591	0.954331	0.633858	Normal	2	2	4
2026-02-08	0.301575	0.674803	0.23622	Dry	1	1	1
Result							Normal Conditions - 14

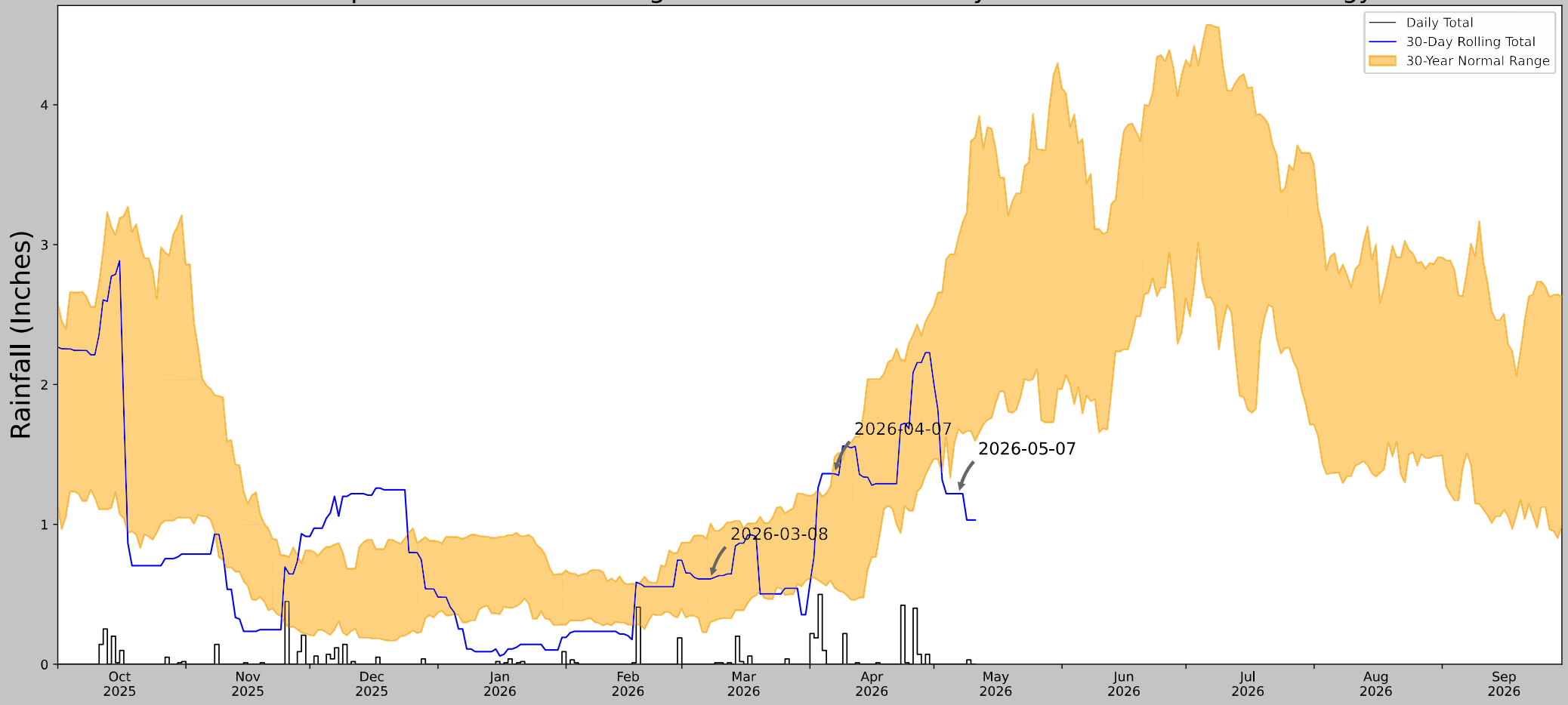
Figures and tables made by the
Antecedent Precipitation Tool
Version 3.0

US Army Corps of Engineers.
ERDC

Developed by:
U.S. Army Corps of Engineers and
U.S. Army Engineer Research and
Development Center

Weather Station Name	Coordinates	Elevation (ft)	Distance (mi)	Elevation Δ	Weighted Δ	Days Normal	Days Antecedent
ABERDEEN	45.4558, -98.4133	1382.874	3.846	90.381	2.078	11353	90

Antecedent Precipitation vs Normal Range based on NOAA's Daily Global Historical Climatology Network



Coordinates	45.43285, -98.48558
Observation Date	2026-05-07
Elevation (ft)	1292.493
Drought Index (PDSI)	Moderate wetness (2026-04)
WebWIMP H_2O Balance	Dry Season

30 Days Ending	30th %ile (in)	70th %ile (in)	Observed (in)	Wetness Condition	Condition Value	Month Weight	Product
2026-05-07	1.683465	3.054725	1.220472	Dry	1	3	3
2026-04-07	0.547638	1.482677	1.362205	Normal	2	2	4
2026-03-08	0.302362	1.006693	0.610236	Normal	2	1	2
Result							Drier than Normal - 9

Figures and tables made by the Antecedent Precipitation Tool Version 3.0

US Army Corps of Engineers.
ERDC

Developed by:
U.S. Army Corps of Engineers and
U.S. Army Engineer Research and Development Center

Weather Station Name	Coordinates	Elevation (ft)	Distance (mi)	Elevation Δ	Weighted Δ	Days Normal	Days Antecedent
ABERDEEN	45.4558, -98.4133	1382.874	3.846	90.381	2.078	11353	90

Attachment B: Wetland Determination Data Forms

WETLAND DETERMINATION DATA FORM - Great Plains Region

Project/Site: Hub City Energy Park | City/County: Brown County | Sampling Date: 4/9/2026

Applicant/Owner: Northwestern Energy | State: SD | Sampling Point: 01w

Investigators: Alex Brazeal | Section, Township, Range: S 25 T 123N R 64W

Landform (hillslope, terrace, etc.): None | Local Relief (concave, convex, none): None | Slope(%): 0

Subregion (LRR): Sub-Region (LRR) | Lat: 45.433165 | Long: -98.492817 | Datum: NAD83

Soil Map Unit Name: G472A - Aberdeen-Nahon silty clay loams, 0 to 2 percent slopes | NWI Classification: PEM1A

Are climatic / hydrologic conditions on the site typical for this time of year? Yes X No ____ (If No, explain in Remarks)

Are Vegetation X, Soil X, Hydrology X, significantly disturbed? Are "Normal Circumstances" present? Yes ____ No X

Are Vegetation ____, Soil ____, Hydrology ____, naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS - Attach a site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes	X	No	
Hydric Soil Present?	Yes	X	No	
Wetland Hydrology Present?	Yes	X	No	

Is the Sampled Area within a Wetland? **Yes X No ____**

Remarks:
Sample point collected in cultivated agricultural field. Significantly disturbed vegetation and soil present.

VEGETATION – Use scientific names of plants.

	Absolute % Cover	Dominant Species	Indicator Status
Tree Stratum			
Shrub Stratum			
Herb Stratum (Plot size: 5 Ft)			
Zea mays	10	Y	UPL
	10	=Total Cover	
Vine Stratum			

% Bare Ground in Herb Stratum 90

Dominance Test Worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 0 (A)

Total Number of Dominant Species Across all Strata: 1 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 0.0% (A/B)

Prevalence Index Worksheet:

Total % Cover of:		Multiply by:	
OBL species		x 1 =	
FACW species		x 2 =	
FAC species		x 3 =	
FACU species		x 4 =	
UPL species		x 5 =	
Column Totals:	0 (A)		(B)

Prevalence Index = B/A = ____

Hydrophytic Vegetation Indicators:

____ Rapid Test for Hydrophytic Vegetation

____ Dominance Test > 50%

____ Prevalence Index ≤ 3.0

____ Morphological Adaptations (Provide supporting data in Remarks or on a separate sheet)

X Problematic Hydrophytic Vegetation (Explain)

Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Hydrophytic Vegetation Present? **Yes X No ____**

Remarks: (Include photo numbers here or on a separate sheet.)
Vegetation within the study area has been greatly disturbed due to history of agricultural activities. Sample point meets problematic hydrophytic vegetation

SOIL

Sampling Point: 01w

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of Indicators.)

Depth (inches)	Matrix Color (moist)	%	Redox Features Color (moist)	%	Type [1]	Loc [2]	Texture	Remarks
0 to 8	10YR 3 / 1	100					SILT LOAM	
8 to 16	10YR 2 / 1	100					SILTY CLAY	
16 to 24	10YR 2 / 1	98	10YR 5/6	2	C	M	CLAY	

[1]Type: C=Concentration, D=Depletion, RM=Reduced Martix, CS=Covered or Coated Sand Grains. [2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators:

- ☐ Histosol (A1)
- ☐ Histic Epipedon (A2)
- ☐ Black Histic (A3)
- ☐ Hydrogen Sulfide (A4)
- ☐ Stratified Layers (A5) LRR F
- ☐ 1 cm Muck (A9) LRRF G, H
- ☐ Depleted Below Dark Surface (A11)
- ☐ Thick Dark Surface (A12)
- ☐ Sandy Mucky Mineral (S1)
- ☐ 2.5 cm Mucky Peat or Peat (S2) (LRR G, H)
- ☐ 5 cm Mucky Peat or Peat (S3)
- ☐ Sandy Gleyed Matrix (S4)
- ☐ Sandy Redox (S5)
- ☐ Stripped Matrix (S6)
- ☐ Loamy Mucky Mineral (F1)
- ☐ Loamy Gleyed Matrix (F2)
- ☐ Depleted Matrix (F3)
- ☐ Redox Dark Surface (F6)
- ☐ Depleted Dark Surface (F7)
- ☐ Redox Depressions (F8)
- ☐ High Plains Depressions (F16) (MLRA 72 73 of LRR H)

Indicators for Problematic Hydric Soils: [3]

- ☐ 1 cm Muck (A9) (LRR I, J)
- ☐ Coast Prairie Redox (A16)
- ☐ Dark Surface (S7) (LRR G)
- ☐ High Plains Depressions (F16) (LRR H outside of MLRA 72 73)
- ☐ Reduced Vertic (F18)
- ☐ Red Parent Material (TF2)
- ☐ Very Shallow Dark Surface (TF12)
- ☑ Other (Explain in Remarks)

[3] Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

☐ **Restrictive Layer (if observed):**

Type: _____

Depth (inches): _____

Hydric Soil Present? Yes X No ____

Remarks:
Soil within the study area has been greatly disturbed due to history of agricultural activities. Sample point meets problematic hydric soil indicator.

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one is required; check all that apply)

- ☐ Surface Water (A1)
- ☐ High Water Table (A2)
- ☐ Saturation (A3)
- ☐ Water Marks (B1)
- ☐ Sediment Deposits (B2)
- ☐ Drift Deposits (B3)
- ☐ Algal Mat or Crust (B4)
- ☐ Iron Deposits (B5)
- ☐ Inundation Visible on Aerial Imagery (B7)
- ☐ Water-Stained Leaves (B9)
- ☐ Salt Crust (B11)
- ☐ Aquatic Fauna (B13)
- ☐ Hydrogen Sulfide Odor (C1)
- ☐ Dry-Season Water Table (C2)
- ☐ Oxidized Rhizospheres along Living Roots (C3) (where not tilled)
- ☐ Presence of Reduced Iron (C4)
- ☐ Thin Muck Surface (C7)
- ☐ Other (Explain in Remarks)

Secondary Indicators (minimum of two required)

- ☐ Surface Soil Cracks (B6)
- ☐ Sparsely Vegetated Concave Surface (B8)
- ☐ Drainage Patterns (B10)
- ☐ Oxidized Rhizospheres on Living Roots (C3) (where tilled)
- ☐ Crayfish Burrows (C8)
- ☑ Saturation Visible on Aerial Imag.(C9)
- ☑ Geomorphic Position (D2)
- ☐ FAC-Neutral Test (D5)
- ☐ Frost-Heave Hummocks (D7) (LRR F)

Field Observations:

Surface Water Present?	Yes ____	No X	Depth (inches):	____	
Water Table Present?	Yes ____	No X	Depth (inches):	____	
Saturation Present? (includes capillary fringe)	Yes ____	No X	Depth (inches):	____	

Wetland Hydrology Present? Yes X No ____

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:
Sample point meets sufficient wetland hydrology indicators.

WETLAND DETERMINATION DATA FORM - Great Plains Region

Project/Site: Hub City Energy Park | City/County: Brown County | Sampling Date: 4/9/2026

Applicant/Owner: Northwestern Energy | State: SD | Sampling Point: 02u

Investigators: Alex Brazeal | Section, Township, Range: S 25 T 123N R 64W

Landform (hillslope, terrace, etc.): None | Local Relief (concave, convex, none): None | Slope(%): 1

Subregion (LRR): Sub-Region (LRR) | Lat: 45.433153 | Long: -98.492881 | Datum: NAD83

Soil Map Unit Name: G472A - Aberdeen-Nahon silty clay loams, 0 to 2 percent slopes | NWI Classification: PEM1A

Are climatic / hydrologic conditions on the site typical for this time of year? Yes X No ____ (If No, explain in Remarks)

Are Vegetation X, Soil X, Hydrology ____, significantly disturbed? Are "Normal Circumstances" present? Yes ____ No X

Are Vegetation ____, Soil ____, Hydrology ____, naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS - Attach a site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes ____	No X	
Hydric Soil Present?	Yes ____	No X	**Is the Sampled Area within a Wetland?** Yes ____ No X
Wetland Hydrology Present?	Yes ____	No X	

Remarks:
Sample point collected in cultivated agricultural field. Significantly disturbed vegetation and soil present.

VEGETATION – Use scientific names of plants.

	Absolute % Cover	Dominant Species	Indicator Status
Tree Stratum			
Shrub Stratum			
Herb Stratum (Plot size: 5 Ft)			
Zea mays	10	Y	UPL
	10 =Total Cover		
Vine Stratum			

% Bare Ground in Herb Stratum 90

Dominance Test Worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 0 (A)

Total Number of Dominant Species Across all Strata: 1 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 0.0% (A/B)

Prevalence Index Worksheet:

	Total % Cover of:	Multiply by:	
OBL species	0	x 1 =	0
FACW species	0	x 2 =	0
FAC species	0	x 3 =	0
FACU species	0	x 4 =	0
UPL species	10	x 5 =	50
Column Totals:	10 (A)		50 (B)

Prevalence Index = B/A= 5.00

Hydrophytic Vegetation Indicators:

____ Rapid Test for Hydrophytic Vegetation

____ Dominance Test > 50%

____ Prevalence Index ≤ 3.0

____ Morphological Adaptations (Provide supporting data in Remarks or on a separate sheet)

____ Problematic Hydrophytic Vegetation (Explain)

Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Hydrophytic Vegetation Present? Yes ____ No X

Remarks: (Include photo numbers here or on a separate sheet.)
Sample point does not meet hydrophytic vegetation indicator.

SOIL

Sampling Point: 02u

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of Indicators.)

Depth (inches)	Matrix Color (moist)	%	Redox Features Color (moist)	%	Type [1]	Loc [2]	Texture	Remarks
0 to 10	10YR 3 / 1	100					SILT LOAM	
10 to 18	10YR 2 / 1	100					CLAY LOAM	
18 to 24	10YR 2 / 1	100					CLAY	

[1]Type: C=Concentration, D=Depletion, RM=Reduced Martix, CS=Covered or Coated Sand Grains. [2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators:

- ☐ Histosol (A1)
- ☐ Histic Epipedon (A2)
- ☐ Black Histic (A3)
- ☐ Hydrogen Sulfide (A4)
- ☐ Stratified Layers (A5) LRR F
- ☐ 1 cm Muck (A9) LRRF G, H
- ☐ Depleted Below Dark Surface (A11)
- ☐ Thick Dark Surface (A12)
- ☐ Sandy Mucky Mineral (S1)
- ☐ 2.5 cm Mucky Peat or Peat (S2) (LRR G, H)
- ☐ 5 cm Mucky Peat or Peat (S3)
- ☐ Sandy Gleyed Matrix (S4)
- ☐ Sandy Redox (S5)
- ☐ Stripped Matrix (S6)
- ☐ Loamy Mucky Mineral (F1)
- ☐ Loamy Gleyed Matrix (F2)
- ☐ Depleted Matrix (F3)
- ☐ Redox Dark Surface (F6)
- ☐ Depleted Dark Surface (F7)
- ☐ Redox Depressions (F8)
- ☐ High Plains Depressions (F16) (MLRA 72 73 of LRR H)

Indicators for Problematic Hydric Soils: [3]

- ☐ 1 cm Muck (A9) (LRR I, J)
- ☐ Coast Prairie Redox (A16)
- ☐ Dark Surface (S7) (LRR G)
- ☐ High Plains Depressions (F16) (LRR H outside of MLRA 72 73)
- ☐ Reduced Vertic (F18)
- ☐ Red Parent Material (TF2)
- ☐ Very Shallow Dark Surface (TF12)
- ☐ Other (Explain in Remarks)

[3] Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

☐ **Restrictive Layer (if observed):**

Type: _____

Depth (inches): _____

Hydric Soil Present? Yes ____ No X

Remarks:
Sample point does not meet hydric soil indicator.

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one is required; check all that apply)

- ☐ Surface Water (A1)
- ☐ High Water Table (A2)
- ☐ Saturation (A3)
- ☐ Water Marks (B1)
- ☐ Sediment Deposits (B2)
- ☐ Drift Deposits (B3)
- ☐ Algal Mat or Crust (B4)
- ☐ Iron Deposits (B5)
- ☐ Inundation Visible on Aerial Imagery (B7)
- ☐ Water-Stained Leaves (B9)
- ☐ Salt Crust (B11)
- ☐ Aquatic Fauna (B13)
- ☐ Hydrogen Sulfide Odor (C1)
- ☐ Dry-Season Water Table (C2)
- ☐ Oxidized Rhizospheres along Living Roots (C3) (where not tilled)
- ☐ Presence of Reduced Iron (C4)
- ☐ Thin Muck Surface (C7)
- ☐ Other (Explain in Remarks)

Secondary Indicators (minimum of two required)

- ☐ Surface Soil Cracks (B6)
- ☐ Sparsely Vegetated Concave Surface (B8)
- ☐ Drainage Patterns (B10)
- ☐ Oxidized Rhizospheres on Living Roots (C3) (where tilled)
- ☐ Crayfish Burrows (C8)
- ☐ Saturation Visible on Aerial Imag.(C9)
- ☐ Geomorphic Position (D2)
- ☐ FAC-Neutral Test (D5)
- ☐ Frost-Heave Hummocks (D7) (LRR F)

Field Observations:

Surface Water Present? Yes ____ No X Depth (inches): _____

Water Table Present? Yes ____ No X Depth (inches): _____

Saturation Present? Yes ____ No X Depth (inches): _____

(includes capillary fringe)

Wetland Hydrology Present? Yes ____ No X

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:
Sample point does not meet sufficient wetland hydrology indicators.

WETLAND DETERMINATION DATA FORM - Great Plains Region

Project/Site: Hub City Energy Park | City/County: Brown County | Sampling Date: 4/9/2026

Applicant/Owner: Northwestern Energy | State: SD | Sampling Point: 03w

Investigators: Alex Brazeal | Section, Township, Range: S 25 T 123N R 64W

Landform (hillslope, terrace, etc.): None | Local Relief (concave, convex, none): Concave | Slope(%): 1

Subregion (LRR): Sub-Region (LRR) | Lat: 45.430707 | Long: -98.485340 | Datum: NAD83

Soil Map Unit Name: G851A - Nahon-Aberdeen-Exline silt loams, 0 to 2 percent slopes | NWI Classification: PEM1C

Are climatic / hydrologic conditions on the site typical for this time of year? Yes X No ____ (If No, explain in Remarks)

Are Vegetation ____, Soil ____, Hydrology ____, significantly disturbed? Are "Normal Circumstances" present? Yes X No ____

Are Vegetation ____, Soil ____, Hydrology ____, naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS - Attach a site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes X	No	**Is the Sampled Area within a Wetland?**	**Yes X No**
Hydric Soil Present?	Yes X	No		
Wetland Hydrology Present?	Yes X	No		

Remarks:
Sample point collected in grass dominated area adjacent to fallow agricultural field.

VEGETATION – Use scientific names of plants.

	Absolute % Cover	Dominant Species	Indicator Status
Tree Stratum			
Shrub Stratum			
Herb Stratum (Plot size: 5 Ft)			
Phalaris arundinacea	45	Y	FACW
Spartina pectinata	30	Y	FACW
Eleocharis palustris	10	N	OBL
Persicaria pensylvanica	10	N	FACW
	95	=Total Cover	
Vine Stratum			

% Bare Ground in Herb Stratum 5

Dominance Test Worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 2 (A)

Total Number of Dominant Species Across all Strata: 2 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 100.0% (A/B)

Prevalence Index Worksheet:

Total % Cover of:		Multiply by:	
OBL species	10	x 1 =	10
FACW species	85	x 2 =	170
FAC species	0	x 3 =	0
FACU species	0	x 4 =	0
UPL species	0	x 5 =	0
Column Totals:	95 (A)		180 (B)

Prevalence Index = B/A = 1.89

Hydrophytic Vegetation Indicators:

- ____ Rapid Test for Hydrophytic Vegetation
- X Dominance Test > 50%
- X Prevalence Index ≤ 3.0
- ____ Morphological Adaptations (Provide supporting data in Remarks or on a separate sheet)
- ____ Problematic Hydrophytic Vegetation (Explain)

Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Hydrophytic Vegetation Present? Yes X No ____

Remarks: (Include photo numbers here or on a separate sheet.)
Sample point meets hydrophytic vegetation indicator.

SOIL

Sampling Point: 03w

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of Indicators.)

Depth (inches)	Matrix Color (moist)	%	Redox Features Color (moist)	%	Type [1]	Loc [2]	Texture	Remarks
0 to 6	10YR 3 / 2	100					SILT LOAM	
6 to 10	10YR 3 / 1	98	10YR 5/6	2	C	M	SILT LOAM	
10 to 24	10YR 2 / 1	97	10YR 5/6	3	C	M	SILTY CLAY	

[1]Type: C=Concentration, D=Depletion, RM=Reduced Martix, CS=Covered or Coated Sand Grains. [2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators:

- ☐ Histosol (A1)
- ☐ Histic Epipedon (A2)
- ☐ Black Histic (A3)
- ☐ Hydrogen Sulfide (A4)
- ☐ Stratified Layers (A5) LRR F
- ☐ 1 cm Muck (A9) LRRF G, H
- ☐ Depleted Below Dark Surface (A11)
- ☐ Thick Dark Surface (A12)
- ☐ Sandy Mucky Mineral (S1)
- ☐ 2.5 cm Mucky Peat or Peat (S2) (LRR G, H)
- ☐ 5 cm Mucky Peat or Peat (S3)
- ☐ Sandy Gleyed Matrix (S4)
- ☐ Sandy Redox (S5)
- ☐ Stripped Matrix (S6)
- ☐ Loamy Mucky Mineral (F1)
- ☐ Loamy Gleyed Matrix (F2)
- ☐ Depleted Matrix (F3)
- ☑ Redox Dark Surface (F6)
- ☐ Depleted Dark Surface (F7)
- ☐ Redox Depressions (F8)
- ☐ High Plains Depressions (F16) (MLRA 72 73 of LRR H)

Indicators for Problematic Hydric Soils: [3]

- ☐ 1 cm Muck (A9) (LRR I, J)
- ☐ Coast Prairie Redox (A16)
- ☐ Dark Surface (S7) (LRR G)
- ☐ High Plains Depressions (F16) (LRR H outside of MLRA 72 73)
- ☐ Reduced Vertic (F18)
- ☐ Red Parent Material (TF2)
- ☐ Very Shallow Dark Surface (TF12)
- ☐ Other (Explain in Remarks)

[3] Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

☐ **Restrictive Layer (if observed):**

Type: _____

Depth (inches): _____

Hydric Soil Present? Yes X No _____

Remarks:
Sample point meets hydric soil indicator.

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one is required; check all that apply)

- ☐ Surface Water (A1)
- ☐ High Water Table (A2)
- ☐ Saturation (A3)
- ☐ Water Marks (B1)
- ☐ Sediment Deposits (B2)
- ☐ Drift Deposits (B3)
- ☐ Algal Mat or Crust (B4)
- ☐ Iron Deposits (B5)
- ☐ Inundation Visible on Aerial Imagery (B7)
- ☐ Water-Stained Leaves (B9)
- ☐ Salt Crust (B11)
- ☐ Aquatic Fauna (B13)
- ☐ Hydrogen Sulfide Odor (C1)
- ☐ Dry-Season Water Table (C2)
- ☐ Oxidized Rhizospheres along Living Roots (C3) (where not tilled)
- ☐ Presence of Reduced Iron (C4)
- ☐ Thin Muck Surface (C7)
- ☐ Other (Explain in Remarks)

Secondary Indicators (minimum of two required)

- ☐ Surface Soil Cracks (B6)
- ☐ Sparsely Vegetated Concave Surface (B8)
- ☐ Drainage Patterns (B10)
- ☐ Oxidized Rhizospheres on Living Roots (C3) (where tilled)
- ☐ Crayfish Burrows (C8)
- ☑ Saturation Visible on Aerial Imag.(C9)
- ☑ Geomorphic Position (D2)
- ☑ FAC-Neutral Test (D5)
- ☐ Frost-Heave Hummocks (D7) (LRR F)

Field Observations:

Surface Water Present?	Yes	_____	No	X	Depth (inches): _____
Water Table Present?	Yes	_____	No	X	Depth (inches): _____
Saturation Present? (includes capillary fringe)	Yes	_____	No	X	Depth (inches): _____

Wetland Hydrology Present? Yes X No _____

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:
Sample point meets sufficient wetland hydrology indicators.

WETLAND DETERMINATION DATA FORM - Great Plains Region

Project/Site: Hub City Energy Park | City/County: Brown County | Sampling Date: 4/9/2026

Applicant/Owner: Northwestern Energy | State: SD | Sampling Point: 04u

Investigators: Alex Brazeal | Section, Township, Range: S 25 T 123N R 64W

Landform (hillslope, terrace, etc.): None | Local Relief (concave, convex, none): None | Slope(%): 1

Subregion (LRR): Sub-Region (LRR) | Lat: 45.430693 | Long: -98.485231 | Datum: NAD83

Soil Map Unit Name: G851A - Nahon-Aberdeen-Exline silt loams, 0 to 2 percent slopes | NWI Classification: PEM1C

Are climatic / hydrologic conditions on the site typical for this time of year? Yes X No ____ (If No, explain in Remarks)

Are Vegetation ____, Soil ____, Hydrology ____, significantly disturbed? Are "Normal Circumstances" present? Yes X No ____

Are Vegetation ____, Soil ____, Hydrology ____, naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS - Attach a site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes ____	No X	**Is the Sampled Area within a Wetland?** **Yes** ____ **No** **X**
Hydric Soil Present?	Yes ____	No X	
Wetland Hydrology Present?	Yes ____	No X	

Remarks:
Sample point collected in grass dominated area adjacent to fallow agricultural field.

VEGETATION – Use scientific names of plants.

	Absolute % Cover	Dominant Species	Indicator Status
Tree Stratum			
Shrub Stratum			
Herb Stratum (Plot size: 5 Ft)			
Poa annua	40	Y	FACU
Phalaris arundinacea	30	Y	FACW
Bromus inermis	20	Y	UPL
	90	=Total Cover	
Vine Stratum			

% Bare Ground in Herb Stratum 10

Dominance Test Worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 1 (A)

Total Number of Dominant Species Across all Strata: 3 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 33.3% (A/B)

Prevalence Index Worksheet:

Total % Cover of:		Multiply by:	
OBL species	0	x 1 =	0
FACW species	30	x 2 =	60
FAC species	0	x 3 =	0
FACU species	40	x 4 =	160
UPL species	20	x 5 =	100
Column Totals:	90 (A)		320 (B)

Prevalence Index = B/A = 3.56

Hydrophytic Vegetation Indicators:

____ Rapid Test for Hydrophytic Vegetation

____ Dominance Test > 50%

____ Prevalence Index ≤ 3.0

____ Morphological Adaptations (Provide supporting data in Remarks or on a separate sheet)

____ Problematic Hydrophytic Vegetation (Explain)

Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Hydrophytic Vegetation Present? **Yes** ____ **No** **X**

Remarks: (Include photo numbers here or on a separate sheet.)
Sample point does not meet hydrophytic vegetation indicator.

SOIL

Sampling Point: 04u

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of Indicators.)

Depth (inches)	Matrix Color (moist)	%	Redox Features Color (moist)	%	Type [1]	Loc [2]	Texture	Remarks
0 to 10	10YR 3 / 1	100					SILT LOAM	
10 to 16	10YR 2 / 1	100					SILTY CLAY	
16 to 24	10YR 2 / 1	100					CLAY	

[1]Type: C=Concentration, D=Depletion, RM=Reduced Martix, CS=Covered or Coated Sand Grains. [2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators:

- ☐ Histosol (A1)
- ☐ Histic Epipedon (A2)
- ☐ Black Histic (A3)
- ☐ Hydrogen Sulfide (A4)
- ☐ Stratified Layers (A5) LRR F
- ☐ 1 cm Muck (A9) LRRF G, H
- ☐ Depleted Below Dark Surface (A11)
- ☐ Thick Dark Surface (A12)
- ☐ Sandy Mucky Mineral (S1)
- ☐ 2.5 cm Mucky Peat or Peat (S2) (LRR G, H)
- ☐ 5 cm Mucky Peat or Peat (S3)
- ☐ Sandy Gleyed Matrix (S4)
- ☐ Sandy Redox (S5)
- ☐ Stripped Matrix (S6)
- ☐ Loamy Mucky Mineral (F1)
- ☐ Loamy Gleyed Matrix (F2)
- ☐ Depleted Matrix (F3)
- ☐ Redox Dark Surface (F6)
- ☐ Depleted Dark Surface (F7)
- ☐ Redox Depressions (F8)
- ☐ High Plains Depressions (F16) (MLRA 72 73 of LRR H)

Indicators for Problematic Hydric Soils: [3]

- ☐ 1 cm Muck (A9) (LRR I, J)
- ☐ Coast Prairie Redox (A16)
- ☐ Dark Surface (S7) (LRR G)
- ☐ High Plains Depressions (F16) (LRR H outside of MLRA 72 73)
- ☐ Reduced Vertic (F18)
- ☐ Red Parent Material (TF2)
- ☐ Very Shallow Dark Surface (TF12)
- ☐ Other (Explain in Remarks)

[3] Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

☐ **Restrictive Layer (if observed):**

Type: _____

Depth (inches): _____

Hydric Soil Present? Yes ____ No X

Remarks:
Sample point does not meet hydric soil indicator.

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one is required; check all that apply)

- ☐ Surface Water (A1)
- ☐ High Water Table (A2)
- ☐ Saturation (A3)
- ☐ Water Marks (B1)
- ☐ Sediment Deposits (B2)
- ☐ Drift Deposits (B3)
- ☐ Algal Mat or Crust (B4)
- ☐ Iron Deposits (B5)
- ☐ Inundation Visible on Aerial Imagery (B7)
- ☐ Water-Stained Leaves (B9)
- ☐ Salt Crust (B11)
- ☐ Aquatic Fauna (B13)
- ☐ Hydrogen Sulfide Odor (C1)
- ☐ Dry-Season Water Table (C2)
- ☐ Oxidized Rhizospheres along Living Roots (C3) (where not tilled)
- ☐ Presence of Reduced Iron (C4)
- ☐ Thin Muck Surface (C7)
- ☐ Other (Explain in Remarks)

Secondary Indicators (minimum of two required)

- ☐ Surface Soil Cracks (B6)
- ☐ Sparsely Vegetated Concave Surface (B8)
- ☐ Drainage Patterns (B10)
- ☐ Oxidized Rhizospheres on Living Roots (C3) (where tilled)
- ☐ Crayfish Burrows (C8)
- ☐ Saturation Visible on Aerial Imag.(C9)
- ☐ Geomorphic Position (D2)
- ☐ FAC-Neutral Test (D5)
- ☐ Frost-Heave Hummocks (D7) (LRR F)

Field Observations:

Surface Water Present? Yes ____ No X Depth (inches): _____

Water Table Present? Yes ____ No X Depth (inches): _____

Saturation Present? Yes ____ No X Depth (inches): _____

(includes capillary fringe)

Wetland Hydrology Present? Yes ____ No X

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:
Sample point does not meet sufficient wetland hydrology indicators.

WETLAND DETERMINATION DATA FORM - Great Plains Region

Project/Site: Hub City Energy Park | City/County: Brown County | Sampling Date: 5/7/2026

Applicant/Owner: Northwestern Energy | State: SD | Sampling Point: 05w

Investigators: Alex Brazeal | Section, Township, Range: S 25 T 123N R 64W

Landform (hillslope, terrace, etc.): Toe of Slope | Local Relief (concave, convex, none): Concave | Slope(%): 5

Subregion (LRR): Sub-Region (LRR) | Lat: 45.43539047 | Long: -98.48348999 | Datum: NAD83

Soil Map Unit Name: G431A - Bearden silt loam, 0 to 2 percent slopes | NWI Classification: PEM1Cx

Are climatic / hydrologic conditions on the site typical for this time of year? Yes ____ No X (If No, explain in Remarks)

Are Vegetation ____, Soil ____, Hydrology ____, significantly disturbed? Are "Normal Circumstances" present? Yes X No ____

Are Vegetation ____, Soil ____, Hydrology ____, naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS - Attach a site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes	X	No		
Hydric Soil Present?	Yes	X	No	**Is the Sampled Area within a Wetland?**	**Yes X No**
Wetland Hydrology Present?	Yes	X	No		

Remarks:
Sample point taken in vegetated buffer adjacent to fallow agricultural field. Prior three month period was drier than normal.

VEGETATION – Use scientific names of plants.

	Absolute % Cover	Dominant Species	Indicator Status
Tree Stratum			
Shrub Stratum			
Herb Stratum (Plot size: 5 Ft)			
Phalaris arundinacea	55	Y	FACW
Bromus inermis	30	Y	UPL
Typha latifolia	10	N	OBL
Persicaria pensylvanica	5	N	FACW
	100	=Total Cover	
Vine Stratum			

% Bare Ground in Herb Stratum 0

Dominance Test Worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 1 (A)

Total Number of Dominant Species Across all Strata: 2 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 50.0% (A/B)

Prevalence Index Worksheet:

	Total % Cover of:	Multiply by:	
OBL species	10	x 1 =	10
FACW species	60	x 2 =	120
FAC species	0	x 3 =	0
FACU species	0	x 4 =	0
UPL species	30	x 5 =	150
Column Totals:	100 (A)		280 (B)

Prevalence Index = B/A= 2.80

Hydrophytic Vegetation Indicators:

- ____ Rapid Test for Hydrophytic Vegetation
- ____ Dominance Test > 50%
- X Prevalence Index ≤ 3.0
- ____ Morphological Adaptations (Provide supporting data in Remarks or on a separate sheet)
- ____ Problematic Hydrophytic Vegetation (Explain)

Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Hydrophytic Vegetation Present? **Yes X No** ____

Remarks: (Include photo numbers here or on a separate sheet.)
Sample point meets hydrophytic vegetation indicator.

SOIL

Sampling Point: 05w

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of Indicators.)

Depth (inches)	Matrix Color (moist)	%	Redox Features Color (moist)	%	Type [1]	Loc [2]	Texture	Remarks
0 to 4	10YR 2 / 1	100					CLAY	
4 to 10	10YR 2 / 1	83	10YR 5/6	3	C	M	CLAY LOAM	
4 to 10	10YR 5 / 1	10	10YR 4/6	4	C	M	CLAY	
10 to 18	10YR 2 / 1	100					CLAY LOAM	

[1]Type: C=Concentration, D=Depletion, RM=Reduced Martix, CS=Covered or Coated Sand Grains. [2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators:

- ☐ Histosol (A1)
- ☐ Histic Epipedon (A2)
- ☐ Black Histic (A3)
- ☐ Hydrogen Sulfide (A4)
- ☐ Stratified Layers (A5) LRR F
- ☐ 1 cm Muck (A9) LRRF G, H
- ☐ Depleted Below Dark Surface (A11)
- ☐ Thick Dark Surface (A12)
- ☐ Sandy Mucky Mineral (S1)
- ☐ 2.5 cm Mucky Peat or Peat (S2) (LRR G, H)
- ☐ 5 cm Mucky Peat or Peat (S3)
- ☐ Sandy Gleyed Matrix (S4)
- ☐ Sandy Redox (S5)
- ☐ Stripped Matrix (S6)
- ☐ Loamy Mucky Mineral (F1)
- ☐ Loamy Gleyed Matrix (F2)
- ☐ Depleted Matrix (F3)
- ☑ Redox Dark Surface (F6)
- ☐ Depleted Dark Surface (F7)
- ☐ Redox Depressions (F8)
- ☐ High Plains Depressions (F16) (MLRA 72 73 of LRR H)

Indicators for Problematic Hydric Soils: [3]

- ☐ 1 cm Muck (A9) (LRR I, J)
- ☐ Coast Prairie Redox (A16)
- ☐ Dark Surface (S7) (LRR G)
- ☐ High Plains Depressions (F16) (LRR H outside of MLRA 72 73)
- ☐ Reduced Vertic (F18)
- ☐ Red Parent Material (TF2)
- ☐ Very Shallow Dark Surface (TF12)
- ☐ Other (Explain in Remarks)

[3] Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

☐ **Restrictive Layer (if observed):**

Type: _____

Depth (inches): _____

Hydric Soil Present? Yes X No _____

Remarks:
Sample point meets hydric soil indicator.

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one is required; check all that apply)

- ☐ Surface Water (A1)
- ☐ High Water Table (A2)
- ☑ Saturation (A3)
- ☐ Water Marks (B1)
- ☐ Sediment Deposits (B2)
- ☐ Drift Deposits (B3)
- ☐ Algal Mat or Crust (B4)
- ☐ Iron Deposits (B5)
- ☐ Inundation Visible on Aerial Imagery (B7)
- ☐ Water-Stained Leaves (B9)
- ☐ Salt Crust (B11)
- ☐ Aquatic Fauna (B13)
- ☐ Hydrogen Sulfide Odor (C1)
- ☐ Dry-Season Water Table (C2)
- ☐ Oxidized Rhizospheres along Living Roots (C3) (where not tilled)
- ☐ Presence of Reduced Iron (C4)
- ☐ Thin Muck Surface (C7)
- ☐ Other (Explain in Remarks)

Secondary Indicators (minimum of two required)

- ☐ Surface Soil Cracks (B6)
- ☐ Sparsely Vegetated Concave Surface (B8)
- ☐ Drainage Patterns (B10)
- ☐ Oxidized Rhizospheres on Living Roots (C3) (where tilled)
- ☐ Crayfish Burrows (C8)
- ☑ Saturation Visible on Aerial Imag.(C9)
- ☑ Geomorphic Position (D2)
- ☐ FAC-Neutral Test (D5)
- ☐ Frost-Heave Hummocks (D7) (LRR F)

Field Observations:

Surface Water Present?	Yes	No X	Depth (inches):		
Water Table Present?	Yes	No X	Depth (inches):		
Saturation Present? (includes capillary fringe)	Yes X	No	Depth (inches):	10	

Wetland Hydrology Present? Yes X No _____

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:
Sample point meets sufficient wetland hydrology indicators.

WETLAND DETERMINATION DATA FORM - Great Plains Region

Project/Site: Hub City Energy Park | City/County: Brown County | Sampling Date: 5/7/2026

Applicant/Owner: Northwestern Energy | State: SD | Sampling Point: 06u

Investigators: Alex Brazeal | Section, Township, Range: S 25 T 123N R 64W

Landform (hillslope, terrace, etc.): Hillslope | Local Relief (concave, convex, none): None | Slope(%): 2

Subregion (LRR): Sub-Region (LRR) | Lat: 45.43536377 | Long: -98.48355103 | Datum: NAD83

Soil Map Unit Name: G431A - Bearden silt loam, 0 to 2 percent slopes | NWI Classification: N/A

Are climatic / hydrologic conditions on the site typical for this time of year? Yes ____ No X (If No, explain in Remarks)

Are Vegetation ____, Soil ____, Hydrology ____, significantly disturbed? Are "Normal Circumstances" present? Yes X No ____

Are Vegetation ____, Soil ____, Hydrology ____, naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS - Attach a site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes ____	No X	
Hydric Soil Present?	Yes ____	No X	**Is the Sampled Area within a Wetland?** Yes ____ No X
Wetland Hydrology Present?	Yes ____	No X	

Remarks:
Sample point takenon hillslope in vegetated buffer adjacent to fallow agricultural field. Prior three month period was drier than normal.

VEGETATION – Use scientific names of plants.

	Absolute % Cover	Dominant Species	Indicator Status
Tree Stratum			
Shrub Stratum			
Herb Stratum (Plot size: 5 Ft)			
Bromus inermis	70	Y	UPL
Phalaris arundinacea	30	N	FACW
	100	=Total Cover	
Vine Stratum			

% Bare Ground in Herb Stratum 0

Dominance Test Worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 0 (A)

Total Number of Dominant Species Across all Strata: 1 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 0.0% (A/B)

Prevalence Index Worksheet:

	Total % Cover of:	Multiply by:	
OBL species	0	x 1 =	0
FACW species	30	x 2 =	60
FAC species	0	x 3 =	0
FACU species	0	x 4 =	0
UPL species	70	x 5 =	350
Column Totals:	100 (A)		410 (B)

Prevalence Index = B/A= 4.10

Hydrophytic Vegetation Indicators:

____ Rapid Test for Hydrophytic Vegetation

____ Dominance Test > 50%

____ Prevalence Index ≤ 3.0

____ Morphological Adaptations (Provide supporting data in Remarks or on a separate sheet)

____ Problematic Hydrophytic Vegetation (Explain)

Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Hydrophytic Vegetation Present? Yes ____ No X

Remarks: (Include photo numbers here or on a separate sheet.)
Sample point does not meet hydrophytic vegetation indicator.

SOIL

Sampling Point: 06u

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of Indicators.)

Depth (inches)	Matrix Color (moist)	%	Redox Features Color (moist)	%	Type [1]	Loc [2]	Texture	Remarks
0 to 6	10YR 3 / 1	100					SILT LOAM	
6 to 10	10YR 2 / 1	100					CLAY	
10 to 20	10YR 2 / 1	100					CLAY LOAM	

[1]Type: C=Concentration, D=Depletion, RM=Reduced Martix, CS=Covered or Coated Sand Grains. [2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators:

- ☐ Histosol (A1)
- ☐ Histic Epipedon (A2)
- ☐ Black Histic (A3)
- ☐ Hydrogen Sulfide (A4)
- ☐ Stratified Layers (A5) LRR F
- ☐ 1 cm Muck (A9) LRRF G, H
- ☐ Depleted Below Dark Surface (A11)
- ☐ Thick Dark Surface (A12)
- ☐ Sandy Mucky Mineral (S1)
- ☐ 2.5 cm Mucky Peat or Peat (S2) (LRR G, H)
- ☐ 5 cm Mucky Peat or Peat (S3)
- ☐ Sandy Gleyed Matrix (S4)
- ☐ Sandy Redox (S5)
- ☐ Stripped Matrix (S6)
- ☐ Loamy Mucky Mineral (F1)
- ☐ Loamy Gleyed Matrix (F2)
- ☐ Depleted Matrix (F3)
- ☐ Redox Dark Surface (F6)
- ☐ Depleted Dark Surface (F7)
- ☐ Redox Depressions (F8)
- ☐ High Plains Depressions (F16) (MLRA 72 73 of LRR H)

Indicators for Problematic Hydric Soils: [3]

- ☐ 1 cm Muck (A9) (LRR I, J)
- ☐ Coast Prairie Redox (A16)
- ☐ Dark Surface (S7) (LRR G)
- ☐ High Plains Depressions (F16) (LRR H outside of MLRA 72 73)
- ☐ Reduced Vertic (F18)
- ☐ Red Parent Material (TF2)
- ☐ Very Shallow Dark Surface (TF12)
- ☐ Other (Explain in Remarks)

[3] Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

☐ **Restrictive Layer (if observed):**

Type: _____

Depth (inches): _____

Hydric Soil Present? Yes ____ No X

Remarks:
Sample point does not meet hydric soil indicator.

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one is required; check all that apply)

- ☐ Surface Water (A1)
- ☐ High Water Table (A2)
- ☐ Saturation (A3)
- ☐ Water Marks (B1)
- ☐ Sediment Deposits (B2)
- ☐ Drift Deposits (B3)
- ☐ Algal Mat or Crust (B4)
- ☐ Iron Deposits (B5)
- ☐ Inundation Visible on Aerial Imagery (B7)
- ☐ Water-Stained Leaves (B9)
- ☐ Salt Crust (B11)
- ☐ Aquatic Fauna (B13)
- ☐ Hydrogen Sulfide Odor (C1)
- ☐ Dry-Season Water Table (C2)
- ☐ Oxidized Rhizospheres along Living Roots (C3) (where not tilled)
- ☐ Presence of Reduced Iron (C4)
- ☐ Thin Muck Surface (C7)
- ☐ Other (Explain in Remarks)

Secondary Indicators (minimum of two required)

- ☐ Surface Soil Cracks (B6)
- ☐ Sparsely Vegetated Concave Surface (B8)
- ☐ Drainage Patterns (B10)
- ☐ Oxidized Rhizospheres on Living Roots (C3) (where tilled)
- ☐ Crayfish Burrows (C8)
- ☐ Saturation Visible on Aerial Imag.(C9)
- ☐ Geomorphic Position (D2)
- ☐ FAC-Neutral Test (D5)
- ☐ Frost-Heave Hummocks (D7) (LRR F)

Field Observations:

Surface Water Present? Yes ____ No X Depth (inches): _____

Water Table Present? Yes ____ No X Depth (inches): _____

Saturation Present? Yes ____ No X Depth (inches): _____

(includes capillary fringe)

Wetland Hydrology Present? Yes ____ No X

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:
Sample point does not meet sufficient wetland hydrology indicators.

WETLAND DETERMINATION DATA FORM - Great Plains Region

Project/Site: Hub City Energy Park | City/County: Brown County | Sampling Date: 5/7/2026

Applicant/Owner: Northwestern Energy | State: SD | Sampling Point: 07w

Investigators: Alex Brazeal | Section, Township, Range: S 25 T 123N R 64W

Landform (hillslope, terrace, etc.): Linear depression | Local Relief (concave, convex, none): Concave | Slope(%): 1

Subregion (LRR): Sub-Region (LRR) | Lat: 45.43478394 | Long: -98.48301697 | Datum: NAD83

Soil Map Unit Name: G431A - Bearden silt loam, 0 to 2 percent slopes | NWI Classification: PEM1Cx

Are climatic / hydrologic conditions on the site typical for this time of year? Yes ____ No X (If No, explain in Remarks)

Are Vegetation ____, Soil ____, Hydrology ____, significantly disturbed? Are "Normal Circumstances" present? Yes X No ____

Are Vegetation ____, Soil ____, Hydrology ____, naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS - Attach a site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes	X	No	
Hydric Soil Present?	Yes	X	No	
Wetland Hydrology Present?	Yes	X	No	

Is the Sampled Area within a Wetland? **Yes X No ____**

Remarks:
Sample point taken in vegetated buffer adjacent to fallow agricultural field. Prior three month period was drier than normal.

VEGETATION – Use scientific names of plants.

	Absolute % Cover	Dominant Species	Indicator Status
Tree Stratum			
Shrub Stratum			
Herb Stratum (Plot size: 5 Ft)			
Phalaris arundinacea	65	Y	FACW
Bromus inermis	30	Y	UPL
Persicaria pensylvanica	5	N	FACW
	100	=Total Cover	
Vine Stratum			

% Bare Ground in Herb Stratum 0

Dominance Test Worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 1 (A)

Total Number of Dominant Species Across all Strata: 2 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 50.0% (A/B)

Prevalence Index Worksheet:

Total % Cover of:		Multiply by:	
OBL species	0	x 1 =	0
FACW species	70	x 2 =	140
FAC species	0	x 3 =	0
FACU species	0	x 4 =	0
UPL species	30	x 5 =	150
Column Totals:	100 (A)		290 (B)

Prevalence Index = B/A= 2.90

Hydrophytic Vegetation Indicators:

____ Rapid Test for Hydrophytic Vegetation

____ Dominance Test > 50%

X Prevalence Index ≤ 3.0

____ Morphological Adaptations (Provide supporting data in Remarks or on a separate sheet)

____ Problematic Hydrophytic Vegetation (Explain)

Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Hydrophytic Vegetation Present? **Yes X No ____**

Remarks: (Include photo numbers here or on a separate sheet.)
Sample point meets hydrophytic vegetation indicator.

SOIL

Sampling Point: 07w

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of Indicators.)

Depth (inches)	Matrix Color (moist)	%	Redox Features Color (moist)	%	Type [1]	Loc [2]	Texture	Remarks
0 to 6	10YR 3 / 1	100					CLAY LOAM	
6 to 12	10YR 2 / 1	80	10YR 5/6	40	C	M	CLAY	
6 to 12	10YR 5 / 1	12	10YR 4/6	40	C	M	CLAY	
12 to 20	10YR 6 / 1	98	10YR 5/6	2	C	M	CLAY LOAM	

[1]Type: C=Concentration, D=Depletion, RM=Reduced Martix, CS=Covered or Coated Sand Grains. [2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators:

- ☐ Histosol (A1)
- ☐ Histic Epipedon (A2)
- ☐ Black Histic (A3)
- ☐ Hydrogen Sulfide (A4)
- ☐ Stratified Layers (A5) LRR F
- ☐ 1 cm Muck (A9) LRRF G, H
- ☐ Depleted Below Dark Surface (A11)
- ☐ Thick Dark Surface (A12)
- ☐ Sandy Mucky Mineral (S1)
- ☐ 2.5 cm Mucky Peat or Peat (S2) (LRR G, H)
- ☐ 5 cm Mucky Peat or Peat (S3)
- ☐ Sandy Gleyed Matrix (S4)
- ☐ Sandy Redox (S5)
- ☐ Stripped Matrix (S6)
- ☐ Loamy Mucky Mineral (F1)
- ☐ Loamy Gleyed Matrix (F2)
- ☐ Depleted Matrix (F3)
- ☑ Redox Dark Surface (F6)
- ☐ Depleted Dark Surface (F7)
- ☐ Redox Depressions (F8)
- ☐ High Plains Depressions (F16) (MLRA 72 73 of LRR H)

Indicators for Problematic Hydric Soils: [3]

- ☐ 1 cm Muck (A9) (LRR I, J)
- ☐ Coast Prairie Redox (A16)
- ☐ Dark Surface (S7) (LRR G)
- ☐ High Plains Depressions (F16) (LRR H outside of MLRA 72 73)
- ☐ Reduced Vertic (F18)
- ☐ Red Parent Material (TF2)
- ☐ Very Shallow Dark Surface (TF12)
- ☐ Other (Explain in Remarks)

[3] Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

☐ **Restrictive Layer (if observed):**

Type: _____

Depth (inches): _____

Hydric Soil Present? Yes X No _____

Remarks:
Sample point meets hydric soil indicator.

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one is required; check all that apply)

- ☐ Surface Water (A1)
- ☐ High Water Table (A2)
- ☑ Saturation (A3)
- ☐ Water Marks (B1)
- ☐ Sediment Deposits (B2)
- ☐ Drift Deposits (B3)
- ☐ Algal Mat or Crust (B4)
- ☐ Iron Deposits (B5)
- ☐ Inundation Visible on Aerial Imagery (B7)
- ☐ Water-Stained Leaves (B9)
- ☐ Salt Crust (B11)
- ☐ Aquatic Fauna (B13)
- ☐ Hydrogen Sulfide Odor (C1)
- ☐ Dry-Season Water Table (C2)
- ☐ Oxidized Rhizospheres along Living Roots (C3) (where not tilled)
- ☐ Presence of Reduced Iron (C4)
- ☐ Thin Muck Surface (C7)
- ☐ Other (Explain in Remarks)

Secondary Indicators (minimum of two required)

- ☐ Surface Soil Cracks (B6)
- ☐ Sparsely Vegetated Concave Surface (B8)
- ☐ Drainage Patterns (B10)
- ☐ Oxidized Rhizospheres on Living Roots (C3) (where tilled)
- ☐ Crayfish Burrows (C8)
- ☐ Saturation Visible on Aerial Imag.(C9)
- ☑ Geomorphic Position (D2)
- ☐ FAC-Neutral Test (D5)
- ☐ Frost-Heave Hummocks (D7) (LRR F)

Field Observations:

Surface Water Present?	Yes	No X	Depth (inches):		
Water Table Present?	Yes	No X	Depth (inches):		
Saturation Present? (includes capillary fringe)	Yes X	No	Depth (inches):	10	

Wetland Hydrology Present? Yes X No _____

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:
Sample point meets sufficient wetland hydrology indicators.

WETLAND DETERMINATION DATA FORM - Great Plains Region

Project/Site: Hub City Energy Park | City/County: Brown County | Sampling Date: 5/7/2026

Applicant/Owner: Northwestern Energy | State: SD | Sampling Point: 08u

Investigators: Alex Brazeal | Section, Township, Range: S 25 T 123N R 64W

Landform (hillslope, terrace, etc.): Top of Slope | Local Relief (concave, convex, none): Convex | Slope(%): 2

Subregion (LRR): Sub-Region (LRR) | Lat: | Long: | Datum: NAD83

Soil Map Unit Name: G431A - Bearden silt loam, 0 to 2 percent slopes | NWI Classification: N/A

Are climatic / hydrologic conditions on the site typical for this time of year? Yes ____ No X (If No, explain in Remarks)

Are Vegetation ____, Soil ____, Hydrology ____, significantly disturbed? Are "Normal Circumstances" present? Yes X No ____

Are Vegetation ____, Soil ____, Hydrology ____, naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS - Attach a site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes ____	No X	**Is the Sampled Area within a Wetland?** **Yes** ____ **No** **X**
Hydric Soil Present?	Yes ____	No X	
Wetland Hydrology Present?	Yes ____	No X	

Remarks:
Sample point taken in upland break vegetated buffer adjacent to fallow agricultural field. Prior three month period was drier than normal.

VEGETATION – Use scientific names of plants.

	Absolute % Cover	Dominant Species	Indicator Status
Tree Stratum			
Shrub Stratum			
Herb Stratum (Plot size: 5 Ft)			
Bromus inermis	70	Y	UPL
Phalaris arundinacea	30	Y	FACW
	100	=Total Cover	
Vine Stratum			

% Bare Ground in Herb Stratum 0

Dominance Test Worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 1 (A)

Total Number of Dominant Species Across all Strata: 2 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 50.0% (A/B)

Prevalence Index Worksheet:

Total % Cover of:		Multiply by:	
OBL species	0	x 1 =	0
FACW species	30	x 2 =	60
FAC species	0	x 3 =	0
FACU species	0	x 4 =	0
UPL species	70	x 5 =	350
Column Totals:	100 (A)		410 (B)

Prevalence Index = B/A= 4.10

Hydrophytic Vegetation Indicators:

____ Rapid Test for Hydrophytic Vegetation

____ Dominance Test > 50%

____ Prevalence Index ≤ 3.0

____ Morphological Adaptations (Provide supporting data in Remarks or on a separate sheet)

____ Problematic Hydrophytic Vegetation (Explain)

Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Hydrophytic Vegetation Present? **Yes** ____ **No** **X**

Remarks: (Include photo numbers here or on a separate sheet.)
Sample point does not meet hydrophytic vegetation indicator.

SOIL

Sampling Point: 08u

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of Indicators.)

Depth (inches)	Matrix Color (moist)	%	Redox Features Color (moist)	%	Type [1]	Loc [2]	Texture	Remarks
0 to 8	10YR 3 / 1	100					CLAY LOAM	
8 to 16	10YR 2 / 1	100					SILT LOAM	
16 to 20	10YR 2 / 1	100					CLAY	

[1]Type: C=Concentration, D=Depletion, RM=Reduced Martix, CS=Covered or Coated Sand Grains. [2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators:

- ☐ Histosol (A1)
- ☐ Histic Epipedon (A2)
- ☐ Black Histic (A3)
- ☐ Hydrogen Sulfide (A4)
- ☐ Stratified Layers (A5) LRR F
- ☐ 1 cm Muck (A9) LRRF G, H
- ☐ Depleted Below Dark Surface (A11)
- ☐ Thick Dark Surface (A12)
- ☐ Sandy Mucky Mineral (S1)
- ☐ 2.5 cm Mucky Peat or Peat (S2) (LRR G, H)
- ☐ 5 cm Mucky Peat or Peat (S3)
- ☐ Sandy Gleyed Matrix (S4)
- ☐ Sandy Redox (S5)
- ☐ Stripped Matrix (S6)
- ☐ Loamy Mucky Mineral (F1)
- ☐ Loamy Gleyed Matrix (F2)
- ☐ Depleted Matrix (F3)
- ☐ Redox Dark Surface (F6)
- ☐ Depleted Dark Surface (F7)
- ☐ Redox Depressions (F8)
- ☐ High Plains Depressions (F16) (MLRA 72 73 of LRR H)

Indicators for Problematic Hydric Soils: [3]

- ☐ 1 cm Muck (A9) (LRR I, J)
- ☐ Coast Prairie Redox (A16)
- ☐ Dark Surface (S7) (LRR G)
- ☐ High Plains Depressions (F16) (LRR H outside of MLRA 72 73)
- ☐ Reduced Vertic (F18)
- ☐ Red Parent Material (TF2)
- ☐ Very Shallow Dark Surface (TF12)
- ☐ Other (Explain in Remarks)

[3] Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

☐ **Restrictive Layer (if observed):**

Type: _____

Depth (inches): _____

Hydric Soil Present? Yes ____ No X

Remarks:
Sample point does not meet hydric soil indicator.

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one is required; check all that apply)

- ☐ Surface Water (A1)
- ☐ High Water Table (A2)
- ☐ Saturation (A3)
- ☐ Water Marks (B1)
- ☐ Sediment Deposits (B2)
- ☐ Drift Deposits (B3)
- ☐ Algal Mat or Crust (B4)
- ☐ Iron Deposits (B5)
- ☐ Inundation Visible on Aerial Imagery (B7)
- ☐ Water-Stained Leaves (B9)
- ☐ Salt Crust (B11)
- ☐ Aquatic Fauna (B13)
- ☐ Hydrogen Sulfide Odor (C1)
- ☐ Dry-Season Water Table (C2)
- ☐ Oxidized Rhizospheres along Living Roots (C3) (where not tilled)
- ☐ Presence of Reduced Iron (C4)
- ☐ Thin Muck Surface (C7)
- ☐ Other (Explain in Remarks)

Secondary Indicators (minimum of two required)

- ☐ Surface Soil Cracks (B6)
- ☐ Sparsely Vegetated Concave Surface (B8)
- ☐ Drainage Patterns (B10)
- ☐ Oxidized Rhizospheres on Living Roots (C3) (where tilled)
- ☐ Crayfish Burrows (C8)
- ☐ Saturation Visible on Aerial Imag.(C9)
- ☐ Geomorphic Position (D2)
- ☐ FAC-Neutral Test (D5)
- ☐ Frost-Heave Hummocks (D7) (LRR F)

Field Observations:

Surface Water Present? Yes ____ No X Depth (inches): _____

Water Table Present? Yes ____ No X Depth (inches): _____

Saturation Present? Yes ____ No X Depth (inches): _____

(includes capillary fringe)

Wetland Hydrology Present? Yes ____ No X

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:
Sample point does not meet sufficient wetland hydrology indicators.

WETLAND DETERMINATION DATA FORM - Great Plains Region

Project/Site: Hub City Energy Park | City/County: Brown County | Sampling Date: 5/7/2026

Applicant/Owner: Northwestern Energy | State: SD | Sampling Point: 09u

Investigators: Alex Brazeal | Section, Township, Range: S 25 T 123N R 64W

Landform (hillslope, terrace, etc.): Depression | Local Relief (concave, convex, none): Concave | Slope(%): 1

Subregion (LRR): Sub-Region (LRR) | Lat: 45.43190765 | Long: -98.49441528 | Datum: NAD83

Soil Map Unit Name: G472A - Aberdeen-Nahon silty clay loams, 0 to 2 percent slopes | NWI Classification: PEM1A

Are climatic / hydrologic conditions on the site typical for this time of year? Yes ____ No X (If No, explain in Remarks)

Are Vegetation X, Soil X, Hydrology ____, significantly disturbed? Are "Normal Circumstances" present? Yes ____ No X

Are Vegetation ____, Soil ____, Hydrology ____, naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS - Attach a site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes ____	No X	
Hydric Soil Present?	Yes ____	No X	**Is the Sampled Area within a Wetland?** Yes ____ No X
Wetland Hydrology Present?	Yes ____	No X	

Remarks:
Sample point taken in the vicinity of NWI feature located in cultivated agricultural field. Prior three month period was drier than normal.

VEGETATION – Use scientific names of plants.

	Absolute % Cover	Dominant Species	Indicator Status
Tree Stratum			
Shrub Stratum			
Herb Stratum (Plot size: 5 Ft)			
Zea mays	5	Y	UPL
	5 =Total Cover		
Vine Stratum			

% Bare Ground in Herb Stratum 95

Dominance Test Worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 0 (A)

Total Number of Dominant Species Across all Strata: 1 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 0.0% (A/B)

Prevalence Index Worksheet:

Total % Cover of:		Multiply by:	
OBL species	0	x 1 =	0
FACW species	0	x 2 =	0
FAC species	0	x 3 =	0
FACU species	0	x 4 =	0
UPL species	5	x 5 =	25
Column Totals:	5 (A)		25 (B)

Prevalence Index = B/A= 5.00

Hydrophytic Vegetation Indicators:

____ Rapid Test for Hydrophytic Vegetation

____ Dominance Test > 50%

____ Prevalence Index ≤ 3.0

____ Morphological Adaptations (Provide supporting data in Remarks or on a separate sheet)

____ Problematic Hydrophytic Vegetation (Explain)

Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Hydrophytic Vegetation Present? Yes ____ No X

Remarks: (Include photo numbers here or on a separate sheet.)
Corn residue from previous year present. No signs of ruderal vegetation. Sample point does not meet hydrophytic vegetation indicator.

SOIL

Sampling Point: 09u

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of Indicators.)

Depth (inches)	Matrix Color (moist)	%	Redox Features Color (moist)	%	Type [1]	Loc [2]	Texture	Remarks
0 to 6	10YR 3 / 2	100					SILT LOAM	
6 to 12	10YR 3 / 1	100					CLAY LOAM	
12 to 24	10YR 2 / 1	100					SILT LOAM	

[1]Type: C=Concentration, D=Depletion, RM=Reduced Martix, CS=Covered or Coated Sand Grains. [2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators:

- ☐ Histosol (A1)
- ☐ Histic Epipedon (A2)
- ☐ Black Histic (A3)
- ☐ Hydrogen Sulfide (A4)
- ☐ Stratified Layers (A5) LRR F
- ☐ 1 cm Muck (A9) LRRF G, H
- ☐ Depleted Below Dark Surface (A11)
- ☐ Thick Dark Surface (A12)
- ☐ Sandy Mucky Mineral (S1)
- ☐ 2.5 cm Mucky Peat or Peat (S2) (LRR G, H)
- ☐ 5 cm Mucky Peat or Peat (S3)
- ☐ Sandy Gleyed Matrix (S4)
- ☐ Sandy Redox (S5)
- ☐ Stripped Matrix (S6)
- ☐ Loamy Mucky Mineral (F1)
- ☐ Loamy Gleyed Matrix (F2)
- ☐ Depleted Matrix (F3)
- ☐ Redox Dark Surface (F6)
- ☐ Depleted Dark Surface (F7)
- ☐ Redox Depressions (F8)
- ☐ High Plains Depressions (F16) (MLRA 72 73 of LRR H)

Indicators for Problematic Hydric Soils: [3]

- ☐ 1 cm Muck (A9) (LRR I, J)
- ☐ Coast Prairie Redox (A16)
- ☐ Dark Surface (S7) (LRR G)
- ☐ High Plains Depressions (F16) (LRR H outside of MLRA 72 73)
- ☐ Reduced Vertic (F18)
- ☐ Red Parent Material (TF2)
- ☐ Very Shallow Dark Surface (TF12)
- ☐ Other (Explain in Remarks)

[3] Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

☐ **Restrictive Layer (if observed):**

Type: _____

Depth (inches): _____

Hydric Soil Present? Yes ____ No X

Remarks:
Sample point does not meet hydric soil indicator.

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one is required; check all that apply)

- ☐ Surface Water (A1)
- ☐ High Water Table (A2)
- ☐ Saturation (A3)
- ☐ Water Marks (B1)
- ☐ Sediment Deposits (B2)
- ☐ Drift Deposits (B3)
- ☐ Algal Mat or Crust (B4)
- ☐ Iron Deposits (B5)
- ☐ Inundation Visible on Aerial Imagery (B7)
- ☐ Water-Stained Leaves (B9)
- ☐ Salt Crust (B11)
- ☐ Aquatic Fauna (B13)
- ☐ Hydrogen Sulfide Odor (C1)
- ☐ Dry-Season Water Table (C2)
- ☐ Oxidized Rhizospheres along Living Roots (C3) (where not tilled)
- ☐ Presence of Reduced Iron (C4)
- ☐ Thin Muck Surface (C7)
- ☐ Other (Explain in Remarks)

Secondary Indicators (minimum of two required)

- ☐ Surface Soil Cracks (B6)
- ☐ Sparsely Vegetated Concave Surface (B8)
- ☐ Drainage Patterns (B10)
- ☐ Oxidized Rhizospheres on Living Roots (C3) (where tilled)
- ☐ Crayfish Burrows (C8)
- ☐ Saturation Visible on Aerial Imag.(C9)
- ☐ Geomorphic Position (D2)
- ☐ FAC-Neutral Test (D5)
- ☐ Frost-Heave Hummocks (D7) (LRR F)

Field Observations:

Surface Water Present? Yes ____ No X Depth (inches): _____

Water Table Present? Yes ____ No X Depth (inches): _____

Saturation Present? Yes ____ No X Depth (inches): _____

(includes capillary fringe)

Wetland Hydrology Present? Yes ____ No X

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:
Sample point does not meet sufficient wetland hydrology indicators.

WETLAND DETERMINATION DATA FORM - Great Plains Region

Project/Site: Hub City Energy Park | City/County: Brown County | Sampling Date: 5/7/2026

Applicant/Owner: Northwestern Energy | State: SD | Sampling Point: 10u

Investigators: Alex Brazeal | Section, Township, Range: S 25 T 123N R 64W

Landform (hillslope, terrace, etc.): Top of Slope | Local Relief (concave, convex, none): Convex | Slope(%): 1

Subregion (LRR): Sub-Region (LRR) | Lat: 45.4304924 | Long: -98.49189758 | Datum: NAD83

Soil Map Unit Name: G472A - Aberdeen-Nahon silty clay loams, 0 to 2 percent slopes | NWI Classification: N/A

Are climatic / hydrologic conditions on the site typical for this time of year? Yes ____ No X (If No, explain in Remarks)

Are Vegetation ____, Soil ____, Hydrology ____, significantly disturbed? Are "Normal Circumstances" present? Yes X No ____

Are Vegetation ____, Soil ____, Hydrology ____, naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS - Attach a site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes ____	No X	
Hydric Soil Present?	Yes ____	No X	**Is the Sampled Area within a Wetland?** Yes ____ No X
Wetland Hydrology Present?	Yes ____	No X	

Remarks:
Sample point located on field approach that lacks culvert. Prior three month period was drier than normal.

VEGETATION – Use scientific names of plants.

	Absolute % Cover	Dominant Species	Indicator Status
Tree Stratum			
Shrub Stratum			
Herb Stratum (Plot size: 5 Ft)			
Bromus inermis	60	Y	UPL
Poa annua	30	Y	FACU
	90	=Total Cover	
Vine Stratum			

% Bare Ground in Herb Stratum

Dominance Test Worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 0 (A)

Total Number of Dominant Species Across all Strata: 2 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 0.0% (A/B)

Prevalence Index Worksheet:

Total % Cover of:		Multiply by:	
OBL species	0	x 1 =	0
FACW species	0	x 2 =	0
FAC species	0	x 3 =	0
FACU species	30	x 4 =	120
UPL species	60	x 5 =	300
Column Totals:	90 (A)		420 (B)

Prevalence Index = B/A= 4.67

Hydrophytic Vegetation Indicators:

____ Rapid Test for Hydrophytic Vegetation

____ Dominance Test > 50%

____ Prevalence Index ≤ 3.0

____ Morphological Adaptations (Provide supporting data in Remarks or on a separate sheet)

____ Problematic Hydrophytic Vegetation (Explain)

Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Hydrophytic Vegetation Present? Yes ____ No X

Remarks: (Include photo numbers here or on a separate sheet.)
Sample point does not meet hydrophytic vegetation indicator.

SOIL

Sampling Point: 10u

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of Indicators.)

Depth (inches)	Matrix Color (moist)	%	Redox Features Color (moist)	%	Type [1]	Loc [2]	Texture	Remarks
0 to 4	10YR 3 / 2	100					SILT LOAM	
4 to 12	10YR 2 / 1	100					CLAY LOAM	
12 to 20	10YR 3 / 1	100					SILTY CLAY	

[1]Type: C=Concentration, D=Depletion, RM=Reduced Martix, CS=Covered or Coated Sand Grains. [2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators:

- ☐ Histosol (A1)
- ☐ Histic Epipedon (A2)
- ☐ Black Histic (A3)
- ☐ Hydrogen Sulfide (A4)
- ☐ Stratified Layers (A5) LRR F
- ☐ 1 cm Muck (A9) LRRF G, H
- ☐ Depleted Below Dark Surface (A11)
- ☐ Thick Dark Surface (A12)
- ☐ Sandy Mucky Mineral (S1)
- ☐ 2.5 cm Mucky Peat or Peat (S2) (LRR G, H)
- ☐ 5 cm Mucky Peat or Peat (S3)
- ☐ Sandy Gleyed Matrix (S4)
- ☐ Sandy Redox (S5)
- ☐ Stripped Matrix (S6)
- ☐ Loamy Mucky Mineral (F1)
- ☐ Loamy Gleyed Matrix (F2)
- ☐ Depleted Matrix (F3)
- ☐ Redox Dark Surface (F6)
- ☐ Depleted Dark Surface (F7)
- ☐ Redox Depressions (F8)
- ☐ High Plains Depressions (F16) (MLRA 72 73 of LRR H)

Indicators for Problematic Hydric Soils: [3]

- ☐ 1 cm Muck (A9) (LRR I, J)
- ☐ Coast Prairie Redox (A16)
- ☐ Dark Surface (S7) (LRR G)
- ☐ High Plains Depressions (F16) (LRR H outside of MLRA 72 73)
- ☐ Reduced Vertic (F18)
- ☐ Red Parent Material (TF2)
- ☐ Very Shallow Dark Surface (TF12)
- ☐ Other (Explain in Remarks)

[3] Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

☐ **Restrictive Layer (if observed):**

Type: _____

Depth (inches): _____

Hydric Soil Present? Yes ____ No X

Remarks:
Sample point does not meet hydric soil indicator.

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one is required; check all that apply)

- ☐ Surface Water (A1)
- ☐ High Water Table (A2)
- ☐ Saturation (A3)
- ☐ Water Marks (B1)
- ☐ Sediment Deposits (B2)
- ☐ Drift Deposits (B3)
- ☐ Algal Mat or Crust (B4)
- ☐ Iron Deposits (B5)
- ☐ Inundation Visible on Aerial Imagery (B7)
- ☐ Water-Stained Leaves (B9)
- ☐ Salt Crust (B11)
- ☐ Aquatic Fauna (B13)
- ☐ Hydrogen Sulfide Odor (C1)
- ☐ Dry-Season Water Table (C2)
- ☐ Oxidized Rhizospheres along Living Roots (C3) (where not tilled)
- ☐ Presence of Reduced Iron (C4)
- ☐ Thin Muck Surface (C7)
- ☐ Other (Explain in Remarks)

Secondary Indicators (minimum of two required)

- ☐ Surface Soil Cracks (B6)
- ☐ Sparsely Vegetated Concave Surface (B8)
- ☐ Drainage Patterns (B10)
- ☐ Oxidized Rhizospheres on Living Roots (C3) (where tilled)
- ☐ Crayfish Burrows (C8)
- ☐ Saturation Visible on Aerial Imag.(C9)
- ☐ Geomorphic Position (D2)
- ☐ FAC-Neutral Test (D5)
- ☐ Frost-Heave Hummocks (D7) (LRR F)

Field Observations:

Surface Water Present? Yes ____ No X Depth (inches): _____

Water Table Present? Yes ____ No X Depth (inches): _____

Saturation Present? Yes ____ No X Depth (inches): _____

(includes capillary fringe)

Wetland Hydrology Present? Yes ____ No X

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:
Sample point does not meet sufficient wetland hydrology indicators.

WETLAND DETERMINATION DATA FORM - Great Plains Region

Project/Site: Hub City Energy Park | City/County: Brown County | Sampling Date: 5/7/2026

Applicant/Owner: Northwestern Energy | State: SD | Sampling Point: 11u

Investigators: Alex Brazeal | Section, Township, Range: S 25 T 123N R 64W

Landform (hillslope, terrace, etc.): Top of Slope | Local Relief (concave, convex, none): Convex | Slope(%): 1

Subregion (LRR): Sub-Region (LRR) | Lat: 45.43044662 | Long: -98.48433685 | Datum: NAD83

Soil Map Unit Name: G851A - Nahon-Aberdeen-Exline silt loams, 0 to 2 percent slopes | NWI Classification: N/A

Are climatic / hydrologic conditions on the site typical for this time of year? Yes ____ No X (If No, explain in Remarks)

Are Vegetation ____, Soil ____, Hydrology ____, significantly disturbed? Are "Normal Circumstances" present? Yes X No ____

Are Vegetation ____, Soil ____, Hydrology ____, naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS - Attach a site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes ____	No X	
Hydric Soil Present?	Yes ____	No X	**Is the Sampled Area within a Wetland?** Yes ____ No X
Wetland Hydrology Present?	Yes ____	No X	

Remarks:
Sample point located on field approach that lacks culvert. Prior three month period was drier than normal.

VEGETATION – Use scientific names of plants.

	Absolute % Cover	Dominant Species	Indicator Status
Tree Stratum			
Shrub Stratum			
Herb Stratum (Plot size: 5 Ft)			
Bromus inermis	60	Y	UPL
Poa annua	30	Y	FACU
	90	=Total Cover	
Vine Stratum			

% Bare Ground in Herb Stratum

Dominance Test Worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 0 (A)

Total Number of Dominant Species Across all Strata: 2 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 0.0% (A/B)

Prevalence Index Worksheet:

Total % Cover of:		Multiply by:	
OBL species	0	x 1 =	0
FACW species	0	x 2 =	0
FAC species	0	x 3 =	0
FACU species	30	x 4 =	120
UPL species	60	x 5 =	300
Column Totals:	90 (A)		420 (B)

Prevalence Index = B/A = 4.67

Hydrophytic Vegetation Indicators:

____ Rapid Test for Hydrophytic Vegetation

____ Dominance Test > 50%

____ Prevalence Index ≤ 3.0

____ Morphological Adaptations (Provide supporting data in Remarks or on a separate sheet)

____ Problematic Hydrophytic Vegetation (Explain)

Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Hydrophytic Vegetation Present? Yes ____ No X

Remarks: (Include photo numbers here or on a separate sheet.)
Sample point does not meet hydrophytic vegetation indicator.

SOIL

Sampling Point: 11u

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of Indicators.)

Depth (inches)	Matrix Color (moist)	%	Redox Features Color (moist)	%	Type [1]	Loc [2]	Texture	Remarks
0 to 4	10YR 3 / 2	100					SILT LOAM	
4 to 12	10YR 2 / 1	100					CLAY LOAM	
12 to 20	10YR 3 / 1	100					SILTY CLAY	

[1]Type: C=Concentration, D=Depletion, RM=Reduced Martix, CS=Covered or Coated Sand Grains. [2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators:

- ☐ Histosol (A1)
- ☐ Histic Epipedon (A2)
- ☐ Black Histic (A3)
- ☐ Hydrogen Sulfide (A4)
- ☐ Stratified Layers (A5) LRR F
- ☐ 1 cm Muck (A9) LRRF G, H
- ☐ Depleted Below Dark Surface (A11)
- ☐ Thick Dark Surface (A12)
- ☐ Sandy Mucky Mineral (S1)
- ☐ 2.5 cm Mucky Peat or Peat (S2) (LRR G, H)
- ☐ 5 cm Mucky Peat or Peat (S3)
- ☐ Sandy Gleyed Matrix (S4)
- ☐ Sandy Redox (S5)
- ☐ Stripped Matrix (S6)
- ☐ Loamy Mucky Mineral (F1)
- ☐ Loamy Gleyed Matrix (F2)
- ☐ Depleted Matrix (F3)
- ☐ Redox Dark Surface (F6)
- ☐ Depleted Dark Surface (F7)
- ☐ Redox Depressions (F8)
- ☐ High Plains Depressions (F16) (MLRA 72 73 of LRR H)

Indicators for Problematic Hydric Soils: [3]

- ☐ 1 cm Muck (A9) (LRR I, J)
- ☐ Coast Prairie Redox (A16)
- ☐ Dark Surface (S7) (LRR G)
- ☐ High Plains Depressions (F16) (LRR H outside of MLRA 72 73)
- ☐ Reduced Vertic (F18)
- ☐ Red Parent Material (TF2)
- ☐ Very Shallow Dark Surface (TF12)
- ☐ Other (Explain in Remarks)

[3] Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

☐ **Restrictive Layer (if observed):**

Type: _____

Depth (inches): _____

Hydric Soil Present? Yes ____ No X

Remarks:
Sample point does not meet hydric soil indicator.

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one is required; check all that apply)

- ☐ Surface Water (A1)
- ☐ High Water Table (A2)
- ☐ Saturation (A3)
- ☐ Water Marks (B1)
- ☐ Sediment Deposits (B2)
- ☐ Drift Deposits (B3)
- ☐ Algal Mat or Crust (B4)
- ☐ Iron Deposits (B5)
- ☐ Inundation Visible on Aerial Imagery (B7)
- ☐ Water-Stained Leaves (B9)
- ☐ Salt Crust (B11)
- ☐ Aquatic Fauna (B13)
- ☐ Hydrogen Sulfide Odor (C1)
- ☐ Dry-Season Water Table (C2)
- ☐ Oxidized Rhizospheres along Living Roots (C3) (where not tilled)
- ☐ Presence of Reduced Iron (C4)
- ☐ Thin Muck Surface (C7)
- ☐ Other (Explain in Remarks)

Secondary Indicators (minimum of two required)

- ☐ Surface Soil Cracks (B6)
- ☐ Sparsely Vegetated Concave Surface (B8)
- ☐ Drainage Patterns (B10)
- ☐ Oxidized Rhizospheres on Living Roots (C3) (where tilled)
- ☐ Crayfish Burrows (C8)
- ☐ Saturation Visible on Aerial Imag.(C9)
- ☐ Geomorphic Position (D2)
- ☐ FAC-Neutral Test (D5)
- ☐ Frost-Heave Hummocks (D7) (LRR F)

Field Observations:

Surface Water Present? Yes ____ No X Depth (inches): _____

Water Table Present? Yes ____ No X Depth (inches): _____

Saturation Present? Yes ____ No X Depth (inches): _____

(includes capillary fringe)

Wetland Hydrology Present? Yes ____ No X

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:
Sample point does not meet sufficient wetland hydrology indicators.

WETLAND DETERMINATION DATA FORM - Great Plains Region

Project/Site: Hub City Energy Park | City/County: Brown County | Sampling Date: 5/7/2026

Applicant/Owner: Northwestern Energy | State: SD | Sampling Point: 12u

Investigators: Alex Brazeal | Section, Township, Range: S 25 T 123N R 64W

Landform (hillslope, terrace, etc.): Top of Slope | Local Relief (concave, convex, none): Convex | Slope(%): 1

Subregion (LRR): Sub-Region (LRR) | Lat: 45.43046188 | Long: -98.48297882 | Datum: NAD83

Soil Map Unit Name: G851A - Nahon-Aberdeen-Exline silt loams, 0 to 2 percent slopes | NWI Classification: N/A

Are climatic / hydrologic conditions on the site typical for this time of year? Yes ____ No X (If No, explain in Remarks)

Are Vegetation ____, Soil ____, Hydrology ____, significantly disturbed? Are "Normal Circumstances" present? Yes X No ____

Are Vegetation ____, Soil ____, Hydrology ____, naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS - Attach a site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes ____	No X	
Hydric Soil Present?	Yes ____	No X	**Is the Sampled Area within a Wetland?** Yes ____ No X
Wetland Hydrology Present?	Yes ____	No X	

Remarks:
Sample point located on field approach that lacks culvert. Prior three month period was drier than normal.

VEGETATION – Use scientific names of plants.

	Absolute % Cover	Dominant Species	Indicator Status
Tree Stratum			
Shrub Stratum			
Herb Stratum (Plot size: 5 Ft)			
Bromus inermis	60	Y	UPL
Poa annua	30	Y	FACU
	90	=Total Cover	
Vine Stratum			

% Bare Ground in Herb Stratum

Dominance Test Worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 0 (A)

Total Number of Dominant Species Across all Strata: 2 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 0.0% (A/B)

Prevalence Index Worksheet:

Total % Cover of:		Multiply by:	
OBL species	0	x 1 =	0
FACW species	0	x 2 =	0
FAC species	0	x 3 =	0
FACU species	30	x 4 =	120
UPL species	60	x 5 =	300
Column Totals:	90 (A)		420 (B)

Prevalence Index = B/A = 4.67

Hydrophytic Vegetation Indicators:

____ Rapid Test for Hydrophytic Vegetation

____ Dominance Test > 50%

____ Prevalence Index ≤ 3.0

____ Morphological Adaptations (Provide supporting data in Remarks or on a separate sheet)

____ Problematic Hydrophytic Vegetation (Explain)

Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Hydrophytic Vegetation Present? Yes ____ No X

Remarks: (Include photo numbers here or on a separate sheet.)
Sample point does not meet hydrophytic vegetation indicator.

SOIL

Sampling Point: 12u

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of Indicators.)

Depth (inches)	Matrix Color (moist)	%	Redox Features Color (moist)	%	Type [1]	Loc [2]	Texture	Remarks
0 to 4	10YR 3 / 2	100					SILT LOAM	
4 to 12	10YR 2 / 1	100					CLAY LOAM	
12 to 20	10YR 3 / 1	100					SILTY CLAY	

[1]Type: C=Concentration, D=Depletion, RM=Reduced Martix, CS=Covered or Coated Sand Grains. [2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators:

- ☐ Histosol (A1)
- ☐ Histic Epipedon (A2)
- ☐ Black Histic (A3)
- ☐ Hydrogen Sulfide (A4)
- ☐ Stratified Layers (A5) LRR F
- ☐ 1 cm Muck (A9) LRRF G, H
- ☐ Depleted Below Dark Surface (A11)
- ☐ Thick Dark Surface (A12)
- ☐ Sandy Mucky Mineral (S1)
- ☐ 2.5 cm Mucky Peat or Peat (S2) (LRR G, H)
- ☐ 5 cm Mucky Peat or Peat (S3)
- ☐ Sandy Gleyed Matrix (S4)
- ☐ Sandy Redox (S5)
- ☐ Stripped Matrix (S6)
- ☐ Loamy Mucky Mineral (F1)
- ☐ Loamy Gleyed Matrix (F2)
- ☐ Depleted Matrix (F3)
- ☐ Redox Dark Surface (F6)
- ☐ Depleted Dark Surface (F7)
- ☐ Redox Depressions (F8)
- ☐ High Plains Depressions (F16) (MLRA 72 73 of LRR H)

Indicators for Problematic Hydric Soils: [3]

- ☐ 1 cm Muck (A9) (LRR I, J)
- ☐ Coast Prairie Redox (A16)
- ☐ Dark Surface (S7) (LRR G)
- ☐ High Plains Depressions (F16) (LRR H outside of MLRA 72 73)
- ☐ Reduced Vertic (F18)
- ☐ Red Parent Material (TF2)
- ☐ Very Shallow Dark Surface (TF12)
- ☐ Other (Explain in Remarks)

[3] Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

☐ **Restrictive Layer (if observed):**

Type: _____

Depth (inches): _____

Hydric Soil Present? Yes ____ No X

Remarks:
Sample point does not meet hydric soil indicator.

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one is required; check all that apply)

- ☐ Surface Water (A1)
- ☐ High Water Table (A2)
- ☐ Saturation (A3)
- ☐ Water Marks (B1)
- ☐ Sediment Deposits (B2)
- ☐ Drift Deposits (B3)
- ☐ Algal Mat or Crust (B4)
- ☐ Iron Deposits (B5)
- ☐ Inundation Visible on Aerial Imagery (B7)
- ☐ Water-Stained Leaves (B9)
- ☐ Salt Crust (B11)
- ☐ Aquatic Fauna (B13)
- ☐ Hydrogen Sulfide Odor (C1)
- ☐ Dry-Season Water Table (C2)
- ☐ Oxidized Rhizospheres along Living Roots (C3) (where not tilled)
- ☐ Presence of Reduced Iron (C4)
- ☐ Thin Muck Surface (C7)
- ☐ Other (Explain in Remarks)

Secondary Indicators (minimum of two required)

- ☐ Surface Soil Cracks (B6)
- ☐ Sparsely Vegetated Concave Surface (B8)
- ☐ Drainage Patterns (B10)
- ☐ Oxidized Rhizospheres on Living Roots (C3) (where tilled)
- ☐ Crayfish Burrows (C8)
- ☐ Saturation Visible on Aerial Imag.(C9)
- ☐ Geomorphic Position (D2)
- ☐ FAC-Neutral Test (D5)
- ☐ Frost-Heave Hummocks (D7) (LRR F)

Field Observations:

Surface Water Present? Yes ____ No X Depth (inches): _____

Water Table Present? Yes ____ No X Depth (inches): _____

Saturation Present? Yes ____ No X Depth (inches): _____

(includes capillary fringe)

Wetland Hydrology Present? Yes ____ No X

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:
Sample point does not meet sufficient wetland hydrology indicators.

Attachment C: Photographs



Photo 1: Facing east toward Sample Points 01w/02u.



Photo 2: Facing west towards Sample Points 03w/04u.



Photo 3: Facing northeast showing Sample Point 05w/06u.



Photo 4: Facing south toward Sample Point 07w/08u.



Photo 5: Facing north toward Wetland 3 within former railroad ditch.



Photo 6: Facing north toward Sample Point 09u and NWI feature.



Photo 7: Facing west toward Wetland 6b within north road ditch of 135th Street.



Photo 8: Facing west toward Wetland 4 from constructed field entrance.



Photo 9: Facing south showing cultivated field conditions.



Photo 10: Facing south showing vegetated upland buffer.



Photo 11: Facing north showing vegetated upland buffer.

U.S. Army Corps of Engineers (USACE)

REQUEST FOR JURISDICTIONAL DETERMINATION (JD)

For use of this form, see Sec 404 CWA, Sec 10 RHA, Sec 103 MPRSA; the proponent agency is CECW-COR.

Form Approved -
OMB No. 0710-0024
Expires 2027-09-30

DATA REQUIRED BY THE PRIVACY ACT OF 1974

Authority Rivers and Harbors Act, Section 10, 33 USC 403; Clean Water Act, Section 404, 33 USC 1344; Marine Protection, Research, and Sanctuaries Act, Section 103, 33 USC 1413; Regulatory Programs of the Corps of Engineers; Final Rule 33 CFR 320-332.

Principal Purpose The information that you provide will be used in evaluating your request to determine whether there are any aquatic resources within the review area that are or that may be subject to federal jurisdiction under the regulatory authorities referenced above.

Routine Uses This information may be shared with the Department of Justice and other federal, state, and local government agencies, and the public, and may be made available as part of a public notice or FOIA request as required by federal law. Your name and property location where federal jurisdiction is to be determined will be included in any approved jurisdictional determination (AJD), which will be made available to the public on the District's website and on the Headquarters USACE website.

Disclosure Submission of requested information is voluntary, however, if the information is not provided there may be some delay in processing your request. Failure to provide this information will not result in an adverse action.
System of Record Notice (SORN): The information received is entered into our permit tracking database and a SORN has been completed (SORN #A1145b) and may be accessed at the following website:
http://dpcld.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570115/a1145b-ce.aspx

The Agency Disclosure Notice (ADN)

The Public reporting burden for this collection of information, 0710-0024, is estimated to average 10 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or burden reduction suggestions to the Department of Defense, Washington Headquarters Services, at whs.mc-alex.esd.mbx.dd-dod-information-collections@mail.mil. Respondents should be aware that notwithstanding any other provision of law, no person shall be subject to any penalty for failing to comply with a collection of information if it does not display a currently valid OMB control number.

1. To (*District Name*): Omaha District- SD Regulatory Office

2. I am requesting a JD on property located at (*Street Address*): 440 SW 135th Street; 270 SW 135th Street; 90SW 135th Street

City/Township/Parish: Aberdeen County: Brown State: South Dakota

Acreage of Parcel/Review Area for JD: 176

Section: 25 Township: 123N Range: 64W

Latitude (*decimal degrees*): 45.260297 ° Longitude (*decimal degrees*): -98.294587 °

(*For linear projects, please include the center point of the proposed alignment.*)

3. Please attach a survey/plat map and vicinity map identifying location and review area for the JD.

4. ☐ I currently own this property. ☐ I plan to purchase this property.

☒ I am an agent/consultant acting on behalf of the requester.

☐ Other (*provide explanation*):

5. Reason for request: (*check as many as applicable*)

- [ ] I intend to construct/develop a project or perform activities on this parcel which would be designed to avoid all aquatic resources.
- [ ] I intend to construct/develop a project or perform activities on this parcel which would be designed to avoid all jurisdictional aquatic resources under Corps authority.
- [x] I intend to construct/develop a project or perform activities on this parcel which may require authorization from the Corps, and the JD would be used to avoid and minimize impacts to jurisdictional aquatic resources and as an initial step in a future permitting process.
- [ ] I intend to construct/develop a project or perform activities on this parcel which may require authorization from the Corps; this request is accompanied by my permit application and the JD is to be used in the permitting process.
- [ ] I intend to construct/develop a project or perform activities in a navigable water of the U.S. which is included on the district Section 10 list and/or is subject to the ebb and flow of the tide.
- [ ] A Corps JD is required in order to obtain my local/state authorization.
- [ ] I intend to contest jurisdiction over a particular aquatic resource and request the Corps confirm that jurisdiction does/does not exist over the aquatic resource on the parcel.
- [ ] I believe that the site may be comprised entirely of dry land.
- [ ] Other *(provide details below):*

6. Type of determination being requested:

- [x] I am requesting an approved JD.
- [ ] I am requesting a preliminary JD.
- [x] I am requesting a "no permit required" letter as I believe my proposed activity is not regulated.
- [ ] I am requesting a verification of an aquatic resources delineation but I am not requesting a JD.
- [ ] I am unclear as to which JD I would like to request and require additional information to inform my decision.

7. Typed or Printed Name: Alex Brazeal | Daytime Phone No.: 701-934-7830

Company Name: HDR Engineering, Inc. | Email Address: alex.brazeal@hdrinc.com

Address: 3231 Greensboro Drive, Suite 200
Bismarck, ND 58503

By signing below, you are indicating that you have the authority, or are acting as the duly authorized agent of a person or entity with such authority, to and do hereby grant Corps personnel right of entry to legally access the site if needed to perform the JD. Your signature shall be an affirmation that you possess the requisite property rights to request a JD on the subject property.

Signature: Brazeal, Alex Taylor Digitally signed by Brazeal, Alex Taylor Date: 2026.09.21 13:15:00 -05'00' | Date: 2026-09-21

Scott Leigh

From: SD Regulatory Mailbox <SDRegulatoryMailbox@usace.army.mil>
Sent: Friday, September 25, 2026 3:18 PM
To: Brazeal, Alex; SD Regulatory Mailbox
Cc: joshua.follman@northwestern.com; Lucostic, Seamus; benjamin.sorensen; Scott Leigh; Shuler, Carrie; Carlberg, Hadden J CIV USARMY CENWO (USA)
Subject: RE: (NWO-2026-01237-PIE) NWPS Hub City Energy Park - AJD Request

You don't often get email from sdregulatorymailbox@usace.army.mil. Learn why this is important

Thank you for contacting the US Army Corps of Engineers, South Dakota Regulatory Office. We have received your submittal.

Assigned Corps file number: NWO-2026-01237-PIE

Assigned Project Manager: Hadden Carlberg / Hadden.J.Carlberg@usace.army.mil

Please refer to this Corps file number in all future correspondence. We appreciate your interest in the US Army Corps of Engineers' Regulatory program. We will contact you for any questions.

South Dakota Regulatory Office
US Army Corps of Engineers, Omaha District
28563 Powerhouse Road
Pierre, SD 57501
605-224-8531
SDRegulatoryMailbox@usace.army.mil
https://www.nwo.usace.army.mil/Missions/Regulatory-Program/South-Dakota/

We are accepting permit applications, requests for jurisdictional determinations and pre-application requests through a website tool, the Regulatory Request System: https://rrs.usace.army.mil/rrs

The Omaha District is committed to providing the highest level of support to the public. To help us ensure we continue to do so, please complete the Customer Satisfaction Survey located at our website at https://regulatory.ops.usace.army.mil/customer-service-survey/

Final Permit Actions: https://permits.ops.usace.army.mil/

From: Brazeal, Alex <Alex.Brazeal@hdrinc.com>
Sent: Tuesday, September 22, 2026 3:40 PM
To: SD Regulatory Mailbox <SDRegulatoryMailbox@usace.army.mil>
Cc: Follman, Joshua <joshua.follman@northwestern.com>; Lucostic, Seamus <seamus.lucostic@northwestern.com>; Sorensen, Benjamin <benjamin.sorensen@northwestern.com>; Scott Leigh <scott.leigh@aionenergyllc.com>; Shuler,

Carrie <carrie.shuler@hdrinc.com>
Subject: [Non-DoD Source] (NWO-2026-01237-PIE) NWPS Hub City Energy Park - AJD Request

Hello,

NorthWestern Energy Public Service Corporation d/b/a (NorthWestern Energy) is planning to develop the Hub City Energy Park, a new, three-unit nominal 131 megawatt (MW) gross simple cycle combustion turbine facility (Project). The Project is adjacent to the existing Aberdeen Generating Station south of Aberdeen, SD and will interconnect to the electric grid at 115 kV via a new, on-site substation and will be fed natural gas from a nearby interstate pipeline. The Project covers approximately 176 acres within Section 25, Township 123N, Range 64W in Brown County, SD.

Please see the attached cover letter with attached project site plat map and enclosed Delineation report and eng form 6247 requesting an Approved Jurisdictional Determination of delineated aquatic resources within the Project Area.

If you have any questions during your review, please contact me directly at alex.brazeal@hdrinc.com, or 701-934-7830.

Thank you,

Alex T. Brazeal
Environmental Project Manager
HDR
3231 Greensboro Drive, Suite 200
Bismarck, ND 58503
C 701.934.7830
D 701.557.9731

alex.brazeal@hdrinc.com
hdrinc.com/follow-us

UNITED STATES DEPARTMENT OF AGRICULTURE – NATURAL RESOURCES CONSERVATION SERVICE (USDA-NRCS)

- 8/31/26 – Letter from NorthWestern to USDA-NRCS
- 9/2/26 – Letter from USDA-NRCS to NorthWestern

August 31, 2026

Sent Via Email (jessica.michalski@usda.gov)

Jessica Michalski
Acting State Conservationist
U.S. Department of Agriculture – Natural Resources Conservation Service
200 Fourth Street SW, Room 203
Huron, SD 57350

Re: NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy
Hub City Energy Park

Dear Jessica Michalski:

NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy ("NorthWestern") is developing the Hub City Energy Park (the "Project") adjacent to and to the north of its existing Aberdeen Generating Station ("AGS") near Aberdeen, South Dakota. The purpose of this letter is: (i) to introduce and provide an overview of the Project and (ii) to solicit any initial direction that you may have on the Project ahead of the provision of additional, detailed information.

The Project will consist of three (3) natural gas combustion turbines ("CTs") in simple cycle configuration totaling 131 MW (gross). The Project will be located on approximately 176 acres of NorthWestern-owned property in Section 25, Township 123 North, Range 64 West of the 5th P.M., to the south of the City of Aberdeen, South Dakota in Brown County – please see Attachment 1 for the Project location. The Project development was initiated as a result of NorthWestern's Integrated Resource Plan for South Dakota and the Southwest Power Pool ("SPP") Expedited Resource Adequacy Study ("ERAS") Procedures, both of which identified the need for additional capacity to maintain and improve electric grid reliability.

Subject to ongoing development, the Project plans to connect to a nearby interstate pipeline for the supply of natural gas, interconnect to the electric grid at 115 kV at the existing AGS Siebrecht substation, tie into the municipal water system for water needs, and connect to the municipal sewer system.

NorthWestern Energy has advanced various aspects of Project development and plans to submit an Energy Conversion Facility construction permit application to the South Dakota Public Utilities Commission ("Commission") in September 2026. Project construction is currently planned to begin in late 2027 or early 2028, with the Project planned to be operational in 2030. In support of the Project, NorthWestern has:

1. Submitted an Interconnection Request to SPP under the ERAS Procedures in October 2025 and expects the Project Generator Interconnection Agreement to be fully executed no later than September 2026;
2. Executed a procurement contract for the supply of the CTs for the Project, including backend selective catalytic reduction and oxidation catalyst systems for emissions control;
3. Submitted a Notice of Intent to apply for an Energy Conversion Facility construction permit to the Commission pursuant to SDCL § 49-41B-5 and ARSD ch. 20:10:22:02 (Docket No. EL25-038);
4. Secured the Project site;
5. Completed desktop and field surveys for wetlands/waterbodies, habitat/threatened and endangered species, cultural resources, and noise;
6. Initiated an engineer, procure, construct request for proposal process and is in the process of evaluating proposals; and
7. Held a Project open house in Aberdeen, South Dakota in July 2026.

NorthWestern plans to send additional correspondence with information specific to your agency in the near future. Understanding that detailed feedback will be dependent upon this future information, NorthWestern would welcome and appreciate any feedback, insights, or recommendations in the interim regarding the ongoing development of the Project or measures to be taken, in general.

Your consideration of this important NorthWestern Project is very much appreciated.

Sincerely,

Joshua Follman

Josh Follman
Project Director
Joshua.Follman@northwestern.com
O 406-498-3617

Cc: Ben Sorensen, Technical Advisor (benjamin.sorensen@northwestern.com)
Seamus Lucostic, Project Manager (seamus.lucostic@northwestern.com)
Scott Leigh, Consultant (scott.leigh@aionenergyllc.com)

Attachments

Attachment 1 Project Site Location Map

USDA Natural Resources Conservation Service
U.S. DEPARTMENT OF AGRICULTURE

South Dakota State Office
200 Fourth Street SW, Room 203
Huron, SD 57350

September 2, 2026

Mr. Joshua Follman
Northwestern Energy
11 East Park
Butte, Montana 59701

RE: Environmental Review for:
Aberdeen_Hub City Energy Park-3 Nat. Gas Combustion turbines project

Dear Mr. Follman,

Thank you for the opportunity to provide a Farmland Protection Policy Act (FPPA) review on this project. The project as outlined will have **no impact** on prime or important farmland.

If you have any questions, please contact me at (605) 352-1234.

Sincerely,

RYAN KRUSE
Acting State Resource Conservationist

cc:
Nathan Jones, State Soil Scientist, NRCS, Huron SO

USDA is an equal opportunity provider, employer, and lender.

UNITED STATES FISH AND WILDLIFE SERVICE

- 8/31/26 – Letter from NorthWestern to USFWS
- 9/16/26 – Letter (Species List) from USFWS to NorthWestern (via HDR)
- 9/18/26 – Letter (Bat Determination) from USFWS to NorthWestern (via HDR)

August 31, 2026

Sent Via Email (southdakotafieldoffice@fws.gov)

United States Fish and Wildlife Service – South Dakota Office
420 South Garfield Ave, Suite 400
Pierre, SD 57501

Re: NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy
Hub City Energy Park

South Dakota FWS Field Office Team:

NorthWestern Energy Public Service Corporation d/b/a NorthWestern Energy ("NorthWestern") is developing the Hub City Energy Park (the "Project") adjacent to and to the north of its existing Aberdeen Generating Station ("AGS") near Aberdeen, South Dakota. The purpose of this letter is: (i) to introduce and provide an overview of the Project and (ii) to solicit any initial direction that you may have on the Project ahead of the provision of additional, detailed information.

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Your consideration of this important NorthWestern Project is very much appreciated.

Sincerely,

Joshua Follman

Josh Follman
Project Director
Joshua.Follman@northwestern.com
O 406-498-3617

Cc: Ben Sorensen, Technical Advisor (benjamin.sorensen@northwestern.com)
Seamus Lucostic, Project Manager (seamus.lucostic@northwestern.com)
Scott Leigh, Consultant (scott.leigh@aionenergyllc.com)
Alex Brazeal, Environmental Project Manager (alex.brazeal@hdrinc.com)

Attachments

Attachment 1 Project Site Location Map

United States Department of the Interior

FISH AND WILDLIFE SERVICE
South Dakota Ecological Services Field Office
420 South Garfield Avenue, Suite 400
Pierre, SD 57501-5408
Phone: (605) 224-8693 Fax: (605) 224-1416
https://www.fws.gov/office/south-dakota-ecological-services

In Reply Refer To: 09/16/2026 19:57:59 UTC
Project Code: 2026-0087450
Project Name: Hub City Energy Park

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)

(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

https://www.fws.gov/media/endangered-species-consultation-handbook

Migratory Birds: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts see https://www.fws.gov/law/bald-and-golden-eagle-protection-act, https://www.fws.gov/media/endangered-species-act-1, and/or https://www.fws.gov/law/migratory-bird-treaty-act-1918.

It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures see https://www.fws.gov/birds/bird-enthusiasts/threats-to-birds.php.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit https://www.fws.gov/law/migratory-birds

Please be aware that bald and golden eagles are protected under the Migratory Bird Treaty Act (16 U.S.C. §§ 703-712, as amended), as well as the Bald and Golden Eagle Protection Act (16 U.S.C. 668 et seq.). Projects affecting these species may benefit from the development of an Eagle Conservation Plan (ECP), see guidance at this website (https://www.fws.gov/node/266177). An ECP can assist developers in achieving compliance with regulatory requirements, help avoid “take” of eagles at project sites, and provide biological support for eagle permit applications. Additionally, we recommend wind energy developments adhere to our Land-based Wind Energy Guidelines for minimizing impacts to migratory

birds and bats.
We have recently updated our guidelines for minimizing impacts to migratory birds at projects that have communication towers (including meteorological, cellular, digital television, radio, and emergency broadcast towers). These guidelines can be found at:

https://www.fws.gov/media/avoiding-and-minimizing-communication-tower-impacts-migratory-birds
https://www.fws.gov/library/collections/bird-friendly-communication-tower-toolkit

According to National Wetlands Inventory maps, (available online at https://www.fws.gov/library/collections/national-wetland-inventory) wetlands exist adjacent to the proposed construction corridor. If a project may impact wetlands or other important fish and wildlife habitats, the U.S. Fish and Wildlife Service (Service), in accordance with the National Environmental Policy Act of 1969 (42 U.S.C. 4321-4347) and other environmental laws and rules, recommends complete avoidance of these areas, if possible. If this is not possible, attempts should be made to minimize adverse impacts. Finally if adverse impacts are unavoidable, measures should be undertaken to replace the impacted areas. Alternatives should be examined and the least damaging practical alternative selected. If wetland impacts are unavoidable, a mitigation plan addressing the number and types of wetland acres to be impacted, and the methods of replacement should be prepared and submitted to the resource agencies for review.

Please check with your local wetland management district to determine whether Service interest lands exist at the proposed project site, the exact locations of these properties, and any additional restrictions that may apply regarding these sites. The Offices are listed below. If you are not sure which office to contact, we can help you make that decision.

U.S. Fish and Wildlife Service, Huron Wetland Management District, Federal Building, Room 309, 200 4th Street SW, Huron, SD 57350; telephone (605) 352-5894. Counties in the Huron WMD: Beadle, Buffalo, Hand, Hughes, Hyde, Jerauld, Sanborn, Sully.

U.S. Fish and Wildlife Service, Lake Andes Wetland Management District, P O Box 18, Pickstown, South Dakota, 57367; telephone (605) 487-7603. Counties in the Lake Andes WMD: Aurora, Brule, Charles Mix, Davison, Douglas.

U.S. Fish and Wildlife Service, Madison Wetland Management District, P.O. Box 48, Madison, South Dakota, 57042, telephone (605) 256-2974. Counties in the Madison WMD: Bon Homme, Brookings, Clay, Deuel, Hamlin, Hanson, Hutchinson, Kingsbury, Lake, Lincoln, McCook, Miner, Minnehaha, Moody, Turner, Union, Yankton.

U.S. Fish and Wildlife Service, Sand Lake Wetland Management District, 39650 Sand Lake Drive, Columbia, South Dakota, 57433; telephone (605) 885-6320. Counties in the Sand Lake WMD: Brown, Campbell, Edmunds, Faulk, McPherson, Potter, Spink, Walworth.

U.S. Fish and Wildlife Service, Waubay Wetland Management District, 44401 134A Street, Waubay, South Dakota, 57273; telephone (605) 947-4521. Counties in the Waubay WMD: Clark, Codington, Day,

Grant, Marshall, Roberts.

You are welcome to visit our website (https//www.fws.gov/office/southdakota-ecological-services) or to contact our office/staff at the address or phone number above for more information.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List
- USFWS National Wildlife Refuges and Fish Hatcheries
- Bald & Golden Eagles
- Migratory Birds
- Wetlands

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

South Dakota Ecological Services Field Office
420 South Garfield Avenue, Suite 400
Pierre, SD 57501-5408
(605) 224-8693

PROJECT SUMMARY

Project Code: 2026-0087450
Project Name: Hub City Energy Park
Project Type: Refining - Energy
Project Description: NorthWestern Energy Public Service Corporation d/b/a (NorthWestern Energy) is planning to develop Hub City Energy Park; a new, three-unit nominal 131 megawatt (MW) simple cycle combustion turbine facility (Project). The Project is adjacent to the existing Aberdeen Generating Station south of Aberdeen, SD and will interconnect to the electric grid at 115 kV via a new, on-site substation and will be fed natural gas from a nearby interstate pipeline. The Project covers approximately 176 acres within Section 25, Township 123N, Range 64W in Brown County, SD

Project Location:

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@45.43560775,-98.48656751707465,14z



Counties: Brown County, South Dakota

ENDANGERED SPECIES ACT SPECIES

There is a total of 7 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries[1], as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

---

1. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

MAMMALS

NAME	STATUS
Northern Long-Eared Bat *Myotis septentrionalis* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9045	Endangered

BIRDS

NAME	STATUS
rufa red knot *Calidris canutus rufa* There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/1864	Threatened
Whooping crane *Grus americana* Population: Wherever found, except where listed as an experimental population There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/758	Endangered

INSECTS

NAME	STATUS
Dakota Skipper *Hesperia dacotae* There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/1028	Threatened
Monarch butterfly *Danaus plexippus* There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9743	Proposed Threatened
Suckley's cuckoo bumble bee *Bombus suckleyi* Population: No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/10885	Proposed Endangered
Western regal fritillary *Argynnis idalia occidentalis* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/12017	Proposed Threatened

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the National Wildlife Refuge system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

BALD & GOLDEN EAGLES

Bald and Golden Eagles are protected under the Bald and Golden Eagle Protection Act [2] and the Migratory Bird Treaty Act (MBTA) [1]. Any person or organization who plans or conducts activities that may result in impacts to Bald or Golden Eagles, or their habitats, should follow appropriate regulations and consider implementing appropriate avoidance and minimization measures, as described in the various links on this page.

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1. The Bald and Golden Eagle Protection Act of 1940.
2. The Migratory Birds Treaty Act of 1918.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

There are Bald Eagles and/or Golden Eagles in your project area.

Measures for Proactively Minimizing Eagle Impacts
For information on how to best avoid and minimize disturbance to nesting bald eagles, please review the National Bald Eagle Management Guidelines. You may employ the timing and activity-specific distance recommendations in this document when designing your project/ activity to avoid and minimize eagle impacts. For bald eagle information specific to Alaska, please refer to Bald Eagle Nesting and Sensitivity to Human Activity.

The FWS does not currently have guidelines for avoiding and minimizing disturbance to nesting Golden Eagles. For site-specific recommendations regarding nesting Golden Eagles, please consult with the appropriate Regional Migratory Bird Office or Ecological Services Field Office.

If disturbance or take of eagles cannot be avoided, an incidental take permit may be available to authorize any take that results from, but is not the purpose of, an otherwise lawful activity. For assistance making this determination for Bald Eagles, visit the Do I Need A Permit Tool. For assistance making this determination for golden eagles, please consult with the appropriate Regional Migratory Bird Office or Ecological Services Field Office.

Ensure Your Eagle List is Accurate and Complete
If your project area is in a poorly surveyed area in IPaC, your list may not be complete and you may need to rely on other resources to determine what species may be present (e.g. your local FWS field office, state surveys, your own surveys). Please review the Supplemental Information

on Migratory Birds and Eagles, to help you properly interpret the report for your specified location, including determining if there is sufficient data to ensure your list is accurate.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to bald or golden eagles on your list, see the "Probability of Presence Summary" below to see when these bald or golden eagles are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bald Eagle *Haliaeetus leucocephalus* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Dec 1 to Aug 31

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "Supplemental Information on Migratory Birds and Eagles", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

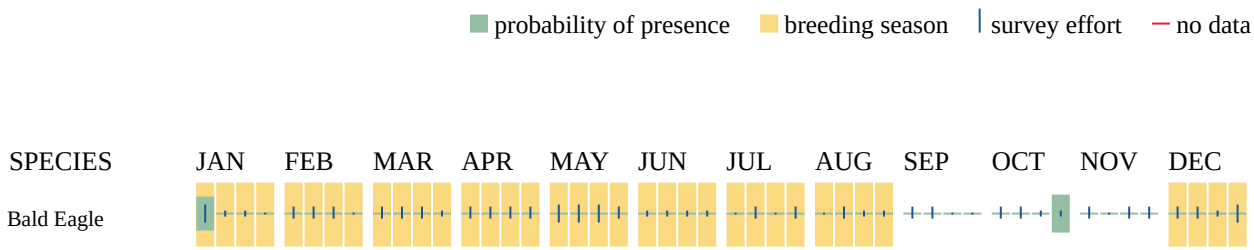
Probability of Presence (▪)

Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

Breeding Season (▪)
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

Survey Effort (|)
Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data (–)
A week is marked as having no data if there were no survey events for that week.



Non-BCC
Vulnerable

Additional information can be found using the following links:

- Eagle Management https://www.fws.gov/program/eagle-management
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
- Nationwide avoidance and minimization measures for birds https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf
- Supplemental Information for Migratory Birds and Eagles in IPaC https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action

MIGRATORY BIRDS

The Migratory Bird Treaty Act (MBTA) [1] prohibits the take (including killing, capturing, selling, trading, and transport) of protected migratory bird species without prior authorization by the Department of Interior U.S. Fish and Wildlife Service (Service).

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1. The Migratory Birds Treaty Act of 1918.
2. The Bald and Golden Eagle Protection Act of 1940.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the "Probability of Presence Summary" below to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
American Golden-Plover *Pluvialis dominica* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/10561	Breeds elsewhere
Bald Eagle *Haliaeetus leucocephalus* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Dec 1 to Aug 31

NAME	BREEDING SEASON
Black Tern *Chlidonias niger surinamenisis* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/3093	Breeds May 15 to Aug 20
Bobolink *Dolichonyx oryzivorus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9454	Breeds May 20 to Jul 31
California Gull *Larus californicus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/10955	Breeds Mar 1 to Jul 31
Chimney Swift *Chaetura pelagica* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9406	Breeds Mar 15 to Aug 25
Franklin's Gull *Leucophaeus pipixcan* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/10567	Breeds May 1 to Jul 31
Golden-winged warbler *Vermivora chrysoptera* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/8745	Breeds May 1 to Jul 20
Hudsonian Godwit *Limosa haemastica* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9482	Breeds elsewhere
Lesser Yellowlegs *Tringa flavipes* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9679	Breeds elsewhere
Marbled Godwit *Limosa fedoa* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9481	Breeds May 1 to Jul 31
Northern Harrier *Circus hudsonius* This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/8350	Breeds Apr 1 to Sep 15

NAME	BREEDING SEASON
Pectoral Sandpiper *Calidris melanotos* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9561	Breeds elsewhere
Red-headed Woodpecker *Melanerpes erythrocephalus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9398	Breeds May 10 to Sep 10
Western Grebe *Aechmophorus occidentalis* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/6743	Breeds Jun 1 to Aug 31
Willet *Tringa semipalmata* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/10669	Breeds Apr 20 to Aug 5

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "Supplemental Information on Migratory Birds and Eagles", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

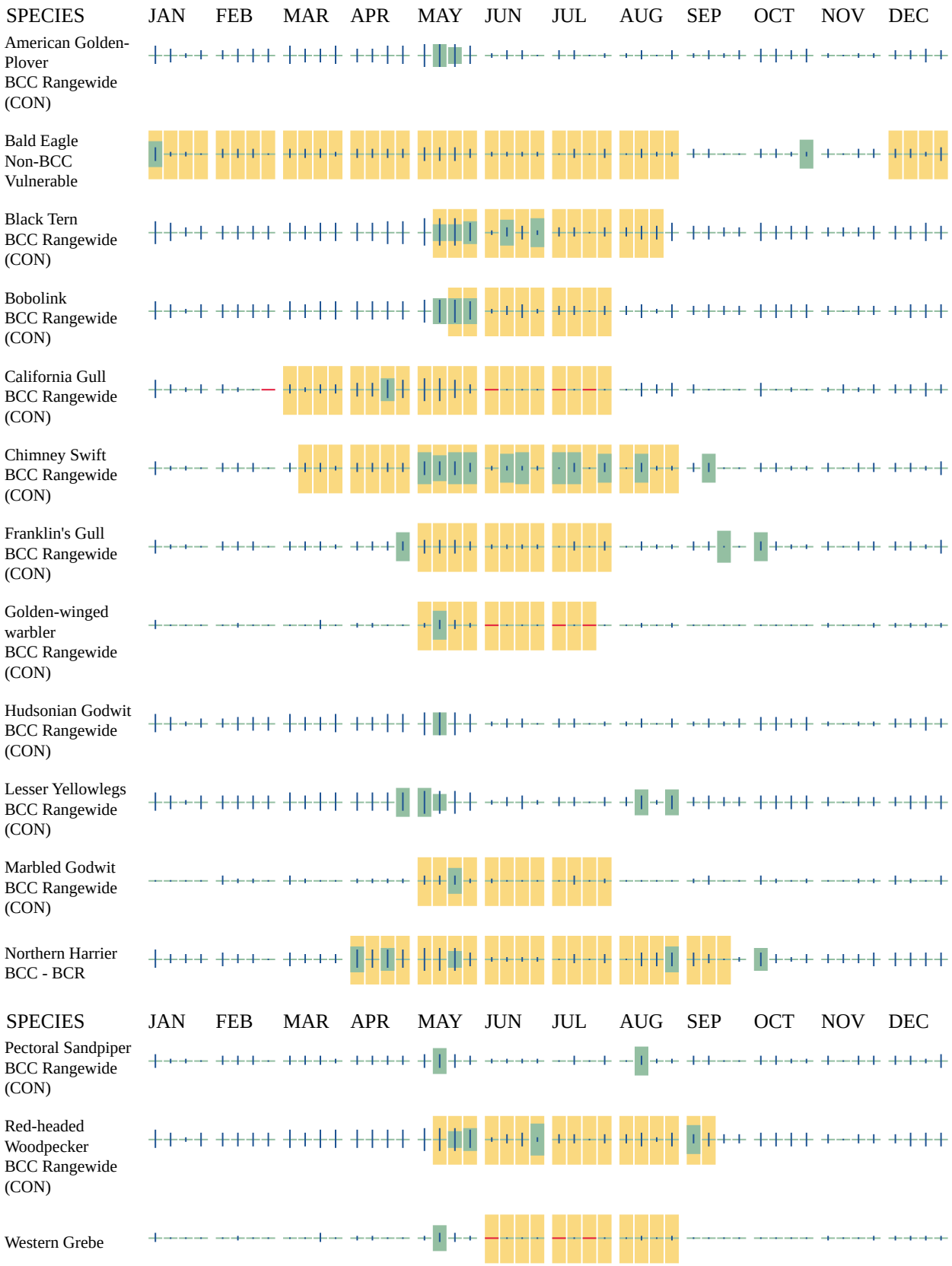
Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

Breeding Season (■)
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

Survey Effort (|)
Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

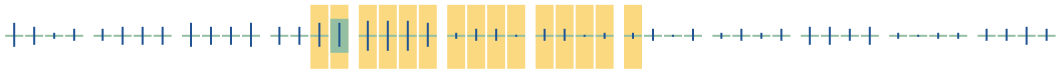
No Data (–)
A week is marked as having no data if there were no survey events for that week.

■ probability of presence ■ breeding season | survey effort – no data


SPECIES
JAN
FEB
MAR
APR
MAY
JUN
JUL
AUG
SEP
OCT
NOV
DEC
American Golden-Plover BCC Rangewide (CON)
Bald Eagle Non-BCC Vulnerable
Black Tern BCC Rangewide (CON)
Bobolink BCC Rangewide (CON)
California Gull BCC Rangewide (CON)
Chimney Swift BCC Rangewide (CON)
Franklin's Gull BCC Rangewide (CON)
Golden-winged warbler BCC Rangewide (CON)
Hudsonian Godwit BCC Rangewide (CON)
Lesser Yellowlegs BCC Rangewide (CON)
Marbled Godwit BCC Rangewide (CON)
Northern Harrier BCC - BCR
SPECIES
JAN
FEB
MAR
APR
MAY
JUN
JUL
AUG
SEP
OCT
NOV
DEC
Pectoral Sandpiper BCC Rangewide (CON)
Red-headed Woodpecker BCC Rangewide (CON)
Western Grebe

BCC Rangewide (CON)

Willet
BCC Rangewide (CON)



Additional information can be found using the following links:

- Eagle Management https://www.fws.gov/program/eagle-management
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
- Nationwide avoidance and minimization measures for birds
- Supplemental Information for Migratory Birds and Eagles in IPaC https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action

WETLANDS

Impacts to NWI wetlands and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local U.S. Army Corps of Engineers District.

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

FRESHWATER EMERGENT WETLAND

- PEM1C
- PEM1Cx
- PEM1A

IPAC USER CONTACT INFORMATION

Agency:	Private Entity
Name:	Alex Brazeal
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Email	alex.brazeal@hdrinc.com
Phone:	7015579731

United States Department of the Interior

FISH AND WILDLIFE SERVICE
South Dakota Ecological Services Field Office
420 South Garfield Avenue, Suite 400
Pierre, SD 57501-5408
Phone: (605) 224-8693 Fax: (605) 224-1416

In Reply Refer To: 09/18/2026 20:26:24 UTC
Project code: 2026-0087450
Project Name: Hub City Energy Park

Federal Nexus: no
Federal Action Agency (if applicable):

Subject: Record of project representative's no effect determination with the Northern Long-eared Bat and Tricolored Bat Range-wide Determination Key for 'Hub City Energy Park'

Dear Alex Brazeal:

This letter records your determination using the Information for Planning and Consultation (IPaC) system provided to the U.S. Fish and Wildlife Service (Service) on September 18, 2026, for 'Hub City Energy Park' (here forward, Project). This project has been assigned Project Code 2026-0087450 and all future correspondence should clearly reference this number. **Please carefully review this letter.**

Ensuring Accurate Determinations When Using IPaC

The Service developed the IPaC system and associated species' determination keys in accordance with the Endangered Species Act of 1973 (ESA; 87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.) and based on a standing analysis. All information submitted by the Project proponent into IPaC must accurately represent the full scope and details of the Project.

Failure to accurately represent or implement the Project as detailed in IPaC or the **Northern Long-eared Bat and Tricolored Bat Range-wide Determination Key (Dkey)**, invalidates this letter. ***Answers to certain questions in the DKey commit the project proponent to implementation of conservation measures that must be followed for the ESA determination to remain valid.***

Determination for the Northern Long-Eared Bat and/or Tricolored Bat

Based upon your IPaC submission and a standing analysis, your project has reached the following effect determinations:

Species	Listing Status	Determination

Northern Long-Eared Bat (*Myotis septentrionalis*)	Endangered	No effect

To make a no effect determination, the full scope of the proposed project implementation (action) should not have any effects (either positive or negative), to a federally listed species or designated critical habitat. Effects of the action are all consequences to listed species or critical habitat that are caused by the proposed action, including the consequences of other activities that are caused by the proposed action. A consequence is caused by the proposed action if it would not occur but for the proposed action and it is reasonably certain to occur. Effects of the action may occur later in time and may include consequences occurring outside the immediate area involved in the action. (See § 402.17).

Under Section 7 of the ESA, if a federal action agency makes a no effect determination, no consultation with the Service is required (ESA §7). If a proposed Federal action may affect a listed species or designated critical habitat, formal consultation is required except when the Service concurs, in writing, that a proposed action "is not likely to adversely affect" listed species or designated critical habitat [50 CFR §402.02, 50 CFR§402.13].

Other Species and Critical Habitat that May be Present in the Action Area

The IPaC-assisted determination key for the northern long-eared bat and tricolored bat does not apply to the following ESA-protected species and/or critical habitat that also may occur in your Action area:

- Dakota Skipper *Hesperia dacotae* Threatened
- Monarch butterfly *Danaus plexippus* Proposed Threatened
- rufa red knot *Calidris canutus rufa* Threatened
- Suckley's cuckoo bumble bee *Bombus suckleyi* Proposed Endangered
- Western regal fritillary *Argynnis idalia occidentalis* Proposed Threatened
- Whooping crane *Grus americana* Endangered

You may coordinate with our Office to determine whether the Action may affect the animal species listed above and, if so, how they may be affected.

Next Steps

If there are no updates on listed species, no further consultation/coordination for this project is required with respect to the species covered by this key. However, the Service recommends that project proponents re-evaluate the Project in IPaC if: 1) the scope, timing, duration, or location of the Project changes (includes any project changes or amendments); 2) new information reveals the Project may impact (positively or negatively) federally listed species or designated critical habitat; or 3) a new species is listed, or critical habitat designated. If any of the above conditions occurs, additional coordination with the Service should take place to ensure compliance with the Act.

If you have any questions regarding this letter or need further assistance, please contact the South Dakota Ecological Services Field Office and reference Project Code 2026-0087450 associated with this Project.

Action Description
You provided to IPaC the following name and description for the subject Action.

1. Name

Hub City Energy Park

2. Description

The following description was provided for the project 'Hub City Energy Park':

> NorthWestern Energy Public Service Corporation d/b/a (NorthWestern Energy) is planning to develop Hub City Energy Park; a new, three-unit nominal 131 megawatt (MW) simple cycle combustion turbine facility (Project). The Project is adjacent to the existing Aberdeen Generating Station south of Aberdeen, SD and will interconnect to the electric grid at 115 kV via a new, on-site substation and will be fed natural gas from a nearby interstate pipeline. The Project covers approximately 176 acres within Section 25, Township 123N, Range 64W in Brown County, SD

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@45.43560775,-98.48656751707465,14z



DETERMINATION KEY RESULT

Based on the information you provided, you have determined that the Proposed Action will have no effect on the species covered by this determination key. Therefore, no consultation with the U.S. Fish and Wildlife Service pursuant to Section 7(a)(2) of the Endangered Species Act of 1973 (87 Stat. 884, as amended 16 U.S.C. 1531 *et seq.*) is required for those species.

QUALIFICATION INTERVIEW

1. Does the proposed project include, or is it reasonably certain to cause, intentional take of listed bats or any other listed species that is not covered by an existing section 10 (a)(1)(A) Recovery Permit, exempted under section 4(d) or authorized by a section 6 cooperative agreement? **Note:** Intentional take is defined as take that is the intended result of a project. Intentional take could refer to research, direct species management, surveys, and/or studies that include intentional handling/ encountering, harassment, collection, or capturing of any individual of a federally listed threatened, endangered or proposed species?

   No

2. Is the action area wholly within Zone 2 of the year-round active area for northern long-eared bat and/or tricolored bat?

   Automatically answered
   No

3. Does the action area intersect Zone 1 of the year-round active area for northern long-eared bat and/or tricolored bat?

   Automatically answered
   No

4. Does any component of the action involve leasing, construction or operation of wind turbines? Answer 'yes' if the activities considered are conducted with the intention of gathering survey information to inform the leasing, construction, or operation of wind turbines.

   No

5. Is the proposed action authorized, permitted, licensed, funded, or being carried out by a Federal agency in whole or in part?

   Note for projects in Pennsylvania: Projects requiring authorization under Section 404 of the Clean Water Act and/or Section 10 of the Rivers and Harbors Act would be considered as having a federal nexus. Since the U.S. Army Corps of Engineers (Corps) has issued the Pennsylvania State Programmatic General Permit (PASPGP), which may be verified by the PA Department of Environmental Protection or certain Conservation Districts, the need to receive a Corps authorization to perform the work under the PASPGP serves as a federal nexus. As such, if proposing to use the PASPGP, you would answer ‘yes’ to this question.

   No

6. [Semantic] Is the action area located within 0.5 miles of a known bat hibernaculum or winter roost? Note: The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your state wildlife agency.

   Automatically answered
   No

7. Does the action area contain any winter roosts or caves (or associated sinkholes, fissures, or other karst features), mines, rocky outcroppings, or tunnels that could provide habitat for hibernating bats?

   No

8. Does the action area contain (1) talus or (2) anthropogenic or naturally formed rock shelters or crevices in rocky outcrops, rock faces or cliffs?

   No

9. Is the action located in New England (CT, MA, ME, NH, RI, or VT)?

   No

10. Will the action cause effects to a bridge?

    Note: Covered bridges should be considered as bridges in this question.

    No

11. Will the action result in effects to a culvert or tunnel at any time of year?

    No

12. Are trees present within 1000 feet of the action area? **Note:** If there are trees within the action area that are of a sufficient size to be potential roosts for bats answer "Yes". If unsure, additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines.

    Yes

13. Does the action include the intentional exclusion of bats from a building or building-like structure? **Note:** Exclusion is conducted to deny bats' entry or reentry into a building. To be effective and to avoid harming bats, it should be done according to established standards. If your action includes bat exclusion and you are unsure whether northern long-eared bats or tricolored bats are present, answer "Yes." Answer "No" if there are no signs of bat use in the building/structure. If unsure, contact your local Ecological Services Field Office to help assess whether northern long-eared bats or tricolored bats may be present. Contact a Nuisance Wildlife Control Operator (NWCO) for help in how to exclude bats from a structure safely without causing harm to the bats (to find a NWCO certified in bat standards, search the Internet using the search term "National Wildlife Control Operators Association bats"). Also see the White-Nose Syndrome Response Team's guide for bat control in structures.

    No

14. Does the action involve removal, modification, or maintenance of a human-made building-like structure (barn, house, or other building) **known or suspected to contain roosting bats?**

    No

15. Will the action cause construction of one or more new roads open to the public?

    For federal actions, answer ‘yes’ when the construction or operation of these facilities is either (1) part of the federal action or (2) would not occur but for an action taken by a federal agency (federal permit, funding, etc.).

    No

16. Will the action include or cause any construction or other activity that is reasonably certain to increase average night-time traffic permanently or temporarily on one or more existing roads? **Note:** For federal actions, answer ‘yes’ when the construction or operation of these facilities is either (1) part of the federal action or (2) would not occur but for an action taken by a federal agency (federal permit, funding, etc.). .

    No

17. Will the action include or cause any construction or other activity that is reasonably certain to increase the number of travel lanes on an existing thoroughfare?

    For federal actions, answer ‘yes’ when the construction or operation of these facilities is either (1) part of the federal action or (2) would not occur but for an action taken by a federal agency (federal permit, funding, etc.).

    No

18. Will the proposed Action involve the creation of a new water-borne contaminant source (e.g., leachate pond, pits containing chemicals that are not NSF/ANSI 60 compliant)?

    Note: For information regarding NSF/ANSI 60 please visit https://www.nsf.org/knowledge-library/nsf-ansi-standard-60-drinking-water-treatment-chemicals-health-effects

    No

19. Will the proposed action involve the creation of a new point source discharge from a facility other than a water treatment plant or storm water system?

    No

20. Will the action include drilling or blasting?

    No

21. Will the action involve military training (e.g., smoke operations, obscurant operations, exploding munitions, artillery fire, range use, helicopter or fixed wing aircraft use at night)?

    No

22. Will the proposed action involve the use of herbicides or pesticides (e.g., fungicides, insecticides, or rodenticides)?

    No

23. Will the action include or cause activities that are reasonably certain to cause chronic or intense nighttime noise (above current levels of ambient noise in the area) in suitable summer habitat for the northern long-eared bat or tricolored bat during the active season? Chronic noise is noise that is continuous or occurs repeatedly again and again for a long time. Sources of chronic or intense noise that could cause adverse effects to bats may include, but are not limited to: road traffic; trains; aircraft; industrial activities; gas compressor stations; loud music; crowds; oil and gas extraction; construction; and mining. **Note:** Additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines.

    No

24. Does the action include, or is it reasonably certain to cause, the use of permanent or temporary artificial lighting within 1000 feet of suitable forested northern long-eared bat or tricolored bat roosting habitat? **Note:** Additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines.

    Yes

25. Will the action cause an increase in the extent of suitable forested habitat exposed to artificial lighting?

    No

26. Will the action include tree cutting or other means of knocking down or bringing down trees, tree topping, or tree trimming?

    No

27. Will the proposed action result in the use of prescribed fire?

    Note: If the prescribed fire action includes other activities than application of fire (e.g., tree cutting, fire line preparation) please consider impacts from those activities within the previous representative questions in the key. This set of questions only considers impacts from flame and smoke.

    No

28. Does the action area intersect the northern long-eared bat species list area?

    Automatically answered
    Yes

29. [Semantic] Is the action area located within 0.5 miles of radius of an entrance/opening to any known NLEB hibernacula or winter roost? Note: The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your State wildlife agency.

    Automatically answered
    No

30. [Semantic] Is the action area located within 0.25 miles of a culvert that is known to be occupied by northern long-eared or tricolored bats? **Note:** The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your State wildlife agency.

    Automatically answered
    No

31. [Semantic] Is the action area located within 150 feet of a documented northern long-eared bat roost site?

    Note: The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your State wildlife agency.Have you contacted the appropriate agency to determine if your action is within 150 feet of any documented northern long-eared bat roosts?

    Note: A document with links to Natural Heritage Inventory databases and other state-specific sources of information on the locations of northern long-eared bat roosts is available here. Location information for northern long-eared bat roosts is generally kept in state natural heritage inventory databases – the availability of this data varies by state. Many states provide online access to their data, either directly by providing maps or by providing the opportunity to make a data request. In some cases, to protect those resources, access to the information may be limited.

    Automatically answered
    No

32. Is suitable summer habitat for the northern long-eared bat present within 1000 feet of project activities? If unsure, answer "Yes." **Note:** Additional information defining suitable summer habitat for the northern long-eared bat and tricolored bat can be found in the USFWS' Range-wide Indiana Bat and Northern long-eared bat Survey Guidelines

    Yes

33. Has a presence/probable absence summer bat survey targeting the northern long-eared bat following the Service's Range-wide Indiana Bat and Northern Long-Eared Bat Survey Guidelines been conducted within the project area?

    No

34. Do you have any documents that you want to include with this submission?

    No

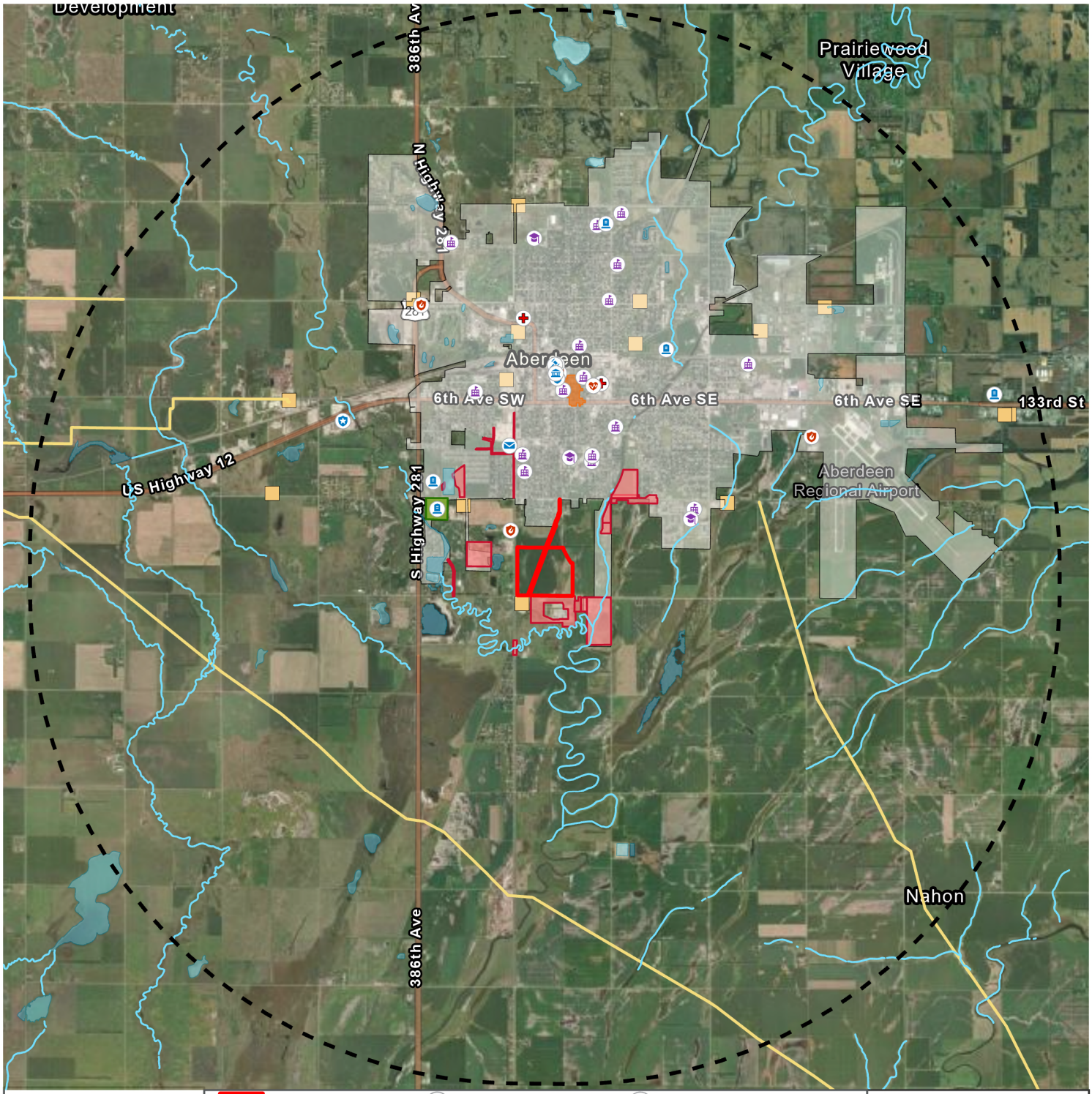
PROJECT QUESTIONNAIRE

IPAC USER CONTACT INFORMATION

Agency: Private Entity
Name: Alex Brazeal
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OVERVIEW MAP SENT WITH NORTHWESTERN PROJECT OVERVIEW LETTERS

(Sent to agencies/entities on 8/31/26 and tribes on 9/1/26 – single map included in Appendix to reduce file size)



SITE MAP
ABERDEEN III
ABERDEEN, SD

N

0 0.25 0.5
MILES

NorthWestern Energy
Delivering a Bright Future

HDR

- Project Location
- LRC_ReviewZone
- Cultural Surveys
- Waterbodies
- Riverside Memorial Park
- Historic District
- Municipal Boundary

Local Sites

- School
- College / University
- Technical / Trade School
- Ambulance Service
- Fire Station / EMS Station
- Law Enforcement
- Post Office
- Hospital / Medical Center
- Cemetery
- Court House
- City / Town Hall
- Electric Substations
- National Register of Historic Places
- Aviation Facilities
- Rivers & Streams
- Natural Gas Pipelines Transmission

