

LEGGETTE, BRASHEARS & GRAHAM, INC.

PROFESSIONAL GROUNDWATER AND ENVIRONMENTAL ENGINEERING SERVICES

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April 4, 2016

Mr. Dennis Odens
Banner Associates, Inc.
409 22nd Avenue South
Brookings, SD 57006

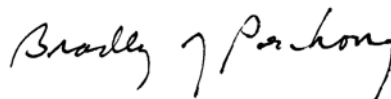
RE: Phase I Environmental Site Assessment
Lewis and Clark Regional Water System
Segment MN-4
Olney, Dewald and Worthington Townships
Nobles, MN

Dear Mr. Odens:

Leggette, Brashears & Graham, Inc. has completed the Phase I Environmental Site Assessment at the referenced site. We appreciate the opportunity to assist you on this project.

If you have any questions about this report, or need any additional information, please do not hesitate to contact me at (605) 334-6000.

Sincerely,
LEGGETTE, BRASHEARS & GRAHAM, INC.



Bradley Peschong
Project Manager

BJP:kk

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Enclosure

**Phase I Environmental
Site Assessment Report**

**Lewis and Clark Regional Water System Segment MN-4
Olney, Dewald and Worthington Townships
Nobles County, MN 56187**

Prepared for

Banner Associates, Inc.
409 22nd Ave South, PO Box 298
Brookings, SD 57006

Prepared by

Leggette, Brashears & Graham, Inc.
140 E Hinks Lane, Ste 126
Sioux Falls, SD 57104
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Job Number: 0615.BANLC4.PI
04/04/2016

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1.0 General Information

Project Information:

Lewis and Clark Regional Water System Segment MN-4

Project Number:

0615.BANLC4.PI

Consultant Information:

Leggette, Brashears & Graham, Inc.

140 E Hinks Lane, Ste 126

Sioux Falls, SD 57104

Phone: 605.334.6000

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Inspection Date: 02/19/2016

Report Date: 04/04/2016

Site Information:

Lewis and Clark Regional Water System Segment MN-4

Olney, Dewald and Worthington Townships

Nobles County, MN 56187

County: Nobles

Latitude, Longitude: 433610.560000, 433610.560000

Site Access Contact: Dennis Odens

Client Information:

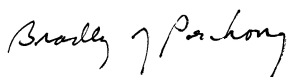
Banner Associates, Inc.

Dennis Odens

409 22nd Ave South, PO Box 298

Brookings, SD 57006

Site Assessor



Bradley J. Peschong
Senior Project Manager

Senior Reviewer



Kimberly Blomker
Senior Vice President

Certification:

I declare that, to the best of my professional knowledge and belief, I meet the definition of Environmental Professional as defined in 40 CFR Part 312. I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. I have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.



Bradley J. Peschong - Senior Project Manager

2.0 Executive Summary

2.1 Subject Property Description

The Subject Property is known as Lewis and Clark Treated Water Pipeline Segment MN-4 and is located in Olney, Dewald and Worthington Townships, Nobles County, Minnesota (Figure 1). The Subject Property consists of approximately 15 miles of easement corridor for the proposed rural water pipeline. The corridor traverses forty-seven (47) generally contiguous parcels separated by intermittent state, county, township and city right-of-way. For the purposes of this report, the corridor will be referred to herein as the "Subject Property." Where required, individual parcel numbers will be utilized for descriptive purposes.

Segment MN-4 easement is a total of 90 feet wide (50-foot permanent plus 40-foot temporary easement) and extends from Section 27 T102N R42W (Olney Township) southeast of Adrian, MN, to Section 26 T102N R40W (Worthington Township) in Worthington, MN.



2.0 Executive Summary (continued)

2.1 Subject Property Description (continued)

The Subject Property is located primarily in cultivated agricultural land. Portions of the corridor are residential properties. Right of way and vacant properties are located on the Subject Property in Worthington, MN.

2.2 Data Gaps

A data gap was encountered for this project. It was not possible to determine the first developed use of the Subject Property as the properties were already developed as 'agricultural' in the earliest historical data. It is assumed that the first developed use is agricultural based on the location and inferred use and ownership of the properties. It is not anticipated that this data gap is significant and the data gap should not limit the conclusions contained in this report.

2.3 Environmental Report Summary

Leggette, Brashears & Graham, Inc. has performed a Phase I Environmental Site Assessment (Phase I ESA), in conformance with the Scope of Work developed in cooperation with the client and the provisions of ASTM Practice E 1527-13. Any exceptions to, or deletions from, this practice are described in Section 3.5 of this report.

Within the scope of this investigation, Leggette, Brashears & Graham, Inc. discovered evidence of Recognized Environmental Conditions (RECs) or significant environmental concerns in connection with the Subject Property.

A REC was identified for Parcel 4-47, which is the site of historical lake bottom dredge fill materials from nearby Lake Okabena. Materials dredged from lakes in urban settings such as Lake Okabena typically receive runoff from streets and nearby commercial areas that may contain heavy metals, volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), and petroleum hydrocarbons. The sediments from lake bottoms are generally highly organic and in combination with the compounds listed, may generate hydrogen sulfide or methane, which may pose additional concerns. Furthermore, the fill area may have been unrestricted during placement of the fill material. Therefore, the possibility that material other than lake bottom sediment was disposed in the fill area cannot be ruled out. The potential risk(s) associated with the historical fill at 4-47 is unknown and is inferred to be low, but based on the lack of existing information related to this fill area, a REC cannot be ruled out. If required by the risk tolerance of the client, additional assessment would be required to characterize the sediments at 4-47. This additional assessment would include, but not necessarily be limited to, sampling and chemical analysis of suspected impacted media (soil, water).

Report Section		No Further Action	REC	HREC	Issue/Further Investigation	Comments
4.4	Current Use of Property	X				
4.6	Adjoining Property Information	X				
6.1	Standard Environmental Records Sources		X			Parcel 4-47 is located at an historical lake dredge fill site.
6.4.1	Historical Summary		X			Parcel 4-47 is located at an historical lake dredge fill site.
6.4.7	Other Environmental Reports	X				
7.3.1	Hazardous Substances	X				
7.3.3	USTs	X				
7.3.4	ASTs	X				
7.3.5	Other Suspect Containers	X				
7.3.6	Equipment Likely to Contain PCBs	X				
7.3.11	Stained Soil/Stressed Vegetation	X				
9.1	Asbestos-Containing Materials	X				
9.2	Lead-Based Paint	X				



2.0 Executive Summary (continued)

2.3 Environmental Report Summary (continued)

Report Section	No Further Action	REC	HREC	Issue/Further Investigation	Comments
9.3 Radon	X				

2.4 Recommendations

A REC was identified on the Subject Property. If required by the risk tolerance of the client, additional assessment would be required to provide information on the impact of these concerns of the property on soil or groundwater if any. This additional assessment may include but is not necessarily limited to performance of soil and groundwater sampling, and laboratory chemical analysis.

3.0 Introduction

3.1 Purpose

The purpose of the Phase I ESA was to evaluate the current and historical conditions of the Subject Property in an effort to identify RECs in connection with the Subject Property.

A REC is defined by ASTM as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. The term is not intended to include de minimis conditions that generally do not present a material risk to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate government agencies.

The identification of RECs in connection with the Subject Property may impose an environmental liability on owners or operators of the site, reduce the value of the site, or restrict the use or marketability of the site, and therefore, further investigation may be warranted to evaluate the scope and extent of potential environmental liabilities.

3.2 Scope of Work

The Phase I ESA conducted at the Subject Property was in general accordance with ASTM Standard E 1527-13 and included the following:

- Review of previous environmental site assessments;
- Records review;
- Interviews with regulatory officials and personnel associated with the subject and adjoining properties;
- A site visit; and
- Evaluation of information and preparation of the report provided herein.

Typically, a Phase I ESA does not include sampling or testing of air, soil, groundwater, surface water, or building materials. These activities would be carried out in a Phase II ESA, if required. For this Phase I ESA, no additions to the ASTM E 1527-13 standard were made with the exception of the identification of wetlands as on the National Wetlands Inventory maintained by the U.S. Fish and Wildlife Service.

3.3 Significant Assumptions

There is a possibility that even with the proper application of these methodologies there may exist on the Subject Property conditions that could not be identified within the scope of the assessment or which were not reasonably identifiable from the available information. Leggette, Brashears & Graham, Inc. believes that the information obtained from the record review and the interviews concerning the site is reliable. However, Leggette, Brashears & Graham, Inc. cannot and does not warrant or guarantee that the information provided by these other sources is accurate or complete. The methodologies of this assessment are not intended to produce all inclusive or comprehensive results, but rather to provide Banner Associates, Inc. with information relating to the Subject Property from which to make informed decisions.



3.0 Introduction (continued)

3.4 Limitations and Exceptions

Along with all of the limitations set forth in various sections of the ASTM E 1527-13 protocol, the accuracy and completeness of this report may be limited by the following:

Access Limitations - None

Physical Obstructions to Observations - Snow cover was present on most of the properties, limiting or precluding observation of most of the ground surface.

Outstanding Information Requests - Numerous questionnaires were not returned by landowners of the Parcels. The non-responsive landowners are summarized in Table 1 (attached).

Historical Data Source Failure - It was not possible to identify the first developed use of the Subject Properties. The properties were cultivated agricultural land in the first available historical information.

It should be noted that this assessment did not include a review or audit of operational environmental compliance issues, or of any environmental management systems (EMS) that may exist on the property. Where required, the documents listed in the Appendices were used as reference material for the completion of the Phase I ESA. Some of the information presented in this report was provided through existing documents and interviews. Although attempts were made, whenever possible, to obtain a minimum of two confirmatory sources of information, Leggette, Brashears & Graham, Inc. in certain instances has been required to assume that the information provided is accurate.

The information and conclusions contained in this report are based upon work undertaken by trained professional and technical staff in accordance with generally accepted engineering and scientific practices current at the time the work was performed. The conclusions and recommendations presented represent the best judgment of Leggette, Brashears & Graham, Inc. based on the data obtained from the work. Due to the nature of investigation and the limited data available, Leggette, Brashears & Graham, Inc. cannot warrant against undiscovered environmental liabilities. Conclusions and recommendations presented in this report should not be construed as legal advice.

Should additional information become available which differs significantly from our understanding of conditions presented in this report, the conclusions may need to be reassessed.

3.5 Deviations

Deviations from the recommended scope of ASTM Standard E 1527-13 were not performed as part of this Phase I ESA with the exception of the inclusion of identification of wetlands on the Subject Property via publically-available wetlands maps.

3.6 Special Terms and Conditions

Authorization to perform this assessment was given by the client on December 8, 2015. Instructions as to the location of the property, access, and an explanation of the property and facilities to be assessed were provided by Banner Associates, Inc. Several modifications were made to the land owners and or route changes during the course of the assessment. The report includes the most recent data Leggette, Brashears & Graham, Inc. was provided.

3.7 Reliance

This report has been prepared for the sole benefit of the client. The report may not be relied upon by any other person or entity without the express written consent of Leggette, Brashears & Graham, Inc., Banner Associates, Inc., and the Lewis and Clark Regional Water System.

4.0 Site Description

4.1 Location and Legal Description

The Subject Property is known as Lewis and Clark Regional Water System Segment MN-4 and is located in Olney, Dewald and Worthington Townships, Nobles County, Minnesota. Information obtained from the Nobles County, MN Assessor's Department provided the tax assessment parcel numbers for the Subject Property as shown on Table 1, attached.



4.0 Site Description (continued)

4.2 Activity/Use Limitations

Leggette, Brashears & Graham, Inc. has performed a Phase I ESA in conformance with the scope and limitations of ASTM Practice E 1527 of the property located in Olney, Dewald and Worthington Townships, Nobles County, MN. Any exceptions to or deletions from this practice are described in Section 3.5 of this report. No activity or use limitations were identified by the client for the Subject Property.

4.3 Site and Vicinity Description

The Subject Property consists of approximately 15 miles of a proposed 90-foot wide utility easement corridor (50-foot permanent easement plus 40-foot temporary easement). The Subject Property is located mostly in rural Nobles County, MN in cultivated agricultural land adjacent to the right-of-way of the accompanying roadway. At the eastern end of the easement property in Worthington, MN, the property is right-of-way, residential or vacant. There are no permanent building structures on any of the parcels of the Subject Property.

Ground surface is primarily cultivated agricultural land in the rural portion, and cultivated agricultural land and mowed grassy areas within the Worthington portion of the Subject Property. The ground surface along the corridor is nominally flat or gently rolling, and transected by intermittent drainage-ways or creeks.

The area surrounding the Subject Property is primarily agricultural land in the rural portions, and residential, commercial, vacant/undeveloped within the Worthington city limits.

4.4 Current Use of Property

At the present time, Parcels 4-1 through 4-15, 4-17, 4-18, 4-20 through 4-36, 4-39a, and 4-41 through 4-48 are developed as cultivated agricultural land. The balance of the Parcels are residential, right-of-way or vacant/undeveloped.

4.5 Description of Structures and Other Improvements

There are no above-grade structures on any portion of the Subject Property, with the exception of several culverts and water drainage structures along the public right-of way.

4.6 Adjoining Property Information

During the site reconnaissance, Leggette, Brashears & Graham, Inc. observed the following land use on properties in the immediate vicinity of the Subject Property. All parcels of the Subject Property are bounded by the right-of-way of the adjacent state, county or township roadway, and by cultivated agricultural land. Exceptions to this include Parcels 4-37, 4-38, 4-41 and 4-50, adjoined by residential, vacant/undeveloped or commercial.

5.0 User Provided Information

5.1 Specialized Knowledge

Leggette, Brashears & Graham, Inc. has no specialized knowledge of the Subject Property outside of the research which was conducted and reported as part of this report.

The property ownership and tenants as well as all individuals who were interviewed as part of this investigation, have not reported any specialized knowledge of this Subject Property outside of what is contained in this report.

5.2 Valuation Reduction for Environmental Issues

No environmental issues were identified by the user/client that could result in property value reduction.



5.0 User Provided Information (continued)

5.3 Owner, Property Manager, and Occupant Information

No written or verbal communication provided by the property owners or user revealed information which suggested that there are currently or historically were, known RECs associated with the Subject Property.

Questionnaires were sent to each property owner of the parcels associated with the corridor. The list of property owners is presented on Table 1 of the Appendix. If a response was not received after approximately 2-weeks from mailing the original request, a follow-up reminder was sent to the property owner. Of the forty-seven (47) questionnaires sent, thirty-five (35) were returned.

There were three "yes" (affirmative) responses:

- Parcel 4-29 - Q1a - parcel use (motor repair facility)
- Parcel 4-39a - Q1b - adjoining industrial use; Q2b adjoining waste treatment
- Parcel 4-47/4-48 - Q3 - adjoining container storage

Several questionnaires contained "unknown" responses to the inquiries:

- Parcel 4-4 - "Unknown" response: Q16 - waste water discharge
- Parcel 4-12 - "Unknown" responses: Q1b, Q2b - adjoining property use
- Parcel 4-25 - "Unknown" responses: Q1b, Q2b - adjoining property use; Q3 - discarded containers
- Parcel 4-26 - "Unknown" responses - Q2b through Q12
- Parcel 4-34 - "Unknown" responses - Q1a - parcel use; Q1b - adjoining property use; Q3 - discarded containers; Q4 - industrial disposal; Q5 - fill dirt; Q8 - USTs; Q9 - fill pipes
- Parcel 4-38 - "Unknown" response - Q9 - fill pipes
- Parcel 4-39a - "Unknown" responses - Q3 - Q14 and Q17, Q18
- Parcel 4-48 / 4-49 - "Unknown" responses - Q4 - parcel industrial disposal; Q5 - fill dirt; Q16 - waste water discharge

For the affirmative response on Parcel 4-29, the landowner (C. Middagh) confirmed to LBG that the affirmative response was incorrectly attributed to the Parcel, but was in reality on the south-adjacent property. The use noted was a hobby and not a commercial business. Therefore, it is unlikely that this off-site usage will pose an environmental concern to the Subject Property.

Parcel 4-39a is adjacent to a recycling facility (Nobles County Recycling, Map ID #35) discussed further in Section 6.1. It is not expected that Nobles County Recycling is likely to pose an environmental concern to the Subject Property.

Parcel 4-48/4-49 is east-adjacent to "Shine Brothers" (Map ID #8) a Conditionally Exempt Small Quantity Generator. The Shine Brothers facility is approximately 900 feet west of Parcel 4-48/4-49 and based on distance and geologic considerations (clay soils), unlikely to pose an environmental concern to the Subject property.

5.4 Reason For Performing Phase I ESA

The purpose of this Phase I ESA was to identify existing or potential RECs (as defined by ASTM Standard E 1527-13) in connection with the Subject Property. Leggette, Brashears & Graham, Inc. understands that the findings of this study is being conducted as part of environmental due diligence.

6.0 Records Review

6.1 Standard Environmental Records Sources

Leggette, Brashears & Graham, Inc. contracted Environmental Data Resources, Inc. (EDR) to conduct a search of Federal and State databases containing known and suspected sites of environmental contamination. The number of listed sites identified within the approximate minimum search distance (AMSD) from the Federal and State environmental records database listings specified in ASTM Standard E 1527-13 are summarized in the following table. Detailed information for



6.0 Records Review (continued)

6.1 Standard Environmental Records Sources (continued)

sites identified within the AMSDs is included in the Appendix. Copies of the EDR research data and a description of the databases are included in the Appendix of this report.

Distances are not provided in the following Map Findings Summary due to the variable distances to the Subject Property corridor. The following summary provides those sites within the maximum AMSD search radius.

The following Table indicates that there are a vast number of sites identified in the database search within the AMSD. Many of the sites are identified on multiple databases, thus exaggerating the number of properties within the AMSD.

LBG's review has determined that *adjacent* sites identified by the database search are:

- Various farming operations (with feedlots) identified on the Minnesota WIMN (What's in My Neighborhood) database. Sites listed (Map IDs #17 #20, #24, #28, #29, #32, #33, #34) are listed because of active or inactive feedlots and potential surface water concerns associated with that use. These sites are unlikely to pose a concern to the Subject Property.
- 27008 Highway 59 (Nobles County Recycling, ID #35) is identified as an active AST site. The site is located adjacent to the south end of Parcel 4-39a. The MPCA indicates the AST is a 560 gallon waste oil tank. The location of the single AST is not known, but based on aerial imagery, the building and active areas on the site are approximately 200 feet from Parcel 4-39a. There are no leaks reported for the facility according to the MPCA. Based on the limited volume of the AST and the inferred distance, it is unlikely that this AST would pose a significant concern to the Subject Property.

The closest non-adjacent sites to the Subject Property of potential environmental note are:

- 810 Highway 59 (Scholte Motors ID #11), found near Parcels 4-48 and 4-47, which has been identified as a historical gasoline station. The site is about 400 feet from the Subject Property, separated from the Subject Property by cultivated agricultural land, and based on geologic considerations (clay soils), is not anticipated to impact the Subject Property.
- 27148 271st Street (Dykes Auto Salvage, ID #37) near Parcels 4-37 and 4-38. The site is approximately 1,100 feet from the Subject Property, separated from the Subject Property by cultivated agricultural land, and based on geologic considerations (clay soils), is not anticipated to impact the Subject Property.
- 27098 Highway 59 (Cooperative Energy, ID #30) has been identified as an AST site. The site is approximately 1,100 feet from the Subject Property, separated from the Subject Property by cultivated agricultural land, and based on geologic considerations (clay soils), is not anticipated to impact the Subject Property.

Additional sites identified in the database search appear to be sufficiently distant from the Subject Property, and/or based on geologic or hydrogeologic conditions, are unlikely to impact the Subject Property.

With the exception noted below in the "Orphan" table, none of the Orphan sites (sites with insufficient information to locate on the map) appear to be within the AMSD of the Subject Property and were not considered further.

Note that the Minnesota Pollution Control Agency (MPCA) database shows a "Worthington City Dump" (ID #21) south of Parcel 4-42. Additional information obtained from the MPCA suggests the location noted is incorrect, and the actual location of ID #21 is approximately 1 mile southwest of the mapped location, and approximately 2,500 feet from the Subject Property. Photographs of the landfill (1980) suggest it was a construction rubble site; however, no other specific information was available. This landfill site is not expected to pose an environmental concern to the Subject Property due to the distance and geologic setting (clay soils).

Map Findings Summary

Database	Target Property	Search Distance (Miles)	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
RCRA-LQG: Resource Conservation and Recovery Act (RCRA) Large quantity generators	no							1



6.0 Records Review (continued)

6.1 Standard Environmental Records Sources (continued)

Database	Target Property	Search Distance (Miles)	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
RCRA-CESQG: RCRA Conditionally exempt small quantity generators	no							5
RCRA NonGen / NLR: RCRA Non-Generators	no							7
FINDS: Facility Index System	no							19
US AIRS: Aerometric Information Retrieval System	no							1
SHWS: Superfund Site Information Listing	no							1
MN PLP: Permanent List of Priorities	no							1
SRS: Site Remediation Section	no							4
SWF/LF: Solid Waste Facilities/Landfill Sites	no							1
MN LS: List of Sites	no							4
SWRCY: Recycling Facilities	no							2
LUST: Leaking Underground Storage Tank	no							13
UST: Underground Storage Tank Database	no							14
LAST: Leaking Aboveground Storage Tanks	no							1
AST: Aboveground Storage Tanks	no							4
LIENS: Environmental Liens	no							3
MANIFEST: Hazardous Waste Manifest Data	no							1
SPILLS: Spills Database	no							3
INST CONTROL: Site Remediation Section Database	no							2
VIC: Voluntary Investigation and Cleanup Program	no							3
BROWNFIELDS: Petroleum Brownfields Program Sites	no							3
ENF: Generators Associated with Enforcement Logs	no							3
AIRS: Permit Contact List	no							4
TIER 2: Tier 2 Facility Listing	no							6
EDR MGP: Manufactured Gas Plant Database	no							1
EDR Hist Auto	no							4
WIMN: "What's in My Neighborhood"	no							92

Orphans Summary

Facility Name:	Worthington Tractor Parts
Databases:	AST, UST
Address:	PO Box 14, Route 4; 271070 Highway 59



6.0 Records Review (continued)

6.1 Standard Environmental Records Sources (continued)

Comments:

This site is located approximately 1,100 feet south of Parcels 4-37 and 4-38. Due to the distance and site geology (clay soils), it is unlikely that this will pose an environmental concern to the Subject Property.

6.2 Additional Environmental Record Sources

Information was collected from the MPCA regarding Map ID #21, the "Worthington City Dump" as discussed in Section 6.1. No other information was obtained outside of that contained in this report.

6.3 General Site Setting

The Subject Property is located mostly in rural Nobles County, MN, in and surrounded by cultivated agricultural land. The eastern portion of the Subject Property is located within the city limits of Worthington, MN. The Subject Property begins approximately 3-miles east and 2-miles south of Adrian, MN. The terminal (eastern) end of the Subject Property enters and crosses into the city limits of Worthington, MN. In the Worthington portion of the Subject Property, the parcels are agricultural land, undeveloped / vacant and right-of-way.

The Subject Property is located in the following sections in Nobles County: (from the west) Sections 27, 26, 25 T102N R42W (Olney Township); Sections 32, 33, 34, 27, 26, 36, 25, T102N R41W (Dewald Township) and 30, 29, 28, 33, 34, 27, 26 and 25 T102N R40W (Worthington Township), as shown on Figures 1 through 7.

6.3.1 Topography

In general, the eastern and western ends of the Subject Property are at a surface elevation of approximately 1,600 feet National Geodetic Vertical Datum of 1929 (NGVD), and the middle portion of the Subject Property at an elevation of approximately 1,700 feet NGVD.

6.3.2 Surface Water Bodies

The nearest surface water in the vicinity of the Property is Okabena Lake located within approximately 1,500 feet north of the eastern end of the Subject Property and the Little Rock River. The Little Rock River crosses the Subject Property near Parcel 4-14, but is shown as intermittent at this location. The flow direction of the Little Rock River is to the south.

6.3.3 Geology and Hydrology

The geology of the site is inferred from the "Surface Geology Mosaic" (Minnesota Geologic Survey, 1995). Surficial sediments are Quaternary Pleistocene glacial drift (till). The drift is described as calcareous till, which generally is a heterogenous mixture of boulders, pebbles, sand, silt, and clay. Locally, areas of windblown sediment (loess) may be present. The thickness of the glacial sediments are estimated to be 400 to 450 feet. The underlying bedrock is described as "Cretaceous rock, undifferentiated - undivided-Dakota, Graneros, Greenhorn, Carlile, Niobrara, and Pierre formations and their non-marine equivalents in southwestern, and southeastern Minnesota" (Morey, 2000).

Groundwater is inferred to be present at depths of 10 to 15 feet below grade. The groundwater flow direction is variable, and typically mimics the topography. Regionally, the groundwater is expected to flow south.

No on-site water wells or springs were observed during the reconnaissance.

No settling ponds or lagoons were observed at the Subject Property during this investigation. Wetlands, as reported by the U.S. Fish and Wildlife National Wetland Inventory, were present, and are further discussed in Section 9.4.



6.0 Records Review (continued)

6.4 Historical Use

6.4.1 Historical Summary

In general, all Parcels of the Subject Property (except Parcels 4-1, 4-10, 4-13, 4-19, 4-37, 4-38, 4-41, farmstead/residential) appear to have been cultivated agricultural land or vacant on the first available historical data record, 1949 aerial imagery. The usage of the Subject Property prior to 1949 is unknown, but it is inferred that agricultural use is likely. With the following exceptions, all parcels continue to be used as agricultural to the present day.

Parcel 4-47 was a dredge fill site in the 1970s to 1980s, accepting lake bottom materials from the dredging of nearby Okabena Lake. The pre-filling land use of Parcel 4-47 was cultivated agricultural land. According to Dwayne Haffield, City of Worthington, there are no known chemical analyses of the dredge materials placed at the location, further the fill area may have been unrestricted during placement of the fill material. Therefore the possibility that material other than lake bottom sediment was disposed in the fill area cannot be ruled out. Thus, the presence of the fill at Parcel 4-47 represents a REC to the Subject Property.

Parcels 4-1 and 4-10 are noted to have been farmsteads from 1949 until at least 1984. Cultivated agricultural land was observed on each parcel aerial imagery from 1996 to 2000, the most-recent aerial images.

The balance of the land use in Parcels 4-1 to 4-43 remained generally unchanged throughout the imagery reviewed. There is development (streets, commercial buildings, infrastructure) near Parcels 4-43 to 4-50 from approximately 1965 to 2000, as Worthington expanded to the south, yet the individual Parcels appear to remain cultivated agricultural land during this time.

6.4.2 Title Records

Title records for the Subject Property were not readily available or reviewable.

6.4.3 City Directories

City Directories for the Subject Property and surrounding area were not readily available or reviewable.

6.4.4 Aerial Photos

Available aerial photographs dated 1949 to 2000 from EDR were reviewed for this Phase I ESA. Copies of selected photographs are included in the Appendix of this report. A summary of the imagery is found in the following table.

Summary

Date(s)	Property Comments	Surrounding Area Comments
2000	As as below	As below.
1996	As below, except no Residential (farmstead) at 4-1 or 4-10. Parcel 4-47 cultivated agricultural land. Parcel 4-47 cultivated agricultural land. No coverage >4-44	As below. Parcel 4-41 has adjacent development. No coverage >4-44
1984	As below. Dredge fill at 4-47 Development at 4-16	As below. Parcels 4-46, 4-47, 4-49 have adjacent development



6.0 Records Review (continued)

6.4 Historical Use (continued)

6.4.4 Aerial Photos (continued)

Date(s)	Property Comments	Surrounding Area Comments
1976	Residential (farmstead) - N end of 4-1 Residential (farmstead) - Mid of 4-10 Residential (farmstead) - E end of 4-13 Residential (farmstead) - 4-19 Residential (farmstead) - 4-37, 4-38 Dredge fill - 4-47 All other Parcels appear to be cultivated agricultural.	Residential (farmsteads) adjacent is common for most of the Parcels, intermixed with cultivated agricultural land or undeveloped. Parcel 4-48 and 4-50 appears to have developed land west-adjacent.
1965	As below (Parcels 4-1 to 4-14 only) No coverage > 4-14	As below (Parcels 4-1 to 4-14 only) No coverage > 4-14
1953	As below (Parcels 4-1 to 4-19 only) No coverage > 4-19	As below (Parcels 4-1 to 4-19 only) No coverage > 4-19
1949	Residential (farmstead) - N end of 4-1 Residential (farmstead) - Mid of 4-10 Residential (farmstead) - E end of 4-13 Residential (farmstead) - 4-19 Residential (farmstead) - 4-37 Residential (?) - 4-41 All other Parcels appear to be cultivated agricultural land.	Residential (farmsteads) adjacent is common for most of the Parcels, intermixed with cultivated agricultural land or undeveloped. Parcel 4-50 appears to have developed land west-adjacent.

6.4.5 Sanborn/Historical Maps

Sanborn Fire Insurance maps for the Subject Property and surrounding area were not readily available or reviewable. The area is unmapped.

6.4.6 Historical Topographic Maps

Topographic maps dated 1954 through 1985 from U.S. Geological Survey were reviewed for this Phase I ESA. Copies of the maps are included in the Appendix of this report. Due to the scale of the maps (1:24000 to 1:250000) there was not sufficient detail to provide data beyond that contained in other historical information, e.g. aerial photos, except at Parcel 4-47.

At Parcel 4-47, the 1976 and 1985 maps show a disturbance and a lake which are subsequently determined to be a dredge fill operation related to nearby Okabena Lake. According to Dwayne Haffield, City of Worthington, there are no known chemical analyses of the dredge materials placed at the location. Furthermore, the fill area may have been unrestricted during placement of the fill material. Therefore the possibility that material other than lake bottom sediment was disposed in the fill area cannot be ruled out. Thus, the presence of the fill at Parcel 4-47 represents a REC for the Subject Property.

6.4.7 Other Environmental Reports

Environmental Reports for the Subject Property and surrounding area were not readily available or reviewable.

6.4.8 Building Department Records

There are no structures on the Subject Property; therefore, this section is not applicable.



6.0 Records Review (continued)

6.4 Historical Use (continued)

6.4.9 Other Land Use Records

No other Land Use Records for the Subject Property and surrounding area were readily available or reviewable.

6.5 Environmental Liens and Activity/Use Limitations

Environmental lien and activity and use limitation search results were not provided to Leggette, Brashears & Graham, Inc. by the client.

7.0 Site Reconnaissance

7.1 Methodology and Limiting Conditions

The site reconnaissance was conducted on February 19, 2016 by M. Salzwedel, Hydrogeologist II with Leggette, Brashears & Graham, Inc., Mr. Salzwedel was unaccompanied. Weather conditions at the time of the site reconnaissance were 45F, windy. A visit was also performed on March 11, 2016 due to a modification of the pipeline route by the client.

The visual reconnaissance consisted of observing the property by systematically traversing along the length of the corridor via automobile to provide a continuous observation, wherever possible. Photographs of pertinent site features identified during the site reconnaissance are included in the Appendix, along with map locations of the site photographs.

7.2 General Site Setting

The Subject Property is predominately cultivated agricultural land, with several residential properties. None of the parcels contain buildings. The ground surface at the site varies considerably but generally consists of gently undulating land, with hills and swales of cultivated agricultural land and grassy areas.

7.3 Site Visit Findings

7.3.1 Hazardous Substances

No hazardous substances were identified on the Subject Property during the site reconnaissance.

7.3.2 Petroleum Products

No petroleum products were identified on the Subject Property during the site reconnaissance.

7.3.3 USTs

No readily apparent evidence of underground storage tanks (USTs) was identified on the Subject Property during the site reconnaissance.

7.3.4 ASTs

No readily apparent evidence of above ground storage tanks (ASTs) was identified on the Subject Property during the site reconnaissance.

7.3.5 Other Suspect Containers

No suspect containers were identified on the Subject Property during the site reconnaissance.



7.0 Site Reconnaissance (continued)

7.3 Site Visit Findings (continued)

7.3.6 Equipment Likely to Contain PCBs

No evidence of transformers or electrical equipment likely to contain polychlorinated biphenyls (PCBs) was observed on the Subject Property during the site reconnaissance.

7.3.7 Interior Staining/Corrosion

There are no above-grade structures on the Subject Property aside from various drainage culverts and control structures.

7.3.8 Discharge Features

There are no buildings located on the Subject Property; therefore, there are no discharge features such as floor drains, catch basins, oil/water separators, etc. observed.

7.3.9 Pits, Ponds, And Lagoons

No artificial pits, ponds or lagoons were observed on the Subject Property during the site reconnaissance. Several natural drainages cross the Subject Property; however, these are intermittent in nature and provide drainage for surrounding agricultural land.

7.3.10 Solid Waste Dumping/Landfills

No readily apparent evidence of solid waste dumping, suspect fill material, or landfills was identified on the Subject Property during the site reconnaissance.

7.3.11 Stained Soil/Stressed Vegetation

No stained soil/stressed vegetation was observed on the Subject Property during the site reconnaissance. Most of the agricultural land of the Subject Property had not been planted at the time of site reconnaissance and only remnants of the previous growing season's plants remained. The remaining stubble of the most recent growing season appeared to have been typical / normal for the area and did not appear anomalous or indicative of stressed vegetation. The majority of the Subject Property was snow covered at the time of the site visit.

7.3.12 Wells

No wells were observed on the Subject Property during the site reconnaissance.

8.0 Interviews

Local government officials and several Parcel Owners were interviewed via telephone for this project. The results of the interviews are included in the following table.

In conclusion, the interviews / questionnaires did not indicate the presence of RECs or significant environmental concerns on any of the parcels for the Subject Property.

Summary

Role:	Local Gov't Official
Title:	Project Leader
Name:	Nancy Hennen Blomme
Company:	Minnesota Pollution Control Agency
Method:	Telephone



8.0 Interviews (continued)

Comments: Ms. Blomme has 25+ years experience in the region as MPCA representative. Reviewed tanks and spills database and provided additional information on Nobles County Recycling, located adjacent to Parcel 4-39a. Ms Hennen stated the Nobles County Recycling has a 560-gallon waste oil UST and no leaks or spill are reported for the property.

Role: Local Gov't Official
Title: City of Worthington City Engineer
Name: Dwayne Haffield
Company: City of Worthington
Method: Telephone

Comments: Discussed "Worthington City Dump" on WIMN database. Based on information obtained by LBG from MPCA, Mr. Haffield confirmed that the site is incorrectly located on WIMNs map and is actually >1,000 south of Subject Property. Mr. Haffield identified the 4-47 disturbance as dredge-fill materials from nearby Okabena Lake.

Role: Owner
Title: Parcel Owner 4-29
Name: Charlie Middagh
Company: n/a
Method: Telephone

Comments: Mr. Middagh is owner of 4-29. Notation on questionnaire is incorrect and applies to his residence, and not Parcel 4-29. The notation of "motor repair" is a hobby and not a commercial business. The activities are no longer occurring.

Role: Key Site Manager
Title: Owner
Name: Dan Zulkoski
Company: Lewis and Clark Regional Water System
Method: Written Response

Comments: Completed User Questionnaire for Subject Property. Responses did not identify any potential environmental issues associated with the property.

Role: Local Gov't Official
Title: Project Leader
Name: Pamela Foster
Company: Minnesota Pollution Control Agency
Method: Telephone

Comments: Discussed location and information regarding WIMN listing of "Worthington City Dump." Provided photographs and location description on file at MPCA..

9.0 Other Environmental Considerations

9.1 Asbestos-Containing Materials

This is not part of the authorized scope of services and is not applicable.

9.2 Lead-Based Paint

This is not part of the authorized scope of services and is not applicable.

9.3 Radon

This is not part of the authorized scope of services and is not applicable.



9.0 Other Environmental Considerations (continued)

9.4 Wetlands

The occurrence of wetlands on the Subject Property was evaluated using publically available data from U.S. Fish and Wildlife Service, National Wetlands Inventory, accessed online at <http://www.fws.gov/wetlands/data/mapper.HTML> on February 9, 2016. The data is presented on Figures 1-6 in Appendix F, Additional Documentation.

Wetlands shown on the National Wetlands Inventory map intersected the following parcels:

- 4-13
- 4-14
- 4-16
- 4-17
- 4-25

9.5 Microbial Contamination (Mold)

This is not part of the authorized scope of services and is not applicable.

9.6 Client-Specific Items

In accordance with a client request, a Level 1 Contaminant Survey Checklist was completed for each parcel. The completed checklists are attached in the Appendix F, "Additional Documentation."

Findings

A REC is identified on the Subject Property. The presence of the dredge fill from Okabena Lake in Parcel 4-47 represents a potential environmental impairment due to the unknown chemical composition of the fill. There are no other significant environmental concerns identified on the Subject Property.

Opinions

This assessment has uncovered evidence of a REC or significant environmental concern on the Subject Property, specifically at Parcel 4-47. The property which 4-47 crosses historically received dredge materials from Lake Okabena. Materials dredged from lakes in urban settings such as Lake Okabena typically receive runoff from streets and nearby commercial areas that may contain metals, VOCs, SVOCs, and/or petroleum hydrocarbons. The sediments from lake bottoms are also likely highly organic and, in combination with the compounds listed, may generate hydrogen sulfide or methane, which may pose additional concerns. Furthermore, the fill area may have been unrestricted during placement of the fill material. Therefore, the possibility that material other than lake bottom sediment was disposed in the fill area cannot be ruled out.

The potential risk(s) associated with the 4-47 historical fill is unknown and is inferred to be low, but based on the existing data, a REC cannot be ruled out. If required by the risk tolerance of the client, additional assessment would be required to characterize the sediments at 4-47. This additional assessment would include, but not necessarily be limited to, sampling and chemical analysis of suspected impacted media (soil, water).

Conclusions

We have performed a Phase I ESA in conformance with the scope and limitations of ASTM Practice E1527 of Lewis and Clark Treated Pipeline Segment MN-4. Any exceptions to, or deletions from, this practice are described in Section 3.5 of this report.

This assessment has revealed evidence of a REC in connection with the property. A REC was identified on Parcel 4-47 relative to the presence of unknown fill materials. If necessary based on the risk tolerance of the client, additional assessment would be required to quantify risk on the parcel.



Conclusions (continued)**References**

Surface Geology Mosaic, Minnesota Geologic Survey "Online Map Services." Online Map Services. Minnesota Geological Survey, n.d. Web. 28 Mar. 2016. <<http://www.mngs.umn.edu/service.htm>>.

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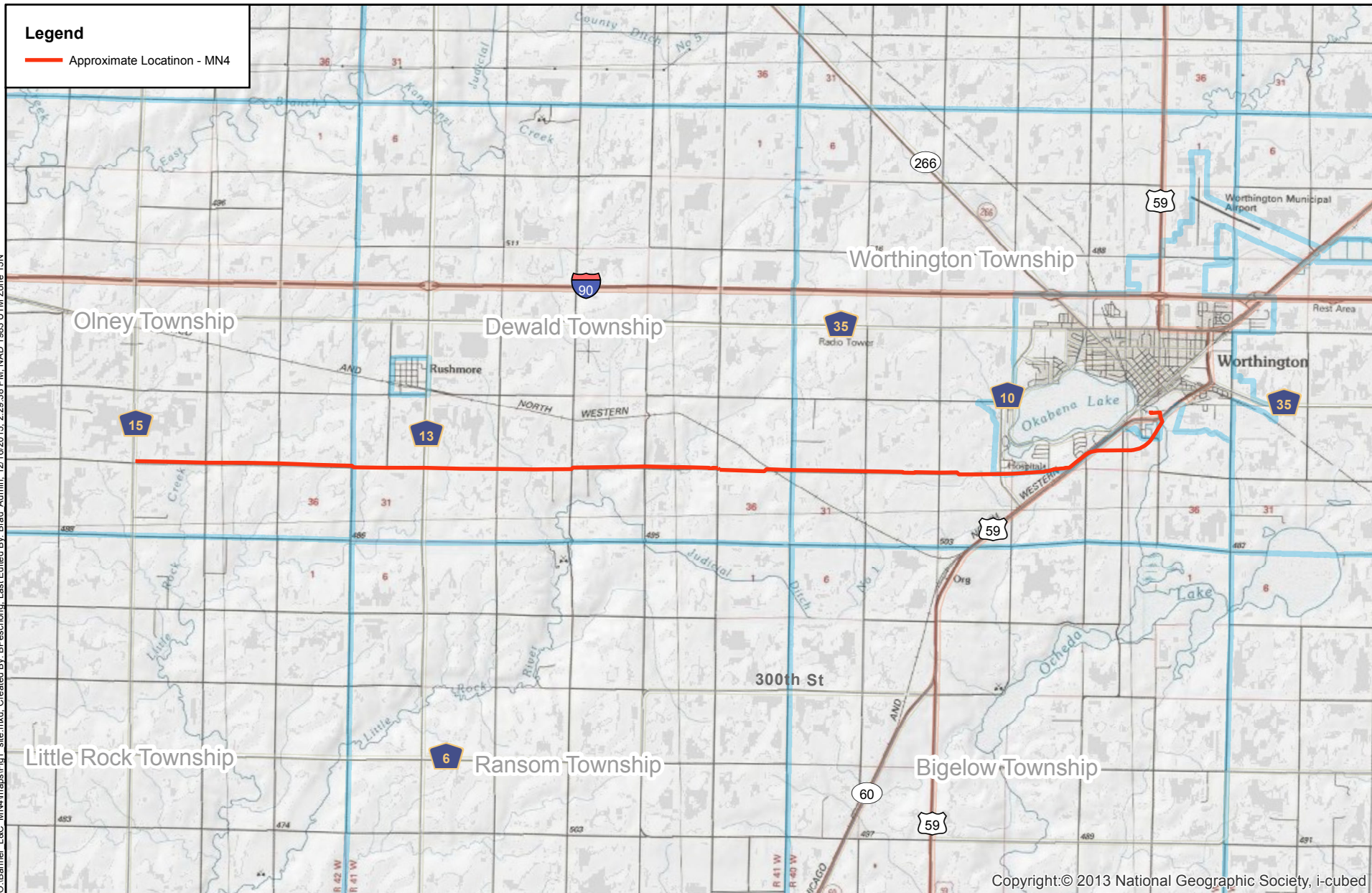
Appendix A:

Figures

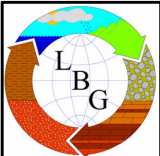
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Legend

— Approximate Location - MN4



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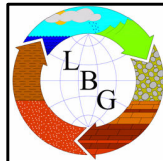
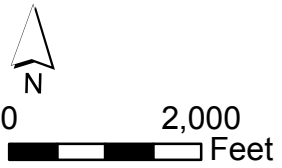
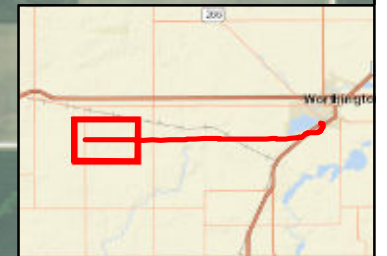
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SITE LOCATION MAP
 OLNEY, DEWALD and WORTHINGTON TOWNSHIPS, NOBLES COUNTY, MINNESOTA

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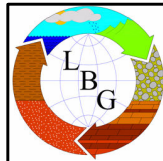
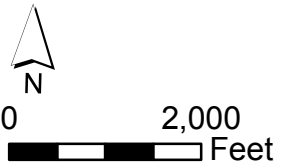
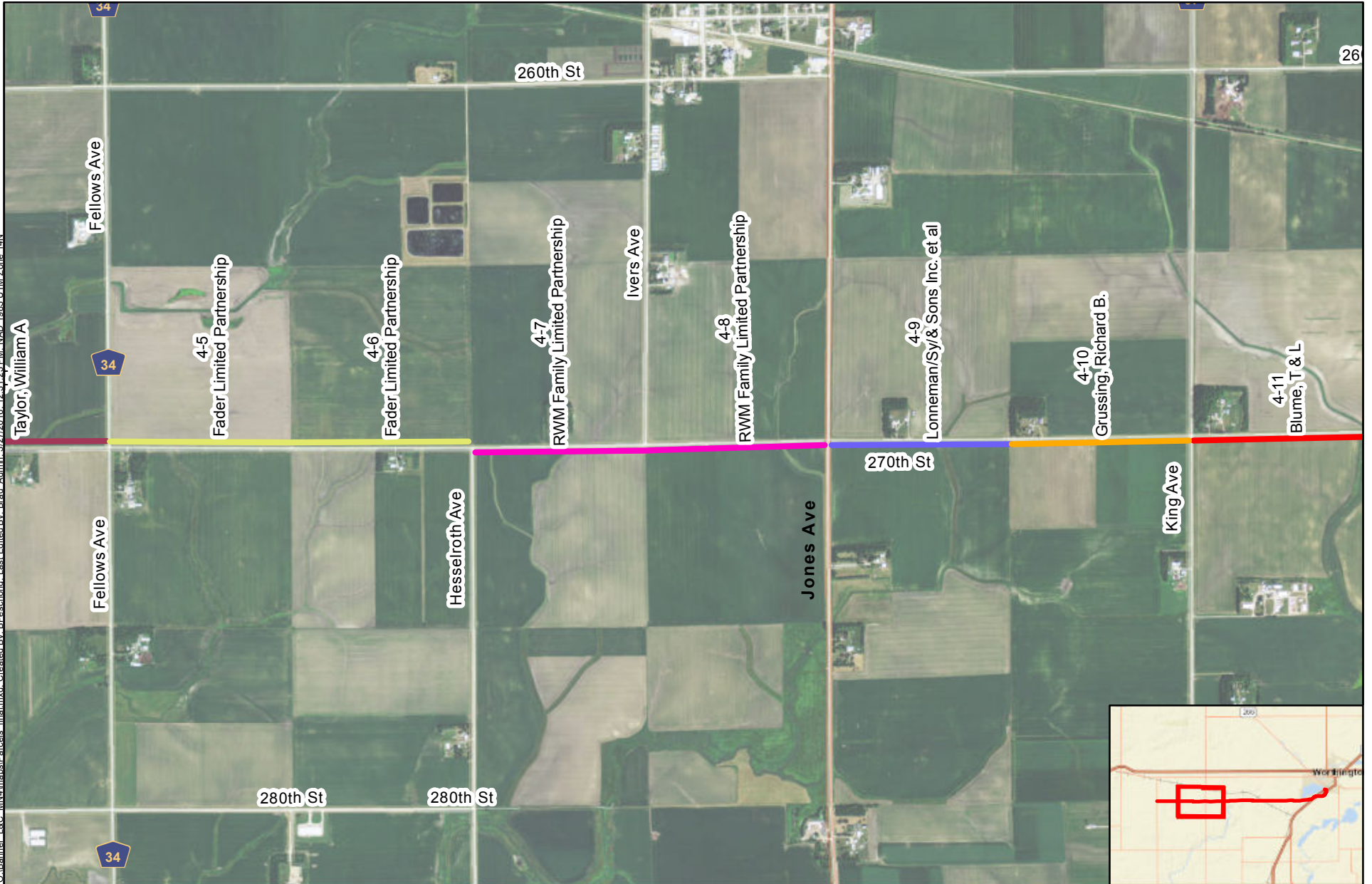
EASEMENTS, PARCEL NUMBERS, OWNERSHIP
 Page 1 of 6

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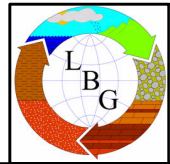
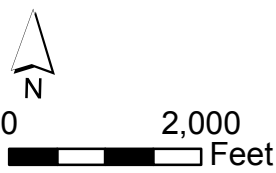
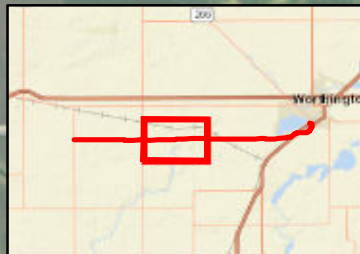
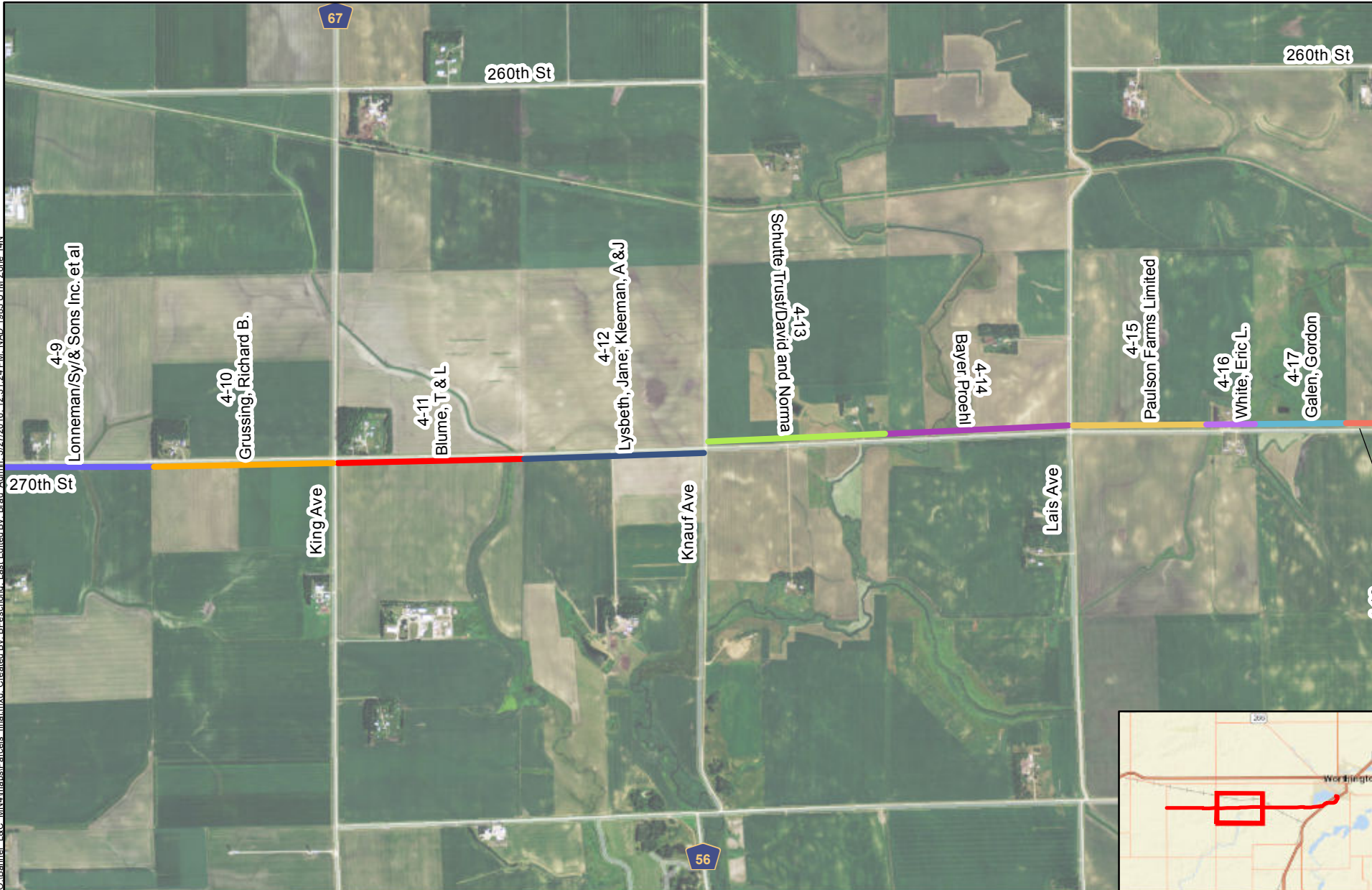
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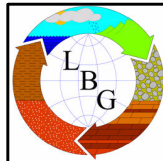
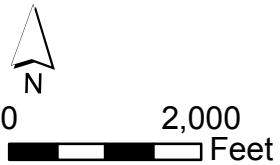
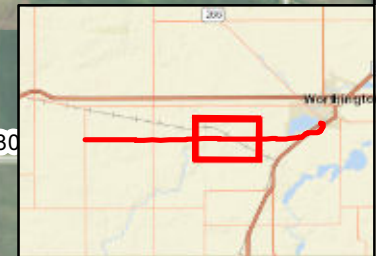
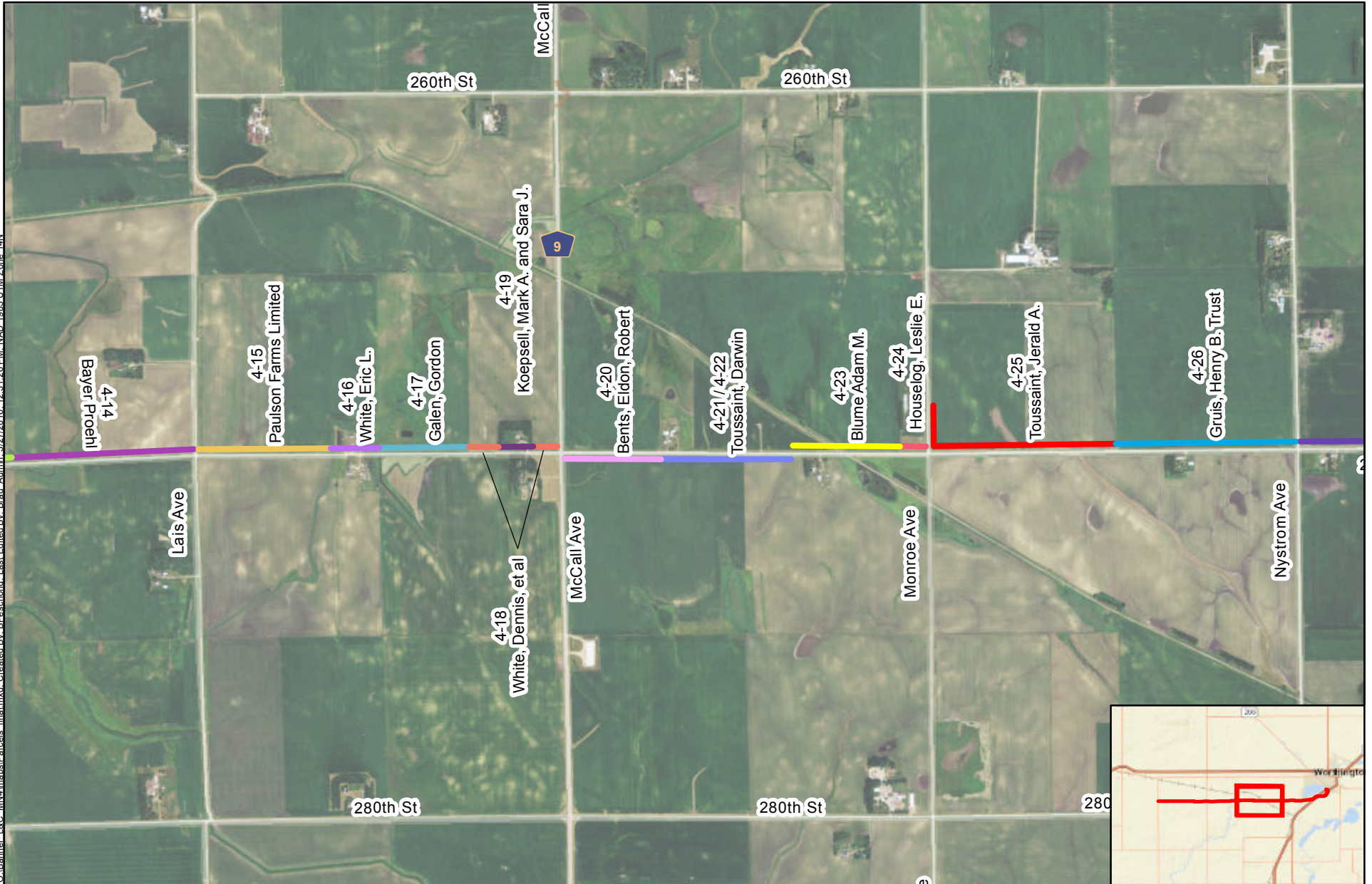
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EASEMENTS, PARCEL NUMBERS, OWNERSHIP Page 3 of 6		
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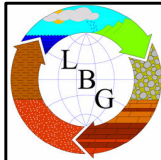
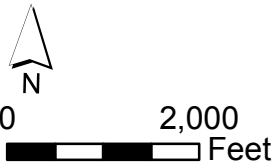
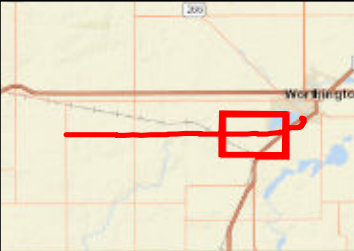


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EASEMENTS, PARCEL NUMBERS, OWNERSHIP
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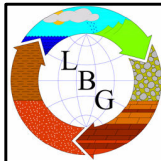
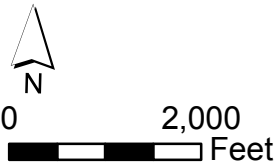
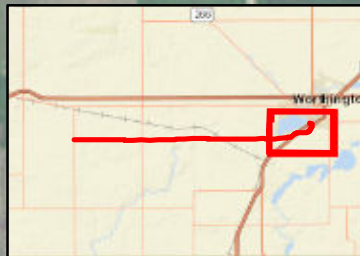
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 Page 6 of 6

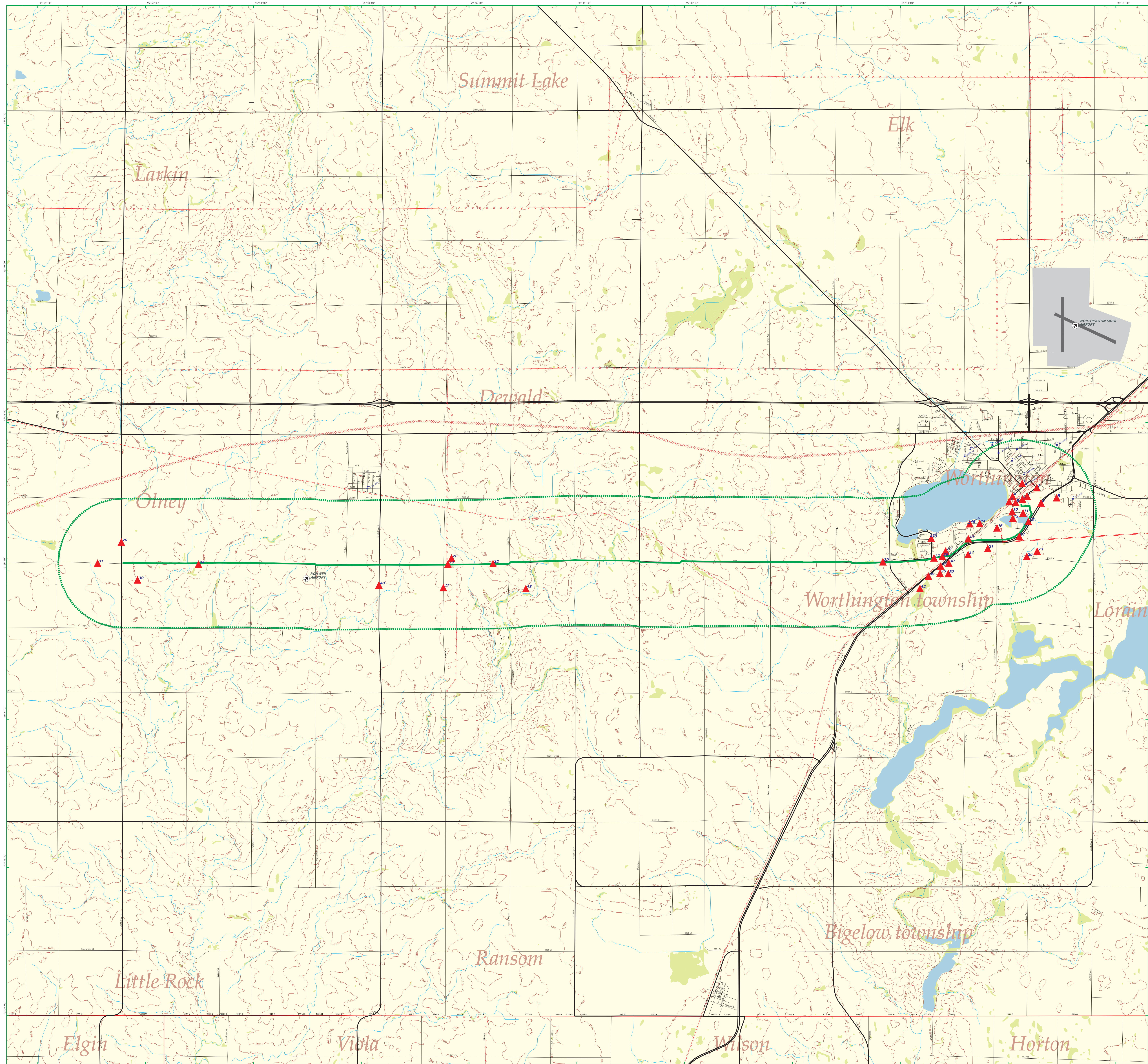
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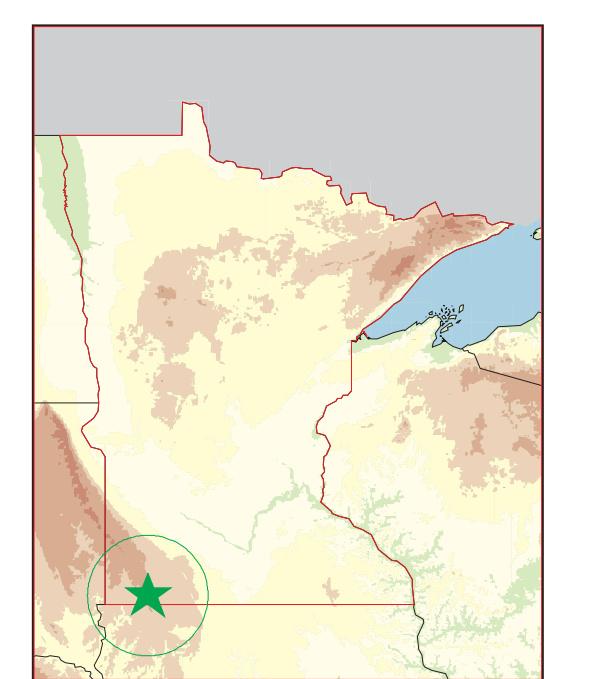
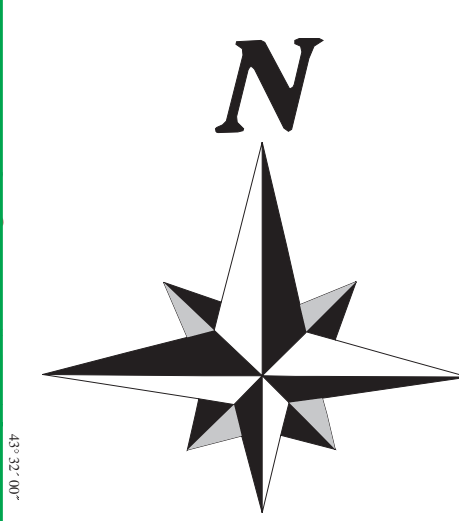
Figure: 7

EDR DataMap® Corridor Study

Lewis & Clark Pipeline Segment MN-4



- Listed Sites
- Earthquake Epicenters (Richter 5 or greater)
- Search Boundary
- Roads
- Major Roads
- Waterways
- Railroads
- Contour Lines
- Pipelines
- Powerlines
- Fault Lines
- Water
- Superfund Sites
- Federal DOD Sites
- Indian Reservations BIA
- National Wetland Inventory



Rushmore, MN



Scale in Miles

