



Department of Energy

Washington, DC 20585

May 8, 2026

Joseph Bell
Executive Director and State Historic Preservation Officer
Texas Historical Commission
P.O. Box 12276
Austin, Texas 78711

cc:
Sherry Hacker, Knox County Historical Commission

SUBJECT: U.S. Department of Energy, Office of Energy Dominance Financing, Section 106 Consultation, American Electric Power, East Munday Greenfield 138 kilovolt (kV) Station Project, Knox County, Texas

Dear Mr. Bell,

Pursuant to its authority under Title XVII of the Energy Policy Act of 2005, as amended, which established a Federal loan guarantee program, the U.S. Department of Energy (DOE) Office of Energy Dominance Financing (EDF) is evaluating whether to provide a Federal loan guarantee to American Electric Power (AEP, or the Applicant) for the East Munday Greenfield 138 kilovolt (kV) Station Project (the Project) located in Knox County, Texas.

The purpose of this letter is to formally initiate consultation with the Texas State Historic Preservation Officer (SHPO) under Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended (54 United States Code [U.S.C.] 306108), and its implementing regulations, 36 Code of Federal Regulations (CFR) Part 800, "Protection of Historic Properties." This letter presents a description of the undertaking, the Area of Potential Effects (APE), and the efforts to identify historic properties; and seeks your concurrence with DOE's Finding of No Historic Properties Affected for this Project.

A cultural resources report is included as Attachment 1, and a Request for SHPO Consultation Form is included as Attachment 2.

The parties listed above that are copied on this letter are invited to participate as consulting parties to the Section 106 consultation for this undertaking and may provide their comments on the undertaking to DOE EDF. In accordance with the confidentiality provisions of the Section 106 regulations at 36 CFR 800.11(c), to avoid the disclosure of potentially sensitive cultural resources information to the public, DOE EDF respectfully requests the consulting parties not share Attachment 1 with outside parties or the public. DOE EDF has made this consultation letter available for public view to solicit public comments on the undertaking.

Description of the Undertaking

DOE's action is the issuance of a proposed Federal loan guarantee to the Applicant for the undertaking (i.e., the Project), which involves the construction of a new 138 kV East Munday Station and completing associated T-line re-terminations for five (5) short T-line tie-ins east of the town of Munday. A new greenfield station is required due to the obsolete condition, safety risks, and operational constraints associated with the existing East Munday Station. The current station contains aging oil breakers, electromechanical relays, and deteriorated components that cannot be replaced or rebuilt in place because the station cannot be cleared for construction without violating N-1 reliability criteria. As a result, the replacement station will be constructed west of the existing Station Yard.

The Project will include installing six (6) new 40 kA 3000 A breakers, modern protective relays, a new DICM control building, and 28.8 MVAR capacitor bank inside the station. The Project also encompasses the transmission line scope necessary to re-terminate all five existing lines into the new station. Work includes installing nine (9) new 138 kV dead-end structures and three (3) new 138 kV tangent structures, along with four (4) substation monopole dead-end structures and associated foundations. The existing lines are predominately built with wood H-Frame structures and shielded with 7#10 wire; these segments will be rebuilt to accommodate the new station configuration and updated structural and electrical performance requirements. Temporary access roads will not be required for this Project. Existing roads and Right-of-way (ROW) will be used for construction. Construction activities consistent with transmission lines typically include erosion and sediment control, crane pad grading, foundation installation, structure assembly and erection, conductor and shield wire installation, and restoration activities following construction completion. Project maps are provided in the cultural resources report that is included as Attachment 1.

Description of the Area of Potential Effects

As defined in the Section 106 regulations (36 CFR § 800.16(d)), the APE is the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The dimensions of the APE are influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking. Within the APE, DOE EDF distinguishes different survey areas for identifying archaeological and historic architectural resources (hereafter, the "archaeological survey area" and "architectural survey area"). The archaeological survey area is defined as the construction footprint of the Project where potential physical effects caused by ground-disturbing activities may occur, also known as the limits of disturbance (LOD). The architectural survey area includes the area in the Project LOD and may apply a distance buffer, as appropriate, within which potential non-physical effects (e.g., visual, vibrational, auditory, or atmospheric) could occur. These survey areas collectively comprise the APE for the Project.

The Project's archaeological survey area includes the LOD totaling approximately 8.5 acres where ground disturbance may occur, encompassing the proposed substation boundary (approximately 6.5 acres) and two transmission pole structures located outside of the substation boundary. The Project's architectural survey area includes the LOD and the area within a 0.25-mile radius of the Project.

Description of Efforts to Identify Historic Properties

Tribal Outreach

In accordance with Section 106, DOE identified federally recognized Native American Indian Tribes (Tribes) that may have an interest in the Project area. DOE has notified the following four (4) federally recognized Tribes to see if they have an interest in the Project: Apache Tribe of Oklahoma; Comanche Nation, Oklahoma; Tonkawa Tribe of Indians of Oklahoma; and Wichita and Affiliated Tribes (Wichita, Keechi, Waco, and Tawakonie), Oklahoma.

By separate letter sent concurrently with this submission to the SHPO, DOE EDF has requested Tribal respondents to provide their comments on the undertaking, provide information regarding historic properties of religious or cultural significance to Tribes that may be present in the APE, and to identify any additional Tribes that may share an interest in the Project area so DOE EDF can promptly invite them to consult. DOE EDF will consider all comments received from Tribes during the 30-day consultation period and will coordinate with the SHPO and other consulting parties, as appropriate, if additional consultation is requested or necessary.

Records Search

As part of the Section 106 process, the Applicant contracted WSP USA Inc. (WSP) to conduct cultural resource identification surveys. WSP prepared the cultural resources report that is included as Attachment 1 and summarized below.

Prior to the initiation of fieldwork, WSP conducted a file review for a 1-mile radius study area surrounding the Project. The online restricted-access Texas Archeological Sites Atlas was reviewed to identify previously recorded archeological and historical sites within the study area. In addition, previously recorded cultural resource data available online from the Texas Historical Sites Atlas were reviewed to identify the locations of historical sites, cemeteries, National Register of Historic Places (NRHP) properties, State Antiquities Landmarks, and Official Texas Historical Markers recorded within the 1-mile-radius study area. The TxDOT Historic Resources Aggregator was reviewed for resources that are listed or determined eligible for listing on the NRHP. At the national level, NPS websites and data centers were reviewed to identify locations and boundaries for historic properties and historic trails.

The review indicated one (1) previous cultural resource survey and one (1) previously historic property are mapped within the 1-mile-radius study area surrounding the Project,

neither of which overlap the current Project APE. Additional details and maps are provided in Attachment 1.

Following the completion of background research, WSP completed Phase I cultural resource surveys to identify newly recorded archaeological sites and historic architectural resources within the APE. The results of the surveys are provided in Attachment 1 and summarized below.

Archaeological and Historic Architectural Resources

The archaeological field survey consisted of pedestrian walkover of the archaeological survey area (8.5 acres) employing visual inspection of the ground surface and supplemented with subsurface shovel testing where conditions allowed. A variety of disturbances were noted throughout the APE that included previous construction associated with the existing East Munday Station. A total of 18 shovel tests were excavated, none of which identified cultural material or features.

No above-ground architectural resources or standing structures were observed or recorded during the survey of the APE (a 0.25-mile radius surrounding the Project). Therefore, no cultural resources or historic properties are present within the Project's APE. Additional details, maps, and photographs are provided in Attachment 1.

Requesting your Concurrence and Next Steps

Based on DOE's review of the efforts to identify historic properties and conclusions drawn from this information, DOE is issuing a Finding of No Historic Properties Affected, consistent with 36 CFR § 800.4(d)(1). As part of the Section 106 process, DOE EDF requests the concurrence of the Texas SHPO on the Finding of No Historic Properties Affected, as well as any comments you may have on the APE or the Project **within thirty (30) days of receipt of this letter.**

The parties listed above that are copied on this letter are invited to participate as Section 106 consulting parties and may provide their comments on the undertaking to DOE EDF **within thirty (30) days of receipt of this letter.** In accordance with the confidentiality provisions of the Section 106 regulations at 36 CFR 800.11(c), to avoid the disclosure of potentially sensitive cultural resources information to the public, DOE EDF respectfully requests the consulting parties not share Attachment 1 with outside parties or the public.

In the event of a post-review unanticipated discovery of cultural resources and/or human remains during construction, DOE EDF will determine actions to resolve adverse effects and notify the SHPO, any Tribe that might attach religious and cultural significance to the affected property, and the Advisory Council on Historic Preservation (ACHP) within 48 hours of the discovery, pursuant to 36 CFR 800.13(b)(3).

We look forward to consulting with your office throughout the Section 106 process. If you have any questions or would like to discuss this project further, please contact me at 240-687-7266 or via email at EDF_Environmental@doe.gov.

Sincerely,

Molly R. Cobbs
Environmental Project Manager
Office of Energy Dominance Financing

Attachments:

Attachment 1. Cultural Resources Report

Attachment 2. Request for SHPO Consultation Form