Exhibit 12.

Phase I Cultural Resources Assessment and SHPO Clearance Letter

Town of Montgomery

SHPO Clearance Letter

BILLY NUNGESSER
LIEUTENANT GOVERNOR

State of Louisiana
OFFICE OF THE LIEUTENANT GOVERNOR
DEPARTMENT OF CULTURE, RECREATION & TOURISM
OFFICE OF CULTURAL DEVELOPMENT
DIVISION OF ARCHAEOLOGY

RICHARD H. HARTLEY
DEPUTY SECRETARY

KRISTIN P. SANDERS
ASSISTANT SECRETARY

December 6, 2018

Paul Jackson
TerraXplorations, Inc.
3523 18th Ave., NE
Tuscaloosa, AL 35406

Re: Draft Phase I Report
La Division of Archaeology Report No. 22-6123
A Phase I Cultural Resources Survey for the Proposed Montgomery Industrial Site in Grant Parish, Louisiana

Dear Paul Jackson:

We acknowledge receipt of your letter dated November 6 (received November 13) and two copies of the above referenced report that was submitted as Due Diligence. This letter is for preliminary, informational purposes only and does not constitute consultation or agency coordination with our Office as defined in 36 CFR 800: "Protection of Historic Properties" or by any state regulatory process. **The recommendation stated below could change once the responsible federal and/or state agency initiates consultation with our Office.** Consultation with the State Historic Preservation Office is not a substitution for consultation with Tribal Historic Preservation Offices, other Native American tribes, local governments, or the public. We have completed our review of this report and have the following comments to offer:

As this project is not yet a Federal undertaking, the use of terms such as Area of Potential Effects is not appropriate, as that is decided by the permitting Federal agency (see Pg. 1).

In the Land Use History chapter, the geologic history and historic use of the land should be directly linked to the probability of sites being present as well as the effects that they may have had on such sites, should they be present.

Please provide our office with shapefiles of the surveyed area. Going forward, we are no longer accepting draft reports that do not have shapefiles and a PDF copy.

If the proposed project will require federal permits, licenses, funds, loans, grants, or assistance for development, we would recommend to the federal or state agency or agencies that no historic properties have been identified in the Certification Boundary and no further cultural resource survey or investigation within it is needed.

The State Historic Preservation Office will provide the above recommendation regarding historic properties and effects to them at this project location if a federal agency initiates consultation.

We look forward to receiving one bound copy (printed double sided) and one pdf of the final report addressing our comments above. If you have any questions, please contact Emily Dale at the Division of Archaeology by email at edale@crt.la.gov or by phone at 225-219-4596.

Sincerely,

Kristen Sanders,
State Historic Preservation Officer

Phase I Cultual Resources Assessment

A Phase I Cultural Resources Survey for the Proposed Montgomery Industrial Site in Grant Parish, Louisiana

NEGATIVE FINDINGS
DRAFT REPORT

Prepared by
TerraXplorations, Inc.

Prepared for
Cothren, Graff, Smoak Engineering, Inc.

TerraXplorations, Inc.
1001 Hampton Gate
Mobile, Alabama 36609
www.terraxplorations.com

October 2018

Cothren, Graff, Smoak Engineering, Inc.
6305 Westport Avenue
Shreveport, Louisiana 71129

A Phase I Cultural Resources Survey for the Proposed Montgomery Industrial Site in Grant Parish, Louisiana

NEGATIVE FINDINGS
DRAFT REPORT

BY
Lucinda Freeman

Prepared by
TerraXplorations, Inc.
1001 Hampton Gate
Mobile, Alabama 36609

Prepared for
Cothren, Graff, Smoak Engineering, Inc.
6305 Westport Avenue
Shreveport, Louisiana 71129

Principal Investigator
Paul D. Jackson

TerraX Report No. 2018.235

October 18, 2018

ABSTRACT

On October 5 and 8, 2018, TerraXplorations, Inc. (TerraX) of Mobile, Alabama performed a Phase I cultural resources survey for the proposed Town of Montgomery Industrial Site located just northwest of the Town of Montgomery in Grant Parish, Louisiana. This is in support of the Louisiana Economic Development (LED) Site Certification process. Total acreage for this project is 31 acres (12.5 hectares). There were no previously recorded sites or standing structures in the project area. No cultural resources were recorded as a result of this survey. All paperwork and supporting documents will be curated at the Troy University Archaeological Research Center in Troy, Alabama. No further archaeological studies are recommended for the proposed Montgomery Industrial Site project.

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LIST OF FIGURES

ACKNOWLEDGMENTS

The Phase I survey was performed by Matthew Sumrall, Kelsey Johnson and Lucinda Freeman with Paul D. Jackson serving as Principal Investigator. Natalie Ledesma digitized the maps and Lucinda Freeman was responsible for the contents of the report. This work was accomplished for Cothren, Graff, Smoak Engineering, Inc. in support of the Louisiana Economic Development (LED) Site Certification process.

CHAPTER 1
INTRODUCTION

TerraXplorations, Inc. (TerraX) of Tuscaloosa, Alabama was contracted by Cothren, Graff, Smoak Engineering, Inc., of Shreveport, Louisiana to conduct a cultural resources survey for the proposed Montgomery Industrial Site in Grant Parish, Louisiana. This is in support of the Louisiana Economic Development (LED) Site Certification process.

The Phase I survey was performed on October 5 and 8, 2018 by Matthew Sumrall, Kelsey Johnson, and Lucinda Freeman, with Paul D. Jackson serving as Principal Investigator. The purpose of this study was to determine if any prehistoric or historic properties exist within the limits of the project area, and if so, to document and assess each based on the National Register of Historic Places (NRHP) criteria. The project area (PA) is the same as the area of potential effect (APE).

The project area lies east of U.S. Highway 71, northwest of Montgomery, Louisiana (Figure 1.1). Total acreage for this project is 31 acres (12.5 hectares). The project area is found within Section 8, Township 8 North, Range 5 West as seen on the 2003 Montgomery, Louisiana USGS 7.5' series topographic quadrangle (Figure 1.2).

This report of our investigations is presented as follows. Chapter 2 contains information regarding land use history in the project area. Chapter 3 examines any previous sites or surveys in or near the project area. Chapter 4 presents the field and laboratory methodology as well as curation. Chapter 5 consists of the results of fieldwork. Chapter 6 concludes the report and summarizes our findings and recommendations. Appendix A is the curation agreement.

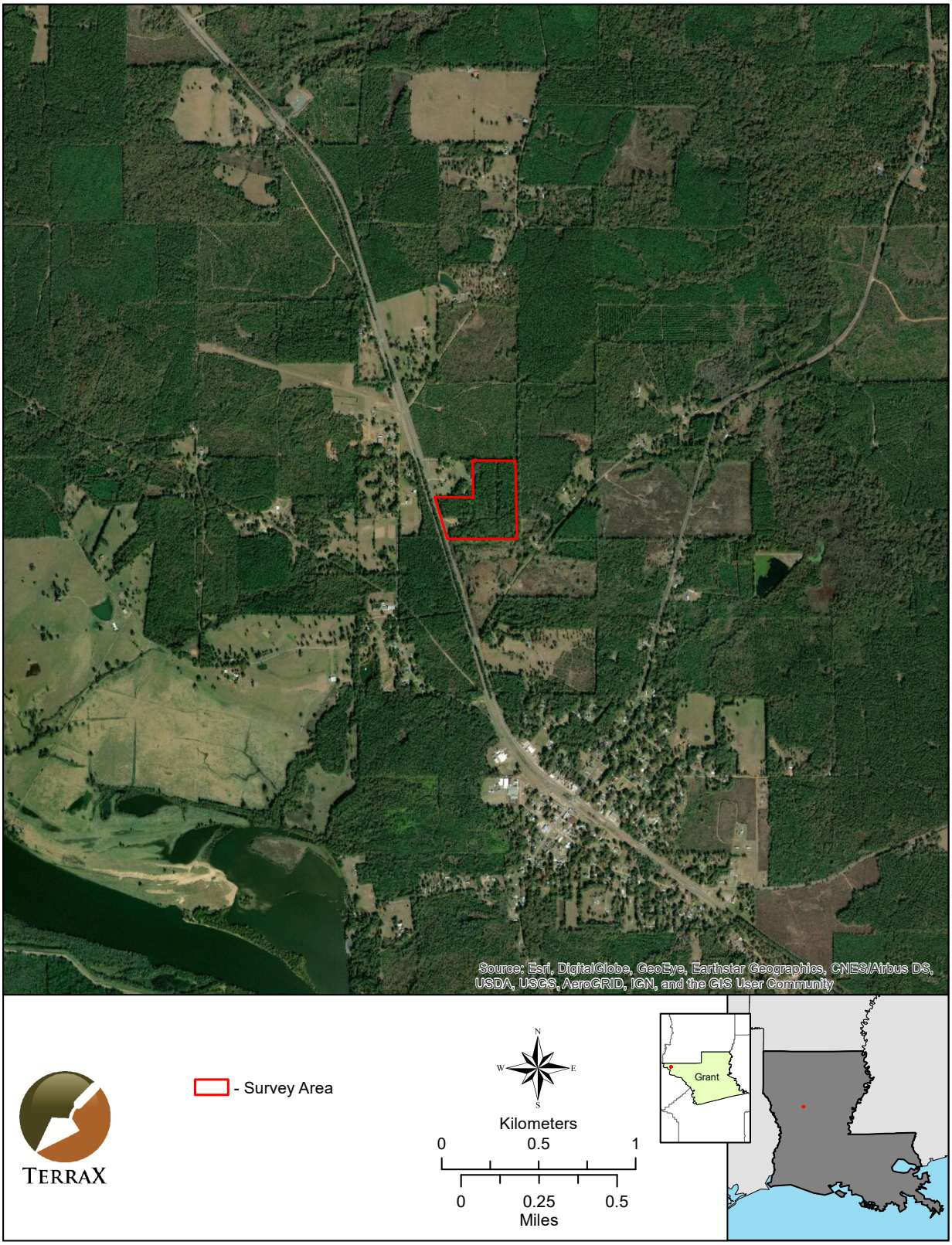

Figure 1.1. *Aerial image showing the project area.*

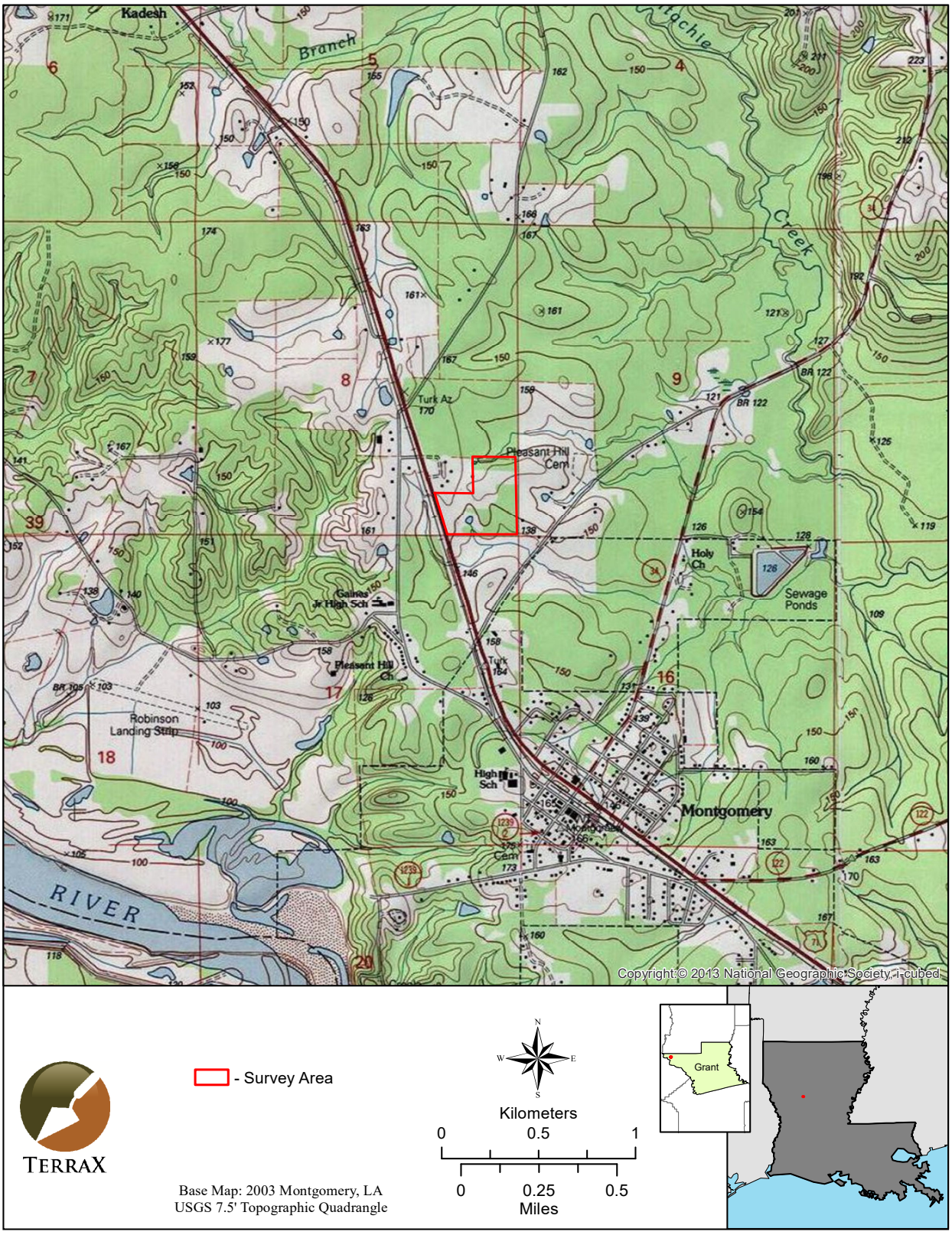

Figure 1.2. *Topographic map showing the project area.*

CHAPTER 2
LAND USE HISTORY

The project area, located in central Louisiana in Grant Parish, falls within the Pleistocene Fluvial Terraces portion of the South Central Plains ecoregion. These unconsolidated Pleistocene terrace deposits are nearly level and poorly drained. Native vegetation includes loblolly pine and lowland oaks well adapted for the hydro-xeric moisture regime. The terraces occur in a vertical sequence with the lowest being nearly flat and clayey while the higher terraces are older and more dissected (Daigle, et al. 2006).

The project area is bound by U.S. Highway 71 on the west and is located about a mile northeast of the Red River. The most current topographic map is the 2003 Montgomery 7.5' series, which shows a small residential area northwest of the project area and the Kansas City Southern Railroad paralleling U.S. Highway 71. No structures are shown within the project area (Figure 2.1).

The current land use map depicts the undeveloped aspect of the project area (Figure 2.2). Much of the northern portion of the property is covered by evergreen forest, with a few areas of mixed forest or shrub/scrub. The southern portion is dominated by mixed forest and evergreen forest. The developed areas of the southeast include easements for U.S. Highway 71 and utilities as well as a gravel drive and pad for staging of the trash collection dumpsters.

The project area is in the Red River Drainage Basin. Elevations in the project area range from about 125 to 175 ft above mean sea level. Dense areas of mixed hardwoods and planted pines of varying stages of growth cover most of the project area. A gravel road runs from a gravel pad out to Highway 71 at the western end of the property. The gravel pad is used as a dumpster staging area for rural trash pick up. A trail branches off from the gravel road and runs east through the project area before turning north and continuing beyond the northern boundary. In the southern portion of the project area, the edges of the trail were lined with piles of modern garbage.

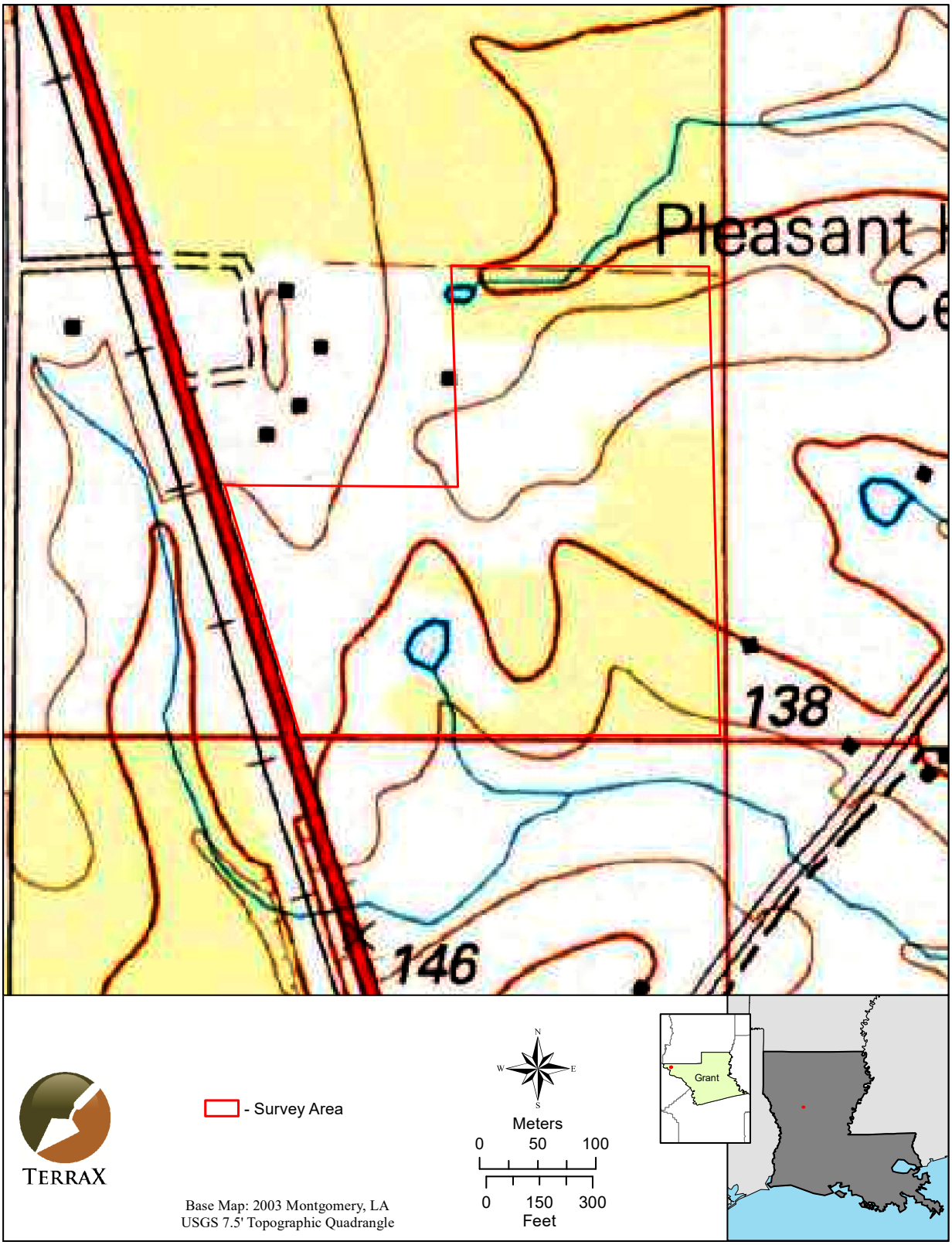

Figure 2.1. *Modern 2003 topographic map showing the project area.*

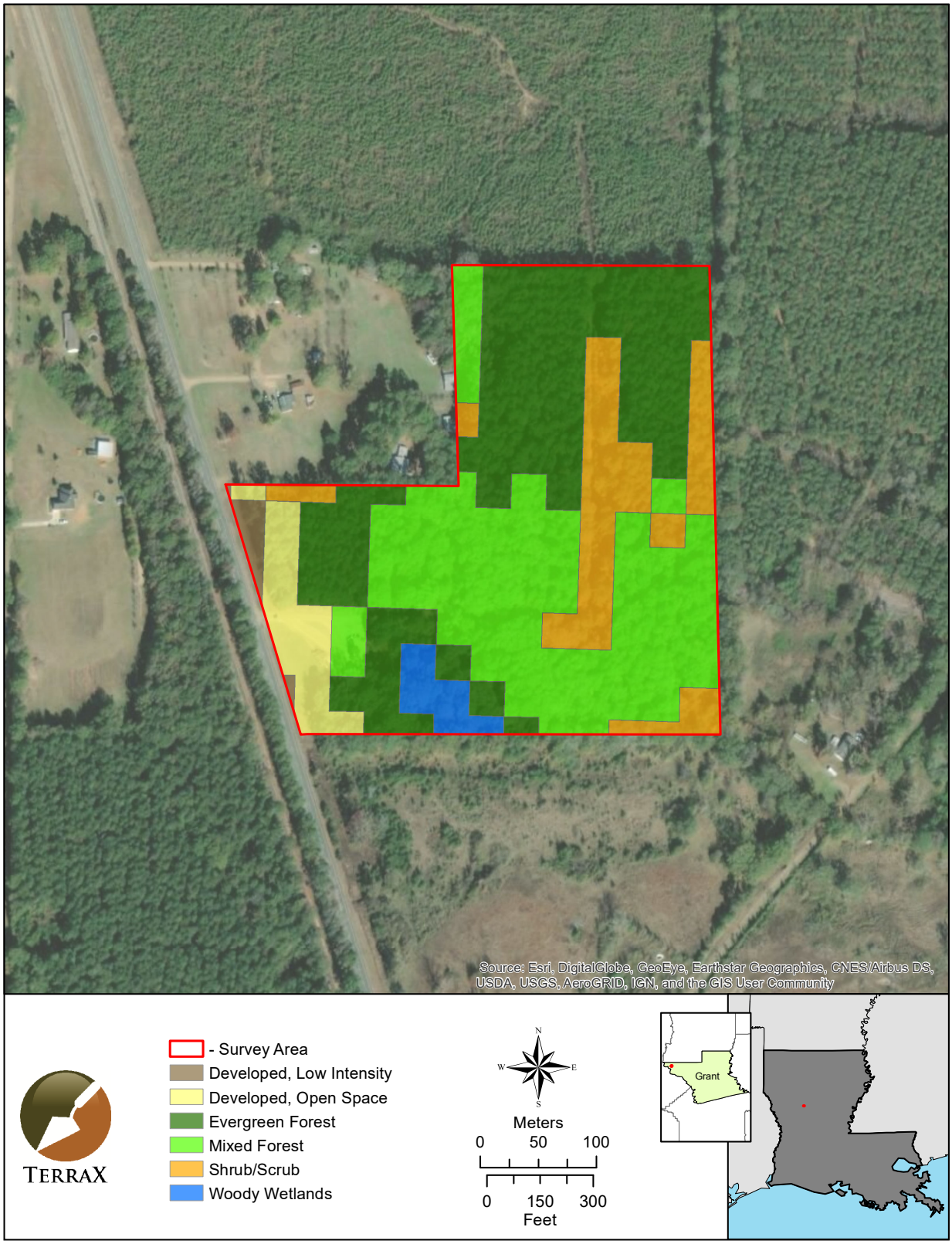

Figure 2.2. *Project area land use map.*

CHAPTER 3
PREVIOUS INVESTIGATIONS

LITERATURE AND DOCUMENT SEARCH

Background research was conducted prior to the survey to identify previously recorded historic and prehistoric properties within a one-mile radius of the proposed Montgomery Industrial Site project located in Grant Parish, Louisiana. This search included an online query of the Louisiana Site Files (Louisiana Division of Archaeology [LDOA] 2018). A one-mile (1.6 km) radius search was conducted around the proposed project area for previously recorded archaeological sites and previous cultural resources surveys. An examination of the Historic Standing Structure Survey Files at the State Library in Baton Rouge, Louisiana was performed to ascertain whether any historic resources have been recorded within or near the project area. Lastly, a query into the National Register of Historic Places (NRHP) (National Park Service 2018) was conducted.

A search of the Phase I Surveys database maintained by LDOA (2018) identified one previously recorded archaeological site within a mile of the study area. Site 16GR28 is an unknown prehistoric campsite found in 1975. There were two surveys conducted within one mile, but neither were within the project area (Figure 3.1). Pleasant Hill Cemetery is located 0.25 mile to the east of the project area and will be unaffected by the proposed undtaking. There are no NRHP-listed resources nor previously recorded historic structures within one mile. Historic map research revealed no structures within the project area.

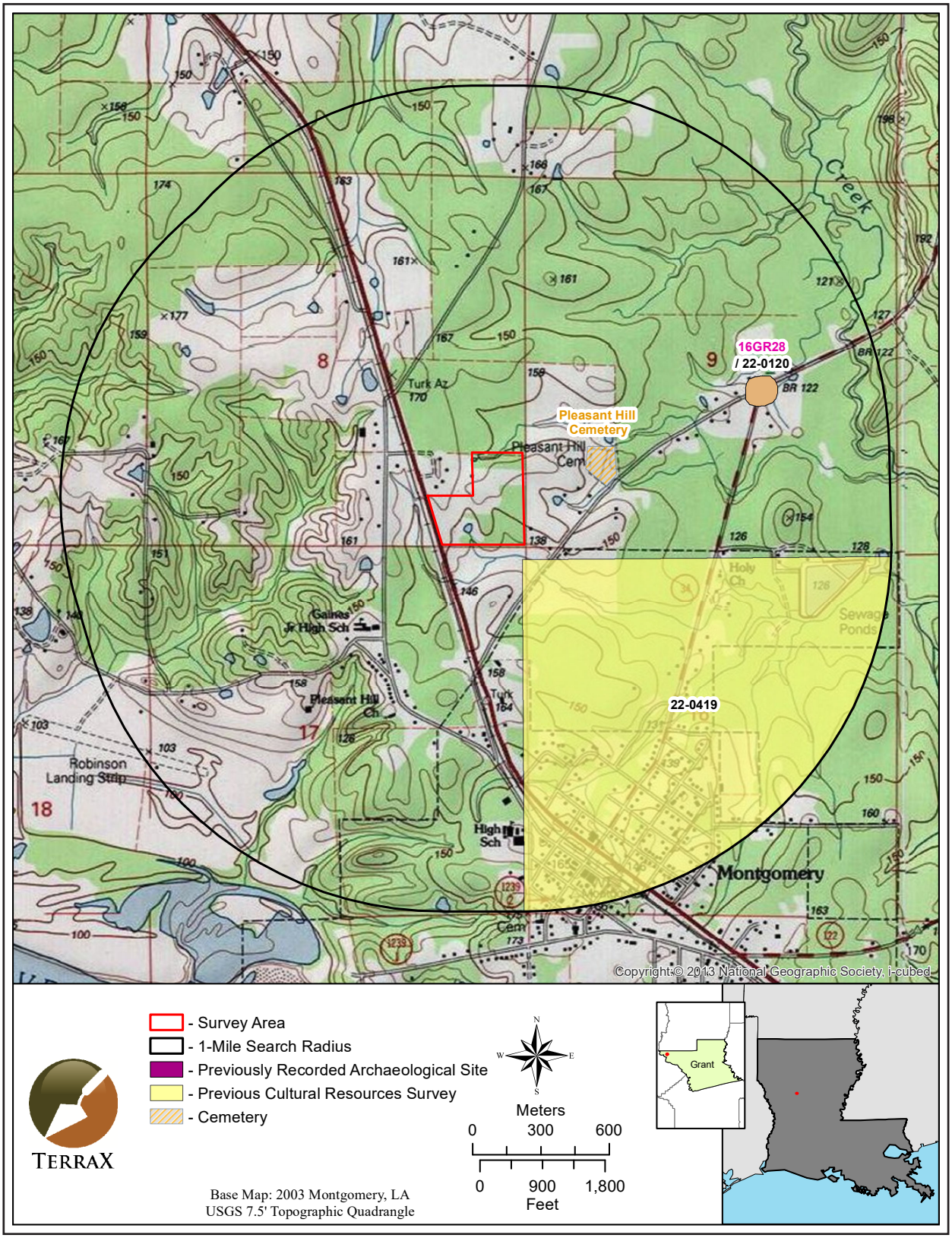

Figure 3.1. *Map showing previous surveys and previously recorded sites within a one-mile radius of the project area.*

CHAPTER 4
METHODOLOGY

STANDING STRUCTURES

Historic maps were reviewed before the field work was accomplished to ascertain the presence or absence of possible historic resources within the project area. No historic resources were found on the historic maps and field reconnaissance corroborated that there are no standing structures within the project area.

ARCHAEOLOGICAL FIELD METHODS

The field survey conducted implemented standard archaeological survey techniques. Full land coverage requirements were achieved through visual inspections of the entire survey area and subsurface testing. While conducting visual inspections, any exposed surfaces were carefully examined for cultural material.

Subsurface testing was performed along 30-m interval transects comprised of shovel tests spaced 30 m apart. Standard shovel tests consist of 30 centimeter (cm) diameter cylindrical holes excavated to the top of the sterile subsoil layer or until the water table or other obstruction was encountered. Soils from each test are screened through 1/4-inch (0.64 cm) hardware cloth for the purpose of recovering any cultural material that may exist at that location. If cultural material is encountered, the material is sorted by provenience and placed into bags labeled with the pertinent excavation information before being transported to TerraX's laboratory. Any cultural material identified during transecting is further examined in order to better define its horizontal and vertical limits. Delineations are conducted by placing additional shovel tests around positive tests. These additional tests are placed at 10 m intervals off of the original positive tests or cultural features in cardinal directions within the project area. This testing is conducted until two negative shovel tests were encountered in each direction or until delineations extended beyond the project boundary. A hand held Garmin GPS unit is used to record the site center and a sketch map is drawn by compass and pace and plotted to scale. Digital photographs are taken for any site recorded as well as for the survey area.

For the Montgomery Industrial Site project, 133 shovel tests along 13 transects were attempted (Figure 4.1). Of these, four tests were unable to be excavated due to a residential use area, the gravel access road, and a gravel pad.

LABORATORY METHODS

All cultural materials recovered during field projects are delivered to TerraX's laboratory in Tuscaloosa, Alabama for processing. Upon initial receipt of materials and field forms, bag lists are entered into a computer database for use with a labeling program. Materials are cleaned and, if necessary, stabilized before classification and quantification by laboratory analysts. Cultural materials are sorted on the basis of morphologic attributes, raw-material type (i.e., chert, quartz, etc.), measurements, and/or function. Previously defined types are often used to facilitate chronological assessments and intrasite comparisons.

CURATION

Along with the cultural material, all project records, photographs, and maps produced while conducting the investigation are transported for curation at the Troy University Archaeological Research Center, Troy, Alabama (Appendix A).

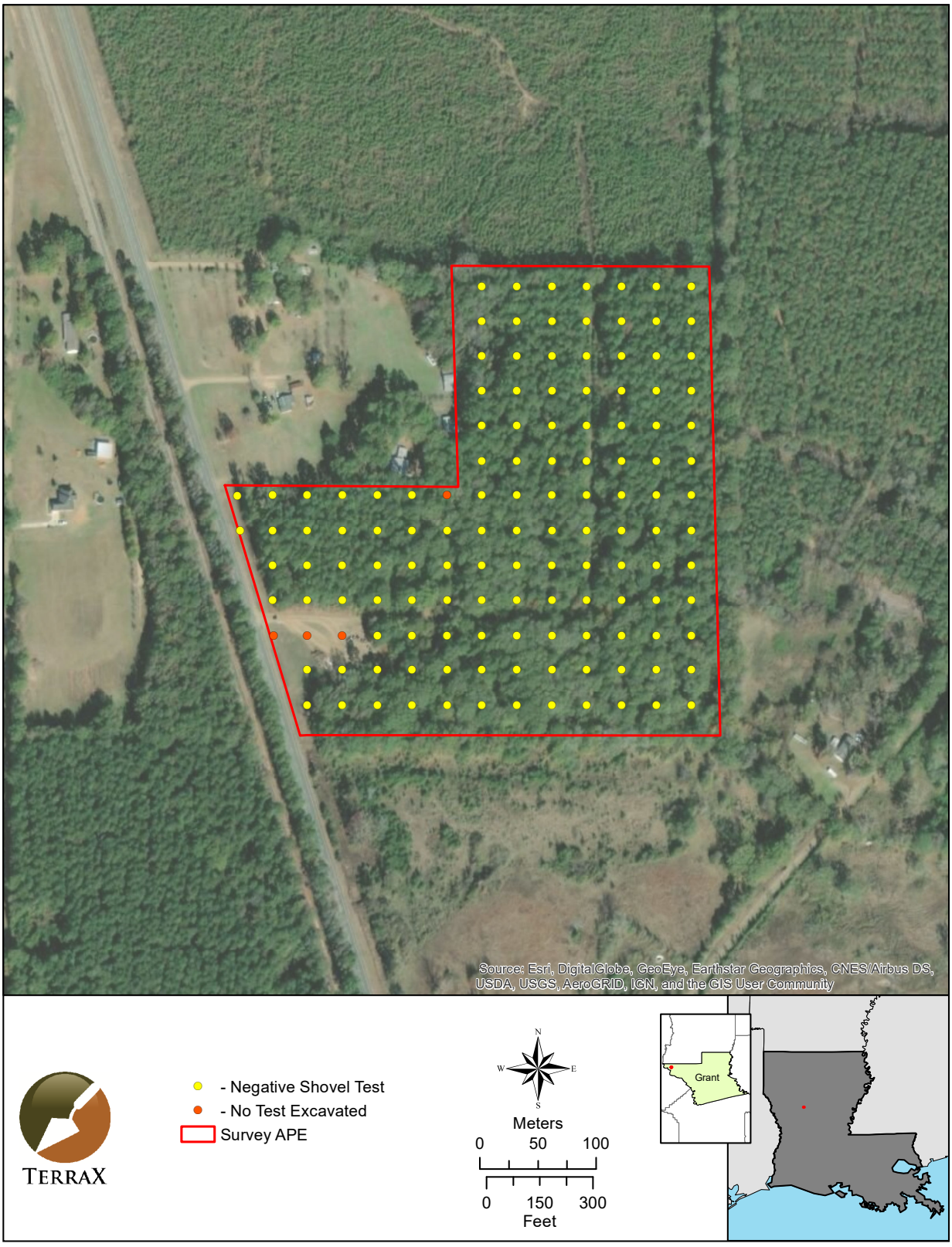

Figure 4.1. *Aerial Map showing shovel tests within the project area.*

CHAPTER 5
RESULTS

OVERVIEW

This Phase I investigation included the placement of 133 shovel tests along 13 transects in this 31-acre (12.5-hectare) tract (see Figure 4.1). All were tested at 30-m high probability intervals. Three of these shovel tests were unable to be excavated due to the gravel access road and staging area for the collection dumpsters in the southwest portion of the project area. One could not be excavated due to a residential use area. The remainder of the shovel tests were negative. A typical shovel test consisted of grayish brown (10YR 5/2) silty loam over yellowish red (5YR 5/6) or strong brown (7.5YR 5/8) clay (Figure 5.1). Figures 5.2-5.7 depict the present condition of the project area.

SITES/ISOLATED FINDS

No cultural materials or surface features were encountered during this survey.

STANDING STRUCTURES

No standing structures are located within the project area boundaries.

HISTORIC AREAS

No historic areas are located within the project area boundaries.

Figure 5.1. *Typical shovel test profile for the project area.*

Figure 5.2. *View of the mixed hardwood forest in the north, facing northwest.*

Figure 5.3. *View from the small pond in the southwest corner towards trashpile along the access road, facing north.*

Figure 5.4. *View of the modern trash piles lining the trail, facing southeast.*

Figure 5.5. *View of the trail crossing through the project area, facing north..*

Figure 5.6. *View of the gravel access road and pad for the collection dumpsters, facing east.*

Figure 5.7. *View of the gravel pad for the collection dumpsters, facing east.*

CHAPTER 6
SUMMARY AND RECOMMENDATIONS

TerraX, under contract with Cothren, Graff, Smoak Engineering, Inc. of Shreveport, Louisiana performed the Phase I cultural resources survey for the proposed Montgomery Industrial Site project located near Montgomery in Grant Parish, Louisiana in compliance with federal and state regulations. The Phase I survey was performed October 5 and 8, 2018. No cultural materials were located during this investigation. Accordingly, no further archaeological studies are recommended for the proposed Montgomery Industrial Site project.

REFERENCES

Daigle, J.J., G.E. Griffith, J.M. Omernik, P.L. Faulkner, R.P. McCulloh, L.R. Handley, L.M. Smith, and S.S. Chapman
2006 Ecoregions of Louisiana (color poster with map, descriptive text, summary tables, and photographs): Reston, Virginia, U.S. Geological Survey.

Louisiana Division of Archaeology (LDOA)
2018 Louisiana Archaeological Site Files. Louisiana Division of Archaeology, Baton Rouge, Louisiana. Assessed online October 4, 2018.

National Park Service
2018 *National Register of Historic Places*. Department of the Interior, Washington, D.C. Available online at www.cr.nps.gov/nr, accessed October 4, 2018.

APPENDIX A
CURATION LETTER

TROY UNIVERSITY

Archaeological
Research Center

Date: September 30, 2017

Paul Jackson
TerraXplorations
3130 East University Blvd
Tuscaloosa Al 34504.

Dear Paul,

As per your request, this letter is to confirm our standing agreement with you to provide curation services to Terra Explorations on an as-needed basis. As you know, we are recognized by a variety of Federal agencies as a repository meeting the standards in 36 CFR Part 79 and have formal agreements to provide curation under these guidelines to multiple federal agencies such as the Army National Guard and Natural Resources Conservation Service.

Please be advised that once a year we must be notified of all reports in which we were named as the repository. Project collections must be submitted within one calendar year of completion. Small projects may be complied for periodic submission. The AHC survey policy specifies which materials must be curated (Administrative Code of Alabama, Chapter 460-X-9). Renewal of this agreement is contingent upon compliance.

We appreciate this opportunity to be of assistance and look forward to working with you in the future.

Sincerely,

Jason Mann
Director
Archeological Research Center
Troy University