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February 28, 2011

Penn Energy Renewables, Ltd.
1 Yonge St., Suite 1801
Toronto, ON M5E 1W7

RE: Penn Energy Glengarry-St. Lawrence Solar Project

Lots 40, 41 and 41A, Judge's Plan 107, South Glengarry Township, County of Stormont, Dundas and Glengarry, Ontario.

FIT#: F-000627-SPV-130-505

IRIMS: HD00576

PIF: P025-201-2010

Dear Proponent:

This letter constitutes the Ministry of Tourism and Culture's written comments as required by s. 22(3)(a) of O. Reg. 359/09 under the *Environmental Protection Act* regarding archaeological assessments undertaken for the above project.

Based on the information contained in the report(s) you have submitted for this project, the Ministry believes the archaeological assessment complies with the *Ontario Heritage Act's* licensing requirements, including the licence terms and conditions and the Ministry's 1993 Archaeological Assessment Technical Guidelines. Please note that the Ministry makes no representation or warranty as to the completeness, accuracy or quality of the Report(s).

The report(s) recommends the following:

- A total of 8,500 shovel tests was excavated on the subject property, as well as a surface survey of four ploughed fields, all at a high potential 5 meter interval. There were no archaeological materials recovered, either historic or prehistoric. Historic records also do not indicate any 19th century structures. Due to the lack of archaeological resources, complete clearance of the subject property is recommended by this report.
- If deeply buried archaeological remains are encountered during construction, the proponent

must stop work immediately and contact the Archaeology Unit of the Ministry of Tourism and Culture at 416-314-7146. If human remains are encountered, the proponent must stop work immediately and contact the Registrar of Cemeteries, Regulations Section of the Ministry of Consumer and Business Services at 416-326-8404, as well as the Archaeology Unit of the Ministry of Tourism and Culture.

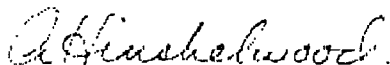
The Ministry is satisfied with the recommendations.

This letter does not waive any requirements which you may have under the Ontario *Heritage Act*. A separate letter addressing archaeological licensing obligations under the Act will be sent to the archaeologist who completed the assessment and will be copied to you.

This letter does not constitute approval of the renewable energy project. Approvals of the project may be required under other statutes and regulations. It is your responsibility to obtain any necessary approvals or licenses.

Please feel free to contact me if you have questions or require additional information.

Sincerely,



Andrew Hinshelwood
Archaeology Review Officer

cc. Dr. L. J. Jackson
Northeastern Archaeological Associates
PO Box 493
Port Hope, ON L1A 3Z4

**In no way will the Ministry be liable for any harm, damages, costs, expenses, losses, claims or actions that may result: (a) if the Report(s) or its recommendations are discovered to be inaccurate, incomplete, misleading or fraudulent; or (b) from the issuance of this letter. Further measures may need to be taken in the event that additional artifacts or archaeological sites are identified or the Report(s) is otherwise found to be inaccurate, incomplete, misleading or fraudulent.

Stage 1 and 2 Archaeological Assessment of the Penn Energy-South
Glengarry_St. Lawrence1 Solar Project, Lots 40, 41 and 41A, Judge's Plan
107, South Glengarry Township, County of Stormont, Dundas, and
Glengarry, Ontario.

FIT#: F-000627-SPV-130-505

For

Penn Energy Renewables, Ltd.

US Address:

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Bala Cynwyd
PA 19004
Ph: 610-668-0300

Canadian Address:

1 Young Street, Suite 1801
Toronto, Ontario
M5E 1W7

From

Northeastern Archaeological Associates Limited,
P.O. Box 493,
Port Hope, Ontario
L1A 3Z4

Licensed to: Dr. Lawrence Jackson,
Licence #: P-025
PIF #: P-025-201-2010

January 27, 2011



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INTRODUCTION

A contract to carry out a Stage 1 and 2 archaeological assessment of the Penn Energy South Glengarry St. Lawrence1 Solar Project (Fit #: F-000627-SPV-130-505), Lots 40, 41 and 41A, Judge's Plan 107, 18423 and 18461 County Road 19, Township of South Glengarry (former Charlottenberg Township), County of Stormont, Dundas and Glengarry, Ontario, was awarded to Northeastern Archaeological Associates Limited by Penn Energy Renewables, Ltd. on September 21, 2010. The subject property is an approximately 177 acre parcel of land just north of the town of Cashions Glen and about 5 km north of the city of Cornwall, Ontario. Permission to enter the property was granted by the proponent. This report represents a complete record of all activities conducted at the site.

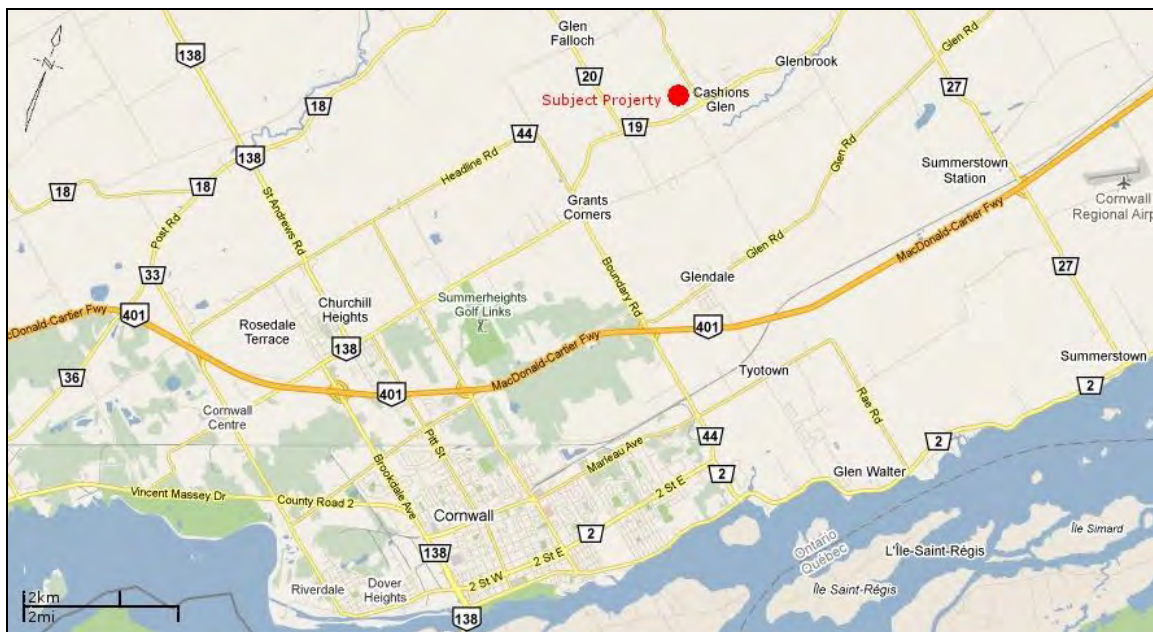


Figure 1: Location of Subject Property (in Red) North of Cornwall, Ontario.

REGIONAL PHYSIOGRAPHY

The subject property is located in the Glengarry Till Plain physiographic region of south-eastern Ontario. This region includes about 935 square miles of undulating to rolling till plains, clay flats, and swamps that form the drainage divide between the Ottawa basin and the St. Lawrence. Soils are stony and contain a high proportion of limestone with some Precambrian rocks from the north (Chapman and Putnam 1973). Locally, the subject property is in an area of flat till plains surrounded by clay plains. It consists of cleared fallow land, as well as planted pine and buckthorn forest leading down to an area of wetland in the west end. Figure 2 shows an aerial view of the subject property with the development area shown in purple.



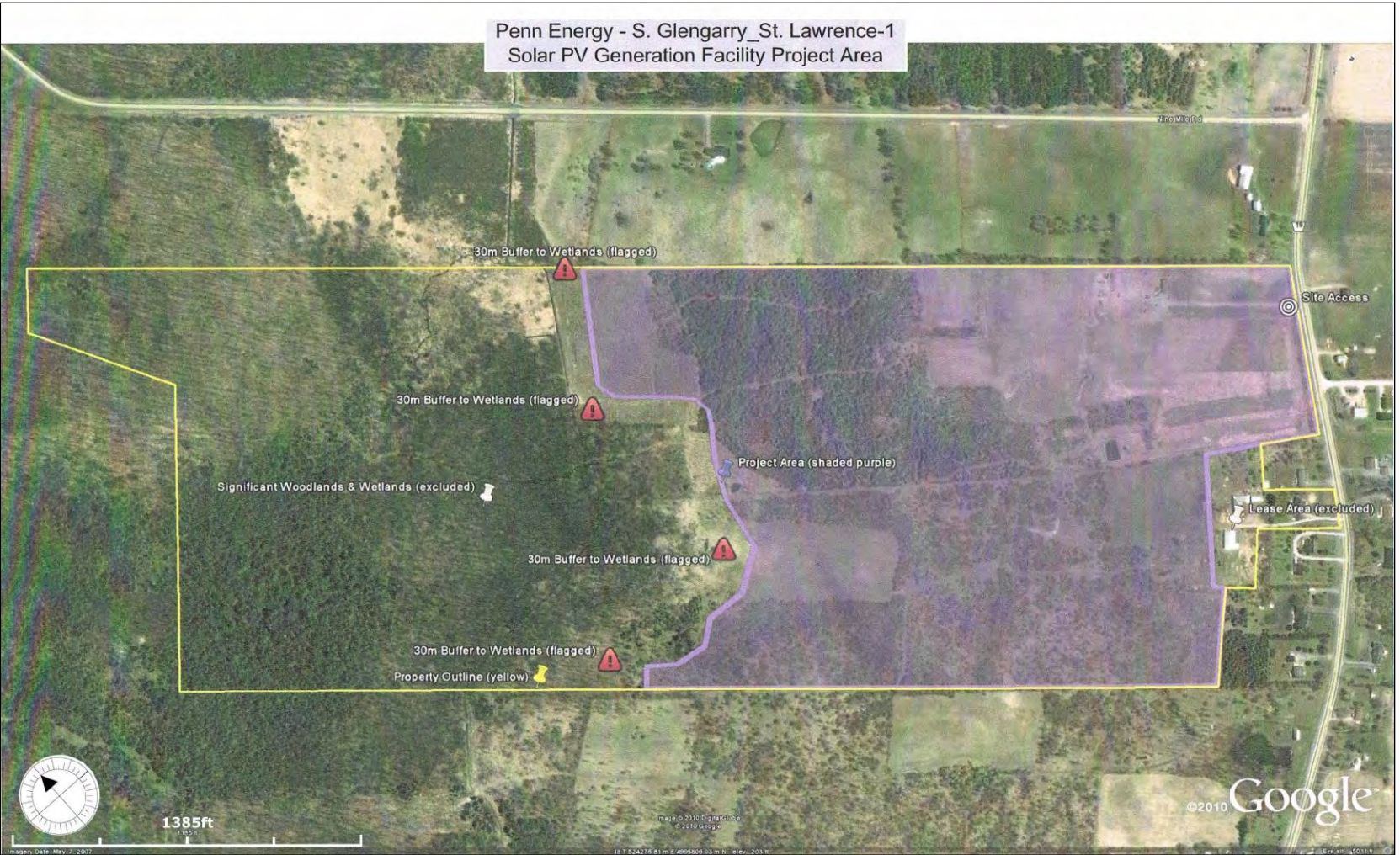


Figure 2: Penn Energy Development Area (in purple) Plan.



KNOWN ARCHAEOLOGICAL SITES

A search of the archaeological sites data base of the Ontario Ministry of Tourism and Culture by data co-ordinator Robert von Bitter on November 5, 2010 did not produce records of any registered archaeological sites within a 2 km radius of the subject property. Given the lack of systematic survey in the area, it is likely that archaeological sites will be discovered in future.

HISTORIC BACKGROUND

The former Township of Charlottenburg in the County of Glengarry, in which the subject property is located, is the biggest township in the county. It was first settled in 1784 by United Empire Loyalists, followed by Scottish emigrants in 1786. Most of the early immigrants were tradesmen. The first church in the area was built in 1789 in the nearby Scottish settlement of St. Andrews, west of the subject property along the banks of Riviere aux Raisins. The church was thought to have been the first in Upper Canada. The first immigrants to the nearby and larger township of Cornwall came at the same time and also consisted of United Empire Loyalists. British patriots that had been moved from Quebec subsequently settled and began the work of clearing forest in this area. It was soon after that construction commenced, and a canal and the Hodge Mill were built in addition to military buildings in the Town of Cornwall. Cornwall was also noted for its textile industry (Belden and Co. 1881).

Locally, the 1881 Historic Atlas map for the township shows the subject properties as owned by Allan and William Young, and J. Cashion. There is a hotel shown in the south-central portion of the property, **well outside** of the property development area, along County Road 19. There are no other buildings shown on the property. Land registry records do not indicate the existence of the fifth concession that the Historic Atlas map shows for this township, as Brigitte Clermont from the land registry office in Alexandria has indicated. In fact, Brigitte notes that the records from this township are almost impossible to trace using these historic lot numbers. Deeds were obtained for the current lots 40, 41, and 41A by Penn Energy Renewables Ltd. The deeds for lot 40 indicate that the patent was to Allan Young in 1853, which is consistent with the Historic Atlas map. Deeds obtained for the present lots 41 and 41A indicate that the patents went in parts to Christy McCallum in 1850 and Allen Young in 1853. The deeds obtained did not include any listing for J. Cashion as a property owner in or around the 1880s, although they do indicate that Christy Cashion bought part of the property in 1875 from Christy McCallum. The deeds for lot 40 show a James Cashion purchasing this property in 1904.



FIELD CREW, SCHEDULE AND CONDITIONS

All field work on the subject property was carried out under the Project Direction of Dr. Lawrence Jackson and the Field Direction of Marika Atfield, with the field assistance of Myles Allen, Nelson Jacobs, and Justin Tighe. All field work was carried out under clear and cool conditions on November 08 to 11 and 15 to 18, 2010.

METHODOLOGY

The entire development area of the subject property was tested at a high potential 5 meter interval due to the existence of a wetland in the west portion of the property and proximity to historic County Road 19. About 60 percent of the property was pine and buckthorn woodlot, as well as lawn associated with existing houses, and was therefore shovel tested. About 30 percent of the property was ploughed farmland which was surface surveyed at a 5 meter interval. Portions of the north and south ends of the property were too wet for testing (see Figure 3). A small area in the south end that consisted of gravel fill and an artificial pond was also exempt from testing, as was the gravel drive and parking area associated with the new frame house in the south-east part of the property. Figure 3 shows the location of shovel test, surface survey and disturbed or wet areas. All shovel tests were excavated to sterile subsoil and all fill was screened through ¼ inch mesh rocker screens. All test units were backfilled.

RESULTS OF STAGE 2 SHOVEL TESTING AND SURFACE SURVEY

Approximately 8,500 shovel tests were excavated on the property, as well as surface survey of four ploughed fields, all at a high potential 5 meter interval. **There were no archaeological materials recovered as a result of this survey, either historic or prehistoric.** Plates 1, 2 and 4 show shovel testing in progress. Plate 3 shows surface survey in progress. Plate 5 gives a view of the wetland area in the west of the property.



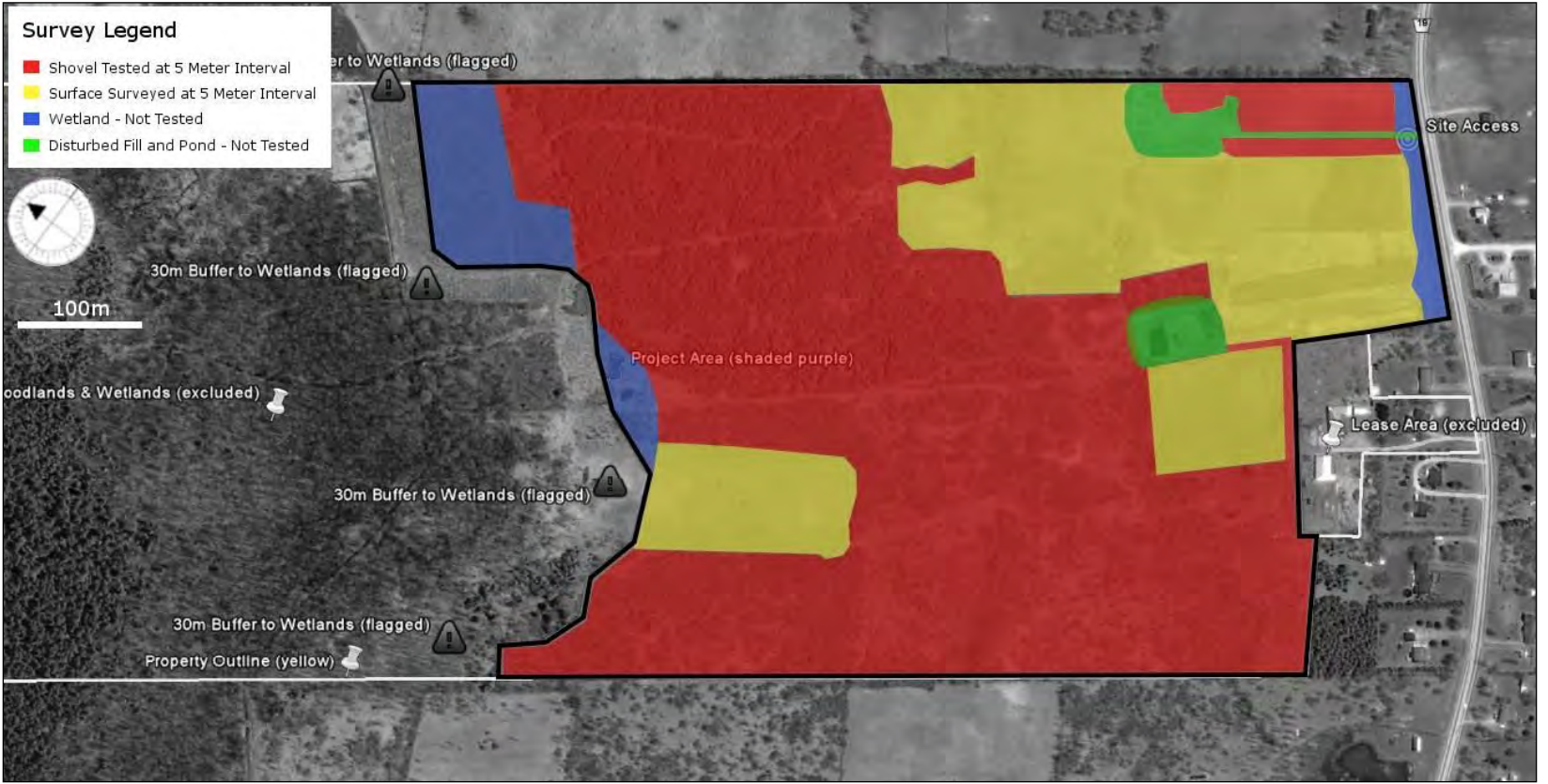


Figure 4: Methodology Map Showing Areas of Shovel Testing, Surface Survey, Disturbance or Wetland.



Plate 1: View of Shovel Testing in Woodlot in North Central Part of Property.



Plate 2: View of Shovel Testing in Buckthorn Woods in Western Part of Property.





Plate 3: View West of Surface Survey in Ploughed Field in Northeast of Property.



Plate 4: View North of Shovel Testing Lawn Surrounding Existing House in Southeast Part of Property.





Plate 5: View of Wetland in North End of Property
(note pooled water in right of photo).

SUMMARY AND RECOMMENDATIONS

A total of about 8,500 shovel tests was excavated on the subject property, as well as surface survey of four ploughed fields, all at a high potential 5 meter interval. There were no archaeological materials recovered, either historic or prehistoric. Historic records also do not indicate any 19th century structures. Due to the lack of archaeological resources, **complete clearance of the subject property is recommended by this report.**

Development Caution

If deeply buried archaeological remains are encountered during construction, the proponent must stop work immediately and contact the Archaeology Unit of the Ministry of Tourism and Culture at 416-314-7146. If human remains are encountered, the proponent must stop work immediately and contact the Registrar of the Cemeteries Regulations Section of the Ministry of Consumer and Business Services at 416-326-8404, as well as the Archaeology Unit of the Ministry of Tourism and Culture.



REFERENCES CITED

Belden, H., and Co.

1881 **Illustrated Historical Atlas of Prescott and Russel, Stormont, Dundas
and Glengarry Counties, Ontario.** Toronto.

Chapman, L.J. and D.F. Putnam

1973 **The Physiography of Southern Ontario.** 2nd Edition, Toronto.

