

**Appendix 16.6: Letter from
the Department for
Conservation, Restoration
and Use of Historical and
Cultural Treasures (Heritage)
of the Krasnodar Region,
Department Manager N.V
Volkodov to the General
Director of OJSC “Naslediye
Kubany” (Kuban Heritage),
N.N. Tkachevaya. Reference
No.78/3865/120119, dated
10 July 2012**

Response of the Administration on Preservation, Restoration And Operation of the Monuments of Historical and Cultural Heritage of the Krasnodar Region on the status of the discovered sites of Varvarovka 1, Varvarovka 2 and Varvarovka 3.

Ref No 110 of 16.07.2012

FAO: O. P. Kulikova

ADMINISTRATION
ON PRESERVATION, RESTORATION AND
OPERATION OF THE MONUMENTS OF
HISTORICAL AND CULTURAL HERITAGE OF THE
KRASNODAR REGION

for work
General Director
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10.07.2012 Ref No 78 – 3865/121114
To Ref No 498/2012 of 09.07.2012

[STAMP: Kuban Heritage OJSC
Ref No 185/2012 Date: 12.07.2012]

Re: Preservation of the Discovered Sites

Dear Natalia Nickolaevna,

The Administration on Preservation, Restoration and Operation of the Monuments of Historical and Cultural Heritage of the Krasnodar Region, hereinafter referred to as "Administration", with regard to your Application Ref No 498/2012 of 09.07.2012 on the issue of the clarification of the term for the identification of the sites with the characteristics of the objects of cultural heritage, inform the following.

According to the information, contained in the registration cards, you submitted earlier, on the discovered sites - Varvarovka 1, Varvarovka 2 and Varvarovka 3, on the basis of the archaeological surveys by a test pit method, no cultural layer was discovered.

To adopt a decision on the inclusion of the object of the archaeological heritage to a Unified State Register of the Objects of Cultural Heritage (Monuments of History and Culture) of the Peoples of the Russian Federation, pursuant to Article 17 of the Federal Law No 73 – FL of 25 June 2002, the relevant authority for the preservation of the objects of cultural heritage must submit to the Government of the Russian Federation a setoff the information and materials, including the description of the specific features of the objects constituting the ground for entering into the Register and for being the subject of mandatory preservation, hereinafter referred to as the "subject of preservation". The subject of preservation of the objects of the archaeological heritage of the residential settlement type (sites of ancient towns, settlements, ancient villages) is the archaeological cultural layer of soil (stratification),

containing the material remnants of human activities, the time of establishment of which is restricted in duration and has a well-defined lower and upper borderline.

Due to the absence of the specific features, liable to the mandatory preservation (subject of preservation), the Administration do not see any grounds for referring the discovered objects to the identified objects of archaeological heritage, subject to state protection pursuant to Para 6 of Article 18 of the Federal Law No 73 – FL of 25 June 2002.

At the same time, during archaeological excavations (surveys) of the discovered objects it was established that fragments of ancient pottery items, bone remnants, fragments of the coatings from the dwellings, etc., occur on their surface in the top soil. This situation may give evidence on the destruction of the cultural layer of the ancient settlement as a result of agricultural works (ploughing), which doesn't exclude the findings of separate archaeological objects, buried below the ploughed level (middens, dwellings, burial ground disposal, etc.).

According to the Handbook of Instructions (HOI) on the Recommendations for Scientific Research, Survey, Design and Production Works, aimed at the preservation of the objects of the cultural heritage (monuments of history and culture) of the people of the Russian Federation (HOI – 2007), 4 Revision, recommended for use by the Ministry of Culture of the Russian Federation, on the territory of the object of the cultural heritage with a significant damage of the cultural layer, the most advisable form of archaeological field surveys are archaeological supervisions of the earth works by an archaeological specialist.

For the purpose of the preservation of the detected objects during the construction of the main South Stream gas pipeline, we consider the supervision by the archaeological specialist-of the earth works on these sections to be necessary.

The archaeological supervisions shall be carried out manually or using excavation equipment to the continent or to the sites of the preserved stratified cultural layer and/or structural elements/complexes (buildings, facilities, burial grounds, etc) or their parts, the works on the archaeological supervision shall be stopped, and rescue archaeological excavations shall be carried out in full scope on these sites throughout the whole area of the site of the archaeological heritage from the level of the modern surface on the sites of the anthropogenic or non-stratified (re-deposited) cultural layer.

For the identification of the detected sites Varvarovka 1, Varvarovka 2 and Varvarovka 3 we recommend to use the term "sections of the un-stratified (re-deposited) cultural layer", as stipulated in the Handbook of Instructions HOI – 2007, 4 Revision.

Head of Administration

[Signature]

N. V. Volkodav

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