



Northern Natural Gas  
P.O. Box 3330  
Omaha, NE 68103-0330  
402 398-7200

March 13, 2024

***Via eFiling***

Ms. Debbie-Anne Reese, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

Re: Northern Natural Gas Company  
Northern Lights 2025 Expansion  
Docket No. CP24-60-000  
USFWS Concurrence

Dear Ms. Reese:

Northern Natural Gas Company (Northern) hereby submits for filing in the above-referenced docket correspondence dated March 6, 2024, from the U.S. Fish and Wildlife Service (USFWS). As provided in the attached, consultation is complete for the Farmington to Hugo C-line extension, the Lake Mills to Albert Lea E-line extension and the modifications at the La Crescent compressor station. In addition, the USFWS approved Northern's survey protocols for the rusty patch bumble bee and the Karner blue butterfly at the Elk River 3rd branch line and the Tomah branch line loop extensions.

Any questions regarding this filing should be directed to the undersigned at (402) 398-7138.

Respectfully submitted,

/signed/ Donna Martens

Donna Martens  
Senior Regulatory Analyst

## **Martens, Donna (Northern Natural Gas)**

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**From:** donna.martens@nngco.com  
**Subject:** FW: [EXTERNAL] Northern Lights 2025 - Species Information

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**From:** Utrup, Nick J <[nick\\_utrup@fws.gov](mailto:nick_utrup@fws.gov)>  
**Sent:** Wednesday, March 6, 2024 10:12 AM  
**To:** Knabe, Susan <[Susan.Knabe@stantec.com](mailto:Susan.Knabe@stantec.com)>  
**Cc:** Chan, Ginger <[ginger.chan@stantec.com](mailto:ginger.chan@stantec.com)>; Noland, Nathan <[Nathan.Noland@stantec.com](mailto:Nathan.Noland@stantec.com)>; [terry.plucker@nngco.com](mailto:terry.plucker@nngco.com)  
**Subject:** Re: [EXTERNAL] Northern Lights 2025 - Species Information

Hi Sue,

I have reviewed your documents for the proposed projects. To facilitate this response, here are my comments for each proposed section:

### Farmington to Hugo C-line

- You have received a verification letter from our IPaC system related to the Minnesota-Wisconsin DKey, dated February 5, 2024 (Project Code: 2024-0029631)
- You have received a concurrence letter from our IPac system related to the NLEB DKey, dated February 5, 2024
  - This concurrence letter returned a NLAA determination for NLEB
  - Related to the Tri-colored bat, based on the NLAA determination for NLEB, we also concur that the project may affect but is not likely to adversely affect the tri-colored bat in the project area.
- No further action is required on your part related to the Farmington to Hugo C-line section of the proposed project. You have fulfilled your consultation requirements with our office.

### La Crescent Compressor Station

- You have received a no effect consistency letter from our IPaC system related to the Minnesota-Wisconsin DKey, dated January 24, 2024 (Project Code: 2024-0029631)
- You have received a no effect determination letter from our IPac system related to the NLEB DKey, dated February 5, 2024
- No further action is required on your part related to the La Crescent Compressor Station section of the proposed project. You have fulfilled your consultation requirements with our office.

### Lake Mills to Albert Lea E-line

- You have received a verification letter from our IPaC system related to the Minnesota-Wisconsin DKey, dated February 5, 2024 (Project Code: 2024-0029603)
- You have received a concurrence letter from our IPac system related to the NLEB DKey, dated February 5, 2024

- This concurrence letter returned a NLAA determination for NLEB
- Related to the Tri-colored bat, based on the NLAA determination for NLEB, we also concur that the project may affect but is not likely to adversely affect the tri-colored bat in the project area.
- No further action is required on your part related to the Lake Mills to Albert Lea E-line section of the proposed project. You have fulfilled your consultation requirements with our office.

Elk River 3rd branch line

- You have received a consistency letter from our IPaC system related to the Minnesota-Wisconsin DKey, dated February 6, 2024 (Project Code: 2024-0029617)
  - This consistency letter returned a "may affect" determination for Rusty Patched Bumble Bee
- You have received a concurrence letter from our IPac system related to the NLEB DKey, dated February 7, 2024
  - This concurrence letter returned a NLAA determination for NLEB
  - Related to the Tri-colored bat, based on the NLAA determination for NLEB, we also concur that the project may affect but is not likely to adversely affect the tri-colored bat in the project area.
- We have reviewed and approve of your proposed survey protocols for RPBB as described in your letter dated February 7, 2024.

Tomah branch line loop

- You have received a consistency letter from our IPaC system related to the Minnesota-Wisconsin DKey, dated February 6, 2024 (Project Code: 2024-0029640)
  - This consistency letter returned a "may affect" determination for Rusty Patched Bumble Bee
  - This consistency letter also returned a "may affect" determination for Karner Blue Butterfly
- You have received a concurrence letter from our IPac system related to the NLEB DKey, dated February 5, 2024
  - This concurrence letter returned a NLAA determination for NLEB
  - Related to the Tri-colored bat, based on the NLAA determination for NLEB, we also concur that the project may affect but is not likely to adversely affect the tri-colored bat in the project area.
- We have reviewed and approve of your proposed survey protocols for RPBB and Karner Blue Butterfly as described in your letter dated February 7, 2024.

Consultation is not yet complete for the Elk River 3<sup>rd</sup> branch line and the Tomah branch line loop, however, you are approved to proceed with surveys for RPBB and Karner Blue Butterfly as outlined in your February 7, 2023 letter.

Please upload a copy of this email to your project file in IPaC.

Thanks,

Nick

Nick Utrup

Minnesota-Wisconsin Ecological Services Field Office  
U.S. Fish and Wildlife Service  
3815 American Boulevard East  
Bloomington, MN 55425

Phone: (612) 600-6122

Email: [Nick\\_Utrup@fws.gov](mailto:Nick_Utrup@fws.gov)

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**From:** Knabe, Susan <[Susan.Knabe@stantec.com](mailto:Susan.Knabe@stantec.com)>  
**Sent:** Wednesday, February 7, 2024 8:06 PM  
**To:** Utrup, Nick J <[nick\\_utrup@fws.gov](mailto:nick_utrup@fws.gov)>  
**Cc:** Chan, Ginger <[ginger.chan@stantec.com](mailto:ginger.chan@stantec.com)>; Noland, Nathan <[Nathan.Noland@stantec.com](mailto:Nathan.Noland@stantec.com)>;  
[terry.plucker@nngco.com](mailto:terry.plucker@nngco.com) <[terry.plucker@nngco.com](mailto:terry.plucker@nngco.com)>  
**Subject:** [EXTERNAL] Northern Lights 2025 - Species Information

This email has been received from outside of DOI – Use caution before clicking on links, opening attachments, or responding.

Hi Nick

Northern Natural Gas is planning to construct its Northern Lights 2025 Expansion Project, which consists of the following components –

- Lake Mills to Albert Lea E-line 36-inch-diameter extension 3.00 miles 31.21 to  
34.21 Freeborn MN
- Elk River 3rd branch line 30-inch-diameter extension 2.43 miles 1.02 to  
3.45 Washington MN
- Farmington to Hugo C-line 30-inch-diameter extension 1.91 miles 0.00 to  
1.91 Washington MN
- Tomah branch line loop 8-inch-diameter extension 1.28 miles 2.25 to  
3.53 Monroe WI
- La Crescent compressor station minor facility modifications  
(aboveground) Houston MN

I will be sending you a separate email with a link to a OneDrive that contains copies of Stantec’s Rare, Threatened and Endangered Species Reports for each component along with copies determination keys completed for each component. We are requesting your concurrence with our determinations of effect. Northern is attaching a PDF summary of the species determination table that we are also submitting to FERC.

Also on the OneDrive is a folder that contains our proposed survey protocol to address the rusty patched bumble bee on the Elk River 3rd branch line and the Tomah branch line loop. The same letter contains our proposed survey protocol for the Karner blue butterfly on the Tomah branch line loop. A series of maps showing the high-potential zones overlaying our Project is included.

Northern understands the U.S. Fish and Wildlife Service may not provide concurrence with determination of effects for candidate and proposed species, but respectfully requests your written concurrence with the determinations for the NLAA species for this project. Northern is acting as FERC's designated non-federal representative per 18 CFR § 380.13(b)(1). FERC will require completed consultation with the USFWS before they will issue an Order of Necessity and Public Need for the project. We want to ensure that we have USFWS concurrence with our survey protocols and initial effect determinations before the start of the spring 2024 survey season begins.

Thank you and please let Nathan Noland or Ginger know if you have trouble with the OneDrive as I will be out of office for a few days.

Thanks again  
Sue

Sue Knabe  
Senior Principal  
De Pere Wisconsin  
Teams – 920-278-3220  
Cell – 920-655-7215  
[Susan.knabe@stantec.com](mailto:Susan.knabe@stantec.com)

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