



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

July 19, 2024

Via eFiling

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

Re: Northern Lights 2025 Expansion Project
Docket No. CP24-60-000
Supplemental Information

Dear Ms. Reese:

Northern Natural Gas Company (Northern) hereby submits for filing with the Federal Energy Regulatory Commission (FERC) in the above-referenced docket the following information.

Impact to traffic:

Northern has updated the attached table to provide the average daily traffic as well as the expected additional traffic flow for the roads that would provide primary access to each aboveground facility during construction. This information supplements Northern's responses to Data Requests 24 and 25 filed June 4, 2024 (response to FERC-issued data request dated May 15, 2024). As Northern stated in its June 4th response, traffic impacts would be minimal and temporary. Additionally, Northern would mitigate impacts by using flagmen and signage to control traffic as it often does during construction projects.

The attached table details the roadways that would provide primary access to the aboveground facilities during construction and operational activities. The table also details the average daily traffic for each roadway. The average daily traffic was collected from the Minnesota Department of Transportation website for seven of the 10 roads. Northern manned locations on two of the roads for six days (Monday through Saturday) to count the number of cars each day to get an estimation of the average daily traffic. The remaining road is associated with the Tomah branch line loop project component, which does not have an impact on an Environmental Justice community. Therefore, Northern did not collect average daily traffic at this location.

Northern provided estimations for average daily round trips for each project component with its June 4th response, which are also included in the attached table. The average daily round trips during construction range between 7 (La Crescent) and 91 (Elk River), which could result in an increase of daily traffic ranging from 2 to 48 percent. These estimated increases represent a worst case scenario as the total number of daily round trips will not

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always occur at the same location each day and will be spread throughout the project workspaces. Additionally, these aboveground facilities are located in rural areas with minimal traffic.

USFWS correspondence – Karner blue butterfly:

Attached is correspondence from the U.S. Fish and Wildlife Service concurring the project will have no effect on the Karner blue butterfly (KBB) and no further surveys for the KBB are necessary.

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

Respectfully submitted,

/signed/ Donna Martens

Donna Martens
Senior Regulatory Analyst

cc: Parties of record

Facility Name	New/ Modified and Facility Type	Associated Pipeline Segment	Primary Access Roadway for Construction	Primary Access Roadway for Operation	Average Daily Traffic (MN DOT Website)	Average Daily Traffic (Counted)	Average Daily Round Trips (Construction)	Estimated Increase in Daily Traffic
La Crescent compressor station	Minor aboveground facility modifications	Stand-alone component	County Road 25	County Road 25	289	N/A	7	2%
E-line tie-over valve setting (existing)	To be removed	Lake Mills to Albert Lea E-line	135th Street	N/A - Site will be removed	155	N/A	67	43%
Lake Mills tie-in valve setting	New valve setting	Lake Mills to Albert Lea E-line	690th Ave	690th Ave	213	N/A	67	31%
Elk River tie-over valve setting (existing)	To be removed	Elk River 3rd branch line	180th Street North	N/A - Site will be removed	N/A	236	91	39%
Elk River tie-in valve setting	New valve setting	Elk River 3rd branch line	Henna Ave North	Henna Ave North	N/A	191	91	48%
Hugo compressor station (existing)	New launcher and associated valves and piping	Farmington to Hugo C-line	170th Street	170th Street	3564	N/A	67	2%
Farmington tie-in valve setting	New valve setting	Farmington to Hugo C-line	Manning Trail North	Manning Trail North	3244	N/A	67	2%
Tomah branch line loop receiver facility (existing)	To be relocated	Tomah branch line loop	County Highway B	N/A - Site will be removed	800	N/A	44	6%
Tomah tie-over valve setting	To be removed	Tomah branch line loop	Gardener Ave	N/A - Site will be removed	N/A	N/A - Not in/near EJ	44	N/A
Tomah branch line loop receiver facility	Relocated receiver and associated valves and piping	Tomah branch line loop	County Highway Q	County Highway Q	260	N/A	44	17%

Martens, Donna (Northern Natural Gas)

From: Plucker, Terry (Northern Natural Gas)
Sent: Thursday, July 11, 2024 1:23 PM
To: Martens, Donna (Northern Natural Gas)
Cc: Knabe, Susan; Kraft, Matt (Northern Natural Gas)
Subject: FW: [INTERNET] Re: [EXTERNAL] Northern Lights 2025 - Results of first lupine survey-request to stop further surveys
Attachments: Nick Utrup Emial 07112024 - Northern Lights 2025 - Results of first lupine survey-request to stop further surveys.pdf

See below and attached for submission to FERC.

From: Utrup, Nick J <nick_utrup@fws.gov>
Sent: Thursday, July 11, 2024 1:13 PM
To: Knabe, Susan <Susan.Knabe@stantec.com>
Cc: Noland, Nathan <Nathan.Noland@stantec.com>; Plucker, Terry (Northern Natural Gas) <terry.plucker@nngco.com>
Subject: [INTERNET] Re: [EXTERNAL] Northern Lights 2025 - Results of first lupine survey- request to stop further surveys

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Hi Sue,

Based on the results of your survey efforts it is reasonable to assume no presence for KBB. You can use this information as justification for "no effect" in your records. You may proceed without further surveys.

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

From: Knabe, Susan <Susan.Knabe@stantec.com>
Sent: Thursday, July 11, 2024 11:54 AM
To: Utrup, Nick J <nick_utrup@fws.gov>
Cc: Noland, Nathan <Nathan.Noland@stantec.com>; terry.plucker@nngco.com <terry.plucker@nngco.com>
Subject: [EXTERNAL] Northern Lights 2025 - Results of first lupine survey- request to stop further surveys

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

Hi Nick

Per our plans and survey commitments listed below and included in our February 7, 2024 letter, Stantec (on behalf of Northern Natural Gas) completed a lupine survey for the Karner Blue Butterfly (KBB) on the Tomah branch line loop on May 29, 2024. The lupine survey is conducted between milepost (MP) 2.2 to MP 2.5 where the KBB high potential range intersected project workspace. Stantec's KBB biologist located a total of 13 lupine plants at MP 2.38 within or adjacent to the proposed project workspace for the Tomah branch line loop. No other lupine plants were identified in the survey area.

Based on the WDNR protocols for the KBB, the population of lupine present is inadequate to support the KBB. Further, Stantec also surveyed for KBB during the lupine survey and no evidence of caterpillars feeding on lupine leaves were observed. Based on the results of the lupine survey, no additional flight surveys for KBB within the Tomah branch line loop workspace are proposed.

Northern is requesting that USFWS confirm if Northern is approved to stop further surveys and we can come to a no effect determination on the KBB for the Tomah branch line loop.

Please let me know if you need more information. Thanks much
Sue

Sue Knabe
Teams: 920-278-3220
Cell: 920-655-7215

Stantec



From: Utrup, Nick J <nick.utrup@fws.gov>
Sent: Wednesday, March 6, 2024 10:12 AM
To: Knabe, Susan <Susan.Knabe@stantec.com>
Cc: Chan, Ginger <ginger.chan@stantec.com>; Noland, Nathan <Nathan.Noland@stantec.com>; 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 3rd 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

From: Knabe, Susan <Susan.Knabe@stantec.com>
Sent: Wednesday, February 7, 2024 8:06 PM
To: Utrup, Nick J <nick_utrump@fws.gov>
Cc: Chan, Ginger <ginger.chan@stantec.com>; Noland, Nathan <Nathan.Noland@stantec.com>; terry.plucker@nngco.com <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

Stantec



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