



Northern Natural Gas Company
P.O. Box 3330
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402 398-7200

March 5, 2025

Via eFiling

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

RE: **Northern Natural Gas
Northern Lights 2025 Expansion
Docket No. CP24-60-000
Acceptance of Order and Implementation Plan (Response to Conditions of
Order)**

Dear Ms. Reese:

On February 19, 2025, the Federal Energy Regulatory Commission (Commission) issued an Order Issuing Certificate and Approving Abandonment (Order) in the above referenced docket authorizing Northern Natural Gas (Northern) to abandon, construct and operate the Northern Lights 2025 project facilities.

Acceptance of Order

Section 157.20(a) of the Commission's regulations and Ordering Paragraph B(2) of the Order, provides that an applicant must accept a certificate within thirty days from the date of the order or the certificate is void and without force or effect. By this letter, Northern accepts such certificate.

Ordering Paragraph B(4)

In accordance with Ordering Paragraph B(4) of the Order, Northern is affirming that firm contracts for capacity levels and terms of service have been executed with Northern's customers.

Response to the Conditions of the Order and Implementation Plan

Northern hereby submits for filing with the Commission in the above-referenced docket the attached responses to the environmental conditions included in the Order and the Implementation Plan in response to Condition 6 of the Environmental Conditions of the Order.

The filing consists of the following:

Responses to Conditions of the Order (Public Information)

- This transmittal letter
- Responses to conditions 1 through 15 with applicable attachments

Privileged Attachments to Responses

- *Addendum Report 2: Shovel Testing of Potential Historic Resource ER-15* (Condition 13)
- Landowner concurrence (Condition 14)

Map Book (11 x 17) (Public Information) (Condition 5)

- Figure 1-4 (alignment sheets)
- Horizontal directional drill (HDD) plan and profile drawings/ Site-specific plans

Map Book (11 x 17) (Privileged Information) (Condition 5)

- Figure 1-5 (alignment sheets)

Critical Energy Infrastructure Information (CEII) (Condition 5)

- Figure 1-6 (plot plans)

The *Addendum Report 2: Shovel Testing of Potential Historic Resource ER-15*, landowner concurrence, and the privileged alignment sheets (Figure 1-5) contain confidential information regarding landowner names and/or the location of cultural resources and have therefore been segregated and labeled **CUI//PRIV ---DO NOT RELEASE**. Figure 1-6 provides operational and engineering details and has been segregated and labeled **CUI//CEII – DO NOT RELEASE**. Pursuant to 18 CFR § 388.112, Northern requests confidential and privileged treatment of the privileged and CEII data.

The person to be contacted regarding the request for privileged and confidential treatment is as follows:

Donna Martens
Senior Regulatory Analyst
Northern Natural Gas Company
1111 South 103rd Street
Omaha, NE 68124-1000
Telephone: 402-398-7138
Email: donna.martens@nngco.com

Please note, attached to the biweekly report (Condition 8) is agency correspondence not previously filed with FERC. The correspondence includes (1) an email dated December 19, 2024, from the Minnesota Department of Natural Resources (DNR) approving Option A of the Blanding Turtle Avoidance Plan; (2) an email dated November 29, 2024, from the Wisconsin DNR concurring both of the desktop-mapped intermittent waterways on the

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Tomah branch line loop are non-jurisdictional at the crossing location; and (3) letters from the U.S. Fish and Wildlife Service dated January 17, 2025, and revised Determination Keys and IPAC listings concurring no habitat and no impact on the Northern long-eared bat for the Tomah branch line loop and the Elk River 3rd branch line.

Northern is not requesting notice to proceed with construction at this time. As indicated in Condition 9, Northern has obtained all permits required under federal law, with the exception of the construction stormwater permits. Northern has applied for the construction stormwater permits in both Minnesota and Wisconsin and anticipates issuance in late March/ early April 2025. Northern will update the permit status once received and request written authorization from the Director of OEP to commence construction at that time.

Based upon the information provided in the attached, Northern is requesting the Director of the Office of Energy Project (OEP) issue written approval (1) to conduct two new open-cut wetland crossings on the Farmington to Hugo C-line described in Condition 1 (and Condition 5); (2) of the modification requests for approval discussed in Condition 5; (3) of the two requests for an exemption from *FERC's Wetland and Waterbody Construction and Mitigation Procedures VI.B.1.a* to extend ETWS42 through wetland FRM-W13 and into the wetland buffer of FRM-12 and to have PD-05 within 45 feet of FRM-W16 and 25 feet of FRM-W18, both on the Farmington to Hugo C-line and discussed in Condition 5; (4) of Northern's Implementation Plan attached to Condition 6 and that Northern may begin construction once all applicable conditions have been satisfied; (5) that Condition 13 has been satisfied; and (6) that Condition 14 has been satisfied. Northern also requests the commission issue approval of Northern's responses to Condition 1, 2, 3, 4, 7, 8, 10, 11, and 12.

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

Respectfully Submitted,

/s/ Donna Martens

Donna Martens
Senior Regulatory Analyst

Northern Natural Gas Company
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Implementation Plan For Docket No. CP24-60-000

Requesting Party: FERC
Reference No: NL2025 COND-01
Requester's Name: Jessica Miller/Andrea Bloomfield
Subject: Construction Procedures and
Mitigation Measures

Condition 1:

Northern shall follow the construction procedures and mitigation measures described in its application and supplements (including responses to staff data requests) and as identified in the EA, unless modified by the Order. Northern must:

- a. request any modification to these procedures, measures, or conditions in a filing with the Secretary of the Commission (Secretary);
- b. justify each modification relative to site-specific conditions;
- c. explain how that modification provides an equal or greater level of environmental protection than the original measure; and
- d. receive approval in writing from the Director of the Office of Energy Projects (OEP), or the Director's designee, before using that modification.

Northern Response:

Northern will follow the construction procedures and mitigation measures described in its application and supplements (including responses to staff data requests) and as identified in the environmental assessment, unless modified by the Order. Northern will:

- a. request any modification to these procedures, measures, or conditions in a filing with the Secretary;
- b. justify each modification relative to site-specific conditions;
- c. explain how that modification provides an equal or greater level of environmental protection than the original measure; and
- d. receive approval in writing from the Director of OEP, or the Director's designee, before using that modification.

At this time, Northern is requesting the Director of OEP issue written approval to conduct two new open-cut wetland crossings on the Farmington to Hugo C-line. See condition 5 for the discussion of the crossings; specifically, Alignment Sheets FAR P3-3, FAR P3-4 and FAR P3-5/Wetland FRM-W23.

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Requesting Party: FERC
Reference No: NL2025 COND-02
Requester's Name: Jessica Miller/Andrea Bloomfield
Subject: Director's Authority

Condition 2:

The Director of OEP, or the Director's designee, has delegated authority to address any requests for approvals or authorizations necessary to carry out the conditions of the Order, and take whatever steps are necessary to ensure the protection of environmental resources during construction and operation of the Project. This authority shall allow:

- a. the modification of conditions of the Order;
- b. stop-work authority; and
- c. the imposition of any additional measures deemed necessary to ensure continued compliance with the intent of the conditions of the Order as well as the avoidance or mitigation of unforeseen adverse environmental impact resulting from Project construction and operation.

Northern Response:

Northern understands the Director of the Office of Energy Projects (OEP), or the Director's designee, has delegated authority to address any requests for approvals or authorizations necessary to carry out the conditions of the Order, and take whatever steps are necessary to ensure the protection of environmental resources during construction and operation of the Project.

Northern further understands this authority allows:

- a. modification of conditions of the Order;
- b. stop-work authority; and
- c. the imposition of any additional measures deemed necessary to ensure continued compliance with the intent of the conditions of the Order as well as the avoidance or mitigation of unforeseen adverse environmental impact resulting from project construction and operation.

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Requesting Party: FERC
Reference No: NL2025 COND-03
Requester's Name: Jessica Miller/Andrea Bloomfield
Subject: Affirmative Statement - Training

Condition 3:

Prior to any construction activities, Northern shall file an affirmative statement with the Secretary, certified by a senior company official, that all company personnel, EIs, and contractor personnel shall be informed of the EIs' authority and have been or will be trained on the implementation of the environmental mitigation measures appropriate to their jobs **before** becoming involved with construction, abandonment, and restoration activities.

Northern Response:

Attached is Northern's affirmative statement, certified by Brian J. Mundt, Vice President, Operations, stating that all company personnel, EIs, and contractor personnel will be informed of the EIs' authority and will be trained on the implementation of the environmental mitigation measures appropriate to their jobs before becoming involved with construction and restoration activities.

AFFIRMATIVE STATEMENT

The undersigned, Brian J. Mundt, Vice President, Operations, hereby certifies that all company personnel, environmental inspectors (EIs), and contractor personnel will be informed of the EIs' authority and will be trained on the implementation of the environmental mitigation measures appropriate to their jobs before becoming involved with construction and restoration activities as specified in the Order issued in Docket No. CP24-60-000.

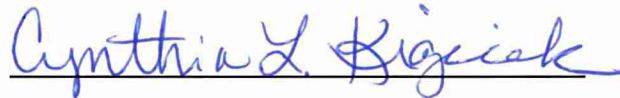
State of Nebraska §
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County of Douglas §

Brian J. Mundt, Vice President, Operations, being duly sworn, hereby attests that he has read the attached Affirmative Statement submitted on behalf of Northern Natural Gas Company in the matter Northern Natural Gas Company at Docket No. CP24-60-000 and hereby certifies that the affirmative statement is true to the best of his knowledge, information and belief.

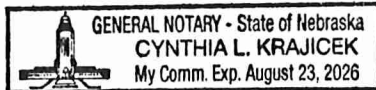


Brian J. Mundt
Vice President, Operations

Subscribed and sworn to before me, a Notary Public in and for the state of Nebraska, the 28th day of February 2025.



Cynthia L. Krajicek
Notary Public



(Seal)

My Commission Expires: August 23, 2026.

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Requesting Party: FERC
Reference No: NL2025 COND-04
Requester's Name: Jessica Miller/Andrea Bloomfield
Subject: Authorized Facility Locations

Condition 4:

The authorized facility location shall be as shown in the EA, as supplemented by filed alignment sheets. **As soon as they are available, and before the start of construction**, Northern shall file with the Secretary any revised detailed survey alignment maps/sheets at a scale not smaller than 1:6,000 with station positions for all facilities approved by the Order. All requests for modifications of environmental conditions of the Order or site-specific clearances must be written and must reference locations designated on these alignment maps/sheets.

Northern's exercise of eminent domain authority granted under NGA section 7(h) in any condemnation proceedings related to the Order must be consistent with these authorized facilities and locations. Northern's right of eminent domain granted under NGA section 7(h) does not authorize it to increase the size of its natural gas facilities to accommodate future needs or to acquire a right-of-way for a pipeline to transport a commodity other than natural gas.

Northern Response:

At this time, Northern is proposing no changes to the authorized facility locations depicted in the environmental assessment. Should any of these locations change, Northern will file with the Secretary revised detailed survey alignment maps/sheets or aerial photographs depicting the change and request written approval from the Director of OEP for the revised location. Northern understands all requests for modifications of environmental conditions of the Order or site-specific clearances must be written and must reference locations designated on these alignment maps/sheets.

Northern understands its exercise of eminent domain authority granted under Natural Gas Act (NGA) Section 7(h) in any condemnation proceedings related to the Order must be consistent with these authorized facilities and locations. Northern further understands its right of eminent domain granted under NGA Section 7(h) does not authorize it to increase the size of its natural gas facilities to accommodate future needs or to acquire a right of way for a pipeline to transport a commodity other than natural gas.

Condition 5:

Northern shall file with the Secretary detailed alignment maps/sheets and aerial photographs at a scale not smaller than 1:6,000 identifying all route realignments or facility relocations, and staging areas, pipe storage yards, new access roads, and other areas that would be used or disturbed and have not been previously identified in filings with the Secretary. Approval for each of these areas must be explicitly requested in writing. For each area, the request must include a description of the existing land use/cover type, documentation of landowner approval, whether any cultural resources or federally listed threatened or endangered species would be affected, and whether any other environmentally sensitive areas are within or abutting the area. All areas shall be clearly identified on the maps/sheets/aerial photographs. Each area must be approved in writing by the Director of OEP, or the Director's designee, **before construction in or near that area.**

This requirement does not apply to extra workspaces allowed by the Commission's Plan and/or minor field realignments per landowner needs and requirements that do not affect other landowners or sensitive environmental areas such as wetlands.

Examples of alterations requiring approval include all route realignments and facility location changes resulting from:

- a. implementation of cultural resources mitigation measures;
- b. implementation of endangered, threatened, or special concern species mitigation measures;
- c. recommendations by state regulatory authorities; and
- d. agreements with individual landowners that affect other landowners or could affect sensitive environmental areas.

Northern Response:

Northern understands extra workspace allowed by the Upland Erosion Control, Revegetation, and Maintenance Plan as well as minor field realignments per landowner needs and requirements that do not affect other landowners or sensitive environmental areas such as wetlands does not require written approval from the Director of the Office of Energy Projects (OEP), or the Director's designee, prior to using such workspace.

Examples of alterations requiring approval include all route realignments and facility location changes resulting from:

- 1) Implementation of cultural resources mitigation measures;
- 2) Implementation of endangered, threatened, or special concern species mitigation measures;
- 3) Recommendations by state regulatory authorities; and
- 4) Agreements with individual landowners that affect other landowners or could affect sensitive environmental areas.

At this time, Northern is submitting the following modifications to Project components. Revised alignment sheets and aerial photographs, horizontal directional drill (HDD) plan and profile drawings and site specific plans (SSP), and revised facility plot plans (Figure 1-6) reflecting these

changes are attached; the revisions are indicated by a delta (F1) symbol on the drawings. A complete set of alignment sheets is attached. A separate version of the alignment sheets, which provides landowner names (Figure 1-5) is segregated and labeled “CUI//PRIV - DO NOT RELEASE.” The facility plot plans provide specific engineering and/or operational information and are segregated and labeled “CUI//CEII – DO NOT RELEASE.”

All revisions fall within the environmentally surveyed and cleared areas and will not result in any additional impacts to cultural resources, threatened and endangered species or their habitats, or waterbodies; no additional agency consultation is required. With the exception of rusty-patched bumble bee (RPBB) habitat on the Tomah branch line loop, there are no environmentally sensitive areas located on or abutting the changes other than areas previously described in the section 7 application. The U.S. Fish and Wildlife Service (USFWS) has approved Northern’s reduced workspaces through the RPBB habitat. With the exception of the new wetland crossings on the Farmington to Hugo C-line, the land use for all revisions described below is the same as the originally proposed alignment. The revisions do not affect any new landowners, and Northern has received written landowner approval as indicated in the descriptions provided below.

The Lake Mills to Albert Lea E-line alignment sheets have new aerial imagery. All of the alignment sheets include updated civil survey; this update slightly modified all stationing information but did not impact any workspace sizes or locations.

Lake Mills to Albert Lea E-line

Alignment Sheet LML P3-1: Per landowner request on Tract FR-001, Northern removed SA01 (staging area), totaling 2.06 acres of agricultural land. Northern also reduced ETWS01 (extra temporary workspace) from 200 feet by 200 feet to approximately 200 feet by 90 by 115 feet by 85 feet by 85 feet, for a reduction of 0.52 acre agricultural land impacts. These modifications to reduce workspace were made to accommodate the landowner’s request to confine construction activities to Northern’s existing easement.

Following an internal review of the final design, the line stop to be located south of County Highway 9 on Northern’s existing MNM80105 E-line also was shifted approximately 40 feet to the south (Tract FR-001). The minor shift will occur within the reduced ETWS01 and remain within Northern’s existing easement.

Alignment Sheet LML P3-9/LML AR-01 and Plot Plan P6-3 FERC (Figure 1-6): Following an internal review of the final design, Northern extended the project terminus by 14 feet within the new Lake Mills tie-in valve setting (MP 34.21). As a result of this minor shift, realignments between the temporary workspace (TWS) and ETWS17 designations were made accordingly resulting in no new temporary workspace; the overall acres in the construction footprint did not change. Also, within the Lake Mills tie-in valve setting, Northern added two aboveground platforms to allow personnel to safely access handwheels; there is no change in the facility footprint. A revised alignment sheet and facility plot plan (Figure 1-6) is attached and labeled “CUI//CEII-DO NOT RELEASE”.

Elk River 3rd Branch Line

Alignment Sheet ERT P3-1: Following a review of the final design, Northern shifted the new line stop approximately 120 feet to the east of the HDD P4-1 tie-in location (Tract WA-041). The line stop is being installed on Northern's MNB87703 Elk River branch line within the existing easement with no modified or additional workspace. A revised alignment sheet, HDD plan & profile and SSP (ERT P4-1) showing the relocated line stop is attached.

Northern is revising Table 1.3-2 (see below) to add a road approach at July Avenue North within the approved construction workspace; this road approach was omitted from the table when the section 7 application was filed. The existing permanent access road for the Elk River tie-over valve setting is not suitable to access the construction workspace due to the location of piping at the tie-over valve setting site. Road approaches are discussed in detail in section 1.3.4 of Resource Report 1 filed with the section 7 application. As discussed in the footnote for the table and section 1.3.4 of Resource Report 1, road approaches are not depicted on the alignment sheets, and the contractor will determine the exact location for the road approach dependent upon site conditions at the time of construction. The change is highlighted in yellow.

Revised Table 1.3-2 (Resource Report 1) Road Approach Locations¹

Road Name	Approximate MP	Number of Road Approaches
Lake Mills to Albert Lea E-line		
County Highway 9	31.21	2
140th Street	31.95	2
County Road 80	33.19	3
165th Street (private road)	34.20	3
Elk River 3rd branch line		
July Avenue N	1.03	1
180th Street N	1.03	1
Ivywood Ave N	1.92	2
Irvine Ave N	2.11	1
180th Street N	3.29	2
Henna Ave N	3.43	3
Farmington to Hugo C-line		
180 Street N	0.00	1
170th Street N	0.99	3
Tomah branch line loop		
Gardener Ave	2.54	2
County Highway Q	3.51	3
La Crescent Compressor Station		
No public roads will have a road approach.		

¹ Northern assumed two road approaches for each staging area and one road approach for each TWS/ETWS. Northern did not include the location of the road approaches on the alignment sheets; the road approaches will be field-determined based on site conditions at the time of construction.

Alignment Sheet ERT P3-2: Northern's safety standards require that existing pipelines are exposed when being crossed and supports are installed under the exposed pipelines. Northern adjusted its proposed centerline between MP 1.74 and 1.88 in order to cross its two existing pipelines (MNB87701 and MNB87702) located near MP 1.81 at a greater angle; this will prevent a larger excavation to expose the existing lines. With the increased angle, the crossing distance over the existing lines is shorter and thereby safer (smaller excavation and fewer supports). Northern also adjusted its Project permanent ROW (Tract WA-051) to reflect the centerline change; the landowner signed off on the revised permanent ROW June 26, 2024. The construction footprint was not modified, just the centerline. The attached alignment sheet, HDD plan and profile ERT P4-2 and site-specific plan (ERT SSP-002) have been revised to reflect the centerline change.

Northern requests written approval from the Director of the OEP for the revised permanent ROW resulting from the centerline adjustment.

Alignment Sheet ERT P3-3: Northern extended HDD ERT P4-4 by 224 feet and lowered the drill to an elevation of 923 feet above mean sea level (amsl) from the original elevation of 928 feet amsl for a total increase of five feet; a new hydrofracture curve is attached. This resulted in a shift of the centerline between MP 2.15 and MP 2.25 and a realignment of the associated construction footprint as described in the following paragraph. The design change was required to move the crossing location of Northern's two existing pipelines (MNB87701 and MNB87702) located near MP 2.23 and increase the vertical separation between the new and existing pipelines. When completing HDDs under existing pipelines, Northern's operating procedures require a line of sight on the existing pipeline to confirm the actual depth of cover. The original crossing location was within the wetland buffer of ERT-W36. The new crossing location will allow Northern to excavate the existing pipelines in an upland location, minimizing environmental impacts. Additionally, the increased separation between the new and existing pipelines reduces the safety risks associated with drilling under in-service pipelines. The workspace changes are detailed below; there is no net increase in workspace associated with these changes and the modification also reduces the permanent project ROW.

ETWS25 was originally 150 feet by 45 feet by 15 feet by 30 feet by 170 feet by 40 feet and has been reduced to 70 feet by 40 feet (0.09 acre reduction). ETWS26 was originally 85 feet by 160 feet by 200 feet by 20 feet by 205 feet and has been reduced to 25 feet by 160 feet (0.48 acre reduction). The overall reduction in workspace for ETWS25 and ETWS26 is 0.57 acre of open land. ETWS26A, which measures 100 feet by 125 feet by 160 feet by 80 feet by 160 feet, was added on Tract WA-060 to accommodate the revised pullback for HDD ERT P4-4. This increase in workspace for ETWS26A is 0.57 acre of open land. These changes do not affect any new landowners and, with the exception of Tract WA-060, workspace has been reduced on all tracts. Northern received written landowner notification February 25, 2025, from Tract WA-060 to utilize ETWS26A.

The attached alignment sheet ERT P3-3, HDD plan and profile, and SSP for HDD ERT P4-4 reflect the revised TWS, ETWS and project permanent ROW as well as the shifted centerline.

Northern requests the Director of OEP issue written authorization for the new ETWS26A on Tract WA-060 and the revised HDD ERT P4-4.

Alignment Sheet ERT P3-5: Per landowner request, Northern removed all workspace at MP 2.94 from Tract WA-079 with the exception of the traffic travel lane for HDD ERT P4-5. Approximately 0.03 acre of workspace was removed from ETWS30 and the TWS; Northern also removed the project permanent ROW from this tract. The alignment sheet, HDD plan and profile and SSP for ERT P4-5 have been revised to reflect the reduced TWS, ETWS30 and project permanent ROW.

Alignment Sheets ERT P3-5, ERT P3-6 and ERT AR-01: Per landowner request, ETWS30 was reduced by 25 feet in width on Tract WA-081 (tree farm) to mitigate impacts to newly planted trees. By making this change, Northern reduced the workspace by 0.42 acre. The alignment sheet, HDD plan and profile and SSP for ERT P4-5 have been revised to reflect the reduced ETWS.

Farmington to Hugo C-line

Alignment Sheet FAR P3-1 and Plot Plan P5-1 FERC (Figure 1-6): Following a review of the final design, Northern shifted MP 0.00 approximately 60 feet to the south within its existing Hugo compressor station. This reduced the overall pipeline length by 0.01 mile for a new total pipeline length of 1.90 miles. Northern also removed the Project permanent ROW from within the compressor station as Northern already has an existing facility easement; duplicate easements inside the compressor station are not required. As a result of these changes, Northern realigned the TWS, ETWS36 and permanent ROW designations accordingly; the overall acres in the construction footprint did not change. A facility plot plan (Figure 1-6) showing the new tie-in location is attached and labeled as “CUI//CEII-DO NOT RELEASE”.

Alignment Sheets FAR P3-3, FAR P3-4 and FAR P3-5: Alignment sheets have been revised to reflect the Minnesota Department of Natural Resources (MDNR) as the landowner of record from 170th Street North (near MP 1.0) to the southern terminus of the Farmington to Hugo C-line (Alignment Sheets FAR P3-3 through P3-5). The following changes to alignment sheets FAR P3-3 through P3-5 are being made as a result of consultation with the MDNR. Northern reduced staging area (SA07) (alignment sheet FAR P3-3) from 4.13 acres to approximately 1.5 acres. The new dimensions of SA07 are 510 feet by 120 feet by 300 feet by 55 feet by 300 feet by 70 feet by 20 feet by 30 feet. The MDNR also requested that Northern install construction mats in the staging areas and most ETWS locations to eliminate topsoil removal and reduce soil compaction; Northern will comply with this request.²

In addition, per MDNR request, a reevaluation of wetlands and waterbodies was conducted on MDNR property during a normal precipitation period. The MDNR acts as the local governmental

² The MDNR’s requests and Northern’s responses are detailed in Northern’s cover letter filed with FERC October 15, 2024, with Northern’s comments to the environmental assessment. Applicable alignment sheets depicting these changes as well as the wetland delineation report for the Farmington to Hugo C-line and the *Northern Lights 2025 Expansion Project – Farmington to Hugo C-Line Rare, Threatened, and Endangered Species Report – Rev 1* were provided to the MDNR and filed with FERC October 15, 2024, the alignment sheets were segregated as privileged information and labeled CUI//PRIV- DO NOT RELEASE.

unit (LGU) under the Wetland Conservation Act (WCA) for all lands that they own. The MDNR is issuing an easement as part of their concurrence under the WCA. As a result of the reevaluation, new and/or revisions to the following wetlands have been made on alignment sheets FAR P3-3 and FAR P3-4.

Wetland FRM-W23 was delineated near the southwest corner of SA07. As noted above, Northern reduced SA07 to avoid impacts to wetland FRM-W23 and its 50-foot-buffer. Wetland FRM-W22 was delineated inside the environmental survey boundary (ESB); however, the addition of this wetland did not require any workspace revisions. Wetland FRM-W23 and FRM-W22 were not identified in previous filings with FERC and have been added to alignment sheets FAR P3-3 and FAR P3-4.

Wetland boundaries for FRM-W12 and FRM-W13 and their associated 50-foot-buffers were expanded, creating two new open-cut wetland crossings (alignment sheet FAR P3-4). To minimize impacts to these wetlands, Northern reduced its 100-foot-wide TWS by extending the length of the 75-foot neck down an additional 0.05 mile (from MP 1.35 to MP 1.41). As a result of the two new wetland crossings, additional temporary impacts totaling 0.06 acre to wetland FRM-W13 and 0.05 acre to wetland FRM-W12 will occur. Northern will install redundant silt fence through these wetlands to provide additional protection.

Northern requests the Director of OEP issue written approval to conduct the two new open-cut wetland crossings pursuant to Condition 1.

Between MP 1.31 and MP 1.37, ETWS42 was reduced from a width ranging between 135 feet and 160 feet to a uniform width of 25 feet to avoid impacts on wetland FRM-W12 and minimize impacts on wetland FRM-W13. ETWS42 was reduced to the minimal width required to safely string and weld pipe for the FAR P4-2 HDD pullback.

Northern is requesting an exemption from FERC's Wetland and Waterbody Construction and Mitigation Procedures (Procedures) VI.B.1.a. ETWS42 extends through wetland FRM-W13 and into the wetland buffer of FRM-12. This will result in 0.04 acre of temporary wetland impacts on FRM-W13 and no impacts to FRM-W12. ETWS42 is required to string the drill pipe for HDD FAR P4-2. Northern will install redundant silt fence to protect the wetlands.

ETWS45 was shifted approximately 390 feet south to avoid the 50-foot-buffer of the expanded wetland FRM-W12; there is no change in the dimensions of the ETWS. ETWS45 is not impacted by the expanded wetland boundaries.

In Resource Report 2, Table 2.3-1, Northern included 0.12 acre of temporary wetland impacts for the Farmington to Hugo C-line; all of these impacts were a result of HDD foot-traffic travel lanes through wetlands. Northern has added 0.15 acre of temporary wetland impact from the open-cut crossings of FRM-W12 and FRM-W13 described above. As these new impacts are on emergent wetlands, the Project still falls under the Utility Regional General Permit non-reporting threshold of 0.5 acre for emergent wetlands. No wetland conversion or permanent fill will result from the Project. The MDNR is the LGU for the Keystone Woods WMA. Northern provided an updated wetland delineation report to the MDNR September 19, 2024, and to FERC October 15, 2024.

An updated Table 2.3-1 is included below. The changes are highlighted in yellow.

Table 2.3-1 Wetlands Crossed by the Project (Resource Report 2)

Unique Wetland Identifier	MP		Field Determined Wetland Classification ¹	Length of Crossing (feet) ²	Primary Wetland Crossing Method	Area Affected by Construction (acres)	Area Affected by Operation (acres)		Wetland Setting	Wetland Function	Aquatic Resource	USACE Regulated (Y/N) ⁷
	From	To					Operationa l Fill	Operational Maintenance ^{3,5}				
Lake Mills to Albert Lea E-line												
LMP-W06	N/A		Seasonally Flooded Basin / PEM1A	N/A	ETWS, TAR	0.02 ⁶	0.00	0.00	Depressional	Wildlife Habitat	Precipitation	N
Subtotal				N/A		0.02	0.00	0.00				
Elk River 3rd Branch Line												
ERT-W34	2.90	2.91	Shallow marsh PEM1C / shrub-carr / PSS1C	56	HDD	0.01 ⁹	0.00	0.00 ⁴	Depressional	Public water / Groundwater Recharge	Groundwater	N
ERT-W35	2.44	2.74	Wet meadow / PEM1B; coniferous bog / PFO2D/PSS1g	1,581	HDD	0.24 ⁹	0.00	0.00 ⁴	Depressional / Floodplain	Wildlife Habitat / Groundwater Recharge	Groundwater/ERT-S01	Y
	2.75	2.75	Wet meadow / PEM1B; coniferous bog / PFO2D/PSS1g	8	HDD	0.00 ^{8,9}	0.00	0.00 ⁴	Depressional / Floodplain	Wildlife Habitat / Groundwater Recharge	Groundwater/ERT-S01	Y
ERT-W36	2.16	2.19	Wet meadow / PEM1B	171	HDD	0.02 ⁹	0.00	0.00 ⁴	Depressional	Groundwater Recharge	Groundwater	N
ERT-W12	2.01	2.05	Disturbed wet meadow / PEM1B	220	HDD	0.03 ⁹	0.00	0.00 ⁴	Depressional	Public Water / Groundwater Recharge	Groundwater / ERT-S02	Y
	1.97	1.98	Disturbed wet meadow / PEM1B	65	HDD	0.01 ⁹	0.00	0.00 ⁴	Depressional	Public Water / Groundwater Recharge	Groundwater / ERT-S02	Y
	1.95	1.96	Disturbed wet meadow / PEM1B	33	HDD	0.00 ^{8,9}	0.00	0.00 ⁴	Depressional	Public Water / Groundwater Recharge	Groundwater	Y
ERT-W14	1.46	1.54	Disturbed wet meadow / PEM1B; shallow marsh / PEM1C	426	HDD	0.06 ⁹	0.00	0.00 ⁴	Depressional	Groundwater Recharge	Groundwater / ERT-S02	Y
ERT-W15	1.36	1.38	Disturbed wet meadow / PEM1B	98	TWS/Open-Cut	0.23 ⁶	0.00	0.11	Depressional	Groundwater Recharge	Groundwater	N
ERT-W18	1.14	1.20	Disturbed wet meadow / PEM1B	307	HDD	0.04 ⁹	0.00	0.00 ⁴	Depressional	Groundwater Recharge	Groundwater	N
ERT-W33	1.08	1.09	Disturbed wet meadow / PEM1B	81	HDD	0.01 ⁹	0.00	0.00 ⁴	Depressional	Groundwater Recharge	Groundwater	N
ERT-W01	1.10	1.11	Disturbed wet meadow / PEM1B	64	HDD	0.01 ⁹	0.00	0.00 ⁴	Depressional	Groundwater Recharge	Groundwater	N
Subtotal				3,012		0.66	0.00	0.11				

Unique Wetland Identifier	MP		Field Determined Wetland Classification ¹	Length of Crossing (feet) ²	Primary Wetland Crossing Method	Area Affected by Construction (acres)	Area Affected by Operation (acres)		Wetland Setting	Wetland Function	Aquatic Resource	USACE Regulated (Y/N) ⁷
	From	To					Operationa l Fill	Operational Maintenance ^{3,5}				
Farmington to Hugo C-line												
FRM-W01	0.21	0.29	Wet meadow / disturbed wet meadow / PEM1B; hardwood swamp / PFO1B	420	HDD	0.06 ⁹	0.00	0.00 ⁴	Depressional	Groundwater Recharge	Groundwater	N
FRM-W05	0.48	0.49	Shrub-carr / PSS1C; wet meadow / PEM1B; open water / PUBF	80	HDD	0.02 ⁹	0.00	0.00	Depressional	Groundwater Recharge	Groundwater	N
FRM-W09	0.71	0.74	Wet meadow / PEM1B	148	HDD	0.01 ⁹	0.00	0.00 ⁴	Depressional	Groundwater Recharge	Groundwater	N
FRM-W10	0.91	0.91	Disturbed wet meadow / PEM1B	39	HDD	0.02 ⁹	0.00	0.00 ⁴	Depressional	Groundwater Recharge	Groundwater	N
FRM-W12	1.38	1.39	Seasonally flooded basin / PEM1A	20	TWS	0.05	0.00	0.05 ⁵	Depressional	Public water / Groundwater Recharge	Groundwater	Y
FRM-W13	1.31	1.35	Seasonally Flooded Basin/ PEM1A; Shallow Marsh/ PEM1C; Open Water / PUBHx	19	TWS, ETWS	0.10	0.00	0.10 ⁵	Depressional	Public water / Groundwater Recharge	Groundwater	Y
FRM-W21	0.32	0.35	Shallow marsh / PEM1C	152	HDD	0.01 ⁹	0.00	0.00 ⁴	Depressional	Groundwater Recharge	Groundwater	N
Subtotal				839		0.27	0.00	0.15				
Tomah branch line loop												
TBL-W03	3.47	3.49	Wet meadow / PEM1B	120	HDD	0.03 ⁹	0.00	0.00 ⁴	Depressional / Floodplain	Wildlife Habitat / Groundwater Recharge	Groundwater / TBL-S01	Y
Subtotal				120		0.03	0.00	0.00				
La Crescent compressor station												
No wetlands were identified within Project component ESB												
Subtotal				N/A		0.00	0.00	0.00				
Total				4,010		0.98	0.00	0.26				

¹ Wetland Classification based on Cowardin, Classification of Wetlands and Deepwater Habitats: PFO1B – Palustrine Forested – broad leaved deciduous – saturated (Hardwood Forest), PFO2D/PSS2g – Palustrine Forested - needle-leaved deciduous / deciduous scrub-shrub – continuously saturated - organic soil (Coniferous Bog), PSS1C – Palustrine Scrub-Shrub - broad-leaved deciduous - seasonally flooded (Shrub-Carr), PEM1A - Palustrine Emergent – temporarily flooded (Seasonally Flooded), PEM1B - Palustrine Emergent – seasonally saturated (Wet Meadow / Disturbed wet meadow), PEM1C - Palustrine Emergent – persistent - seasonally flooded (Shallow Marsh), PUBF – Palustrine Unconsolidated Bottom – semi permanently flooded (Open Water), **PBUHx – Palustrine Unconsolidated Bottom – permanently flooded – excavated (Open Water)** – The listed classification represents the wetland community at the crossing locations.

² Wetland crossing lengths of pipeline.

³ Area required to be cleared at a frequency necessary to maintain the ROW in an herbaceous state.

⁴ Wetlands crossed by the Project via HDD. Northern will not conduct maintenance between the entry and exit pits; therefore, no impacts on the wetland will occur during operation.

⁵ Wetland impacts will occur from routine mowing operations; however, the wetland currently consist of a PEM community, therefore no community type conversion will occur.

⁶ Construction related wetland impacts will not include below-ground impacts

⁷ Jurisdiction determination per USACE determination 33 CFR Part 328 on November 13, 1987.

⁸ Impacts are less than 0.01 acre in size

⁹ Impacts will be limited to foot traffic within a six-foot-wide travel lane between the HDD entry and exit points.

Alignment Sheet FAR P3-5 and Aerial FAR-AR-02: Per MDNR request, Northern reduced the width of permanent drive PD-05 (originally 30 feet) to match the existing gravel footprint/edge of the roads, approximately 20 feet in width. This resulted in a workspace reduction of 0.74 acre for a revised total footprint of 1.95 acres for PD-05.

To account for the reduced width of PD-05, Northern converted ETWS and TAR18 to a small turnaround (part of PD-05) near the proposed Farmington tie-in valve setting to reduce backing of equipment. MDNR written approval was received February 28, 2025, as part of the lease agreement; as indicated below, Northern and the MDNR are in the process of finalizing the document. Also, per landowner request, Northern revised the route of PD-05 to follow the existing road footprint near wetlands FRM-W16 and FRM-W18; therefore, PD-05 is now located within the 50-foot buffer of these wetlands (see FAR AR-02).

Northern is requesting the Director of OEP issue written approval for the revised extended PD-05 upon receipt of written landowner approval (see last paragraph in this section). Northern also is requesting an exemption from VI.B.1.a of the FERC Procedures to have PD-05 within 45 feet of FRM-W16 and 25 feet of FRM-W18. No direct wetland impacts will occur as a result of this revision.

Alignment Sheet FAR P3-5, FAR-AR-02 and P6-1 FERC: Per MDNR request, Northern analyzed the valve setting design located at the project terminus (MP 1.9) and determined that the aboveground valves, piping, and fittings can be installed below ground to mitigate risks from potential hunting activities near the valve setting. Instead, three extended stem valve operators that allow operation of the below-ground valves will be installed at the site; these will eliminate the need for future excavation to operate the valves. The aboveground valve operators will include a handwheel and will extend approximately four feet aboveground. Additionally, a guard rail will be installed around the valve operators for protection. These extended stem valve operators are critical for operating the valves during emergencies, operational outages, and annual maintenance. The overall facility footprint did not change. A facility plot plan (Figure 1-6) showing the new aboveground layout is attached and labeled as “CUI//CEII-DO NOT RELEASE”.

The changes described above for the Farmington to Hugo C-line alignment sheets FAR P3-3 through FAR P3-5 are being made as a result of consultations with the landowner (MDNR). On February 28, 2025, Northern received MDNR's proposed lease agreement. Both parties have agreed in principle to most lease agreement terms and minor, non-material details are being worked out for a final, executable lease agreement. Northern will notify FERC once the final lease agreement has been executed, which is expected in the near future.

Tomah Branch Line Loop

Alignment Sheets TBL P3-1 and TBL P3-2 and Aerial TBL AR02: Northern reduced its TWS between MP 2.64 and MP 2.92 from 75 feet in width to 60 feet in width as an avoidance and mitigation measure to reduce impacts to RPBB habitat. The workspace reduction totals 0.50 acre and is a result of presence/absence surveys conducted in August 2024 for the RPBB. During the surveys, a RPBB queen and worker bee were found on the Tomah branch line loop, near MP 2.9. Northern met with the USFWS August 23, 2024, to continue consultation regarding the RPBB.

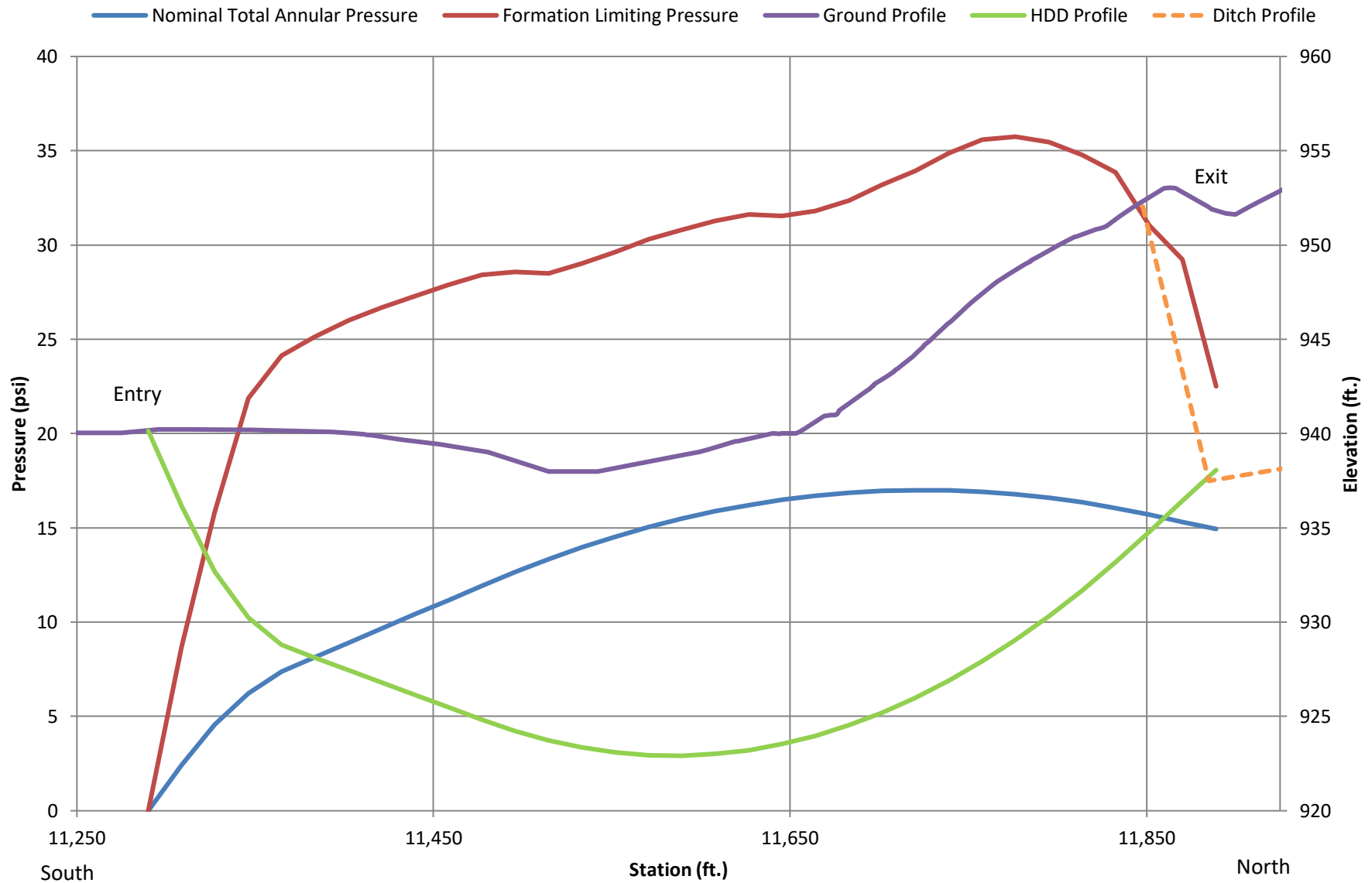
The workspace reduction is the key mitigation strategy Northern agreed to complete. The mitigation measures and survey report as well as USFWS concurrence of a “not likely to adversely affect” determination for the RPBB were provided to FERC October 17, 2024, as part of Northern’s comments for Condition 13 of the Environmental Assessment.

Alignment TBL P3-3 and Aerial TBL AR-03: Per landowner request, Northern removed TAR14 (temporary access road) from Tract MO-028 and MO-029. This resulted in a workspace reduction of 1.05 acres of agricultural land.

Alignment Sheet TBL P3-3, Aerial TBL AR-03 and HDD Plan & Profile TBL P4-2: Per landowner request (Tract-030), Northern removed the Tomah branch line loop receiver facility and permanent driveway (PD06) from the Project scope, which results in a reduction in permanent footprint of 0.61 acre. Northern also reduced the size of the staging area SA09 on the same tract from 815 feet by 500 feet to 500 feet by 500 feet for a reduction in workspace of 3.85 acres. The new total footprint for SA09 is 4.53 acres. Other than the staging area reduction, the construction footprint on this tract did not change. The facility plot plan (Figure 1-6) for the Tomah branch line loop receiver facility is no longer applicable.

With the removal of the receiver facility from the project scope, the terminus of the Tomah branch line loop extension will shift nine feet to the west at MP 3.53 where it will be tied in below ground to the existing Tomah branch line. Tie-in activities will be conducted within the approved workspace.

ERT P4-4 Profile and Hydrofracture Assessment Assumed 9.875" Pilot Bore, 6.625" Drill Rod



Northern Natural Gas Company
Northern Lights 2025 Expansion
Implementation Plan For Docket No. CP24-60-000

Requesting Party: FERC
Reference No: NL2025 COND-06
Requester's Name: Jessica Miller/Andrea Bloomfield
Subject: Implementation Plan

Condition 6:

Within 60 days of the acceptance of the authorization and before construction begins, Northern shall file an Implementation Plan with the Secretary for review and written approval by the Director of OEP, or the Director's designee. Northern must file revisions to the plan as schedules change. The plan shall identify:

- a. how Northern would implement the construction procedures and mitigation measures described in its application and supplements (including responses to staff data requests), identified in the EA, and required by the Order;
- b. how Northern would incorporate these requirements into the contract bid documents, construction contracts (especially penalty clauses and specifications), and construction drawings so that the mitigation required at each site is clear to onsite construction and inspection personnel;
- c. the number of EIs assigned, and how the company would ensure that sufficient personnel are available to implement the environmental mitigation;
- d. company personnel, including EIs and contractors, who would receive copies of the appropriate material;
- e. the location and dates of the environmental compliance training and instructions Northern would give to all personnel involved with construction and restoration (initial and refresher training as the project progresses and personnel change);
- f. the company personnel (if known) and specific portion of Northern's organization having responsibility for compliance;
- g. the procedures (including use of contract penalties) Northern would follow if noncompliance occurs; and
- h. for each discrete facility, a Gantt or PERT chart (or similar project scheduling diagram), and dates for the:
 - i. completion of all required surveys and reports;
 - ii. environmental compliance training of onsite personnel;
 - iii. start of construction; and
 - iv. start and completion of restoration.

Northern Response:

Attached is Northern's Implementation Plan for the Project. Northern requests the Director of the Office of Energy Projects (OEP) issue written approval of the plan and authorization to proceed with construction once all applicable conditions have been met. Northern will file revisions to the plan as schedules change. The plan identifies:

- a. how Northern will implement the construction procedures and mitigation measures described in its application and supplements (including responses to staff data requests), identified in the EA, and required by the Order;
- b. how Northern will incorporate these requirements into the contract bid documents, construction contracts (especially penalty clauses and specifications), and construction drawings so that the mitigation required at each site is clear to onsite construction and inspection personnel;
- c. the number of EIs assigned, and how the company will ensure that sufficient personnel are available to implement the environmental mitigation;
- d. company personnel, including EIs and contractors, who will receive copies of the appropriate material;
- e. the location and dates of the environmental compliance training and instructions Northern will give to all personnel involved with construction and restoration (initial and refresher training as the project progresses and personnel change);
- f. the company personnel and specific portion of Northern's organization having responsibility for compliance; and
- g. the procedures (including use of contract penalties) Northern will follow if noncompliance occurs.

Also attached is a Gantt chart for the project components, which identifies estimated dates for:

- (1) completion of all required surveys and reports;
- (2) environmental compliance training of onsite personnel;
- (3) start of construction; and
- (4) start and completion of restoration.

Northern notes that the start of construction date is tentative and is dependent upon receipt of a Notice to Proceed from the Director of OEP.

NORTHERN NATURAL GAS COMPANY

IMPLEMENTATION PLAN

Northern Lights 2025 Expansion

Docket Number CP24-60-000

- 6a&b. Northern included the Federal Energy Regulatory Commission's (FERC) Upland Erosion Control, Revegetation, and Maintenance Plan (Plan) and the Wetland and Waterbody Construction and Mitigation Procedures (Procedures)¹ as part of the contract documents required to be followed by the facility construction contractors. Northern's contracts require contractors to comply with all valid applicable federal and state laws and any applicable local law, ordinance, or regulations thereunder, issued or promulgated by units of government and regulatory bodies with jurisdiction over any aspect of the work. The contract documents include the construction procedures and mitigation measures described in Northern's filings with FERC and any additional requirements identified in the Environmental Assessment (EA) and in the Order; these will be discussed in detail at the environmental training sessions required for all inspection and construction personnel conducted prior to commencing project construction. Environmental training will be provided to all new construction personnel assigned to each project after the start of project construction. The contract documents contain work stoppage and/or termination rights in the event of noncompliance with any of the requirements described above or for substandard workmanship by the contractor or subcontractors. The contract documents require the contractor to complete any corrective work necessary to comply with all federal and state laws and any applicable local government permits and any applicable statute, ordinance, order, rule, or regulation. If unacceptable work is not corrected in a responsive manner, Northern retains the right to terminate the contract with the contractor responsible for the noncompliance or unacceptable work and to award the work to an acceptable replacement contractor.
- 6c. The EIs' responsibility will be to monitor and ensure environmental compliance for the Project. As currently planned, the four pipeline components and the modifications at the La Crescent compressor station will be constructed in parallel; therefore, each component will have a full-time EI, with the exception of the La Crescent compressor station. One part-time EI will monitor the La Crescent compressor station as there is no ground disturbance and minimal construction activities planned. As a result, Northern plans to employ a minimum of four full-time EIs and one part-time EI for the Project. Northern also will employ additional EIs for the pipeline project components, as necessary, to ensure all HDDs are monitored during construction. The EIs will be responsible for the compilation of the data for the environmental status reports, monitoring environmental aspects

¹ Northern adopted FERC's Plan and Procedures, including modifications, as its own for this project. Northern identified locations where the requirements of the Procedures cannot be met due to site-specific conditions or construction requirements. These locations are summarized in Table 1.3-3 of Resource Report 1.

of construction areas related to the projects and administering project environmental training.

The lead EI will communicate daily with the contractors' environmental point personnel to address any environmental concerns and ensure that sufficient personnel are available to implement any required environmental mitigation or remediation. The EIs will have stop-work authority for any noncompliant work activity. Any activity found to be performed contrary to the environmental requirements will be immediately stopped. The EIs will direct corrective action as needed to bring the activity into compliance. All individuals responsible for non-compliant activities will be required to attend a supplemental environmental training course. Based on the circumstances of the non-compliant activity, the responsible person(s) also may be subject to reassignment of duties or removal from the project. At its discretion, Northern will stop work and conduct environmental stand downs to effectively address noncompliant behavior and activities.

- 6d. Company personnel receiving access to the environmental and other appropriate documents, discussed in section 6a and 6b above, include:

- Vice President, Operations
- Vice President of Engineering
- Environmental Compliance Manager
- Project Director
- Project Managers
- Construction Coordinators

In addition, a complete set of environmental and contract documents will be kept on-site for use by the on-site inspectors, contractor superintendent, on-site staff, and all subcontractors.

Third-party contract personnel receiving copies of the environmental and other appropriate documents include the following:

- Chief Inspector
- Lead Environmental Inspector
- The construction company project manager and principal/office staff






























- 6e. All on site project personnel will be required to attend an environmental training course before participating in project construction activities. The initial project component specific environmental training will be scheduled at a later time as construction is scheduled to commence May 2025. The lead EI or designee will conduct the environmental training, which will include instructions regarding non-compliance prevention, reporting and remediation; spill prevention, reporting and clean-up; adherence to the unanticipated discoveries plan; and compliance with all environmental requirements.




















Supplemental environmental training will be conducted as needed, to accommodate company, contractor, and inspection personnel staff additions and to deter noncompliant activities and to address non-compliance situations.
















- 6f. Company personnel having responsibility for compliance are as follows:




















Vice president, operations	Brian Mundt
Vice president, engineering	Nick Marquardt
Director, environmental	Greg Ammon
Environmental compliance manager	Terry Plucker
Project director, pipeline expansions	Chase Schelhaas
Project manager	Matt Nelson
Project manager	Mia Jewett
Construction coordinator	Ken Addink

- 6g. Northern will use the enforcement measures in the contract documents, described in 6a and 6b above, for occurrences of non-compliance. These documents allow for work termination if substandard workmanship or permit violations occur, or are suspected, and the contractor fails to take necessary corrective action. If a contract is terminated, a contractor approved by Northern management will be selected to complete the remaining work. Any replacement contractor will be subject to the same compliance conditions as the replaced contractor.
- 6h. Attached is a Gantt chart for the project components, which provides the following dates for the project: (1) the completion of all required surveys and reports; (2) the environmental compliance training of onsite personnel; (3) the start of construction; and (4) the start and completion of restoration. The dates shown in the Gantt chart are indicative of all surveys and reports completed for the section 7 filing. Additional pre-construction surveys will be completed in accordance with FERC's EA and/or conditions of the Order prior to the start of construction dates identified in the charts.

ID		Task Mode	Task Name	Duration	Start	Finish	Predecessors	Resource Names	Jan 1, '84
1			Lake Mills to Albert Lea E-line	401 days	Fri 2/16/24	Sat 8/30/25			<div>S</div>
2			Completion of all required surveys and reports (Application submitted)	0 days	Fri 2/16/24	Fri 2/16/24			
3			Environmental compliance training of onsite personnel	9 days	Mon 4/28/25	Thu 5/8/25			
4			Start of construction	0 days	Mon 5/5/25	Mon 5/5/25			
5			Start of restoration	0 days	Wed 6/25/25	Wed 6/25/25			
6			Completion of restoration	0 days	Sat 8/30/25	Sat 8/30/25			
7			Elk River 3rd branch line	406 days	Fri 2/16/24	Sat 9/6/25			
8			Completion of all required surveys and reports (Application submitted)	1 day	Fri 2/16/24	Fri 2/16/24	2SS		
9			Environmental compliance training of onsite personnel	1 day	Mon 4/28/25	Mon 4/28/25	3SS		
10			Start of construction	1 day	Tue 4/29/25	Tue 4/29/25	9SF+2 days		
11			Start of restoration	1 day	Mon 8/4/25	Mon 8/4/25			
12			Completion of restoration	1 day	Sat 9/6/25	Sat 9/6/25			
13			Farmington to Hugo C-line	398 days	Fri 2/16/24	Tue 8/26/25			
14			Completion of all required surveys and reports (Application submitted)	1 day	Fri 2/16/24	Fri 2/16/24	2SS		
15			Environmental compliance training of onsite personnel	1 day	Mon 4/28/25	Mon 4/28/25	3SS		
16			Start of construction	1 day	Fri 5/16/25	Fri 5/16/25	10SF+14 days		
17			Start of restoration	1 day	Mon 7/28/25	Mon 7/28/25			
18			Completion of restoration	1 day	Mon 8/26/24	Mon 8/26/24			
19			Tomah branch line loop	395 days	Fri 2/16/24	Thu 8/21/25			

Project: NL 2025 Pipeline Sched Date: Thu 2/20/25	Task		Inactive Summary		External Tasks	
	Split		Manual Task		External Milestone	
	Milestone		Duration-only		Deadline	
	Summary		Manual Summary Rollup		Progress	
	Project Summary		Manual Summary		Manual Progress	
	Inactive Task		Start-only			
	Inactive Milestone		Finish-only			

ID		Task Mode	Task Name	Duration	Start	Finish	Predecessors	Resource Names	Jan 1, '84
20			Completion of all required surveys and reports (Application submitted)	1 day	Fri 2/16/24	Fri 2/16/24	2SS		S
21			Environmental compliance training of onsite personnel	1 day	Mon 4/28/25	Mon 4/28/25	3SS		
22			Start of construction	1 day	Thu 5/22/25	Thu 5/22/25	4SF+14 days		
23			Start of restoration	1 day	Sat 6/28/25	Sat 6/28/25			
24			Completion of restoration	1 day	Thu 8/21/25	Thu 8/21/25			
25			La Crescent compressor station modification	381 days	Fri 2/16/24	Fri 8/1/25			
26			Completion of all required surveys and reports (Application submitted)	1 day	Fri 2/16/24	Fri 2/16/24	2SS		
27			Environmental compliance training of onsite personnel	1 day	Mon 7/7/25	Mon 7/7/25			
28			Start of construction	1 day	Mon 7/7/25	Mon 7/7/25			
29			Start of restoration	1 day	Mon 7/28/25	Mon 7/28/25			
30			Completion of restoration	1 day	Fri 8/1/25	Fri 8/1/25			

Project: NL 2025 Pipeline Sched Date: Thu 2/20/25	Task		Inactive Summary		External Tasks	
	Split		Manual Task		External Milestone	
	Milestone		Duration-only		Deadline	
	Summary		Manual Summary Rollup		Progress	
	Project Summary		Manual Summary		Manual Progress	
	Inactive Task		Start-only			
	Inactive Milestone		Finish-only			

Northern Natural Gas Company
Northern Lights 2025 Expansion
Implementation Plan For Docket No. CP24-60-000

Requesting Party: FERC
Reference No: NL2025 COND-07
Requester's Name: Jessica Miller/Andrea Bloomfield
Subject: EI Responsibilities

Condition 7:

Northern shall employ at least one EI for the Project. The EI shall be:

- a. responsible for monitoring and ensuring compliance with all mitigation measures required by the Order and other grants, permits, certificates, or other authorizing documents;
- b. responsible for evaluating the construction contractor's implementation of the environmental mitigation measures required in the contract (see condition 6 above) and any other authorizing document;
- c. empowered to order correction of acts that violate the environmental conditions of the Order, and any other authorizing document;
- d. a full-time position, separate from all other activity inspectors);
- e. responsible for documenting compliance with the environmental conditions of the Order, as well as any environmental conditions/permit requirements imposed by other federal, state, or local agencies; and
- f. responsible for maintaining status reports.

Northern Response:

As stated in Northern's Implementation Plan (see condition 6), Northern plans to employ at least one environmental inspector (EI) per construction spread. Northern also will employ additional EIs for the pipeline project components, as necessary, to ensure all horizontal directional drill activities are monitored during construction. The EIs will be:

- a. responsible for monitoring and ensuring compliance with all mitigation measures required by the Order and other grants, permits, certificates, or other authorizing documents;
- b. responsible for evaluating the construction contractors' implementation of the environmental mitigation measures required in the contract (see condition 6) and any other authorizing document;
- c. empowered to order correction of acts that violate the environmental conditions of the Order, and any other authorizing document;
- d. a full-time position, separate from all other activity inspectors;

- e. responsible for documenting compliance with the environmental conditions of the Order, as well as any environmental conditions/permit requirements imposed by other federal, state, or local agencies; and
- f. responsible for maintaining status reports.

Northern Natural Gas Company
Northern Lights 2025 Expansion
Implementation Plan For Docket No. CP24-60-000

Requesting Party: FERC
Reference No: NL2025 COND-08
Requester's Name: Jessica Miller/Andrea Bloomfield
Subject: Biweekly Status Reports

Condition 8:

Beginning with the filing of its Implementation Plan, Northern shall file updated status reports with the Secretary on a **biweekly** basis until all construction and restoration activities are complete. On request, these status reports shall also be provided to other federal and state agencies with permitting responsibilities. Status reports shall include:

- a. an update on Northern's efforts to obtain the necessary federal authorizations;
- b. the construction status of the Project, work planned for the following reporting period, and any schedule changes for work in environmentally sensitive areas;
- c. a listing of all problems encountered, and each instance of noncompliance observed by the EI(s) during the reporting period (both for the conditions imposed by the Commission and any environmental conditions/permit requirements imposed by other federal, state, or local agencies);
- d. a description of the corrective actions implemented in response to all instances of noncompliance;
- e. the effectiveness of all corrective actions implemented;
- f. a description of any landowner/resident complaints that may relate to compliance with the requirements of the Order, and the measures taken to satisfy their concerns;
- g. copies of any correspondence received by Northern from other federal, state, or local permitting agencies concerning instances of noncompliance, and Northern's response; and
- h. noise measurements taken during nighttime (between 10 p.m. and 7 a.m.) horizontal directional drilling to demonstrate that noise levels at nearby NSAs are no more than 55 dBA Ldn.

Northern Response:

Attached is Northern's first status report, which will be filed biweekly until all construction and restoration activities are complete. Agency correspondence from the Minnesota Department of Natural Resources (DNR), the Wisconsin DNR, and the U.S. Fish and Wildlife Service that has not previously been filed with FERC is attached to the biweekly report. On request, these status reports will be provided to other federal and state agencies with permitting responsibilities. The ongoing status reports will include:

- a. an update on Northern's efforts to obtain the necessary federal authorizations;

- b. the construction status of the project, work planned for the following reporting period, and any schedule changes for work in environmentally sensitive areas;
- c. a listing of all problems encountered and each instance of noncompliance observed by the environmental inspectors during the reporting period (both for the conditions imposed by the commission and any environmental conditions/permit requirements imposed by other federal, state, or local agencies);
- d. a description of the corrective actions implemented in response to all instances of noncompliance;
- e. the effectiveness of all corrective actions implemented;
- f. a description of any landowner/resident complaints which may relate to compliance with the requirements of the Order, and the measures taken to satisfy their concerns;
- g. copies of any correspondence received by Northern from other federal, state, or local permitting agencies concerning instances of noncompliance, and Northern's response; and
- h. noise measurements taken during nighttime (between 10 p.m. and 7 a.m.) horizontal directional drilling to demonstrate that noise levels at nearby NSAs are no more than 55 dBA Ldn.



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

March 5, 2025

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
Docket No. CP24-60-000
Biweekly Environmental Inspector Report #1

Dear Ms. Reese:

Pursuant to Condition 8 of the Order Issuing Certificate and Approving Abandonment issued by the Federal Energy Regulatory Commission February 19, 2025, Northern Natural Gas hereby submits for filing in the above-referenced docket its biweekly environmental inspector report for the period ending March 2, 2025.

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

Respectfully submitted,

/s/ Donna Martens

Donna Martens
Senior Regulatory Analyst

Northern Natural Gas Company
Northern Lights 2025 (CP24-60-000)
Weekly Status Report No. 1
Period Ending March 2, 2025

PROJECT DESCRIPTION

Northern Natural Gas (Northern) will construct and operate the Project, which will consist of (1) a 3.00-mile extension of its 36-inch-diameter Lake Mills to Albert Lea E-line; (2) a 2.43-mile extension of its 30-inch-diameter Elk River 3rd branch line; (3) a non-contiguous 1.91-mile extension of its 30-inch-diameter Farmington to Hugo C-line; (4) a 1.28-mile extension of its 8-inch-diameter Tomah branch line loop; (5) minor modifications to its existing La Crescent compressor station; and (6) aboveground facilities including a launcher, receiver and tie-in valve settings. All Project components are located in various counties in Minnesota and Wisconsin.

FEDERAL AUTHORIZATION STATUS

The following table provides the status of all federal and state permits required under federal law.

Responsible Agency	Delegated Authority	Permit or Clearance Required	Status of Permit/Clearance	Date Permit or Clearance Received, Requested or Expected
Federal				
FERC	N/A	Certificate for construction and operation of interstate natural gas transmission pipeline facilities	Section 7 application will be filed February 2024.	Order issued February 19, 2025
EPA	MPCA/WDNR	Clean Air Act permits and approvals	Delegated to the state (MPCA/WDNR)	N/A
	MPCA/WDNR	CWA Section 401 Water Quality Certification	Delegated to the state (MPCA/WDNR)	N/A
	MPCA/WDNR	CWA Section 402 permits for wastewater or stormwater discharges	Delegated to the state (MPCA/WDNR)	N/A
NRCS	N/A	No permit required – consultation for ROW restoration and seeding recommendations	Outreach initiated January 2022	Responses received January 2022. Consultation complete.
USACE – St. Paul	N/A	CWA Section 404 – Dredge and Fill	USACE notification submitted February 14,	Wetland impacts will qualify under

District		Permit	2024	the Regional General Permit 3 – Non-Reporting; no response required
USFWS – Twin Cities Field Office	N/A	Endangered Species Act and MBTA – consultation clearance request for Minnesota	Initial coordination submitted February 7, 2023; D-keys and species survey protocols; final coordination anticipated October 2024 following completion of species-specific surveys	Concurrence received January 15, 2025. NLEB no longer in project area.
Native American Tribes	N/A	NHPA Section 106 consultation to determine if the project will have impact on resources of Native American cultural importance	Submission of cultural reports and UDP completed February 14, 2024	No responses received, consultation complete.
State – Minnesota				
MPCA	From EPA	Clean Air Act, Prevention of Significant Deterioration Minor/Title V Major Air Construction Permit	No compressor/compressor station(s)	N/A
	From EPA	Section 401 Water Quality Certification	Authorization concurrent with USACE Section 404 Approval	No USACE Preconstruction Notification; therefore, Northern will adhere to the Section 401 provisions of the Utility Regional General Permit
	N/A	NPDES Stormwater Permit MNR100001	Permit application for Elk River filed February 21, 2025. Remainder of applications filed in last week of February 2025.	Response anticipated March 2025
	N/A	NPDES Trench Water Discharge Permit	Dewatering information included with stormwater permit application	Authorization included with stormwater permit
MDNR	N/A	MPARS Water Appropriation Permit for Pit Trench Water	Permit applications submitted February 2025	Response anticipated March 2025

	N/A	State Protected Species Consultation	Consultation initiated February 2024	Concurrence received October 14, 2024. Consultation complete.
State Historical Society of Minnesota	N/A	Section 106 Consultation, NHPA	Submission of cultural reports and UDP February 14, 2024; clarifications submitted October 14, 2024, and November 7, 2024	Concurrence received November 13, 2024.
MDA	N/A	Comments on Northern's Agricultural mitigation plan and Noxious Weed Mitigation Plan	Coordination initiated February 7, 2024	Consultation complete.
State - Wisconsin				
WDNR	From EPA	WPDES Air Permits	No compressor/compressor station(s)	N/A
	From EPA	Section 401 Water Quality Certification	No wetland impacts in Wisconsin; permit not required	N/A
	N/A	Chapter 30.025, Stream Crossing/Dredging	No waterbodies or wetlands crossed or dredged	N/A
	N/A	WPDES Construction Site Stormwater Runoff General Permit No. WI-S067831-6	Permit application submitted anticipated February 19, 2025	Response anticipated April 2025
	N/A	WPDES Pit Trench Water Discharge Permit No. WI- WI-0049344-6	Dewatering information included with stormwater permit application	Authorization included with stormwater permit
	N/A	State Protected Species Consultation	Consultation initiated January 2024	Concurrence received March 4, 2024
Wisconsin State Historical Society	N/A	Section 106 Consultation, NHPA	Submission of cultural reports and UDP February 14, 2024	Response received March 2024

Lake Mills to Albert Lea E-line

Northern will construct and operate an approximately 3.00-mile extension of its 36-inch-diameter MNM80105 Lake Mills to Albert Lea E-line in Freeborn County, Minnesota. Northern will remove the existing aboveground valve setting located in Section 16, Township 101 North, Range 22 West (Section 16, T101N, R22W), Freeborn County,

Minnesota. Northern will construct and operate an aboveground valve setting at the terminus of the proposed extension on the north side of 165th Street in Section 33, T102N, R22W, Freeborn County, Minnesota.

Environmental Training

One contractor will construct the Lake Mills to Albert Lea E-line and associated aboveground facilities. The environmental training totals listed below reflect all training conducted to date for this component.

On-site Contractor: K & K, Inc. (K & K)

Overall Construction Start Date: Anticipated May 2025

Environmental Training Conducted: This reporting period: 0 Total to date: 0

Construction Status: No construction occurred during this reporting period.

Construction Modifications: Construction has not commenced.

Stream Crossings and Environmentally Sensitive Areas

No stream crossings or other environmentally sensitive areas were impacted during this reporting period. Construction has not commenced.

Rain Events

Northern will commence documentation of rain events upon start of construction.

Lake Mills to Albert Lea E-line Construction Progress			
Activity	Start Date	Completed	Notes
Survey			
Clearing			
Grading			
Stringing			
Welding			
Ditching			
Lower-in			
Backfill			
Topsoil Restoration			
Removal of existing E-line tie-over valve setting			
New Lake Mills tie-in valve setting			
Clean-up			
Seeding			
*Completed totals include either percentage completed or date all completed. All totals are approximate.			

Two-Week Projection

1. A pre-construction meeting is tentatively scheduled before May 1, 2025, and the contractor will commence construction after that meeting pending receipt of the notice to proceed with construction.

Lake Mills to Albert Lea E-line Related Spill Totals

All project derived waste will be properly managed and every effort will be made to eliminate spills. Construction has not commenced.

Elk River 3rd Branch Line

Northern will construct and operate an approximately 2.43-mile extension of its 30-inch-diameter MNB87703 Elk River 3rd branch line in Washington County, Minnesota. The proposed extension will be tied in below ground approximately 260 feet north of the current terminus in Section 36, T32N, R21W, Washington County, Minnesota; the existing aboveground valve setting located on the east side of July Avenue in Section 36, T32N, R21W, Washington County, Minnesota, will be removed. The downstream tie-in to both Northern's 20-inch-diameter MNB87701 Elk River branch line and 20-inch-diameter MNB87702 Elk River loop will be completed with a new valve setting at the west side of Henna Avenue North in Section 3, T31N, R21W, Washington County, Minnesota.

Environmental Training

One contractor will construct the Elk River 3rd branch line extension. The environmental training totals listed below reflect all training conducted to date for this component.

On-site Contractor: Otis Minnesota Services, LLC (Otis)

Overall Construction Start Date: Anticipated April 2025

Environmental Training Conducted: This reporting period: 0 Total to date: 0

Construction Status: No construction occurred during this reporting period.

Construction Modifications: Construction has not commenced.

Stream Crossings and Environmentally Sensitive Areas

No stream crossings or environmentally sensitive areas were impacted during this reporting period. Construction has not commenced.

Rain Events

Northern will document rain events upon commencement of construction.

Elk River 3rd Branch Line Construction Progress			
Activity	Start Date	Completed	Notes
Survey			
Clearing			
Grading			
Stringing			
Welding			
Ditching			
HDD ERT P4-1			
HDD ERT P4-2			
HDD ERT P4-3			
HDD ERT P4-4			
HDD ERT P4-5			
HDD ERT P4-6			
HDD ERT P4-7			
Lower-in			
Backfill			

Topsoil Restoration			
Existing Elk River tie-over valve setting to be removed			
New Elk River tie-in valve setting			
Clean-up			
Seeding			
*Completed totals include either percentage completed, or date all completed. All totals are approximate.			

Two-Week Projection

1. A pre-construction meeting is tentatively scheduled before May 1, 2025, and the contractor will commence construction after that meeting pending receipt of the notice to proceed.

Elk River 3rd Branch Line Related Spill Totals

All project derived waste will be properly managed and every effort will be made to eliminate spills. Construction has not commenced.

Farmington to Hugo C-Line Extension

Northern will construct and operate a non-contiguous 1.91-mile extension of its 30-inch-diameter Farmington to Hugo C-line in Washington County, Minnesota. The proposed extension will be tied in below ground within Northern's existing Hugo compressor station in Section 6, T31N, R20W, Washington County, Minnesota. The downstream tie-in to Northern's 24-inch-diameter MNM86501 B-line will be completed at a new below-ground valve setting in Section 7, T31N, R20W, Washington County, Minnesota.

Environmental Training

One contractor will construct the Farmington to Hugo C-line extension and associated aboveground facilities. The environmental training totals listed below reflect all training conducted to date for this component.

On-site Contractor: Otis Minnesota Services, LLC (Otis)

Overall Construction Start Date: Anticipated May 2025

Environmental Training Conducted: This reporting period: 0 Total to date: 0

Construction Status: No construction occurred during this reporting period.

Construction Modifications: Construction has not commenced.

Stream Crossings and Environmentally Sensitive Areas

No stream crossings or other environmentally sensitive areas were impacted during this reporting period. Construction has not commenced.

Rain Events

Northern will document rain events upon commencement of construction.

Farmington to Hugo C-Line Construction Progress			
Activity	Start Date	Completed	Notes
Survey			
Clearing			
Grading			
Stringing			
Welding			
Ditching			
HDD FAR P4-1			
HDD FAR P4-2			
Lower-in			
Backfill			
Topsoil Restoration			
Hugo compressor station launcher and valves			
Farmington tie-over valve setting			
Clean-up			
Seeding			
*Completed totals include either percentage completed or date all completed. All totals are approximate.			

Two-Week Projection

1. A pre-construction meeting is tentatively scheduled for completion before May 1 2025, and the contractor will commence construction after that meeting pending issuance of the notice to proceed with construction.

Farmington to Hugo C-line Related Spill Totals

All project derived waste will be properly managed, and every effort will be made to eliminate spills. Construction has not commenced.

Tomah Branch Line Loop

Northern will construct and operate an approximately 1.28-mile extension of its 8-inch-diameter WIB11902 Tomah branch line loop in Monroe County, Wisconsin. The proposed extension will be tied in below ground to the current terminus of the Tomah branch line loop in Section 1, T17N, R4W, Monroe County, Wisconsin. The tie-in valve setting at this location will be removed. The downstream tie-in to its 6-inch-diameter WIB11901 branch line is located in Section 6, T17N, R3W, Monroe County, Wisconsin.

Environmental Training

One contractor will construct the Tomah branch line loop. The environmental training totals listed below reflect all training conducted to date for this component.

On-site Contractor: K & K, Inc. (K & K)

Overall Construction Start Date: Anticipated May 2025

Environmental Training Conducted: This reporting period: 0 Total to date: 0

Construction Status: No construction occurred during this reporting period.

Construction Modifications: Construction has not commenced.

Stream Crossings and Environmentally Sensitive Areas

No stream crossings or other environmentally sensitive areas were impacted during this reporting period.

Rain Events

Northern will document rain events upon commencement of construction.

Tomah Branch Line Loop Construction Progress			
Activity	Start Date	Completed	Notes
Survey			
Clearing			
Grading			
Stringing			
Welding			
Ditching			
HDD TBL P4-1			
HDD TBL P4-2			
Lower-in			
Backfill			
Topsoil Restoration			
Remove Tomah branch line loop receiver facility			
Tomah Tie-over Valve setting			
Clean-up			
Seeding			
*Completed totals include either percentage completed, or date all completed. All totals are approximate.			

Two-Week Projection

1. A pre-construction meeting is tentatively scheduled for completion before May 1, 2025, and the contractor will commence construction after that meeting pending receipt of the notice to proceed.

Tomah Branch Line Loop Related Spill Totals

All project derived waste will be properly managed and every effort will be made to eliminate spills. Construction has not commenced.

La Crescent Compressor Station

Northern will complete minor aboveground facility modifications within its existing La Crescent compressor station facility. The site is located in Section 16, T104N, R5W, Houston County, Minnesota. The facility modifications will consist of replacing the current blind flanges with compressor cylinder end caps; Northern will not complete any ground disturbance at this site and all work will be completed inside the compressor building. There will be no change to the horsepower or emissions at the facility as a result of the Project.

Environmental Training

One contractor will make the La Crescent compressor station modifications. The environmental training totals listed below reflect all training conducted to date for this component.

On-site Contractor: To be determined (TBD)

Overall Construction Start Date: Anticipated July 2025

Environmental Training Conducted: This reporting period: 0 Total to date: 0

Construction Status: No construction occurred during this reporting period.

Construction Modifications: Construction has not commenced.

Stream Crossings and Environmentally Sensitive Areas

No stream crossings or other environmentally sensitive areas were impacted during this reporting period.

Rain Events

Northern will document rain events upon commencement of construction.

La Crescent Compressor Station Modifications Construction Progress			
Activity	Start Date	Completed	Notes
Compressor Modifications			
*Completed totals include either percentage completed, or date all completed. All totals are approximate.			

Two-Week Projection

1. A pre-construction meeting is tentatively scheduled for completion before July 1, 2025 and the contractor will commence construction after that meeting pending receipt of the notice to proceed with construction.

La Crescent Compressor Station Related Spill Totals

All project derived waste will be properly managed, and every effort will be made to eliminate spills. Construction has not commenced.

PROJECT-WIDE AGENCY COMMUNICATIONS AND SITE VISITS

Attached are agency correspondence not previously filed with FERC. The correspondence includes (1) an email dated December 19, 2024, from the Minnesota Department of Natural Resources (DNR) approving Option A of the Blanding Turtle Avoidance Plan; (2) an email dated November 29, 2024, from the Wisconsin DNR concurring both of the desktop-mapped intermittent waterways on the Tomah branch line loop are non-jurisdictional at the crossing location; (3) letters from the U.S. Fish and Wildlife Service dated January 17, 2025, and revised Determination Keys and IPAC listings concurring no habitat and no impact on the Northern long-eared bat for the Tomah branch line loop and the Elk River 3rd branch line.

PROJECT-WIDE LANDOWNER CONCERNS

There were no landowner concerns during this reporting period.

PROJECT-WIDE NON-COMPLIANCE CONCERNS

No project non-compliance concerns were identified during this reporting period.

Photos of this week's activities

Lake Mills to Albert Lea E-line

Elk River 3rd Branch Line

Farmington to Hugo C-Line

Tomah Branch Line Loop

La Crescent Compressor Station Modifications

Minnesota DNR Correspondence
(Condition 8/biweekly report)

From: [Horton, Becky \(DNR\)](#)
To: [Knabe, Susan](#); [Horton, Becky \(DNR\)](#); [Collins, Melissa \(DNR\)](#)
Cc: [Barrett, Molly \(She/Her/Hers\) \(DNR\)](#); [Noland, Nathan](#); [Joyal, Lisa \(DNR\)](#); [Henning-Randa, Bridget \(DNR\)](#)
Subject: Re: Northern Lights 2025 Expansion -BT avoidance plan
Date: Thursday, December 19, 2024 2:51:42 PM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[NL 2025 Blandings Turtle Avoidance Plan_final.pdf](#)

Hi Sue,

We have reviewed the Blanding's turtle avoidance plan related to the Northern Lights 2025 Expansion project (Elk River 3rd Branch Line and Farmington to Hugo C line).

Option A is approved.

For Option B, additional coordination will be needed if fences are not up by mid-May, as then we would have concerns about nesting turtles and nests. If Option B needs to occur due to approval and weather conditions, please contact reports.nhis@state.mn.us for additional coordination.

Thanks for your patience while we reviewed this avoidance plan.

Any questions, please let me know.

Becky

Rebecca Horton

Planner Principal | Division of Ecological and Water Resources

Minnesota Department of Natural Resources

500 Lafayette Road

St. Paul, MN 55155-4025

Phone: 651-259-5122

Email: becky.horton@state.mn.us

mndnr.gov



mndnr.gov

Wisconsin DNR Correspondence
(Condition 8/biweekly report)

Martens, Donna (Northern Natural Gas)

From: Knabe, Susan <Susan.Knabe@stantec.com>
Sent: Monday, December 2, 2024 11:03 AM
To: Plucker, Terry (Northern Natural Gas); Kraft, Matt (Northern Natural Gas)
Cc: Noland, Nathan; Martens, Donna (Northern Natural Gas)
Subject: [INTERNET] FW: Navigability Determination Request - Northern Natural Gas Northern Lights 2025 Expansion Project - Tomah branch line loop

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Hello

Happy Monday morning – Nate received the below email from WDNR on Friday.

Good news- they agreed that both of the “desktop mapped” intermittent waterways on Tomah are non-jurisdictional at our crossing locations so we will not need a GP3 or any temporary bridges.....

Donna – I think we will want to file this with the implementation plan or sooner if you would like. Just let me know. This means all that is left in Wisconsin is the stormwater permit!

Thanks
Sue



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From: Matthews, Weston K - DNR <weston.matthews@wisconsin.gov>
Sent: Friday, November 29, 2024 9:18 AM
To: Noland, Nathan <Nathan.Noland@stantec.com>
Subject: RE: Navigability Determination Request - Northern Natural Gas Northern Lights 2025 Expansion Project - Tomah branch line loop

Hi Nathan –

[Map Link](#)

Thank you for submitting the navigability determination request for the proposed **Northern Natural Gas Northern Lights 2025 Expansion Project – Tomah Branch Line Loop, in Monroe County**. The WDNR Office of Energy reviewed the request and made the following determination:

- **Navigability Determination Request:** The unnamed tributary (WBIC 5025388) within the proposed project area (43.973587, -90.795181). **WDNR Determination: Non-jurisdictional in the project/review area for the purpose of this project.**

- **Navigability Determination Request:** The unnamed tributary (WBIC 5025364) within the proposed project area (~43.974183, -90.792043). **WDNR Determination: Non-jurisdictional in the project/review area for the purpose of this project.**

Please let me know if you have any questions.

Thank you,

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Weston Matthews

Pronouns: He/Him/His

Phone: 608-228-9164

weston.matthews@wisconsin.gov

From: Noland, Nathan <Nathan.Noland@stantec.com>

Sent: Tuesday, November 26, 2024 9:27 AM

To: Matthews, Weston K - DNR <weston.matthews@wisconsin.gov>

Subject: RE: Navigability Determination Request - Northern Natural Gas Northern Lights 2025 Expansion Project - Tomah branch line loop

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Hi Weston – Yes those attachments are correct. Please let me know if you need any other information that was not provided for the review.

Thanks,

Nathan Noland

Environmental Scientist | Project Manager

Pronouns: he, him, his

Direct: 763-479-4228

Mobile: 270-860-9675

Nathan.Noland@stantec.com

Stantec

One Carlson Parkway, Suite 100

Plymouth, MN 55447



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From: Matthews, Weston K - DNR <weston.matthews@wisconsin.gov>

Sent: Tuesday, November 26, 2024 8:14 AM

To: Noland, Nathan <Nathan.Noland@stantec.com>

Subject: Navigability Determination Request - Northern Natural Gas Northern Lights 2025 Expansion Project - Tomah branch line loop

Hi Nathan –

Writing to notify you that I will be reviewing this navigability determination request. Could you please verify all and the correct attachments were forwarded over to me?

Thanks!

Weston Matthews

Pronouns: He/Him/His

Energy Project Liaison – Division of External Services

Wisconsin Department of Natural Resources

3911 Fish Hatchery Rd.

Fitchburg, WI 53711

Cell Phone: 608-228-9164

weston.matthews@wisconsin.gov



dnr.wi.gov

Our core values include professionalism, integrity, and customer service.

Please visit our [survey](#) to provide feedback on your experience interacting with any DNR employee.



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USFWS Correspondence
(Condition 8/biweekly report)

Martens, Donna (Northern Natural Gas)

From: Knabe, Susan <Susan.Knabe@stantec.com>
Sent: Tuesday, January 21, 2025 10:57 AM
To: Plucker, Terry (Northern Natural Gas); Martens, Donna (Northern Natural Gas); Nelson, Matt (Northern Natural Gas); Jewett, Mia (Northern Natural Gas)
Subject: [INTERNET] FW: [EXTERNAL] RE: Northern Lights 2025 - RPBB Determination Keys

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FYI – looks like USFWS agrees with the new D-keys for the Elk River and Tomah projects – no longer have bats!

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

Stantec



From: Utrup, Nick J <nick_utrup@fws.gov>
Sent: Friday, January 17, 2025 1:36 PM
To: Knabe, Susan <Susan.Knabe@stantec.com>
Cc: terry.plucker@nngco.com
Subject: Re: [EXTERNAL] RE: Northern Lights 2025 - RPBB Determination Keys

Hi Sue,

That doesn't surprise me since the bat tools have been finalized and are now based on a new habitat model. If NLEB does not show up in the new modeled habitat then you are no longer required to consult on that species.

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: Friday, January 17, 2025 1:01 PM
To: Utrup, Nick J <nick_utrup@fws.gov>
Cc: terry.plucker@nngco.com <terry.plucker@nngco.com>
Subject: RE: [EXTERNAL] RE: Northern Lights 2025 - RPBB Determination Keys

Hello Nick

Northern re-ran the IPaC and Determination Keys for two of its Northern Lights 2025 Expansion Projects

Tomah branch line loop – in Monroe County, Wisconsin
Elk River 3rd branch line – Washington County, Minnesota

There were a few changes that occurred since we ran the last IPaC reports, namely the NLEB no longer shows up on either Project.

We are sending these to you for notification as we will also be providing to FERC at some point in the near future.

Please let me know if you have any questions or concerns about the new D-Keys.

Thank you
Sue

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

Stantec



From: Utrup, Nick J <nick_utrup@fws.gov>
Sent: Tuesday, September 10, 2024 2:31 PM
To: Knabe, Susan <Susan.Knabe@stantec.com>
Cc: terry.plucker@nngco.com
Subject: Re: [EXTERNAL] RE: Northern Lights 2025 - RPBB Determination Keys

Hi Sue,

Based on our recent conversations, your proposed avoidance and minimization measures, and our understanding of the project, we concur with your determinations of NLAA for Rusty Patched Bumble Bee. We also agree with your rationale for a "no effect" determination for Salamander Mussel.

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: Friday, August 23, 2024 2:45 PM
To: Utrup, Nick J <nick_utrup@fws.gov>
Cc: terry.plucker@nngco.com <terry.plucker@nngco.com>
Subject: [EXTERNAL] RE: Northern Lights 2025 - RPBB Determination Keys

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

Hi Nick

Thank you for meeting with us this week to discuss the rusty patched bumble bee (RPBB) on Tomah – your input was greatly appreciated.

As discussed during the meeting, we are attaching the Determination Keys for the Elk River 3rd branch line and the Tomah branch line loop.

For the Elk River 3rd branch line, we completed the presence/absence surveys for the RPBB and did not observe any during the survey events. That is reflected in the updated key.

The salamander mussel, which is proposed for listing as endangered, did get added. However, Northern is approximately 7.5 miles west of the St Croix River – which is shown as its preferred habitat. Additionally, the two waterbodies we cross on the Project do not meet its habitat requirements and are being crossed via horizontal directional drill. Northern has determined, as previously mentioned, the Elk River 3rd branch line will have no effect on the salamander mussel. As RPBB were not found on the Elk River 3rd branch line, the determination key indicated a may affect not likely to adversely effect on the RPBB.

For the Tomah branch line loop, Northern reduced its construction footprint in the RPBB habitat to 1.6 acres to mitigate for the discovery of the queen and worker bee on August 2. With the reduction in workspace and commitment not to use pesticides or herbicides, the determination key indicated a may affect not likely to adversely effect on the RPBB.

The other species listed on the determination keys remain with a no effect determination.

Please respond to this email if you have any further questions about the NLAA determination for the RPBB and the no effect to the salamander mussel.

If you concur, this will complete the consultation process for the Northern Lights 2025 Project as the RPBB was the only outstanding determination to finalize.

Thank you again for your assistance.

Sue

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

Stantec



From: Utrup, Nick J <nick.utrup@fws.gov>
Sent: Wednesday, August 14, 2024 1:54 PM
To: Knabe, Susan <Susan.Knabe@stantec.com>
Subject: Re: [EXTERNAL] RE: Northern Lights 2025 - RPBB survey status

Hi Sue,

I would be available for a Teams meeting next week (Tue though Fri). Afternoons would be best.

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, August 14, 2024 11:23 AM
To: Utrup, Nick J <nick.utrup@fws.gov>
Subject: [EXTERNAL] RE: Northern Lights 2025 - RPBB survey status

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Hi Nick

I wanted to provide the USFWS with a summary on the survey status for the Northern Lights 2025 rusty patched bumble bee floristic and presence/absence surveys.

Portions of both the Elk River 3rd branch line in Washington County MN and the Tomah branch line loop in Monroe County WI were located in HPZ. In accordance with our May 28, 2024 survey protocols, Stantec has completed the floristic and presence absence surveys in both areas.

No RPBB were observed on the Elk River 3rd branch line during any of the on-site surveys.

Stantec did locate a RPBB queen and worker bee on the Tomah branch line loop on August 2, 2024 near latitude 43.974019 and longitude -90.793045. This will correspond to approximately Milepost 2.9 on the branch line loop. Below is a screenshot of the general location for reference.



We would like to request a meeting with USFWS staff to discuss next steps and possible mitigation/avoidance options for this species.

I will shortly have shapefiles available of the potential RPBB in this area and Stantec is working on the results report but that will not be ready for a little while.

Please let me know if USFWS is able to meet with us to discuss and if you prefer a Teams or in-person meeting and some potential dates?

Thanks much

Also feel free to call my cell phone if that is easier.

Sue

Sue Knabe

Teams: 920-278-3220

Cell: 920-655-7215

Stantec



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

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_utrump@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 was 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_utrup@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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United States Department of the Interior

FISH AND WILDLIFE SERVICE
Minnesota-Wisconsin Ecological Services Field Office
3815 American Blvd East
Bloomington, MN 55425-1659
Phone: (952) 858-0793



In Reply Refer To:

01/14/2025 21:27:42 UTC

Project code: 2024-0029617

Project Name: Northern Lights 2025 Expansion Project Elk River 3rd branch line

Subject: Verification letter for 'Northern Lights 2025 Expansion Project Elk River 3rd branch line' for specified threatened and endangered species that may occur in your proposed project location consistent with the Minnesota-Wisconsin Endangered Species Determination Key (Minnesota-Wisconsin DKey).

Dear Mia Bauer:

The U.S. Fish and Wildlife Service (Service) received on **January 14, 2025** your effect determination(s) for the 'Northern Lights 2025 Expansion Project Elk River 3rd branch line' (Action) using the Minnesota-Wisconsin DKey within the Information for Planning and Consultation (IPaC) system. You have submitted this key to satisfy requirements under Section 7(a)(2). The Service developed this system in accordance of with the Endangered Species Act of 1973 (ESA) (87 Stat. 884, as amended; 16 U.S.C 1531 et seq.).

Based on your answers and the assistance of the Service's Minnesota-Wisconsin DKey, you made the following effect determination(s) for the proposed Action:

Species	Listing Status	Determination
Monarch Butterfly (<i>Danaus plexippus</i>)	Proposed	No effect
	Threatened	
Rusty Patched Bumble Bee (<i>Bombus affinis</i>)	Endangered	NLAA
Salamander Mussel (<i>Simpsonaias ambigua</i>)	Proposed	May affect
	Endangered	
Whooping Crane (<i>Grus americana</i>)	Experimental	No effect
	Population, Non-Essential	

Determination Information

The Service will notify you within 30 calendar days if we determine that this proposed Action does not meet the criteria for a "may affect, not likely to adversely affect" (NLAA) determination for Federally listed species in Minnesota and Wisconsin. If we do not notify you within that timeframe, you may proceed with the Action under the terms of the NLAA concurrence provided

here. This verification period allows the Minnesota-Wisconsin Ecological Services Field Office to apply local knowledge to evaluation of the Action, as we may identify a small subset of actions having impacts that were unanticipated. In such instances, the Minnesota-Wisconsin Ecological Services Field Office may request additional information to verify the effects determination reached through the Minnesota-Wisconsin DKey.

Additional Information

Sufficient project details: Please provide sufficient project details on your project homepage in IPaC (Define Project, Project Description) to support your conclusions. Failure to disclose important aspects of your project that would influence the outcome of your effects determinations may negate your determinations and invalidate this letter. If you have site-specific information that leads you to believe a different determination is more appropriate for your project than what the Dkey concludes, you can and should proceed based on the best available information.

Future project changes: The Service recommends that you contact the Minnesota-Wisconsin Ecological Services Field Office or re-evaluate the project in IPaC if: 1) the scope or location of the proposed Action is changed; 2) new information reveals that the action may affect listed species or designated critical habitat in a manner or to an extent not previously considered; 3) the Action is modified in a manner that causes effects to listed species or designated critical habitat; or 4) a new species is listed or critical habitat designated. If any of the above conditions occurs, additional consultation with the Service should take place before project changes are final or resources committed.

Species-specific information

Bald and Golden Eagles: Bald eagles, golden eagles, and their nests are protected under the Bald and Golden Eagle Protection Act (54 Stat. 250, as amended, 16 U.S.C. 668a-d) (Eagle Act). The Eagle Act prohibits, except when authorized by an Eagle Act permit, the “taking” of bald and golden eagles and defines “take” as “pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb.” The Eagle Act’s implementing regulations define disturb as “... to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, (1) injury to an eagle, (2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or (3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior.”

The following species and/or critical habitats may also occur in your project area and **are not** covered by this conclusion:

- Western Regal Fritillary *Argynnis idalia occidentalis* Proposed Threatened

Coordination with the Service is not complete if additional coordination is advised above for any species.

Action Description

You provided to IPaC the following name and description for the subject Action.

1. Name

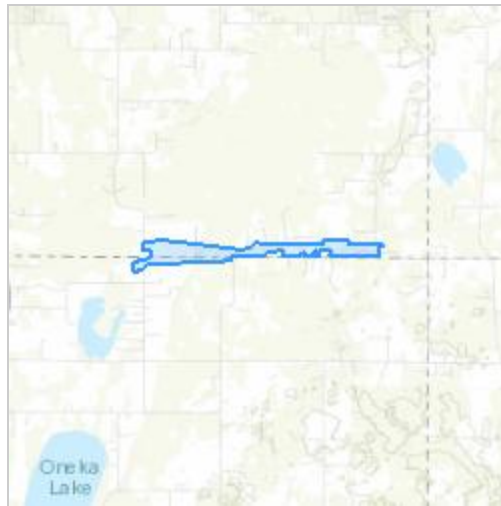
Northern Lights 2025 Expansion Project Elk River 3rd branch line

2. Description

The following description was provided for the project 'Northern Lights 2025 Expansion Project Elk River 3rd branch line':

Northern proposes to construct and operate an approximately 2.43-mile extension of its 30-inch-diameter MNB87703 Elk River 3rd branch line in Washington County, Minnesota. Northern designed its extension to minimize impacts to the environment, including tree removal and wetlands, and landowners; therefore, a majority of the extension is offset from Northern's existing pipelines by more than 25 feet.

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@45.21047735,-92.94040704615719,14z>



QUALIFICATION INTERVIEW

1. This determination key is intended to assist the user in evaluating the effects of their actions on Federally listed species in Minnesota and Wisconsin. It does not cover other prohibited activities under the Endangered Species Act (e.g., for wildlife: import/export, Interstate or foreign commerce, possession of illegally taken wildlife, etc.; for plants: import/export, reduce to possession, malicious destruction on Federal lands, commercial sale, etc.) or other statutes. Additionally, this key DOES NOT cover wind development, purposeful take (e.g., for research or surveys), communication towers that have guy wires or are over 450 feet in height, aerial or other large-scale application of any chemical (such as insecticide or herbicide), and approval of long-term permits or plans (e.g., FERC licenses, HCP's).

Click **YES** to acknowledge that you must consider other prohibitions of the ESA or other statutes outside of this determination key.

Yes

2. Is the action being funded, authorized, or carried out by a Federal agency?

Yes

3. Are you the Federal agency or designated non-federal representative?

Yes

4. Does the action involve the installation or operation of wind turbines?

No

5. Does the action involve purposeful take of a listed animal?

No

6. Does the action involve a new communications tower?

No

7. Does the activity involve aerial or other large-scale application of ANY chemical, including pesticides (insecticide, herbicide, fungicide, rodenticide, etc)?

No

8. Will your action permanently affect local hydrology?

No

9. Will your action temporarily affect local hydrology?

No

10. Will your project have any direct impacts to a stream or river (e.g., Horizontal Directional Drilling (HDD), hydrostatic testing, stream/road crossings, new stormwater outfall discharge, dams, other in-stream work, etc.)?

Yes

11. Does your project have the potential to impact the riparian zone or indirectly impact a stream/river (e.g., cut and fill; horizontal directional drilling; construction; vegetation removal; pesticide or fertilizer application; discharge; runoff of sediment or pollutants; increase in erosion, etc.)?

Note: Consider all potential effects of the action, including those that may happen later in time and outside and downstream of the immediate area involved in the action.

Endangered Species Act regulation defines "effects of the action" to include all consequences to listed species or critical habitat that are caused by the proposed action, including the consequences of other activities that are caused by the proposed action. A consequence is caused by the proposed action if it would not occur but for the proposed action and it is reasonably certain to occur. Effects of the action may occur later in time and may include consequences occurring outside the immediate area involved in the action. (50 CFR 402.02).

Yes

12. Will your action disturb the ground or existing vegetation?

Note: This includes any off-road vehicle access, soil compaction (enough to collapse a rodent burrow), digging, seismic survey, directional drilling, heavy equipment, grading, trenching, placement of fill, pesticide application (herbicide, fungicide), vegetation management (including removal or maintenance using equipment or prescribed fire), cultivation, development, etc.

Yes

13. Will your action include spraying insecticides?

No

14. Does your action area occur entirely within an already developed area?

Note: Already developed areas are already paved, covered by existing structures, manicured lawns, industrial sites, or cultivated cropland, AND do not contain trees that could be roosting habitat. Be aware that listed species may occur in areas with natural, or semi-natural, vegetation immediately adjacent to existing utilities (e.g. roadways, railways) or within utility rights-of-way such as overhead transmission line corridors, and can utilize suitable trees, bridges, or culverts for roosting even in urban dominated landscapes (so these are not considered "already developed areas" for the purposes of this question). If unsure, select NO..

No

15. Your project is within the range of federally listed freshwater mussels. Have surveys for freshwater mussels been conducted according to a Service-approved survey plan?

Note: You must receive prior approval for any proposed mussel survey by contacting the Minnesota-Wisconsin Ecological Services Field Office. All mussel surveys in Minnesota and Wisconsin must comply with State approved protocols.

Minnesota Mussel Protocol: <https://files.dnr.state.mn.us/eco/nhnrp/mn-mussel-survey-and-relocation-protocol.pdf>.

Wisconsin Mussel Protocol: https://molluskconservation.org/Library/Protocol%20PDFs/WI%20Wadable%20Mussel%20Protocol_8-18-15.pdf

No

16. [Semantic] Does the project intersect the Salamander mussel AOI?

Automatically answered

Yes

17. Does the action include – or is it reasonably certain to result in – construction of one or more new roads or rail lines; the addition of travel lanes that are likely to increase vehicle traffic on one or more existing roads; or other structures or activities that will increase vehicle traffic?

No

18. Does the action include – or is it reasonably certain to cause – the use of commercial/managed bees (e.g., the use of honeybees or managed bumble bees to pollinate crops).

No

19. Is there habitat for nesting, foraging, and/or overwintering for the rusty patched bumble bee in the action area?

Note: Please refer to the ESA Section 7(a)(2) Voluntary Implementation Guidance for Rusty Patched Bumble Bee at: <https://www.fws.gov/media/esa-section-7a2-voluntary-implementation-guidance-rusty-patched-bumble-bee>.

Yes

20. Have survey(s) for rusty patched bumble bees been conducted according to Service-approved protocols?

Note: Please refer to survey guidelines at: <https://www.fws.gov/media/survey-protocols-rusty-patched-bumble-bee>

Yes

SUBMITTED DOCUMENTS

- *FW_ EXTERNAL Northern Lights 2025 - Species Information .pdf* <https://ipac.ecosphere.fws.gov/project/LIYTNZHSKZCCBHOQ62EAIPZOJ4/projectDocuments/139882702>
- *NL2025_RPBBSurveyRequest_05282024.pdf* <https://ipac.ecosphere.fws.gov/project/LIYTNZHSKZCCBHOQ62EAIPZOJ4/projectDocuments/148442830>
- *Northern Lights 2025 - Survey Protocols.pdf* <https://ipac.ecosphere.fws.gov/project/LIYTNZHSKZCCBHOQ62EAIPZOJ4/projectDocuments/148442833>

21. Were rusty patched bumble bees observed during surveys?

Note: Surveys must be consistent with FWS-approved protocols with emphasis on recommended survey effort, timing, site selection, and survey technique and methods. Surveys must be conducted within a year before the project initiation for negative survey results to remain valid.

No

22. Have you determined that the action will have no effect on individuals within the whooping crane nonessential experimental population (NEP)?

Yes

23. [Hidden Semantic] Does the action area intersect the monarch butterfly species list area?

Automatically answered

Yes

24. Under the ESA, monarchs remain warranted but precluded by listing actions of higher priority. The monarch is a candidate for listing at this time. The Endangered Species Act does not establish protections or consultation requirements for candidate species. Some Federal and State agencies may have policy requirements to consider candidate species in planning. We encourage implementing measures that will remove or reduce threats to these species and possibly make listing unnecessary.

If your project will have no effect on monarch butterflies (for example, if your project won't affect their habitat or individuals), then you can make a "no effect" determination for this project.

Are you making a "no effect" determination for monarch?

No

25. Is this project funded, authorized, or carried out by the U.S. Fish and Wildlife Service?

No

IPAC USER CONTACT INFORMATION

Agency: Stantec
Name: Mia Bauer
Address: One Carlson Parkway
Address Line 2: Suite 100
City: Plymouth
State: MN
Zip: 55447
Email: mia.bauer@stantec.com
Phone: 6124273725

LEAD AGENCY CONTACT INFORMATION

Lead Agency: Federal Energy Regulatory Commission



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Minnesota-Wisconsin Ecological Services Field Office
3815 American Blvd East
Bloomington, MN 55425-1659
Phone: (952) 858-0793



In Reply Refer To:

01/14/2025 21:05:27 UTC

Project Code: 2024-0029617

Project Name: Northern Lights 2025 Expansion Project Elk River 3rd branch line

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

This response has been generated by the Information, Planning, and Conservation (IPaC) system to provide information on natural resources that could be affected by your project. The U.S. Fish and Wildlife Service (Service) provides this response under the authority of the Endangered Species Act of 1973 (16 U.S.C. 1531-1543), the Bald and Golden Eagle Protection Act (16 U.S.C. 668-668d), the Migratory Bird Treaty Act (16 U.S.C. 703-712), and the Fish and Wildlife Coordination Act (16 U.S.C. 661 *et seq.*).

Threatened and Endangered Species

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and may be affected by your proposed project. The species list fulfills the requirement for obtaining a Technical Assistance Letter from the U.S. Fish and Wildlife Service under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

Consultation Technical Assistance

Please refer to our [Section 7 website](#) for guidance and technical assistance, including [step-by-step instructions](#) for making effects determinations for each species that might be present and for specific guidance on the following types of projects: projects in developed areas, HUD, CDBG, EDA, USDA Rural Development projects, pipelines, buried utilities, telecommunications, and requests for a Conditional Letter of Map Revision (CLOMR) from FEMA.

We recommend running the project (if it qualifies) through our **Minnesota-Wisconsin Federal Endangered Species Determination Key (Minnesota-Wisconsin ("D-key"))**. A [demonstration video](#) showing how-to access and use the determination key is available. Please note that the Minnesota-Wisconsin D-key is the third option of 3 available d-keys. D-keys are tools to help Federal agencies and other project proponents determine if their proposed action has the potential to adversely affect federally listed species and designated critical habitat. The Minnesota-Wisconsin D-key includes a structured set of questions that assists a project proponent in determining whether a proposed project qualifies for a certain predetermined consultation outcome for all federally listed species found in Minnesota and Wisconsin (except for the northern long-eared bat- see below), which includes determinations of "no effect" or "may affect, not likely to adversely affect." In each case, the Service has compiled and analyzed the best available information on the species' biology and the impacts of certain activities to support these determinations.

If your completed d-key output letter shows a "No Effect" (NE) determination for all listed species, print your IPaC output letter for your files to document your compliance with the Endangered Species Act.

For Federal projects with a "Not Likely to Adversely Affect" (NLAA) determination, our concurrence becomes valid if you do not hear otherwise from us after a 30-day review period, as indicated in your letter.

If your d-key output letter indicates additional coordination with the Minnesota-Wisconsin Ecological Services Field Office is necessary (i.e., you get a "May Affect" determination), you will be provided additional guidance on contacting the Service to continue ESA coordination outside of the key; ESA compliance cannot be concluded using the key for "May Affect" determinations unless otherwise indicated in your output letter.

Note: Once you obtain your official species list, you are not required to continue in IPaC with d-keys, although in most cases these tools should expedite your review. If you choose to make an effects determination on your own, you may do so. If the project is a Federal Action, you may want to review our section 7 step-by-step instructions before making your determinations.

Using the IPaC Official Species List to Make No Effect and May Affect Determinations for Listed Species

1. If IPaC returns a result of "There are no listed species found within the vicinity of the project," then project proponents can conclude the proposed activities will have **no effect** on any federally listed species under Service jurisdiction. Concurrence from the Service is not required for **no effect** determinations. No further consultation or coordination is required. Attach this letter to the dated IPaC species list report for your records.
2. If IPaC returns one or more federally listed, proposed, or candidate species as potentially present in the action area of the proposed project – other than bats (see below) – then project proponents must determine if proposed activities will have **no effect** on or **may affect** those species. For assistance in determining if suitable habitat for listed, candidate, or proposed species occurs within your project area or if species may be affected by project activities, you can obtain [Life History Information for Listed and Candidate Species](#) on our office website. If no impacts will occur to a species on the IPaC species list (e.g., there is no habitat present in the project area), the appropriate determination is **no effect**. No further consultation or coordination is required. Attach this letter to the dated IPaC species list report for your records.

3. Should you determine that project activities **may affect** any federally listed, please contact our office for further coordination. Letters with requests for consultation or correspondence about your project should include the Consultation Tracking Number in the header. Electronic submission is preferred.

Northern Long-Eared Bats

Northern long-eared bats occur throughout Minnesota and Wisconsin and the information below may help in determining if your project may affect these species.

Suitable summer habitat for northern long-eared bats consists of a wide variety of forested/wooded habitats where they roost, forage, and travel and may also include some adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, old fields and pastures. This includes forests and woodlots containing potential roosts (i.e., live trees and/or snags ≥ 3 inches dbh for northern long-eared bat that have exfoliating bark, cracks, crevices, and/or hollows), as well as linear features such as fencerows, riparian forests, and other wooded corridors. These wooded areas may be dense or loose aggregates of trees with variable amounts of canopy closure. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet (305 meters) of forested/wooded habitat. Northern long-eared bats have also been observed roosting in human-made structures, such as buildings, barns, bridges, and bat houses; therefore, these structures should also be considered potential summer habitat and evaluated for use by bats. If your project will impact caves or mines or will involve clearing forest or woodland habitat containing suitable roosting habitat, northern long-eared bats could be affected. For bat activity dates, please review Appendix L in the [Range-wide Indiana Bat and Northern Long-Eared Bat Survey Guidelines](#).

Examples of unsuitable habitat include:

- Individual trees that are greater than 1,000 feet from forested or wooded areas,
- Trees found in highly developed urban areas (e.g., street trees, downtown areas),
- A pure stand of less than 3-inch dbh trees that are not mixed with larger trees, and
- A monoculture stand of shrubby vegetation with no potential roost trees.

If IPaC returns a result that northern long-eared bats are potentially present in the action area of the proposed project, project proponents can conclude the proposed activities **may affect** this species **IF** one or more of the following activities are proposed:

- Clearing or disturbing suitable roosting habitat, as defined above, at any time of year,
- Any activity in or near the entrance to a cave or mine,
- Mining, deep excavation, or underground work within 0.25 miles of a cave or mine,
- Construction of one or more wind turbines, or
- Demolition or reconstruction of human-made structures that are known to be used by bats based on observations of roosting bats, bats emerging at dusk, or guano deposits or stains.

If none of the above activities are proposed, project proponents can conclude the proposed activities will have **no effect** on the northern long-eared bat. Concurrence from the Service is not required for **No Effect** determinations. No further consultation or coordination is required. Attach this letter to the dated IPaC

species list report for your records.

If any of the above activities are proposed, and the northern long-eared bat appears on the user's species list, the federal project user will be directed to either the northern long-eared bat and tricolored bat range-wide D-key or the Federal Highways Administration, Federal Railways Administration, and Federal Transit Administration Indiana bat/Northern long-eared bat D-key, depending on the type of project and federal agency involvement. Similar to the Minnesota-Wisconsin D-key, these d-keys help to determine if prohibited take might occur and, if not, will generate an automated verification letter. Additional information about available tools can be found on the Service's [northern long-eared bat website](#).

Whooping Crane

Whooping crane is designated as a non-essential experimental population in Wisconsin and consultation under Section 7(a)(2) of the Endangered Species Act is only required if project activities will occur within a National Wildlife Refuge or National Park. If project activities are proposed on lands outside of a National Wildlife Refuge or National Park, then you are not required to consult. For additional information on this designation and consultation requirements, please review "[Establishment of a Nonessential Experimental Population of Whooping Cranes in the Eastern United States](#)."

Other Trust Resources and Activities

Bald and Golden Eagles - Although the bald eagle has been removed from the endangered species list, this species and the golden eagle are protected by the Bald and Golden Eagle Act and the Migratory Bird Treaty Act. It is the responsibility of the project proponent to survey the area for any migratory bird nests. If there is an eagle nest on-site while work is on-going, eagles may be disturbed. We recommend avoiding and minimizing disturbance to eagles whenever practicable. If you cannot avoid eagle disturbance, you may seek a [permit](#). A [nest take permit](#) is always required for removal, relocation, or obstruction of an eagle nest. For communication and wind energy projects, please refer to additional guidelines below.

Migratory Birds - The Migratory Bird Treaty Act (MBTA) prohibits the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests, except when specifically authorized by the Service. The Service has the responsibility under the MBTA to proactively prevent the mortality of migratory birds whenever possible and we encourage implementation of [recommendations that minimize potential impacts to migratory birds](#). Such measures include clearing forested habitat outside the nesting season (generally March 1 to August 31) or conducting nest surveys prior to clearing to avoid injury to eggs or nestlings.

Communication Towers - Construction of new communications towers (including radio, television, cellular, and microwave) creates a potentially significant impact on migratory birds, especially some 350 species of night-migrating birds. However, the Service has developed [voluntary guidelines for minimizing impacts](#).

Transmission Lines - Migratory birds, especially large species with long wingspans, heavy bodies, and poor maneuverability can also collide with power lines. In addition, mortality can occur when birds, particularly hawks, eagles, kites, falcons, and owls, attempt to perch on uninsulated or unguarded power poles. To minimize these risks, please refer to [guidelines](#) developed by the Avian Power Line Interaction Committee and the Service. Implementation of these measures is especially important along sections of lines adjacent to wetlands or other areas that support large numbers of raptors and migratory birds.

Wind Energy - To minimize impacts to migratory birds and bats, wind energy projects should follow the Service's [Wind Energy Guidelines](#). In addition, please refer to the Service's [Eagle Conservation Plan Guidance](#), which provides guidance for conserving bald and golden eagles in the course of siting, constructing, and operating wind energy facilities.

State Department of Natural Resources Coordination

While it is not required for your Federal section 7 consultation, please note that additional state endangered or threatened species may also have the potential to be impacted. **Please contact the Minnesota or Wisconsin Department of Natural Resources for information on state listed species that may be present in your proposed project area.**

Minnesota

[Minnesota Department of Natural Resources - Endangered Resources Review Homepage](#)

Email: Review.NHIS@state.mn.us

Wisconsin

[Wisconsin Department of Natural Resources - Endangered Resources Review Homepage](#)

Email: DNRERReview@wi.gov

We appreciate your concern for threatened and endangered species. Please feel free to contact our office with questions or for additional information.

Attachment(s):

- Official Species List
- USFWS National Wildlife Refuges and Fish Hatcheries
- Bald & Golden Eagles
- Migratory Birds
- Wetlands

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Minnesota-Wisconsin Ecological Services Field Office

3815 American Blvd East

Bloomington, MN 55425-1659

(952) 858-0793

PROJECT SUMMARY

Project Code: 2024-0029617

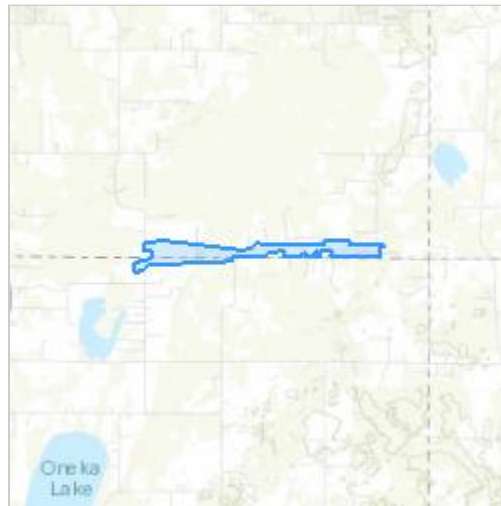
Project Name: Northern Lights 2025 Expansion Project Elk River 3rd branch line

Project Type: Natural Gas Distribution

Project Description: Northern proposes to construct and operate an approximately 2.43-mile extension of its 30-inch-diameter MNB87703 Elk River 3rd branch line in Washington County, Minnesota. Northern designed its extension to minimize impacts to the environment, including tree removal and wetlands, and landowners; therefore, a majority of the extension is offset from Northern's existing pipelines by more than 25 feet.

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@45.21047735,-92.94040704615719,14z>



Counties: Washington County, Minnesota

ENDANGERED SPECIES ACT SPECIES

There is a total of 5 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

BIRDS

NAME	STATUS
Whooping Crane <i>Grus americana</i> Population: U.S.A. (AL, AR, CO, FL, GA, ID, IL, IN, IA, KY, LA, MI, MN, MS, MO, NC, NM, OH, SC, TN, UT, VA, WI, WV, western half of WY) No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/758	Experimental Population, Non-Essential

CLAMS

NAME	STATUS
Salamander Mussel <i>Simpsonaias ambigua</i> There is proposed critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/6208	Proposed Endangered

INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> There is proposed critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9743	Proposed Threatened
Rusty Patched Bumble Bee <i>Bombus affinis</i> There is proposed critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9383 General project design guidelines: https://ipac.ecosphere.fws.gov/project/LIYTNZHSHKZCCBHOQ62EAIPZOJ4/documents/generated/5967.pdf	Endangered
Western Regal Fritillary <i>Argynnis idalia occidentalis</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/12017	Proposed Threatened

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

BALD & GOLDEN EAGLES

Bald and Golden Eagles are protected under the Bald and Golden Eagle Protection Act ² and the Migratory Bird Treaty Act (MBTA) ¹. Any person or organization who plans or conducts activities that may result in impacts to Bald or Golden Eagles, or their habitats, should follow appropriate regulations and consider implementing appropriate avoidance and minimization measures, as described in the various links on this page.

-
1. The [Bald and Golden Eagle Protection Act](#) of 1940.
 2. The [Migratory Birds Treaty Act](#) of 1918.
 3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

There are Bald Eagles and/or Golden Eagles in your [project](#) area.

Measures for Proactively Minimizing Eagle Impacts

For information on how to best avoid and minimize disturbance to nesting bald eagles, please review the [National Bald Eagle Management Guidelines](#). You may employ the timing and activity-specific distance recommendations in this document when designing your project/ activity to avoid and minimize eagle impacts. For bald eagle information specific to Alaska, please refer to [Bald Eagle Nesting and Sensitivity to Human Activity](#).

The FWS does not currently have guidelines for avoiding and minimizing disturbance to nesting Golden Eagles. For site-specific recommendations regarding nesting Golden Eagles, please consult with the appropriate Regional [Migratory Bird Office](#) or [Ecological Services Field Office](#).

If disturbance or take of eagles cannot be avoided, an [incidental take permit](#) may be available to authorize any take that results from, but is not the purpose of, an otherwise lawful activity. For assistance making this determination for Bald Eagles, visit the [Do I Need A Permit Tool](#). For assistance making this determination for golden eagles, please consult with the appropriate Regional [Migratory Bird Office](#) or [Ecological Services Field Office](#).

Ensure Your Eagle List is Accurate and Complete

If your project area is in a poorly surveyed area in IPaC, your list may not be complete and you may need to rely on other resources to determine what species may be present (e.g. your local FWS field office, state surveys, your own surveys). Please review the [Supplemental Information](#)

[on Migratory Birds and Eagles](#), to help you properly interpret the report for your specified location, including determining if there is sufficient data to ensure your list is accurate.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to bald or golden eagles on your list, see the "Probability of Presence Summary" below to see when these bald or golden eagles are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bald Eagle <i>Haliaeetus leucocephalus</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Dec 1 to Aug 31

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "[Supplemental Information on Migratory Birds and Eagles](#)", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

Breeding Season (■)

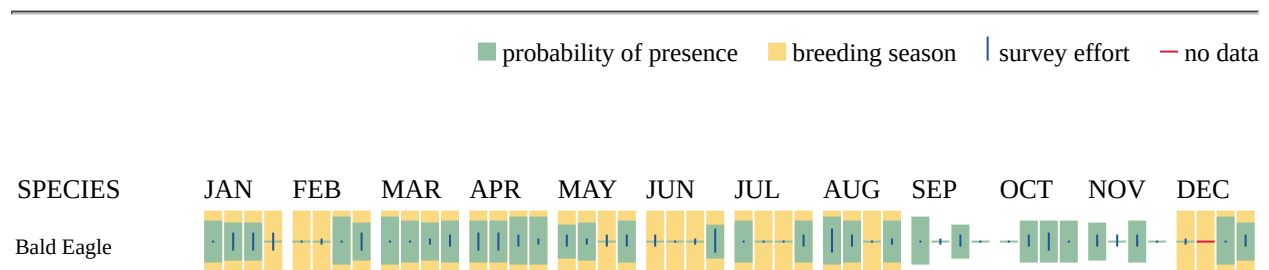
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

Survey Effort (|)

Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data (—)

A week is marked as having no data if there were no survey events for that week.



Non-BCC
Vulnerable

Additional information can be found using the following links:

- Eagle Management <https://www.fws.gov/program/eagle-management>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds>
- Nationwide avoidance and minimization measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>
- Supplemental Information for Migratory Birds and Eagles in IPaC <https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action>

MIGRATORY BIRDS

The Migratory Bird Treaty Act (MBTA) ¹ prohibits the take (including killing, capturing, selling, trading, and transport) of protected migratory bird species without prior authorization by the Department of Interior U.S. Fish and Wildlife Service (Service). The incidental take of migratory birds is the injury or death of birds that results from, but is not the purpose, of an activity. The Service interprets the MBTA to prohibit incidental take.

-
1. The [Migratory Birds Treaty Act](#) of 1918.
 2. The [Bald and Golden Eagle Protection Act](#) of 1940.
 3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the "Probability of Presence Summary" below to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bald Eagle <i>Haliaeetus leucocephalus</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Dec 1 to Aug 31
Black Tern <i>Chlidonias niger surinamenis</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/3093	Breeds May 15 to Aug 20

NAME	BREEDING SEASON
Black-billed Cuckoo <i>Coccyzus erythrophthalmus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9399	Breeds May 15 to Oct 10
Bobolink <i>Dolichonyx oryzivorus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9454	Breeds May 20 to Jul 31
Canada Warbler <i>Cardellina canadensis</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9643	Breeds May 20 to Aug 10
Chimney Swift <i>Chaetura pelagica</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9406	Breeds Mar 15 to Aug 25
Golden-winged Warbler <i>Vermivora chrysoptera</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/8745	Breeds May 1 to Jul 20
Grasshopper Sparrow <i>Ammodramus savannarum perpallidus</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/8329	Breeds Jun 1 to Aug 20
Henslow's Sparrow <i>Centronyx henslowii</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/3941	Breeds May 1 to Aug 31
Lesser Yellowlegs <i>Tringa flavipes</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9679	Breeds elsewhere
Pectoral Sandpiper <i>Calidris melanotos</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9561	Breeds elsewhere
Red-headed Woodpecker <i>Melanerpes erythrocephalus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9398	Breeds May 10 to Sep 10

NAME	BREEDING SEASON
Ruddy Turnstone <i>Arenaria interpres morinella</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/10633	Breeds elsewhere
Rusty Blackbird <i>Euphagus carolinus</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/9478	Breeds elsewhere
Semipalmated Sandpiper <i>Calidris pusilla</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/9603	Breeds elsewhere
Short-billed Dowitcher <i>Limnodromus griseus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9480	Breeds elsewhere
Wood Thrush <i>Hylocichla mustelina</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9431	Breeds May 10 to Aug 31

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "[Supplemental Information on Migratory Birds and Eagles](#)", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

Breeding Season (■)

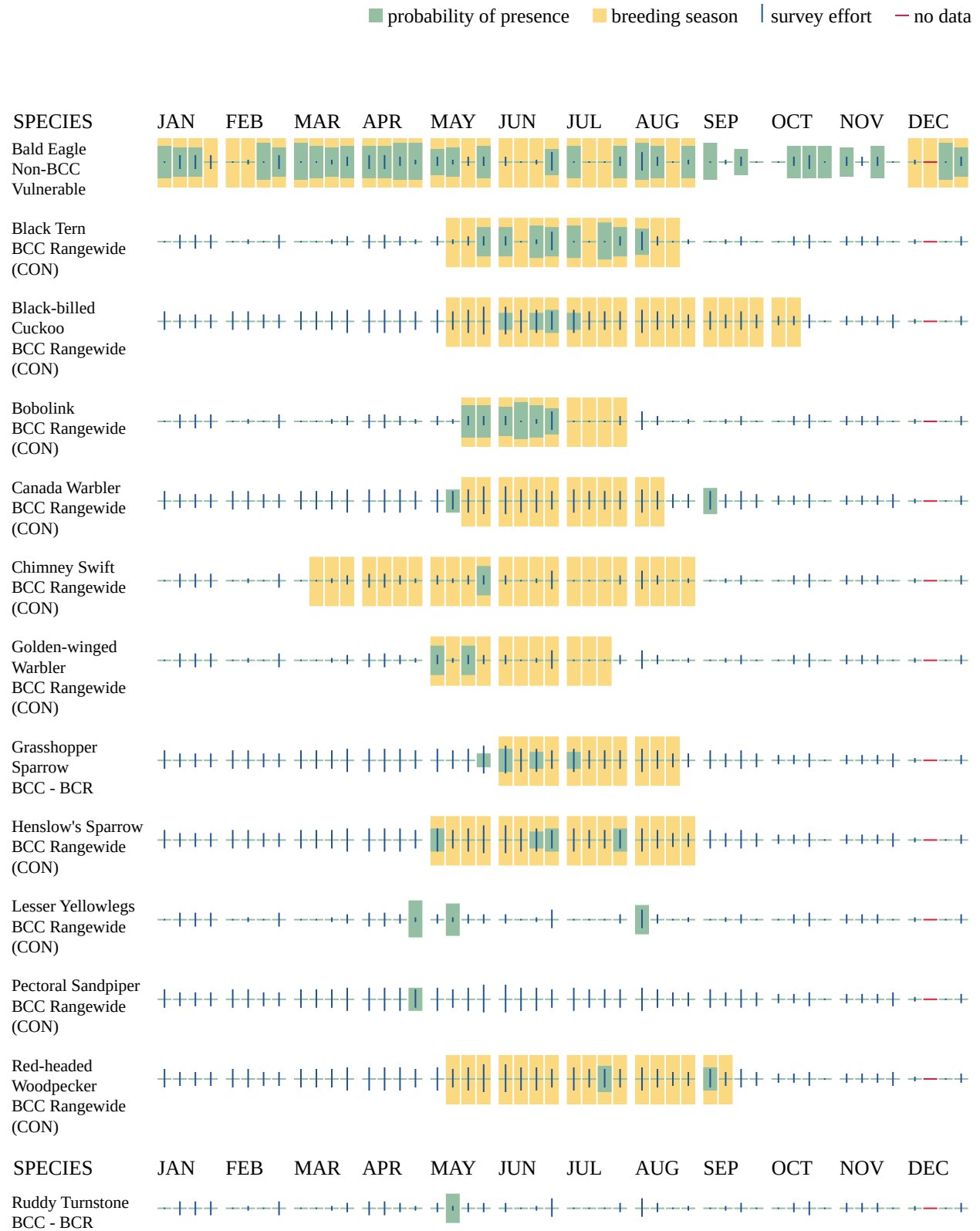
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

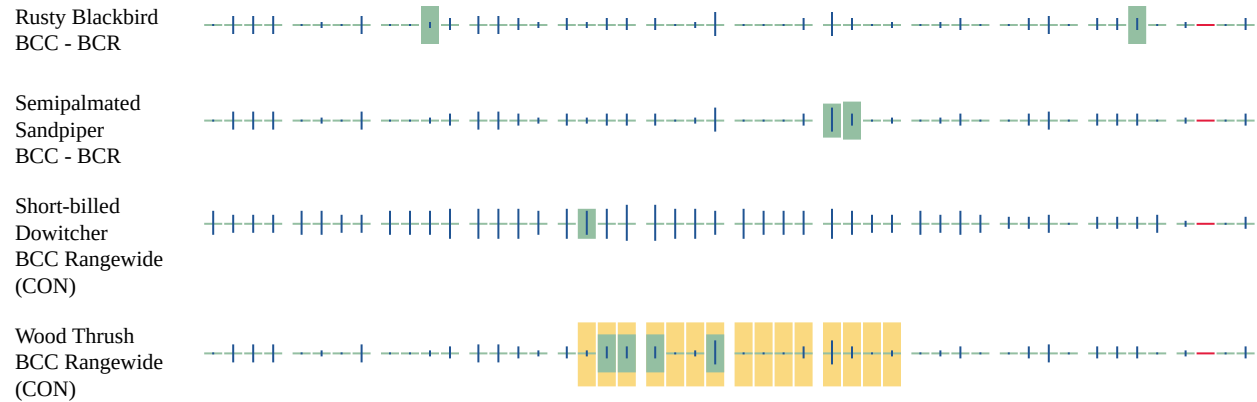
Survey Effort (|)

Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data (—)

A week is marked as having no data if there were no survey events for that week.





Additional information can be found using the following links:

- Eagle Management <https://www.fws.gov/program/eagle-management>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds>
- Nationwide avoidance and minimization measures for birds
- Supplemental Information for Migratory Birds and Eagles in IPaC <https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action>

WETLANDS

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

FRESHWATER POND

- PABH
- PABHx
- PUBF
- PUBHx

FRESHWATER EMERGENT WETLAND

- PEM1C
- PEM1F
- PEM1Cd

- PEM1A

FRESHWATER FORESTED/SHRUB WETLAND

- PFO2/EM1Dg
- PFO1/EM1Cd
- PFO2/SS1Dg
- PSS1/EM1Ad
- PSS1Cd

RIVERINE

- R2UBFx
- R4SBC

IPAC USER CONTACT INFORMATION

Agency: Stantec
Name: Mia Bauer
Address: One Carlson Parkway
Address Line 2: Suite 100
City: Plymouth
State: MN
Zip: 55447
Email: mia.bauer@stantec.com
Phone: 6124273725

LEAD AGENCY CONTACT INFORMATION

Lead Agency: Federal Energy Regulatory Commission



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Minnesota-Wisconsin Ecological Services Field Office
3815 American Blvd East
Bloomington, MN 55425-1659
Phone: (952) 858-0793



In Reply Refer To:

01/15/2025 16:52:18 UTC

Project code: 2024-0029640

Project Name: Northern Lights 2025 Expansion Project Tomah Branch Line Loop

Subject: Verification letter for 'Northern Lights 2025 Expansion Project Tomah Branch Line Loop' for specified threatened and endangered species that may occur in your proposed project location consistent with the Minnesota-Wisconsin Endangered Species Determination Key (Minnesota-Wisconsin DKey).

Dear Mia Bauer:

The U.S. Fish and Wildlife Service (Service) received on **January 15, 2025** your effect determination(s) for the 'Northern Lights 2025 Expansion Project Tomah Branch Line Loop' (Action) using the Minnesota-Wisconsin DKey within the Information for Planning and Consultation (IPaC) system. You have submitted this key to satisfy requirements under Section 7(a)(2). The Service developed this system in accordance of with the Endangered Species Act of 1973 (ESA) (87 Stat. 884, as amended; 16 U.S.C 1531 et seq.).

Based on your answers and the assistance of the Service's Minnesota-Wisconsin DKey, you made the following effect determination(s) for the proposed Action:

Species	Listing Status	Determination
Eastern Massasauga (=rattlesnake) (<i>Sistrurus catenatus</i>)	Threatened	No effect
Karner Blue Butterfly (<i>Lycaeides melissa samuelis</i>)	Endangered	NLAA
Monarch Butterfly (<i>Danaus plexippus</i>)	Proposed	No effect
	Threatened	
Rusty Patched Bumble Bee (<i>Bombus affinis</i>)	Endangered	NLAA
Whooping Crane (<i>Grus americana</i>)	Experimental	No effect
	Population, Non-Essential	

Determination Information

The Service will notify you within 30 calendar days if we determine that this proposed Action does not meet the criteria for a "may affect, not likely to adversely affect" (NLAA) determination for Federally listed species in Minnesota and Wisconsin. If we do not notify you within that timeframe, you may proceed with the Action under the terms of the NLAA concurrence provided

here. This verification period allows the Minnesota-Wisconsin Ecological Services Field Office to apply local knowledge to evaluation of the Action, as we may identify a small subset of actions having impacts that were unanticipated. In such instances, the Minnesota-Wisconsin Ecological Services Field Office may request additional information to verify the effects determination reached through the Minnesota-Wisconsin DKey.

Additional Information

Sufficient project details: Please provide sufficient project details on your project homepage in IPaC (Define Project, Project Description) to support your conclusions. Failure to disclose important aspects of your project that would influence the outcome of your effects determinations may negate your determinations and invalidate this letter. If you have site-specific information that leads you to believe a different determination is more appropriate for your project than what the Dkey concludes, you can and should proceed based on the best available information.

Future project changes: The Service recommends that you contact the Minnesota-Wisconsin Ecological Services Field Office or re-evaluate the project in IPaC if: 1) the scope or location of the proposed Action is changed; 2) new information reveals that the action may affect listed species or designated critical habitat in a manner or to an extent not previously considered; 3) the Action is modified in a manner that causes effects to listed species or designated critical habitat; or 4) a new species is listed or critical habitat designated. If any of the above conditions occurs, additional consultation with the Service should take place before project changes are final or resources committed.

Species-specific information

Bald and Golden Eagles: Bald eagles, golden eagles, and their nests are protected under the Bald and Golden Eagle Protection Act (54 Stat. 250, as amended, 16 U.S.C. 668a-d) (Eagle Act). The Eagle Act prohibits, except when authorized by an Eagle Act permit, the “taking” of bald and golden eagles and defines “take” as “pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb.” The Eagle Act’s implementing regulations define disturb as “... to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, (1) injury to an eagle, (2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or (3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior.”

Coordination with the Service is not complete if additional coordination is advised above for any species.

Action Description

You provided to IPaC the following name and description for the subject Action.

1. Name

Northern Lights 2025 Expansion Project Tomah Branch Line Loop

2. Description

The following description was provided for the project 'Northern Lights 2025 Expansion Project Tomah Branch Line Loop':

Northern proposes to construct and operate an approximately 1.28-mile extension of its 8 inch diameter WIB11902 Tomah branch line loop (Tomah loop) in Monroe County, Wisconsin. Northern will utilize ETWS, temporary access roads, an existing driveway, and a staging area.

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@43.97437745,-90.79274072164415,14z>



QUALIFICATION INTERVIEW

1. This determination key is intended to assist the user in evaluating the effects of their actions on Federally listed species in Minnesota and Wisconsin. It does not cover other prohibited activities under the Endangered Species Act (e.g., for wildlife: import/export, Interstate or foreign commerce, possession of illegally taken wildlife, etc.; for plants: import/export, reduce to possession, malicious destruction on Federal lands, commercial sale, etc.) or other statutes. Additionally, this key DOES NOT cover wind development, purposeful take (e.g., for research or surveys), communication towers that have guy wires or are over 450 feet in height, aerial or other large-scale application of any chemical (such as insecticide or herbicide), and approval of long-term permits or plans (e.g., FERC licenses, HCP's).

Click **YES** to acknowledge that you must consider other prohibitions of the ESA or other statutes outside of this determination key.

Yes

2. Is the action being funded, authorized, or carried out by a Federal agency?

Yes

3. Are you the Federal agency or designated non-federal representative?

Yes

4. Does the action involve the installation or operation of wind turbines?

No

5. Does the action involve purposeful take of a listed animal?

No

6. Does the action involve a new communications tower?

No

7. Does the activity involve aerial or other large-scale application of ANY chemical, including pesticides (insecticide, herbicide, fungicide, rodenticide, etc)?

No

8. Will your action permanently affect local hydrology?

No

9. Will your action temporarily affect local hydrology?

No

10. Will your project have any direct impacts to a stream or river (e.g., Horizontal Directional Drilling (HDD), hydrostatic testing, stream/road crossings, new stormwater outfall discharge, dams, other in-stream work, etc.)?

Yes

11. Does your project have the potential to impact the riparian zone or indirectly impact a stream/river (e.g., cut and fill; horizontal directional drilling; construction; vegetation removal; pesticide or fertilizer application; discharge; runoff of sediment or pollutants; increase in erosion, etc.)?

Note: Consider all potential effects of the action, including those that may happen later in time and outside and downstream of the immediate area involved in the action.

Endangered Species Act regulation defines "effects of the action" to include all consequences to listed species or critical habitat that are caused by the proposed action, including the consequences of other activities that are caused by the proposed action. A consequence is caused by the proposed action if it would not occur but for the proposed action and it is reasonably certain to occur. Effects of the action may occur later in time and may include consequences occurring outside the immediate area involved in the action. (50 CFR 402.02).

Yes

12. Will your action disturb the ground or existing vegetation?

Note: This includes any off-road vehicle access, soil compaction (enough to collapse a rodent burrow), digging, seismic survey, directional drilling, heavy equipment, grading, trenching, placement of fill, pesticide application (herbicide, fungicide), vegetation management (including removal or maintenance using equipment or prescribed fire), cultivation, development, etc.

Yes

13. Will your action include spraying insecticides?

No

14. Does your action area occur entirely within an already developed area?

Note: Already developed areas are already paved, covered by existing structures, manicured lawns, industrial sites, or cultivated cropland, AND do not contain trees that could be roosting habitat. Be aware that listed species may occur in areas with natural, or semi-natural, vegetation immediately adjacent to existing utilities (e.g. roadways, railways) or within utility rights-of-way such as overhead transmission line corridors, and can utilize suitable trees, bridges, or culverts for roosting even in urban dominated landscapes (so these are not considered "already developed areas" for the purposes of this question). If unsure, select NO..

No

15. While it is not required for your Federal section 7 consultation, please note that additional state endangered or threatened species may also have the potential to be impacted.

Have you contacted the Wisconsin Department of Natural Resources for information on state listed species that may be present in your proposed project area?

Yes (If you click yes, you will be prompted to upload a copy of your correspondence with Wisconsin Department of Natural Resources related to presence of Eastern Massasauga Rattlesnake in the project area)

SUBMITTED DOCUMENTS

- *ERR24-232_Northern_Natural_Gas___Tomah_Branch_Line_Loop_WIB11902.pdf* <https://ipac.ecosphere.fws.gov/project/YDIWRTTZVRHDDENZ42HVQCPYFU/projectDocuments/155522630>
- *NL2025_RPBBSurveyRequest_05282024.pdf* <https://ipac.ecosphere.fws.gov/project/YDIWRTTZVRHDDENZ42HVQCPYFU/projectDocuments/148441678>
- *Northern Lights 2025 - Survey Protocols.pdf* <https://ipac.ecosphere.fws.gov/project/YDIWRTTZVRHDDENZ42HVQCPYFU/projectDocuments/148441872>
- *FW_EXTERNAL Northern Lights 2025 - Species Information .pdf* <https://ipac.ecosphere.fws.gov/project/YDIWRTTZVRHDDENZ42HVQCPYFU/projectDocuments/139882332>

16. Will your action impact Eastern Massasauga rattlesnake habitat?

Note: Suitable habitat includes a variety of wetland habitats and associated wetlands. Populations in Wisconsin are typically associated with floodplain habitats along rivers where they occupy open wetlands such as sedge meadows, wet meadows, shrub-carrs, and adjacent upland prairies, floodplain forests, and old fields. Eastern massasaugas also use open uplands and/or forest openings for foraging, basking, gestation and parturition (i.e., giving birth to young). Massasauga habitats generally appear to be characterized by the following: (1) open, sunny areas intermixed with shaded areas, presumably for thermoregulation; (2) presence of the water table near the surface for hibernation; and (3) variable elevations between adjoining lowland and upland habitats. Suitable hibernation habitat are areas where EMR can use for shelter to survive the winter. EMR usually hibernate below the frost line in crayfish or small mammal burrows, tree root networks or rock cervices in or along the edge of wetlands or in adjacent upland areas with presumably high water tables (areas where the soil is saturated but not inundated). Following egress from hibernacula in the spring, EMR typically remain above ground in the vicinity for a week or two, and return to these areas in the fall for several weeks prior to entering hibernation. Surveys in the spring (shorting following egress) or fall (prior to ingress) when snakes are congregating in the vicinity may help identify these important areas. Maintaining stable hydrology of these areas is important during the inactive season.">suitable Eastern Massasauga rattlesnake habitat.

No

17. Will the action occur in oak savanna, oak or pine barrens, prairie, openings within oak and/or pine forest including rights-of-way, or old fields in association with oak forest? If you do not know, click "yes".

No

18. Does the action include – or is it reasonably certain to result in – construction of one or more new roads or rail lines; the addition of travel lanes that are likely to increase vehicle traffic on one or more existing roads; or other structures or activities that will increase vehicle traffic?

No

19. Does the action include – or is it reasonably certain to cause – the use of commercial/managed bees (e.g., the use of honeybees or managed bumble bees to pollinate crops).

No

20. Is there habitat for nesting, foraging, and/or overwintering for the rusty patched bumble bee in the action area?

Note: Please refer to the ESA Section 7(a)(2) Voluntary Implementation Guidance for Rusty Patched Bumble Bee at: <https://www.fws.gov/media/esa-section-7a2-voluntary-implementation-guidance-rusty-patched-bumble-bee>.

Yes

21. Have survey(s) for rusty patched bumble bees been conducted according to Service-approved protocols?

Note: Please refer to survey guidelines at: <https://www.fws.gov/media/survey-protocols-rusty-patched-bumble-bee>

Yes

SUBMITTED DOCUMENTS

- *NL2025_RPBBSurveyRequest_05282024.pdf* <https://ipac.ecosphere.fws.gov/project/YDIWRTTZVRHDDENZ42HVQCPYFU/projectDocuments/148441678>
- *Northern Lights 2025 - Survey Protocols.pdf* <https://ipac.ecosphere.fws.gov/project/YDIWRTTZVRHDDENZ42HVQCPYFU/projectDocuments/148441872>
- *FW_EXTERNAL Northern Lights 2025 - Species Information .pdf* <https://ipac.ecosphere.fws.gov/project/YDIWRTTZVRHDDENZ42HVQCPYFU/projectDocuments/139882332>
- *ERR24-232_Northern_Natural_Gas___Tomah_Branch_Line_Loop_WIB11902.pdf* <https://ipac.ecosphere.fws.gov/project/YDIWRTTZVRHDDENZ42HVQCPYFU/projectDocuments/155522630>

22. Were rusty patched bumble bees observed during surveys?

Note: Surveys must be consistent with FWS-approved protocols with emphasis on recommended survey effort, timing, site selection, and survey technique and methods. Surveys must be conducted within a year before the project initiation for negative survey results to remain valid.

Yes

23. Does the action include collection of seed from native species?

No

24. Does the action include, or will it cause the application of insecticides or fungicides; activities to control native rodent species; or planting or seeding of non-native plant species that are likely to degrade the quality of existing rusty patched bumble bee foraging habitat by decreasing the abundance or diversity of native rusty patched bumble bee forage species?

No

25. Will the action include or cause herbicide use?

No

26. Will the action cause ground disturbance that affects more than 0.25 acre (0.1 hectare) of rusty patched bumble bee nesting habitat (upland grasslands, shrublands, and forest and woodland edges that contain native sources of pollen and nectar) in a High Potential Zone during the nesting season?

Note: Please refer to the ESA Section 7(a)(2) Voluntary Implementation Guidance for Rusty Patched Bumble Bee at: <https://www.fws.gov/media/esa-section-7a2-voluntary-implementation-guidance-rusty-patched-bumble-bee>.

No

27. Will the action cause ground disturbance that affects more than 0.25 acre (0.1 hectare) of rusty patched bumble bee overwintering habitat (forest or woodland that contains native plants that provide pollen and nectar) in a High Potential Zone during the overwintering period?

Note: Please refer to the ESA Section 7(a)(2) Voluntary Implementation Guidance for Rusty Patched Bumble Bee at: <https://www.fws.gov/media/esa-section-7a2-voluntary-implementation-guidance-rusty-patched-bumble-bee>.

No

28. Will the action cause effects to vegetation in rusty patched bumble bee habitat during the nesting period?

Effects could occur as a result of mowing, cutting, grazing, prescribed fire, tree removal, spot-application of herbicide, tree clearing, and/or other activities.

Note: Please refer to the ESA Section 7(a)(2) Voluntary Implementation Guidance for Rusty Patched Bumble Bee at: <https://www.fws.gov/media/esa-section-7a2-voluntary-implementation-guidance-rusty-patched-bumble-bee>.

Yes

29. Will the action cause effects during the nesting period to 2.0 acres (0.8 ha) or more of foraging habitat? This excludes effects to vegetation in newly planted habitats if they occur before the beginning of the third growing season after the initial seeding.

Note: Please refer to the ESA Section 7(a)(2) Voluntary Implementation Guidance for Rusty Patched Bumble Bee at: <https://www.fws.gov/media/esa-section-7a2-voluntary-implementation-guidance-rusty-patched-bumble-bee>.

No

30. Does the action include the use of prescribed fire during the overwintering period that will affect any rusty patched bumble bee habitat that contains trees?

Note: Please refer to the ESA Section 7(a)(2) Voluntary Implementation Guidance for Rusty Patched Bumble Bee at: <https://www.fws.gov/media/esa-section-7a2-voluntary-implementation-guidance-rusty-patched-bumble-bee>.

No

31. Will the action result in the permanent removal or conversion of any existing rusty patched bumble bee habitat at any time of the year?

Note: Please refer to the ESA Section 7(a)(2) Voluntary Implementation Guidance for Rusty Patched Bumble Bee at: <https://www.fws.gov/media/esa-section-7a2-voluntary-implementation-guidance-rusty-patched-bumble-bee>.

No

32. Have you determined that the action will have no effect on individuals within the whooping crane nonessential experimental population (NEP)?

Yes

33. [Hidden Semantic] Does the action area intersect the monarch butterfly species list area?

Automatically answered

Yes

34. Under the ESA, monarchs remain warranted but precluded by listing actions of higher priority. The monarch is a candidate for listing at this time. The Endangered Species Act does not establish protections or consultation requirements for candidate species. Some Federal and State agencies may have policy requirements to consider candidate species in planning. We encourage implementing measures that will remove or reduce threats to these species and possibly make listing unnecessary.

If your project will have no effect on monarch butterflies (for example, if your project won't affect their habitat or individuals), then you can make a "no effect" determination for this project.

Are you making a "no effect" determination for monarch?

No

35. Is this project funded, authorized, or carried out by the U.S. Fish and Wildlife Service?

No

IPAC USER CONTACT INFORMATION

Agency: Stantec
Name: Mia Bauer
Address: One Carlson Parkway
Address Line 2: Suite 100
City: Plymouth
State: MN
Zip: 55447
Email: mia.bauer@stantec.com
Phone: 6124273725

LEAD AGENCY CONTACT INFORMATION

Lead Agency: Federal Energy Regulatory Commission



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Minnesota-Wisconsin Ecological Services Field Office
3815 American Blvd East
Bloomington, MN 55425-1659
Phone: (952) 858-0793



In Reply Refer To:

01/15/2025 16:22:15 UTC

Project Code: 2024-0029640

Project Name: Northern Lights 2025 Expansion Project Tomah Branch Line Loop

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

This response has been generated by the Information, Planning, and Conservation (IPaC) system to provide information on natural resources that could be affected by your project. The U.S. Fish and Wildlife Service (Service) provides this response under the authority of the Endangered Species Act of 1973 (16 U.S.C. 1531-1543), the Bald and Golden Eagle Protection Act (16 U.S.C. 668-668d), the Migratory Bird Treaty Act (16 U.S.C. 703-712), and the Fish and Wildlife Coordination Act (16 U.S.C. 661 *et seq.*).

Threatened and Endangered Species

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and may be affected by your proposed project. The species list fulfills the requirement for obtaining a Technical Assistance Letter from the U.S. Fish and Wildlife Service under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

Consultation Technical Assistance

Please refer to our [Section 7 website](#) for guidance and technical assistance, including [step-by-step instructions](#) for making effects determinations for each species that might be present and for specific guidance on the following types of projects: projects in developed areas, HUD, CDBG, EDA, USDA Rural Development projects, pipelines, buried utilities, telecommunications, and requests for a Conditional Letter of Map Revision (CLOMR) from FEMA.

We recommend running the project (if it qualifies) through our **Minnesota-Wisconsin Federal Endangered Species Determination Key (Minnesota-Wisconsin ("D-key"))**. A [demonstration video](#) showing how-to access and use the determination key is available. Please note that the Minnesota-Wisconsin D-key is the third option of 3 available d-keys. D-keys are tools to help Federal agencies and other project proponents determine if their proposed action has the potential to adversely affect federally listed species and designated critical habitat. The Minnesota-Wisconsin D-key includes a structured set of questions that assists a project proponent in determining whether a proposed project qualifies for a certain predetermined consultation outcome for all federally listed species found in Minnesota and Wisconsin (except for the northern long-eared bat- see below), which includes determinations of “no effect” or “may affect, not likely to adversely affect.” In each case, the Service has compiled and analyzed the best available information on the species’ biology and the impacts of certain activities to support these determinations.

If your completed d-key output letter shows a "No Effect" (NE) determination for all listed species, print your IPaC output letter for your files to document your compliance with the Endangered Species Act.

For Federal projects with a “Not Likely to Adversely Affect” (NLAA) determination, our concurrence becomes valid if you do not hear otherwise from us after a 30-day review period, as indicated in your letter.

If your d-key output letter indicates additional coordination with the Minnesota-Wisconsin Ecological Services Field Office is necessary (i.e., you get a “May Affect” determination), you will be provided additional guidance on contacting the Service to continue ESA coordination outside of the key; ESA compliance cannot be concluded using the key for “May Affect” determinations unless otherwise indicated in your output letter.

Note: Once you obtain your official species list, you are not required to continue in IPaC with d-keys, although in most cases these tools should expedite your review. If you choose to make an effects determination on your own, you may do so. If the project is a Federal Action, you may want to review our section 7 step-by-step instructions before making your determinations.

Using the IPaC Official Species List to Make No Effect and May Affect Determinations for Listed Species

1. If IPaC returns a result of “There are no listed species found within the vicinity of the project,” then project proponents can conclude the proposed activities will have **no effect** on any federally listed species under Service jurisdiction. Concurrence from the Service is not required for **no effect** determinations. No further consultation or coordination is required. Attach this letter to the dated IPaC species list report for your records.
2. If IPaC returns one or more federally listed, proposed, or candidate species as potentially present in the action area of the proposed project – other than bats (see below) – then project proponents must determine if proposed activities will have **no effect** on or **may affect** those species. For assistance in determining if suitable habitat for listed, candidate, or proposed species occurs within your project area or if species may be affected by project activities, you can obtain [Life History Information for Listed and Candidate Species](#) on our office website. If no impacts will occur to a species on the IPaC species list (e.g., there is no habitat present in the project area), the appropriate determination is **no effect**. No further consultation or coordination is required. Attach this letter to the dated IPaC species list report for your records.

3. Should you determine that project activities **may affect** any federally listed, please contact our office for further coordination. Letters with requests for consultation or correspondence about your project should include the Consultation Tracking Number in the header. Electronic submission is preferred.

Northern Long-Eared Bats

Northern long-eared bats occur throughout Minnesota and Wisconsin and the information below may help in determining if your project may affect these species.

Suitable summer habitat for northern long-eared bats consists of a wide variety of forested/wooded habitats where they roost, forage, and travel and may also include some adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, old fields and pastures. This includes forests and woodlots containing potential roosts (i.e., live trees and/or snags ≥ 3 inches dbh for northern long-eared bat that have exfoliating bark, cracks, crevices, and/or hollows), as well as linear features such as fencerows, riparian forests, and other wooded corridors. These wooded areas may be dense or loose aggregates of trees with variable amounts of canopy closure. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet (305 meters) of forested/wooded habitat. Northern long-eared bats have also been observed roosting in human-made structures, such as buildings, barns, bridges, and bat houses; therefore, these structures should also be considered potential summer habitat and evaluated for use by bats. If your project will impact caves or mines or will involve clearing forest or woodland habitat containing suitable roosting habitat, northern long-eared bats could be affected. For bat activity dates, please review Appendix L in the [Range-wide Indiana Bat and Northern Long-Eared Bat Survey Guidelines](#).

Examples of unsuitable habitat include:

- Individual trees that are greater than 1,000 feet from forested or wooded areas,
- Trees found in highly developed urban areas (e.g., street trees, downtown areas),
- A pure stand of less than 3-inch dbh trees that are not mixed with larger trees, and
- A monoculture stand of shrubby vegetation with no potential roost trees.

If IPaC returns a result that northern long-eared bats are potentially present in the action area of the proposed project, project proponents can conclude the proposed activities **may affect** this species **IF** one or more of the following activities are proposed:

- Clearing or disturbing suitable roosting habitat, as defined above, at any time of year,
- Any activity in or near the entrance to a cave or mine,
- Mining, deep excavation, or underground work within 0.25 miles of a cave or mine,
- Construction of one or more wind turbines, or
- Demolition or reconstruction of human-made structures that are known to be used by bats based on observations of roosting bats, bats emerging at dusk, or guano deposits or stains.

If none of the above activities are proposed, project proponents can conclude the proposed activities will have **no effect** on the northern long-eared bat. Concurrence from the Service is not required for **No Effect** determinations. No further consultation or coordination is required. Attach this letter to the dated IPaC

species list report for your records.

If any of the above activities are proposed, and the northern long-eared bat appears on the user's species list, the federal project user will be directed to either the northern long-eared bat and tricolored bat range-wide D-key or the Federal Highways Administration, Federal Railways Administration, and Federal Transit Administration Indiana bat/Northern long-eared bat D-key, depending on the type of project and federal agency involvement. Similar to the Minnesota-Wisconsin D-key, these d-keys help to determine if prohibited take might occur and, if not, will generate an automated verification letter. Additional information about available tools can be found on the Service's [northern long-eared bat website](#).

Whooping Crane

Whooping crane is designated as a non-essential experimental population in Wisconsin and consultation under Section 7(a)(2) of the Endangered Species Act is only required if project activities will occur within a National Wildlife Refuge or National Park. If project activities are proposed on lands outside of a National Wildlife Refuge or National Park, then you are not required to consult. For additional information on this designation and consultation requirements, please review "[Establishment of a Nonessential Experimental Population of Whooping Cranes in the Eastern United States](#)."

Other Trust Resources and Activities

Bald and Golden Eagles - Although the bald eagle has been removed from the endangered species list, this species and the golden eagle are protected by the Bald and Golden Eagle Act and the Migratory Bird Treaty Act. It is the responsibility of the project proponent to survey the area for any migratory bird nests. If there is an eagle nest on-site while work is on-going, eagles may be disturbed. We recommend avoiding and minimizing disturbance to eagles whenever practicable. If you cannot avoid eagle disturbance, you may seek a [permit](#). A [nest take permit](#) is always required for removal, relocation, or obstruction of an eagle nest. For communication and wind energy projects, please refer to additional guidelines below.

Migratory Birds - The Migratory Bird Treaty Act (MBTA) prohibits the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests, except when specifically authorized by the Service. The Service has the responsibility under the MBTA to proactively prevent the mortality of migratory birds whenever possible and we encourage implementation of [recommendations that minimize potential impacts to migratory birds](#). Such measures include clearing forested habitat outside the nesting season (generally March 1 to August 31) or conducting nest surveys prior to clearing to avoid injury to eggs or nestlings.

Communication Towers - Construction of new communications towers (including radio, television, cellular, and microwave) creates a potentially significant impact on migratory birds, especially some 350 species of night-migrating birds. However, the Service has developed [voluntary guidelines for minimizing impacts](#).

Transmission Lines - Migratory birds, especially large species with long wingspans, heavy bodies, and poor maneuverability can also collide with power lines. In addition, mortality can occur when birds, particularly hawks, eagles, kites, falcons, and owls, attempt to perch on uninsulated or unguarded power poles. To minimize these risks, please refer to [guidelines](#) developed by the Avian Power Line Interaction Committee and the Service. Implementation of these measures is especially important along sections of lines adjacent to wetlands or other areas that support large numbers of raptors and migratory birds.

Wind Energy - To minimize impacts to migratory birds and bats, wind energy projects should follow the Service's [Wind Energy Guidelines](#). In addition, please refer to the Service's [Eagle Conservation Plan Guidance](#), which provides guidance for conserving bald and golden eagles in the course of siting, constructing, and operating wind energy facilities.

State Department of Natural Resources Coordination

While it is not required for your Federal section 7 consultation, please note that additional state endangered or threatened species may also have the potential to be impacted. **Please contact the Minnesota or Wisconsin Department of Natural Resources for information on state listed species that may be present in your proposed project area.**

Minnesota

[Minnesota Department of Natural Resources - Endangered Resources Review Homepage](#)

Email: Review.NHIS@state.mn.us

Wisconsin

[Wisconsin Department of Natural Resources - Endangered Resources Review Homepage](#)

Email: DNRERReview@wi.gov

We appreciate your concern for threatened and endangered species. Please feel free to contact our office with questions or for additional information.

Attachment(s):

- Official Species List
- USFWS National Wildlife Refuges and Fish Hatcheries
- Bald & Golden Eagles
- Migratory Birds
- Wetlands

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Minnesota-Wisconsin Ecological Services Field Office

3815 American Blvd East

Bloomington, MN 55425-1659

(952) 858-0793

PROJECT SUMMARY

Project Code: 2024-0029640

Project Name: Northern Lights 2025 Expansion Project Tomah Branch Line Loop

Project Type: Natural Gas Distribution

Project Description: Northern proposes to construct and operate an approximately 1.28-mile extension of its 8 inch diameter WIB11902 Tomah branch line loop (Tomah loop) in Monroe County, Wisconsin. Northern will utilize ETWS, temporary access roads, an existing driveway, and a staging area.

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@43.97437745,-90.79274072164415,14z>



Counties: Monroe County, Wisconsin

ENDANGERED SPECIES ACT SPECIES

There is a total of 5 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

BIRDS

NAME	STATUS
Whooping Crane <i>Grus americana</i> Population: U.S.A. (AL, AR, CO, FL, GA, ID, IL, IN, IA, KY, LA, MI, MN, MS, MO, NC, NM, OH, SC, TN, UT, VA, WI, WV, western half of WY) No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/758	Experimental Population, Non-Essential

REPTILES

NAME	STATUS
Eastern Massasauga (=rattlesnake) <i>Sistrurus catenatus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/2202	Threatened

INSECTS

NAME	STATUS
Karner Blue Butterfly <i>Lycaeides melissa samuelis</i> There is proposed critical habitat for this species. Species profile: https://ecos.fws.gov/ecp/species/6656	Endangered
Monarch Butterfly <i>Danaus plexippus</i> There is proposed critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9743	Proposed Threatened
Rusty Patched Bumble Bee <i>Bombus affinis</i> There is proposed critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9383 General project design guidelines: https://ipac.ecosphere.fws.gov/project/YDIWRTTZVRHDDENZ42HVQCPYFU/documents/generated/5967.pdf	Endangered

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

BALD & GOLDEN EAGLES

Bald and Golden Eagles are protected under the Bald and Golden Eagle Protection Act ² and the Migratory Bird Treaty Act (MBTA) ¹. Any person or organization who plans or conducts activities that may result in impacts to Bald or Golden Eagles, or their habitats, should follow appropriate regulations and consider implementing appropriate avoidance and minimization measures, as described in the various links on this page.

-
1. The [Bald and Golden Eagle Protection Act](#) of 1940.
 2. The [Migratory Birds Treaty Act](#) of 1918.
 3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

There are Bald Eagles and/or Golden Eagles in your [project](#) area.

Measures for Proactively Minimizing Eagle Impacts

For information on how to best avoid and minimize disturbance to nesting bald eagles, please review the [National Bald Eagle Management Guidelines](#). You may employ the timing and activity-specific distance recommendations in this document when designing your project/ activity to avoid and minimize eagle impacts. For bald eagle information specific to Alaska, please refer to [Bald Eagle Nesting and Sensitivity to Human Activity](#).

The FWS does not currently have guidelines for avoiding and minimizing disturbance to nesting Golden Eagles. For site-specific recommendations regarding nesting Golden Eagles, please consult with the appropriate Regional [Migratory Bird Office](#) or [Ecological Services Field Office](#).

If disturbance or take of eagles cannot be avoided, an [incidental take permit](#) may be available to authorize any take that results from, but is not the purpose of, an otherwise lawful activity. For assistance making this determination for Bald Eagles, visit the [Do I Need A Permit Tool](#). For assistance making this determination for golden eagles, please consult with the appropriate Regional [Migratory Bird Office](#) or [Ecological Services Field Office](#).

Ensure Your Eagle List is Accurate and Complete

If your project area is in a poorly surveyed area in IPaC, your list may not be complete and you may need to rely on other resources to determine what species may be present (e.g. your local FWS field office, state surveys, your own surveys). Please review the [Supplemental Information](#)

on [Migratory Birds and Eagles](#), to help you properly interpret the report for your specified location, including determining if there is sufficient data to ensure your list is accurate.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to bald or golden eagles on your list, see the "Probability of Presence Summary" below to see when these bald or golden eagles are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bald Eagle <i>Haliaeetus leucocephalus</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Dec 1 to Aug 31

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read ["Supplemental Information on Migratory Birds and Eagles"](#), specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

Breeding Season (■)

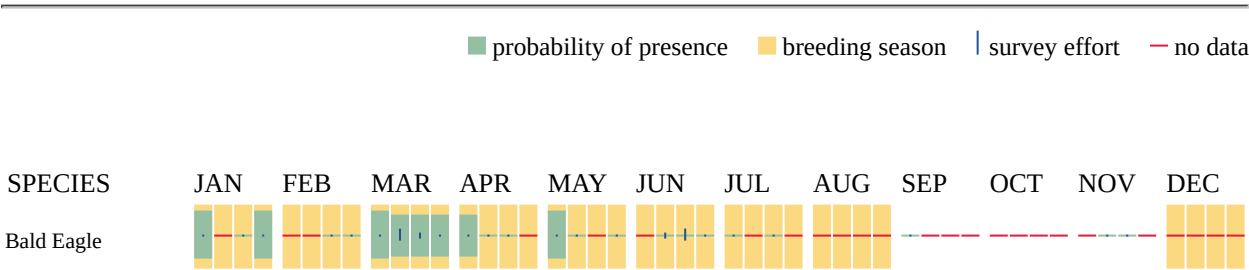
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

Survey Effort (|)

Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data (—)

A week is marked as having no data if there were no survey events for that week.



Non-BCC
Vulnerable

Additional information can be found using the following links:

- Eagle Management <https://www.fws.gov/program/eagle-management>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds>
- Nationwide avoidance and minimization measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>
- Supplemental Information for Migratory Birds and Eagles in IPaC <https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action>

MIGRATORY BIRDS

The Migratory Bird Treaty Act (MBTA) ¹ prohibits the take (including killing, capturing, selling, trading, and transport) of protected migratory bird species without prior authorization by the Department of Interior U.S. Fish and Wildlife Service (Service). The incidental take of migratory birds is the injury or death of birds that results from, but is not the purpose, of an activity. The Service interprets the MBTA to prohibit incidental take.

-
1. The [Migratory Birds Treaty Act](#) of 1918.
 2. The [Bald and Golden Eagle Protection Act](#) of 1940.
 3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the "Probability of Presence Summary" below to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bald Eagle <i>Haliaeetus leucocephalus</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Dec 1 to Aug 31
Chimney Swift <i>Chaetura pelagica</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9406	Breeds Mar 15 to Aug 25

NAME	BREEDING SEASON
Grasshopper Sparrow <i>Ammodramus savannarum perpallidus</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/8329	Breeds Jun 1 to Aug 20
Lesser Yellowlegs <i>Tringa flavipes</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9679	Breeds elsewhere
Red-headed Woodpecker <i>Melanerpes erythrocephalus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9398	Breeds May 10 to Sep 10
Wood Thrush <i>Hylocichla mustelina</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9431	Breeds May 10 to Aug 31

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "[Supplemental Information on Migratory Birds and Eagles](#)", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

Breeding Season (■)

Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

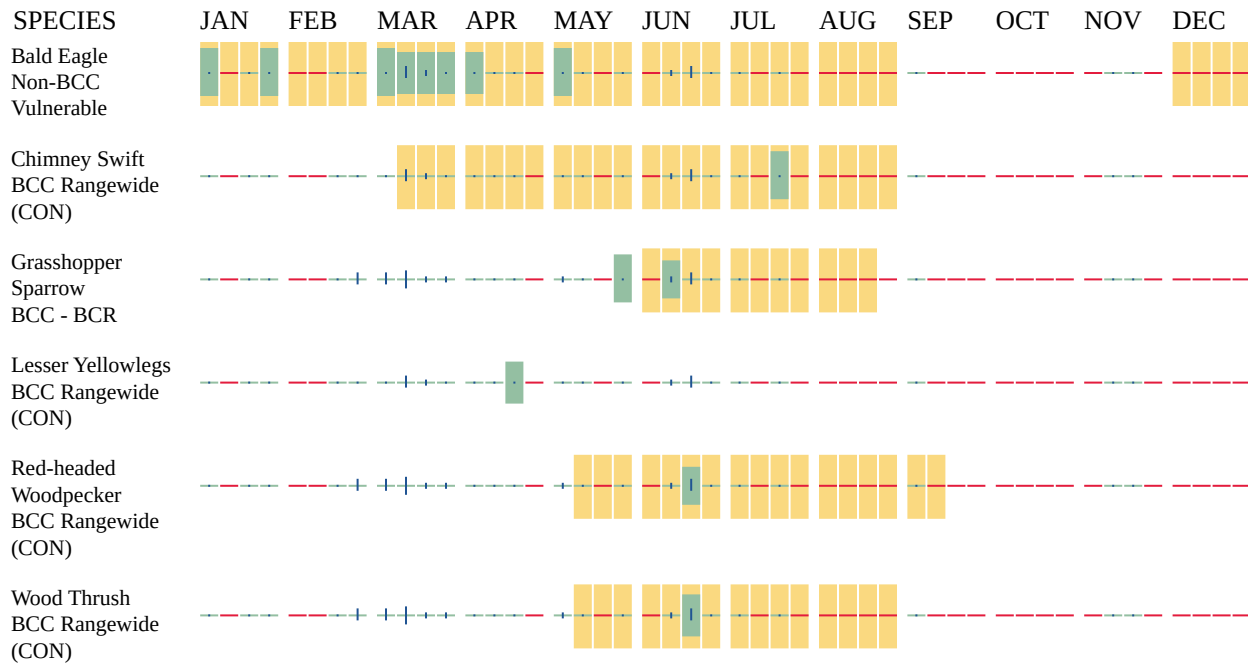
Survey Effort (|)

Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data (—)

A week is marked as having no data if there were no survey events for that week.

■ probability of presence ■ breeding season | survey effort — no data



Additional information can be found using the following links:

- Eagle Management <https://www.fws.gov/program/eagle-management>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds>
- Nationwide avoidance and minimization measures for birds
- Supplemental Information for Migratory Birds and Eagles in IPaC <https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action>

WETLANDS

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

RIVERINE

- R4SBC

FRESHWATER FORESTED/SHRUB WETLAND

- PFO1C

IPAC USER CONTACT INFORMATION

Agency: Stantec
Name: Mia Bauer
Address: One Carlson Parkway
Address Line 2: Suite 100
City: Plymouth
State: MN
Zip: 55447
Email: mia.bauer@stantec.com
Phone: 6124273725

LEAD AGENCY CONTACT INFORMATION

Lead Agency: Federal Energy Regulatory Commission

Northern Natural Gas Company
Northern Lights 2025 Expansion
Implementation Plan For Docket No. CP24-60-000

Requesting Party: FERC
Reference No: NL2025 COND-09
Requester's Name: Jessica Miller/Andrea Bloomfield
Subject: Authorization Prior to Construction

Condition 9:

Northern must receive written authorization from the Director of OEP, or the Director's designee, **before commencing construction or abandonment by removal of any project facilities.** To obtain such authorization, Northern must file with the Secretary documentation that it has received all applicable authorizations required under federal law (or evidence of waiver thereof).

Northern Response:

Attached is the revised Exhibit J table listing authorizations and permits required by federal law for the project. Northern has obtained all permits required under federal law, with the exception of the construction stormwater permits. Northern has applied for the construction stormwater permits in both Minnesota and Wisconsin and anticipates issuance in late March/ early April. Northern will update the permit status once received and request written authorization from the Director of OEP to commence construction at that time.

Exhibit J **Federal Authorizations** **Northern Lights 2025 Project**

Responsible Agency	Delegated Authority	Permit or Clearance Required	Status of Permit/Clearance	Date Permit or Clearance Received, Requested or Expected
Federal				
FERC	N/A	Certificate for construction and operation of interstate natural gas transmission pipeline facilities	Section 7 application will be filed February 2024.	Order issued February 19, 2025
EPA	MPCA/WDNR	Clean Air Act permits and approvals	Delegated to the state (MPCA/WDNR)	N/A
	MPCA/WDNR	CWA Section 401 Water Quality Certification	Delegated to the state (MPCA/WDNR)	N/A
	MPCA/WDNR	CWA Section 402 permits for wastewater or stormwater discharges	Delegated to the state (MPCA/WDNR)	N/A
NRCS	N/A	No permit required – consultation for ROW restoration and seeding recommendations	Outreach initiated January 2022	Responses received January 2022. Consultation complete.
USACE – St. Paul District	N/A	CWA Section 404 – Dredge and Fill Permit	USACE notification submitted February 14, 2024	Wetland impacts will qualify under the Regional General Permit 3 – Non-Reporting; no response required
USFWS – Twin Cities Field Office	N/A	Endangered Species Act and MBTA – consultation clearance request for Minnesota	Initial coordination submitted February 7, 2023; D-keys and species survey protocols; final coordination anticipated October 2024 following completion of species-specific surveys	Concurrence received January 15, 2025. NLEB no longer in project area.
Native American Tribes	N/A	NHPA Section 106 consultation to determine if the project will have impact on resources of Native American cultural importance	Submission of cultural reports and UDP completed February 14, 2024	No responses received, consultation complete.
State – Minnesota				
MPCA	From EPA	Clean Air Act, Prevention of Significant Deterioration Minor/Title V Major	No compressor/compressor station(s)	N/A

Responsible Agency	Delegated Authority	Permit or Clearance Required	Status of Permit/Clearance	Date Permit or Clearance Received, Requested or Expected
		Air Construction Permit		
	From EPA	Section 401 Water Quality Certification	Authorization concurrent with USACE Section 404 Approval	No USACE Preconstruction Notification; therefore, Northern will adhere to the Section 401 provisions of the Utility Regional General Permit
	N/A	NPDES Stormwater Permit MNR100001	Permit application for Elk River filed February 21, 2025. Remainder of applications filed in last week of February 2025.	Response anticipated March 2025
	N/A	NPDES Trench Water Discharge Permit	Dewatering information included with stormwater permit application	Authorization included with stormwater permit
MDNR	N/A	MPARS Water Appropriation Permit for Pit Trench Water	Permit applications submitted February 2025	Response anticipated March 2025
	N/A	State Protected Species Consultation	Consultation initiated February 2024	Concurrence received October 14, 2024. Consultation complete.
State Historical Society of Minnesota	N/A	Section 106 Consultation, NHPA	Submission of cultural reports and UDP February 14, 2024; clarifications submitted October 14, 2024, and November 7, 2024	Concurrence received November 13, 2024
MDA	N/A	Comments on Northern's Agricultural mitigation plan and Noxious Weed Mitigation Plan	Coordination initiated February 7, 2024	Consultation complete.
Wisconsin				
WDNR	From EPA	WPDES Air Permits	No compressor/compressor station(s)	N/A
	From EPA	Section 401 Water Quality Certification	No wetland impacts in Wisconsin; permit not required	N/A
	N/A	Chapter 30.025, Stream Crossing/Dredging	No waterbodies or wetlands crossed or dredged	N/A
	N/A	WPDES Construction Site Stormwater Runoff General Permit No. WI-S067831-6	Permit application submitted anticipated February 19, 2025	Response anticipated April 2025
	N/A	WPDES Pit Trench Water Discharge	Dewatering information included with stormwater permit application	Authorization included with stormwater permit

Responsible Agency	Delegated Authority	Permit or Clearance Required	Status of Permit/Clearance	Date Permit or Clearance Received, Requested or Expected
		Permit No. WI- WI-0049344-6		
	N/A	State Protected Species Consultation	Consultation initiated January 2024	Concurrence received March 4, 2024
Wisconsin State Historical Society	N/A	Section 106 Consultation, NHPA	Submission of cultural reports and UDP February 14, 2024	Response received March 2024

Northern Natural Gas Company
Northern Lights 2025 Expansion
Implementation Plan For Docket No. CP24-60-000

Requesting Party: FERC
Reference No: NL2025 COND-10
Requester's Name: Jessica Miller/Andrea Bloomfield
Subject: Authorization Prior to In-service

Condition 10:

Northern must receive written authorization from the Director of OEP, or the Director's designee, **before placing the project into service.** Such authorization will only be granted following a determination that rehabilitation and restoration of the right-of-way and other areas affected by the project are proceeding satisfactorily.

Northern Response:

Northern will request written authorization from the Director of OEP, or the Director's designee, before placing each project component into service; the project will not be placed into service until such authorization is received. Northern understands that authorization only will be granted following a determination that rehabilitation and restoration of the right of way and other areas affected by the project are proceeding satisfactorily.

Northern Natural Gas Company
Northern Lights 2025 Expansion
Implementation Plan For Docket No. CP24-60-000

Requesting Party: FERC
Reference No: NL2025 COND-11
Requester's Name: Jessica Miller/Andrea Bloomfield
Subject: Affirmative Statement –
Constructed in Compliance

Condition 11:

Within 30 days of placing the authorized facilities in service, Northern shall file an affirmative statement with the Secretary, certified by a senior company official:

- a. that the facilities have been constructed in compliance with all applicable conditions, and that continuing activities would be consistent with all applicable conditions; or
- b. identifying which of the conditions in the Order Northern has complied with or will comply with. This statement shall also identify any areas affected by the Project where compliance measures were not properly implemented, if not previously identified in filed status reports, and the reason for noncompliance.

Northern Response:

Within 30 days of placing the authorized facilities in service, Northern will file an affirmative statement with the Secretary (a) stating that the facilities were constructed in compliance with all applicable conditions of the order and that continuing activities will be consistent with all applicable conditions of the order, or (b) identifying which of the conditions in the order Northern has complied with and, if applicable, any remaining conditions that Northern will comply with. Northern also will identify any areas affected by the project where compliance measures were not properly implemented and the reason for noncompliance, if not previously identified in the biweekly status reports filed with FERC. The affirmative statement will be certified by a senior company official.

Northern Natural Gas Company
Northern Lights 2025 Expansion
Implementation Plan For Docket No. CP24-60-000

Requesting Party: FERC
Reference No: NL2025 COND-12
Requester's Name: Jessica Miller/Andrea Bloomfield
Subject: MPCA Water Quality Certification

Condition 12:

All conditions attached to the water quality certification issued by the Minnesota Pollution Control Agency constitute mandatory conditions of the Commission's Order. **Prior to construction**, Northern shall file, for review and written approval of the Director of OEP, or the Director's designee, any revisions to its Project design necessary to comply with the water quality certification conditions.

Northern Response:

Northern's implementation plan requires no modifications in order to comply with the Section 401 Water Quality certification conditions. Northern will comply with all conditions.

Northern Natural Gas Company
Northern Lights 2025 Expansion
Implementation Plan For Docket No. CP24-60-000

Requesting Party: FERC
Reference No: NL2025 COND-13
Requester's Name: Jessica Miller/Andrea Bloomfield
Subject: SHPO Concurrence

Condition 13:

Northern shall **not begin** construction of facilities and/or use of all staging, storage, or temporary work areas and new or to-be-improved access roads **until**:

- a. Northern files with the Secretary comments on the cultural resources reports and plans from the Minnesota State Historic Preservation Officer;
- b. the Advisory council on Historic Preservation is afforded an opportunity to comment if historic properties would be adversely affected; and
- c. FERC staff reviews and the Director of OEP, or the Director's designee, approves the cultural resources reports and plans, and notifies Northern in writing that treatment plans/mitigation measures may be implemented and/or construction may proceed.

All materials filed with the Commission containing **location, character, and ownership** information about cultural resources must have the cover and any relevant pages therein clearly labeled in bold lettering: "**CUI//PRIV- DO NOT RELEASE.**"

Northern Response:

Attached is the November 13, 2024, letter from the Minnesota State Historic Preservation Officer (MN SHPO) concurring the project (in Minnesota) will result in "**No Historic Properties Affected**". Also attached is correspondence referenced in the November 13 letter that has not previously been filed with FERC (i.e., the November 7, 2024, email from Susan Knabe and the *Addendum Report 2: Shovel Testing of Potential Historic Resource ER-15*). All other correspondence referenced in the November 13 letter was filed August 12, 2024, with the section 7 application (Identification of Historic Properties) and October 15, 2024, with Northern's comments to the environmental assessment.

The attached *Addendum Report 2: Shovel Testing of Potential Historic Resource ER-15* contains confidential information regarding the location of cultural resources and has therefore been labeled "**CUI//PRIV --- DO NOT RELEASE (PRIVILEGED).**"

Northern requests the Director of OEP issue written approval that Condition 14 has been satisfied and that Northern may begin construction once all applicable conditions have been satisfied.

Knabe, Susan

From: Coburn, Leslie (ADM) <leslie.coburn@state.mn.us>
Sent: Wednesday, November 13, 2024 10:41 AM
To: Plucker, Terry (Northern Natural Gas)
Cc: Knabe, Susan
Subject: SHPO Comment Letter for Northern Lights Expansion 2025 (SHPO #2024-0848)
Attachments: 2024-0848b.pdf

Hello, Terry – Please see the attached comment letter – review complete.

Currently, the Minnesota SHPO is sending project review comment letters by email only. A hard copy will not be sent via the US Postal Service.

Regards,
Leslie



Leslie Coburn, AICP (she/her) | Environmental Review Specialist

50 Sherburne Avenue, Suite 203

Saint Paul, MN 55155

(651) 201-3286

leslie.coburn@state.mn.us

SHPO's Environmental Review Program is experiencing a high volume of project submissions, and most reviews continue to take between 45-60 days to complete. During this interim period with reduced staff, some reviews may take longer, including our response time to questions sent by email and phone. As you prepare to submit projects for review, please plan for a longer response time from the SHPO.

Caution: This email originated from outside of Stantec. Please take extra precaution.

Attention: Ce courriel provient de l'extérieur de Stantec. Veuillez prendre des précautions supplémentaires.

Atención: Este correo electrónico proviene de fuera de Stantec. Por favor, tome precauciones adicionales.

November 13, 2024

VIA EMAIL ONLY

Terry Plucker
Division Environmental Specialist
Northern Natural Gas
1111 South 103rd Street
Omaha, NE 68124

RE: Northern Natural Gas Company – Northern Lights 2025 Expansion Project
Freeborn, Houston, and Washington Counties
SHPO Number: 2024-0848

Dear Terry Plucker:

On October 14 and November 7, 2024, we received emails from Susan Knabe of Stantec, with additional information we had requested about this project. It has been reviewed pursuant to the responsibilities given the State Historic Preservation Officer by Section 106 of the National Historic Preservation Act (54 U.S.C. § 306108) and its implementing federal regulations, “Protection of Historic Properties” (36 CFR Part 800).

We now have reviewed the additional material sent to our office on October 14, 2024, and November 7, 2024, including:

- Letter from Shannon R. Ryan, Goodwin & Associates dated October 14, 2024, responding to the comments in our letter dated August 19, 2024
- *Addendum Report 2: Shovel Testing of Potential Historic Resource ER-15, the Mapped Location of a Nineteenth Century Building, for the Proposed Northern Natural Gas Elk River 3rd Branch Line Project (Northern Lights 2025), Washington County, Minnesota* as prepared by Goodwin and Associates, September 2024
- *Technical Memorandum: Proposed Cultural Resources Archaeological Site Probability Model for the Northern Natural Gas Ventura to Farmington Project, Dakota, Freeborn, and Steele Counties, Minnesota / SWCA Project No. 74725* as prepared by SWCA Environmental Consultants, December 2022
- *Phase I Cultural Resources Investigation for the Ventura to Farmington Pipeline Replacement Project* as prepared by SWCA Environmental Consultants, December 2022

Identification of Historic Properties

Architecture-History

We also completed our review of the architectural history portion of the following revised report, submitted to SHPO on July 24, 2024: *Reconnaissance Cultural Resources Survey of the Proposed Northern Natural Gas La Crescent Compressor Station Modifications Project (Northern Lights 2025), Houston County, Minnesota* (Goodwin & Associated, May 2024).

MINNESOTA STATE HISTORIC PRESERVATION OFFICE

50 Sherburne Avenue ■ Administration Building 203 ■ Saint Paul, Minnesota 55155 ■ 651-201-3287

mn.gov/admin/shpo ■ mnshpo@state.mn.us

AN EQUAL OPPORTUNITY AND SERVICE PROVIDER

We agree with the consultant's recommendation that the **Dairyland Power Cooperative/MiEnergy Substation (HU-MPT-00017)** is likely not eligible for listing in the National Register of Historic Places and **no further research is warranted** for this property.

Finding of Effect

Based on our review of the additional information, we concur that the proposed undertaking will result in **No Historic Properties Affected**.

If you have any questions regarding our review of this project, please contact Leslie Coburn, Environmental Review Specialist, at 651-201-3286 or leslie.coburn@state.mn.us.

Sincerely,



Amy Spong
Deputy State Historic Preservation Officer

Cc via email: Susan Knabe, Stantec

Northern Natural Gas Company
Northern Lights 2025 Expansion
Implementation Plan For Docket No. CP24-60-000

Requesting Party:	<u>FERC</u>
Reference No:	<u>NL2025 COND-14</u>
Requester's Name:	<u>Jessica Miller/Andrea Bloomfield</u>
Subject:	<u>Landowner Concurrence- MP 2.51</u> <u>– Tomah Branch Line Loop</u>

Condition 14:

Prior to construction, Northern shall file with the Secretary, for review and written approval by the Director of OEP, or the Director's designee, evidence of landowner concurrence with the site-specific construction plan for construction workspace within 10 feet of the residence at MP 2.51 on the Tomah Branch line Loop. If Northern is unable to obtain concurrence, Northern shall file a revised site-specific construction plan that maintains a 10-foot buffer between the residence and the project workspace.

Northern Response:

Attached is a copy of the landowner's concurrence signed June 19, 2024, along with a copy of the documents presented to the landowner during the meeting. The documents discussed with the landowner include the site-specific residential construction plan, a copy of the alignment sheet associated with the landowner's property, and a copy of the workspace sketch.

The landowner's concurrence and attachments have been segregated and labelled "CUI//PRIV – DO NOT RELEASE".

Northern requests the Director of OEP issue written approval that Condition 14 has been satisfied.

Northern Natural Gas Company
Northern Lights 2025 Expansion
Implementation Plan For Docket No. CP24-60-000

Requesting Party: FERC
Reference No: NL2025 COND-15
Requester's Name: Jessica Miller/Andrea Bloomfield
Subject: Noise Mitigation Plan – Tomah
Loop HDD P4-1 (incorrectly
depicted as HDD P4-2 in section 7)

Condition 15:

Prior to construction, Northern shall file with the Secretary, for review and written approval by the Director of OEP, or the Director's designee, a noise mitigation plan for horizontal directional drill P4-2 to reduce the noise level attributable to drilling operations at noise sensitive areas where predicted day-night levels are above 70 decibels on the A-weighted scale.

Northern Response:

For the Tomah branch line loop extension, Northern's original noise table in Appendix 9H from the section 7 application mislabeled horizontal directional drill (HDD) P4-2; it should have been labelled HDD P4-1. The HDD P4-1 under Gardener Avenue is 140 feet in length and has an estimated construction duration of three days. There are no predicted day-night noise levels over 70 decibels on the A-weighted scale for HDD P4-2. There are changes to the noise levels at this time; the attached table¹ (for Tomah only) corrects the labelling issue with the HDDs.

Northern's contractor for the Tomah branch line has not yet selected an HDD contractor. Once selected, Northern will work with its construction contractor to design and employ a noise mitigation plan appropriate for HDD P4-1 to reduce the day-night noise level attributable to drilling operations at noise sensitive areas (NSAs) where predicted noise levels are above 70 decibels on the A-weighted scale. The noise mitigation plan will be filed with FERC for review and written approval upon its completion.

¹ The noise table includes clerical error updates; these corrections do not impact the noise calculations. All changes are highlighted in yellow.

Appendix 9H – Estimated Noise Impact due to Project HDDs – Tomah Branch Line Loop										
24-Hour HDD Operations										
Location	Latitude of NSA	Longitude of NSA	Distance and Direction to closest – NSA	Existing Ambient L_{dn} (dBA)	Estimated L_{dn} due to Project Construction without Mitigation (dBA)	Estimated L₁₀ due to Project Construction without Mitigation (dBA)	Estimated L_{dn} due to Project Construction with Proposed Mitigation (dBA)	Specific Mitigation Measures Proposed for Nighttime Drilling^a	L_{dn} of Construction plus Ambient L_{dn} (dBA)	Potential Increase Above Ambient (dB)
P4-1										
NSA01	43.9711	-90.8054	1543 ft. Southwest	44	48	45	48	N/A – Daytime only	50	6
NSA02	43.9712	-90.8038	1113 ft. Southwest	44	56	53	56	N/A – Daytime only	56	12
NSA03	43.9722	-90.8020	576 ft. West	44	59	56	59	N/A – Daytime only	59	15
NSA04	43.9724	-90.7992	103 ft. Southeast	44	79	76	79	N/A – Daytime only	79	35
NSA05	43.9722	-90.8004	149 ft. West	44	72	69	72	N/A – Daytime only	72	28
NSA06	43.9717	-90.7999	217 ft. South	44	70	66	70	N/A – Daytime only	70	26
NSA07	43.9719	-90.7973	627 ft. East	44	63	59	63	N/A – Daytime only	63	19
NSA08	43.9732	-90.8030	895 ft. West	44	41	38	41	N/A – Daytime only	46	2
NSA09	43.9739	-90.7977	674 ft. Northeast	44	62	58	62	N/A – Daytime only	62	18

Appendix 9H – Estimated Noise Impact due to Project HDDs – Tomah Branch Line Loop										
24-Hour HDD Operations										
Location	Latitude of NSA	Longitude of NSA	Distance and Direction to closest NSA	Existing Ambient L_{dn} (dBA)	Estimated L_{dn} due to Project Construction without Mitigation (dBA)	Estimated L₁₀ due to Project Construction without Mitigation (dBA)	Estimated L_{dn} due to Project Construction with Proposed Mitigation (dBA)	Specific Mitigation Measures Proposed for Nighttime Drilling^a	L_{dn} of Construction plus Ambient L_{dn} (dBA)	Potential Increase Above Ambient (dB)
NSA10	43.9720	-90.7957	1007 ft. East	44	58	54	58	N/A – Daytime only	58	14
NSA11	43.9746	-90.8016	922 ft. Northwest	44	59	55	59	N/A – Daytime only	59	15
NSA12	43.9720	-90.7936	1546 ft. East	44	54	50	54	N/A – Daytime only	54	10
NSA13	43.9712	-90.7937	1590 ft. East	44	53	50	53	N/A – Daytime only	54	10
NSA14	43.9721	-90.7920	1968 ft. East	44	51	48	51	N/A – Daytime only	52	8
NSA15	43.9711	-90.7904	2442 ft. East	44	49	45	49	N/A – Daytime only	50	6
NSA16	43.9719	-90.7836	4250 ft. East	49	42	39	42	N/A – Daytime only	50	1
NSA17	43.9742	-90.8009	704 ft. Northwest	44	61	58	61	N/A – Daytime only	61	17
NSA18	43.9706	-90.8052	1552 ft. Southwest	44	51	48	51	N/A – Daytime only	52	8
NSA19	43.9709	-90.8045	1346 ft. Southwest	44	53	49	53	N/A – Daytime only	53	9
NSA20	43.9700	-90.8053	1666 ft. Southwest	44	50	47	50	N/A – Daytime only	51	7

Appendix 9H – Estimated Noise Impact due to Project HDDs – Tomah Branch Line Loop										
24-Hour HDD Operations										
Location	Latitude of NSA	Longitude of NSA	Distance and Direction to closest NSA	Existing Ambient L_{dn} (dBA)	Estimated L_{dn} due to Project Construction without Mitigation (dBA)	Estimated L₁₀ due to Project Construction without Mitigation (dBA)	Estimated L_{dn} due to Project Construction with Proposed Mitigation (dBA)	Specific Mitigation Measures Proposed for Nighttime Drilling^a	L_{dn} of Construction plus Ambient L_{dn} (dBA)	Potential Increase Above Ambient (dB)
NSA21	43.9702	-90.8045	1444 ft. Southwest	44	52	48	52	N/A – Daytime only	52	8
NSA22	43.9703	-90.8035	1204 ft. Southwest	44	54	50	54	N/A – Daytime only	54	10
NSA23	43.9710	-90.8030	969 ft. Southwest	44	57	54	57	N/A – Daytime only	57	13
NSA24	43.9708	-90.8027	925 ft. Southwest	44	58	54	58	N/A – Daytime only	58	14
NSA25	43.9702	-90.8027	1085 ft. Southwest	44	56	53	56	N/A – Daytime only	57	13
NSA26	43.9697	-90.8026	1207 ft. Southwest	44	55	52	55	N/A – Daytime only	56	12
NSA27	43.9695	-90.8041	1511 ft. Southwest	44	51	48	51	N/A – Daytime only	52	8
NSA28	43.9695	-90.8056	1832 ft. Southwest	44	49	46	49	N/A – Daytime only	50	6
NSA29	43.9711	-90.7981	634 ft. Southeast	44	62	59	62	N/A – Daytime only	62	18
NSA30	43.9711	-90.7968	890 ft. Southeast	44	59	56	59	N/A – Daytime only	59	15
NSA31	43.9711	-90.7953	1206 ft. Southeast	44	56	53	56	N/A – Daytime only	56	12

Appendix 9H – Estimated Noise Impact due to Project HDDs – Tomah Branch Line Loop										
24-Hour HDD Operations										
Location	Latitude of NSA	Longitude of NSA	Distance and Direction to closest NSA	Existing Ambient L_{dn} (dBA)	Estimated L_{dn} due to Project Construction without Mitigation (dBA)	Estimated L₁₀ due to Project Construction without Mitigation (dBA)	Estimated L_{dn} due to Project Construction with Proposed Mitigation (dBA)	Specific Mitigation Measures Proposed for Nighttime Drilling^a	L_{dn} of Construction plus Ambient L_{dn} (dBA)	Potential Increase Above Ambient (dB)
NSA32	43.9737	-90.8000	424 ft. North	44	66	63	66	N/A – Daytime only	66	22
NSA33	43.9705	-90.7956	1275 ft. Southeast	44	56	52	56	N/A – Daytime only	56	12
NSA34	43.9788	-90.7819	5297 ft. Northeast	49	40	37	40	N/A – Daytime only	50	1
P4-2										
NSA01	43.9711	-90.8054	6202 ft. Southwest	44	27	24	27	N/A – Daytime only	44	-
NSA02	43.9712	-90.8038	5770 ft. Southwest	44	38	34	38	N/A – Daytime only	45	1
NSA03	43.9722	-90.8020	5225 ft. Southwest	44	39	35	39	N/A – Daytime only	45	1
NSA04	43.9724	-90.7992	4503 ft. Southwest	44	41	37	41	N/A – Daytime only	46	2
NSA05	43.9722	-90.8004	4809 ft. Southwest	44	40	36	40	N/A – Daytime only	45	1
NSA06	43.9717	-90.7999	4732 ft. Southwest	44	40	37	40	N/A – Daytime only	45	1
NSA07	43.9719	-90.7973	4079 ft. Southwest	44	42	38	42	N/A – Daytime only	46	2

Appendix 9H – Estimated Noise Impact due to Project HDDs – Tomah Branch Line Loop										
24-Hour HDD Operations										
Location	Latitude of NSA	Longitude of NSA	Distance and Direction to closest NSA	Existing Ambient L_{dn} (dBA)	Estimated L_{dn} due to Project Construction without Mitigation (dBA)	Estimated L₁₀ due to Project Construction without Mitigation (dBA)	Estimated L_{dn} due to Project Construction with Proposed Mitigation (dBA)	Specific Mitigation Measures Proposed for Nighttime Drilling^a	L_{dn} of Construction plus Ambient L_{dn} (dBA)	Potential Increase Above Ambient (dB)
NSA08	43.9732	-90.8030	5390 ft. West	44	39	35	39	N/A – Daytime only	45	1
NSA09	43.9739	-90.7977	3967 ft. West	44	42	39	42	N/A – Daytime only	46	2
NSA10	43.9720	-90.7957	3687 ft. Southwest	44	43	39	43	N/A – Daytime only	46	2
NSA11	43.9746	-90.8016	4944 ft. West	44	40	36	40	N/A – Daytime only	45	1
NSA12	43.9720	-90.7936	3183 ft. Southwest	44	44	41	44	N/A – Daytime only	47	3
NSA13	43.9712	-90.7937	3353 ft. Southwest	44	44	41	44	N/A – Daytime only	47	3
NSA14	43.9721	-90.7920	2800 ft. Southwest	44	46	42	46	N/A – Daytime only	48	4
NSA15	43.9711	-90.7904	2675 ft. Southwest	44	46	43	46	N/A – Daytime only	48	4
NSA16	43.9719	-90.7836	1534 ft. South	49	52	49	52	N/A – Daytime only	54	5
NSA17	43.9742	-90.8009	4790 ft. West	44	40	37	40	N/A – Daytime only	45	1
NSA18	43.9706	-90.8052	6203 ft. Southwest	44	27	24	27	N/A – Daytime only	44	-

Appendix 9H – Estimated Noise Impact due to Project HDDs – Tomah Branch Line Loop										
24-Hour HDD Operations										
Location	Latitude of NSA	Longitude of NSA	Distance and Direction to closest NSA	Existing Ambient L_{dn} (dBA)	Estimated L_{dn} due to Project Construction without Mitigation (dBA)	Estimated L₁₀ due to Project Construction without Mitigation (dBA)	Estimated L_{dn} due to Project Construction with Proposed Mitigation (dBA)	Specific Mitigation Measures Proposed for Nighttime Drilling^a	L_{dn} of Construction plus Ambient L_{dn} (dBA)	Potential Increase Above Ambient (dB)
NSA19	43.9709	-90.8045	6000 ft. Southwest	44	35	31	35	N/A – Daytime only	44	-
NSA20	43.9700	-90.8053	6292 ft. Southwest	44	27	24	27	N/A – Daytime only	44	-
NSA21	43.9702	-90.8045	6063 ft. Southwest	44	27	24	27	N/A – Daytime only	44	-
NSA22	43.9703	-90.8035	5803 ft. Southwest	44	35	32	35	N/A – Daytime only	45	1
NSA23	43.9710	-90.8030	5609 ft. Southwest	44	38	35	38	N/A – Daytime only	45	1
NSA24	43.9708	-90.8027	5544 ft. Southwest	44	38	35	38	N/A – Daytime only	45	1
NSA25	43.9702	-90.8027	5630 ft. Southwest	44	38	35	38	N/A – Daytime only	45	1
NSA26	43.9697	-90.8026	5688 ft. Southwest	44	38	34	38	N/A – Daytime only	45	1
NSA27	43.9695	-90.8041	6062 ft. Southwest	44	27	24	27	N/A – Daytime only	44	-
NSA28	43.9695	-90.8056	6437 ft. Southwest	44	27	23	27	N/A – Daytime only	44	-
NSA29	43.9711	-90.7981	4377 ft. Southwest	44	41	38	41	N/A – Daytime only	46	2

Appendix 9H – Estimated Noise Impact due to Project HDDs – Tomah Branch Line Loop										
24-Hour HDD Operations										
Location	Latitude of NSA	Longitude of NSA	Distance and Direction to closest NSA	Existing Ambient L_{dn} (dBA)	Estimated L_{dn} due to Project Construction without Mitigation (dBA)	Estimated L₁₀ due to Project Construction without Mitigation (dBA)	Estimated L_{dn} due to Project Construction with Proposed Mitigation (dBA)	Specific Mitigation Measures Proposed for Nighttime Drilling^a	L_{dn} of Construction plus Ambient L_{dn} (dBA)	Potential Increase Above Ambient (dB)
NSA30	43.9711	-90.7968	4070 ft. Southwest	44	42	38	42	N/A – Daytime only	46	2
NSA31	43.9711	-90.7953	3735 ft. Southwest	44	43	39	43	N/A – Daytime only	46	2
NSA32	43.9737	-90.8000	4582 ft. West	44	40	37	40	N/A – Daytime only	46	2
NSA33	43.9705	-90.7956	3911 ft. Southwest	44	42	39	42	N/A – Daytime only	46	2
NSA34	43.9788	-90.7819	862 ft. North	49	59	56	59	N/A – Daytime only	60	11

^a Noise Mitigation Measures:

- A. Institute work practices such as reduced idling, fitting equipment with residential mufflers
- B. Utilize a small and more modern HDD rig than was utilized for the noise model
- C. Install sound barrier walls between entry pit and NSA
- D. Install sound barrier walls between entry and exit pits and NSAs
- E. Install sound enclosures around critical equipment such as the drill rig, mud pump engine, shaker
- F. Offer temporary relocation to residents

¹ HDD operations may extend past 7 p.m. during drilling, reaming and pullback and other time-sensitive activities

² Noise barrier walls will have a minimum height of 20 feet

³ L₁₀ sound levels from construction activities have been estimated based on a 3 dB correction factor to the modelled hourly L_{eq}