



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

March 24, 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  
Northern Lights 2025 Expansion  
Docket No. CP24-60-000  
Request – Notice to Proceed With Construction and Abandonment**

Dear Ms. Reese:

In accordance with Condition 9 of the Order Issuing Certificate and Approving Abandonment issued February 19, 2025 (Order), Northern Natural Gas (Northern) submits for filing with the Federal Energy Regulatory Commission (FERC or Commission) in Docket No. CP24-60-000 its Updated Exhibit J, Federal Authorizations for the Northern Lights 2025 Project. Northern has received all applicable authorizations required under federal law as shown on the attached updated Exhibit J<sup>1</sup>.

Based upon the Updated Exhibit J, Northern's responses to the conditions of the Order and the Implementation Plan filed with the Commission March 6, 2025 (March 6 Filing) and the expiration of the 30-day rehearing period March 21, 2025 without a rehearing request, Northern is requesting the Director of the Office of Energy Projects (OEP) issue written approval as expeditiously as possible to permit Northern to commence construction and abandonment activities in accordance with Condition 9 of the Order.

As discussed in the March 6 Filing, Northern also requests the Director of OEP issue written approval (1) to conduct two new open-cut wetland crossings on the Farmington to Hugo C-line described in Condition 1; (2) of the modification requests described in Condition 5; (3) of the two requests for an exemption from Section VI.B.1.a of FERC's Wetland and Waterbody Construction and Mitigation Procedures, which were described in Condition 5; (4) of Northern's Implementation Plan provided in Condition 6; (5) that Condition 13 has been satisfied and construction may proceed; and (6) that Northern can utilize the

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<sup>1</sup> Reference to the MPARS Water Appropriation Permit for Pit Trench Water with the Minnesota Department of Natural Resources (MDNR) and state-protected species consultation with the MDNR have been removed from the attached Exhibit J. These are required under state law rather than federal law and should not have been included on the Exhibit J that was filed with the Implementation Plan.

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construction workspace located within 10 feet of the residence located at Milepost 2.51 on the Tomah branch line loop (Tomah loop) in accordance with Condition 14. Northern also requests the commission issue approval of Northern's responses to Condition 2, 3, 4, 7, 8, 10, 11, and 12.

Northern understands that, in accordance with Condition 15 of the order, horizontal directional drill (HDD) P4-1<sup>2</sup> on the Tomah loop cannot begin until Northern files a noise mitigation plan to reduce the noise level attributable to drilling operations at noise sensitive areas (NSAs) where predicted day-night levels are above 70 decibels on the A-weighted scale and receives written approval from the Director of OEP for such plan. As described in the March 6 filing, once K & K, Inc. (K&K), Northern's contractor, has selected an HDD contractor, Northern will work with K&K to design a noise mitigation plan for HDD P4-1 to reduce the noise level attributable to drilling operations to acceptable levels at NSAs. The noise mitigation plan will be filed with FERC for review and written approval upon its completion at which time Northern also will request approval to commence HDD P4-1 on the Tomah loop.

Northern respectfully requests the Director of OEP issue written approval to commence construction and abandonment activities by April 7, 2025, to allow sufficient time to install silt fence by May 15, 2025, for the Elk River 3<sup>rd</sup> branch line and the Farmington to Hugo C-line as outlined in the Blanding's Turtle Avoidance Plan. Northern's contractor has stated the silt fence will take approximately four weeks to install. 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

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<sup>2</sup> Condition 15 of the Order calls out HDD P4-2 as requiring a noise mitigation plan. As explained in Northern's response to Condition 15 in its March 6 filing with FERC, Northern mislabeled the HDD incorrectly in Appendix 9H (noise table included with the section 7 application); it should have been labeled HDD P4-1.

## Updated 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
<b>Federal</b>				
FERC	N/A	Certificate for construction and operation of interstate natural gas transmission pipeline facilities	Section 7 application filed February 16, 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 submitted October 2024 following completion of species-specific surveys; updated D-keys submitted in January 2025	Concurrence received January 15, 2025. NLEB no longer in project area. Consultation complete.
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.
<b>State – Minnesota</b>				
MPCA	From EPA	Clean Air Act, Prevention of Significant	No compressor unit/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
		Deterioration Minor/Title V Major 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	All permits have been issued	Elk River issued February 21, 2025, Farmington to Hugo issued March 4, 2025, Lake Mills to Albert Lea issued March 13, 2025
	N/A	NPDES Trench Water Discharge Permit	Dewatering information included with stormwater permit application	Authorization included with stormwater permit
MDNR	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.
<b>Wisconsin</b>				
WDNR	From EPA	WPDES Air Permits	No compressor unit/compressor station(s)	N/A
	From EPA	Section 401 Water Quality Certification	No wetland impacts in Wisconsin; permit not required	N/A
	N/A	WPDES Construction Site Stormwater Runoff General Permit No. WI-S067831-6	Permit application submitted February 19, 2025	Received March 13, 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

<b>Responsible Agency</b>	<b>Delegated Authority</b>	<b>Permit or Clearance Required</b>	<b>Status of Permit/Clearance</b>	<b>Date Permit or Clearance Received, Requested or Expected</b>
Wisconsin State Historical Society	N/A	Section 106 Consultation, NHPA	Submission of cultural reports and UDP February 14, 2024	Concurrence received March 2024