



FEDERAL ENERGY REGULATORY COMMISSION FIELD INSPECTION REPORT

Date May 15 and 16, 2025

Project Northern Natural Gas Company
Northern Lights 2025 Expansion Project
Freeborn, Washington, and Houston Counties, Minnesota; and Monroe
County, Wisconsin
Docket No.: CP24-60-000
Authority: 7(c)

Personnel FERC Contractor: Tetra Tech, Inc.
FERC Contractor Staff: Clay Roesler
Company Staff: Terry Plucker (Environmental Compliance
Manager)

Inspection Summary	
<u>0</u>	Problem Area(s)
<u>0</u>	Noncompliance(s)
<u>No</u>	Follow-Up Letter Required
<u>No</u>	Refer to Enforcement

Introduction

On May 15 and 16, 2025, Clay Roesler of Tetra Tech performed an environmental inspection of the Northern Natural Gas Company (NNG), Northern Lights 2025 Expansion Project (Project), under contract to the Federal Energy Regulatory Commission (FERC or Commission) and per the request of the FERC Environmental Project Manager, Andrea Bloomfield.

The Project consists of:

- the construction and operation of an approximately three-mile-long extension of its 36-inch-diameter Lake Mills to Albert Lea E-line and a new aboveground valve setting at the planned terminus of the extension, as well as the abandonment-by-removal of an existing aboveground valve setting at the planned take-off point, in Freeborn County, Minnesota (Lake Mills to Albert E-Line);
- the construction and operation of an approximately 2.43-mile-long extension of its 30-inch-diameter Elk River 3rd Branch Line and an aboveground valve setting, as well as the abandonment-by-removal of an existing aboveground valve setting and approximately 275 feet of the existing 30-inch-diameter Elk River 3rd Branch Line, in Washington County, Minnesota (Elk River 3rd Branch Line);

- the construction and operation of a non-contiguous 1.91-mile-long extension of its 30-inch-diameter Farmington to Hugo C-Line, a new launcher, and an aboveground valve setting in Washington County, Minnesota (Farmington to Hugo C-Line);
- the construction and operation of an approximately 1.28-mile-long extension of its 8-inch-diameter Tomah Branch Line Loop and approximately 40 feet of belowground piping to tie the line in with its existing receiver facility, the relocation of the existing receiver facility by installing it at the terminus of the planned extension, and the abandonment-by-removal of an aboveground valve setting in Monroe County, Wisconsin (Tomah Branch Line Loop); and
- minor modifications to an aboveground facility within its existing La Crescent Compressor Station (CS) in Houston County, Minnesota (La Crescent CS).

The purpose of the inspection was to determine NNG's compliance with the environmental conditions of the Commission's March 21, 2024, *Order Issuing Certificate and Approving Abandonment* for the Project and to inspect the construction conditions of the Project rights-of-way (ROWs).

The findings of the inspection were that no instances of noncompliance or problem areas were identified.

A site map and photographic record are presented in this report.

Inspection

On May 15 and 16, 2025, weather conditions were mostly clear and sunny, with rain at the at the end of the day near Tomah, Wisconsin, on May 15 and windy conditions near Albert Lea, Minnesota, on May 16. Temperatures ranged from 51°F to 81°F across the Project area, at the time of the inspection, and soil conditions at each inspected location were dry and stable.

Lake Mills to Albert Lea E-Line

The inspection began at the laydown yard at milepost (MP) 34.2, where the workspace was graded, and rock was being installed over geotextile material (Photo Number [No.] 1). A double-walled diesel tank was properly housed within a secondary containment structure. Along the agricultural ROW beyond (MP 34.2 to MP 31.29), pipe stringing was underway along the ROW (Photo No. 2). ECDs, including silt fence and haybales, were properly installed. Topsoil was segregated and stockpiled along the edge of the ROW, lined with silt fence or haybales, and stabilized with seed and mulch. At MP 33.2, a gap was left in the segregated topsoil pile along the ROW to prevent the accumulation of rainwater and maintain flow from the upper agricultural field to the lower field (Photo No. 3). Haybales were staked across the gap between the topsoil piles to filter flow and control sediment transport. At MP 31.31, ground-nesting bird nests were identified and marked along the ROW for protection until hatchlings fledge (Photo No. 4). Near the terminus of the line, a pit was excavated to expose the existing pipeline within the ROW and additional temporary workspace (ATWS; Photo No. 5). Topsoil was segregated, and stockpiles were stabilized with seed and mulch. At all locations inspected, the ROW was stable, and no off-ROW impacts or environmental concerns were identified.

Elk River 3rd Branch Line

The inspection continued at the laydown yard at MP 3.4, where topsoil was segregated, and the stockpile was stabilized with seed and mulch (Photo No. 6). The yard was graded, with equipment mats and gravel groundcover being installed. A diesel generator for the construction trailers was properly housed within a secondary containment structure (Photo No. 7). Equipment mats were installed around the construction trailers. Along the forested and open ROW beyond, haybales were staked across the entrances to the

ROW at road crossings (Photo Nos. 8 through 10), and silt fence was properly installed along both edges of the entire ROW to act as a protective exclusion barrier for the Blanding's turtle (Photo Nos. 6 through 12). Topsoil was being segregated along the ROW at MP 2.3 (Photo No. 9). Near MP 2.1, grading was not yet underway; however, a double line of silt fence was properly installed along the western edge of the ROW to protect the adjacent, off-ROW wetland (Photo Nos. 10 and 11). Proper signage was installed to mark the resource boundary (Photo No. 11). A horizontal directional drill (HDD) entry pad will be set up within a plant nursery to cross beneath a forested area (Photo No. 10). At the HDD exit site at MP 1.8, topsoil was segregated and stockpiled along the edge of the workspace, lined with silt fence, and stabilized with seed and mulch (Photo No. 12). PVC pipes were installed to identify underground utilities within the workspace. At all locations inspected, the ROW was stable, with no off-ROW impacts or environmental concerns identified.

Farmington to Hugo C-Line

Along the open ROW inspected from MP 0.1 to MP 1.7, haybales were staked across the ROW entrance at a road crossing (Photo No. 14), and silt fence was properly installed along both edges of the ROW, with no other work yet underway (Photo Nos. 13 through 16). Near MP 1.0, an exclusion buffer area was installed to maintain adequate construction distance and not disturb an active eagle nest site (Photo No. 15); and near MP 1.7, a biologist was surveying and marking ground-nesting bird nest sites (Photo No. 16). At all locations inspected, the ROW was stable, with no off-ROW impacts or environmental concerns identified.

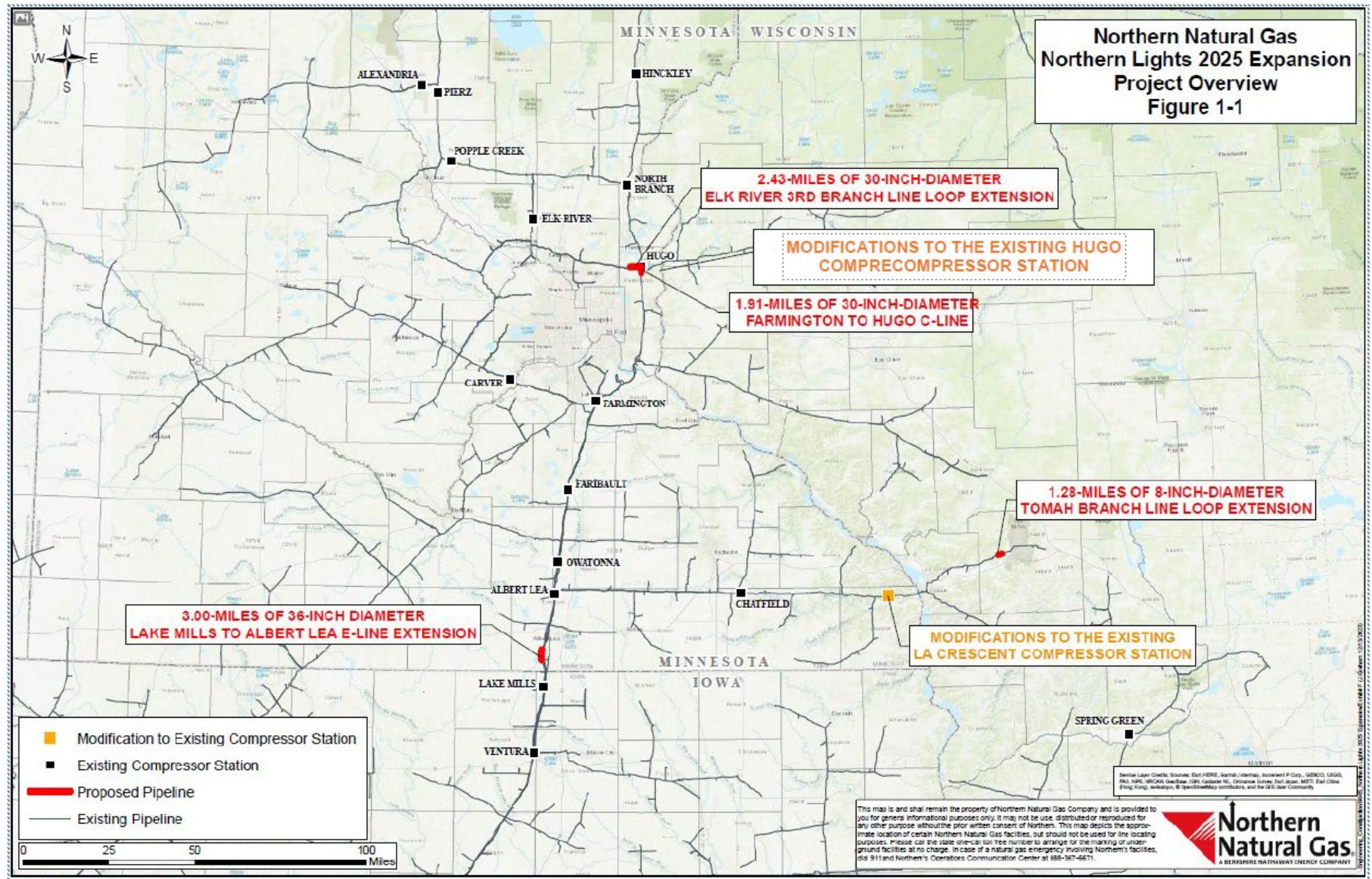
Tomah Branch Line Loop

At the construction yard at MP 3.5, setup of the workspace was underway (Photo No. 17). Along the residential, open, and forested ROW beyond, a crew was trimming the trees for the required workspace (Photo Nos. 17 through 20). Near MP 2.5, NNG self-reported an incident where a truck had driven just off the certificated construction ROW (while remaining on the pre-existing ROW). The truck was moved and left no impact or tire tracks (Photo No. 18). Also near MP 2.5, an exclusion buffer area was installed across the ROW to protect a pair of orioles nesting in the trees at the edge of the ROW (Photo No. 19). The inspection ended at the valve site terminus at MP 2.25, where the valve setting will be tied into during construction (Photo No. 20). At all locations inspected, the ROW was stable, with no off-ROW impacts or environmental concerns identified.

Conclusions and Recommendations

Environmental compliance with the FERC's *Upland Erosion Control, Revegetation, and Maintenance Plan* and *Wetland and Waterbody Construction and Mitigation Procedures* was acceptable. A follow-up letter is not required at this time, because no instances of noncompliance were identified. Overall, construction efforts were progressing satisfactorily, and no environmental concerns were identified. The next inspection is scheduled for the week of June 9, 2025.

SITE MAPS



FEDERAL ENERGY REGULATORY COMMISSION PHOTOGRAPHIC RECORD

Company: Northern Natural Gas Company

Docket No.: CP24-60-000

Projects: Northern Lights 2025 Expansion

Facility: Lake Mills to Albert Lea E-Line



Photo No.: 1

MP/Sta. No.: 34.2

Direction: South

Assessment: Acceptable

Comments: E-Line Laydown Yard. The laydown yard was graded, and rock was being installed over geotextile material. A double-walled diesel tank was properly housed within a secondary containment structure. The yard workspace was stable, and no environmental concerns were identified.



Photo No.: 2

MP/Sta. No.: 34.2

Direction: North

Assessment: Acceptable

Comments: Agricultural ROW. Pipe stringing was underway along the ROW. ECDs, including silt fence and haybales, were properly installed. Topsoil was segregated and stockpiled along the edge of the ROW, lined with silt fence or haybales, and stabilized with seed and mulch. No off-ROW impacts or environmental concerns were identified.

**FEDERAL ENERGY REGULATORY COMMISSION
PHOTOGRAPHIC RECORD**

Company: Northern Natural Gas Company

Docket No.: CP24-60-000

Projects: Northern Lights 2025 Expansion

Facility: Lake Mills to Albert Lea E-Line



Photo No.: 3

MP/Sta. No.: 33.2

Direction: Southeast

Assessment: Acceptable

Comments: Agricultural ROW. A gap was left in the segregated topsoil pile along the ROW to prevent the accumulation of rainwater and maintain flow from the upper agricultural field to the lower field. Haybales were staked across the gap between the topsoil piles to filter flow and control sediment transport. No off-ROW impacts or environmental concerns were identified.



Photo No.: 4

MP/Sta. No.: 31.31

Direction: East

Assessment: Acceptable

Comments: Agricultural ROW. Ground-nesting bird nests were identified and marked along the ROW for protection until hatchlings have fledged. No environmental concerns were identified. (Note: The “haze” is where the camera captured fog and mist along the ROW.)

**FEDERAL ENERGY REGULATORY COMMISSION
PHOTOGRAPHIC RECORD**

Company: Northern Natural Gas Company

Docket No.: CP24-60-000

Projects: Northern Lights 2025 Expansion

Facility: Lake Mills to Albert Lea E-Line/Elk River 3rd
Branch Line



Photo No.: 5

MP/Sta. No.: 31.29

Direction: East

Assessment: Acceptable

Comments: Agricultural ROW. A pit was excavated to expose the existing pipeline within the ROW and ATWS. Topsoil was segregated, and stockpiles were stabilized with seed and mulch. The ROW was stable, and no environmental concerns were identified.



Photo No.: 6

MP/Sta. No.: 3.4

Direction: Northeast

Assessment: Acceptable

Comments: Elk River Laydown Yard. Topsoil was segregated, and the stockpile was stabilized with seed and mulch. The yard was graded, with equipment mats and gravel groundcover being installed. No off-ROW impacts or environmental concerns were identified.

FEDERAL ENERGY REGULATORY COMMISSION PHOTOGRAPHIC RECORD

Company: Northern Natural Gas Company

Docket No.: CP24-60-000

Projects: Northern Lights 2025 Expansion

Facility: Elk River 3rd Branch Line



Photo No.: 7

MP/Sta. No: 3.4

Direction: Northeast

Assessment: Acceptable

Comments: Elk River Laydown Yard. A diesel generator for the construction trailers was properly housed within a secondary containment structure. Equipment mats were installed around the construction trailers. The yard was well-maintained, and no environmental concerns were identified.



Photo No.: 8

MP/Sta. No: 3.4

Direction: Northeast

Assessment: Acceptable

Comments: Forested and Open ROW. Near the kickoff, haybales were staked across the entrance to the ROW. Silt fence was properly installed along both edges of the entire ROW to act as a protective exclusion barrier for the Blanding's turtle. No environmental concerns were identified.

FEDERAL ENERGY REGULATORY COMMISSION PHOTOGRAPHIC RECORD

Company: Northern Natural Gas Company

Docket No.: CP24-60-000

Projects: Northern Lights 2025 Expansion

Facility: Elk River 3rd Branch Line



Photo No.: 9

MP/Sta. No: 2.3

Direction: Southwest

Assessment: Acceptable

Comments: Open ROW. Topsoil was being segregated along the ROW. Silt fence was properly installed, and haybales were staked across the entrance to the ROW at the road crossing. No off-ROW or environmental concerns were identified.



Photo No.: 10

MP/Sta. No: 2.3

Direction: Northeast

Assessment: Acceptable

Comments: Open ROW. Silt fence was properly installed along both edges of the ROW. Haybales were staked across the entrance to the ROW at the road crossing. The western (photo left) edge of the ROW was double-lined with silt fence to protect the adjacent, off-ROW wetland. In the distance, an HDD entry pad will be set up within a plant nursery to cross beneath a forested area. No environmental concerns were identified.

FEDERAL ENERGY REGULATORY COMMISSION PHOTOGRAPHIC RECORD

Company: Northern Natural Gas Company

Docket No.: CP24-60-000

Projects: Northern Lights 2025 Expansion

Facility: Elk River 3rd Branch Line

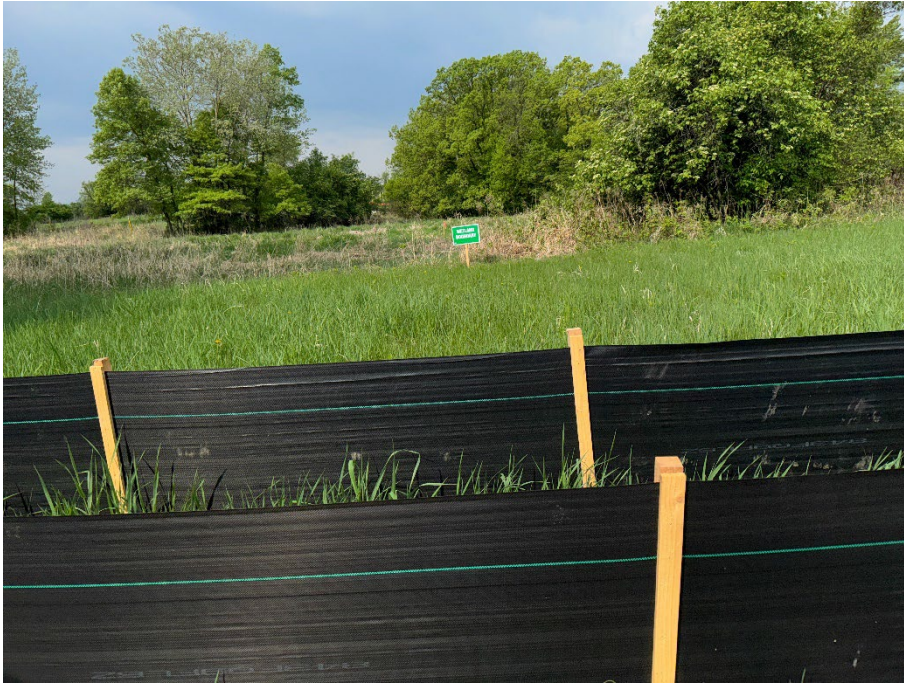


Photo No.: 11

MP/Sta. No.: 2.1

Direction: Southwest

Assessment: Acceptable

Comments: Open ROW. A double line of silt fence was properly installed along the edge of the ROW to protect the adjacent, off-ROW wetland. Proper signage was installed to mark the resource boundary. No off-ROW or environmental concerns were identified.



Photo No.: 12

MP/Sta. No.: 1.8

Direction: East

Assessment: Acceptable

Comments: Forested and Open ROW. At the HDD exit site, topsoil was segregated and stockpiled along the edge of the workspace, lined with silt fence, and stabilized with seed and mulch. PVC pipes were installed to identify underground utilities within the workspace. The site was stable, and no environmental concerns were identified.

**FEDERAL ENERGY REGULATORY COMMISSION
PHOTOGRAPHIC RECORD**

Company: Northern Natural Gas Company

Docket No.: CP24-60-000

Projects: Northern Lights 2025 Expansion

Facility: Farmington to Hugo C-Line



Photo No.: 13

MP/Sta. No.: 0.1

Direction: South

Assessment: Acceptable

Comments: Open ROW, Kickoff. Silt fence was properly installed along both edges of the ROW, with no other work yet underway. No environmental concerns were identified.



Photo No.: 14

MP/Sta. No.: 0.5

Direction: South/Southwest

Assessment: Acceptable

Comments: Open ROW. Haybales were staked across the ROW entrance at the road crossing, and silt fence was properly installed along both edges of the ROW. No environmental concerns were identified.

**FEDERAL ENERGY REGULATORY COMMISSION
PHOTOGRAPHIC RECORD**

Company: Northern Natural Gas Company

Docket No.: CP24-60-000

Projects: Northern Lights 2025 Expansion

Facility: Farmington to Hugo C-Line



Photo No.: 15

MP/Sta. No.: 1.0

Direction: East

Assessment: Acceptable

Comments: Open/Pasture ROW. An exclusion buffer area was installed to maintain adequate construction distance and not disturb an active eagle nest site. No environmental concerns were identified.



Photo No.: 16

MP/Sta. No.: 1.7

Direction: South

Assessment: Acceptable

Comments: Open ROW. A biologist was surveying and marking ground-nesting bird nest sites. Silt fence was properly installed along the eastern edge of the ROW and most of the western edge of the ROW. No environmental concerns were identified.

FEDERAL ENERGY REGULATORY COMMISSION PHOTOGRAPHIC RECORD

Company: Northern Natural Gas Company

Docket No.: CP24-60-000

Projects: Northern Lights 2025 Expansion

Facility: Tomah Branch Line Loop



Photo No.: 17

MP/Sta. No: 3.5

Direction: East

Assessment: Acceptable

Comments: Tomah Branch Construction Yard, Open and Forested ROW. Setup of the construction yard was underway. In the distance, the ROW crosses along the gap in the trees, and a crew was trimming the trees for the required workspace. No environmental concerns were identified.



Photo No.: 18

MP/Sta. No: 2.5

Direction: Southwest

Assessment: Acceptable

Comments: Residential, Open, and Forested ROW. The tree trimming crew had trimmed trees along the eastern edge of the ROW. NNG self-reported an incident where a truck had driven just off the certificated construction ROW (while remaining on the pre-existing ROW). The truck was moved and left no impact or tire tracks. No environmental concerns were identified.

FEDERAL ENERGY REGULATORY COMMISSION PHOTOGRAPHIC RECORD

Company: Northern Natural Gas Company

Docket No.: CP24-60-000

Projects: Northern Lights 2025 Expansion

Facility: Tomah Branch Line Loop



Photo No.: 19

MP/Sta. No: 2.5

Direction: West

Assessment: Acceptable

Comments: Residential, Open, and Forested ROW. An exclusion buffer area was installed across the ROW to protect a pair of orioles nesting in the trees at the edge of the ROW. No environmental concerns were identified. (Note: The “haze” is where the camera captured fog and mist along the ROW.)



Photo No.: 20

MP/Sta. No: 2.25

Direction: West

Assessment: Acceptable

Comments: Open and Forested ROW, Valve Site, Terminus. The valve setting will be tied into during construction. The tree trimming crew had completed work along this section of ROW. No environmental concerns were identified.