



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

June 27, 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
Variance Request – Extra Temporary Workspace – Lake Mills to Albert Lea E-line Extension

Dear Ms. Reese:

In accordance with Condition 5 of the Order Issuing Certificate and Approving Abandonment issued February 19, 2025, by the Federal Energy Regulatory Commission (Commission), Northern Natural Gas (Northern) hereby submits for filing in the above-referenced docket a request for approval to utilize additional extra temporary workspace (ETWS) for the Lake Mills to Albert Lea E-line extension (Lake Mills extension).

Specifically, Northern is requesting approval to use additional ETWS on either side of the open cut crossings of 140th Street (MP 31.95, alignment sheet LML P3-3) and County Road 80¹ (MP 33.19, alignment sheet LML P3-6) for the Lake Mills extension. The additional ETWS is needed to accommodate an 8:1 slope requirement Freeborn County and Nunda Township, respectively, have included in their permits for the open cut crossings. The additional workspace is required to excavate the roadways to an 8:1 slope out from the pipeline trench requiring a much wider trench than originally proposed. The shallower slope will allow better re-compaction of the roadways upon backfill.

The attached alignment sheets depict the four proposed ETWS, which are highlighted with a Delta F2 symbol. At 140th Street, ETWS06A measures 85 feet by 20 feet (0.04 acre) and ETWS05A measures 115 feet by 20 feet (0.05 acre). At County Road 80, ETWS09A measures 85 feet by 25 feet (0.05 acre) and ETWS10A measures 115 feet by 25 feet (0.07 acre). The proposed ETWS will be located entirely within the road right of way with no impact on other landowners. The surrounding area is active farmland. No sensitive

¹ County Road 80 is also referred to as 154th Street.

Northern Natural Gas Company
Northern Lights 2025 Expansion

environmental or cultural resources will be impacted; ETWS09A is located within the 50-foot buffer of wetland LMP-W07, which is actively farmed and has therefore been disturbed. The additional workspace is located within the environmentally cleared area and no additional agency consultation is required. On June 27, 2025, Freeborn County and Nunda Township provided written approval for the additional workspace in order to maintain the 8:1 slope requirements.

A public and privileged version of the alignment sheets (LML P3-3 and P3-6) are attached. The privileged alignment sheets contain confidential information regarding landowner names and has been labeled “**CUI//PRIV ---DO NOT RELEASE (PRIVILEGED).**” Pursuant to 18 CFR Section 388.112, Northern requests confidential and privileged treatment of these alignment sheets due to the confidential nature of the contents.

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

Northern respectfully requests Commission staff issue approval of the proposed ETWS for the Lake Mills to Albert Lea E-line extension as expeditiously as possible; the contractor is scheduled to commence the open cut crossings July 14, 2025. Any questions regarding this filing should be directed to the undersigned at (402) 398-7138.

Respectfully submitted,

/signed/ Donna Martens

Donna Martens
Senior Regulatory Analyst

LEGEND

PROPOSED 36" LAKE
MILLS TO ALBERT LEA
E-LINE EXTENSION

EXIST. 30" MNM80103 C-LINE

EXIST. 30" MNM80104 D-LINE

EXIST. 26" MNM80102 B-LINE

EXIST. 16" MNM80191 J-LINE

EXIST. 36" MNM80105 E-LINE

PROPERTY LINE

SECTION LINE

ROAD R.O.W.

WETLAND

WETLAND BUFFER

STAGING AREA

TEMP. ACCESS ROAD

PROPOSED DRIVE

PROJECT PERMANENT ROW

EXISTING PERMANENT ROW

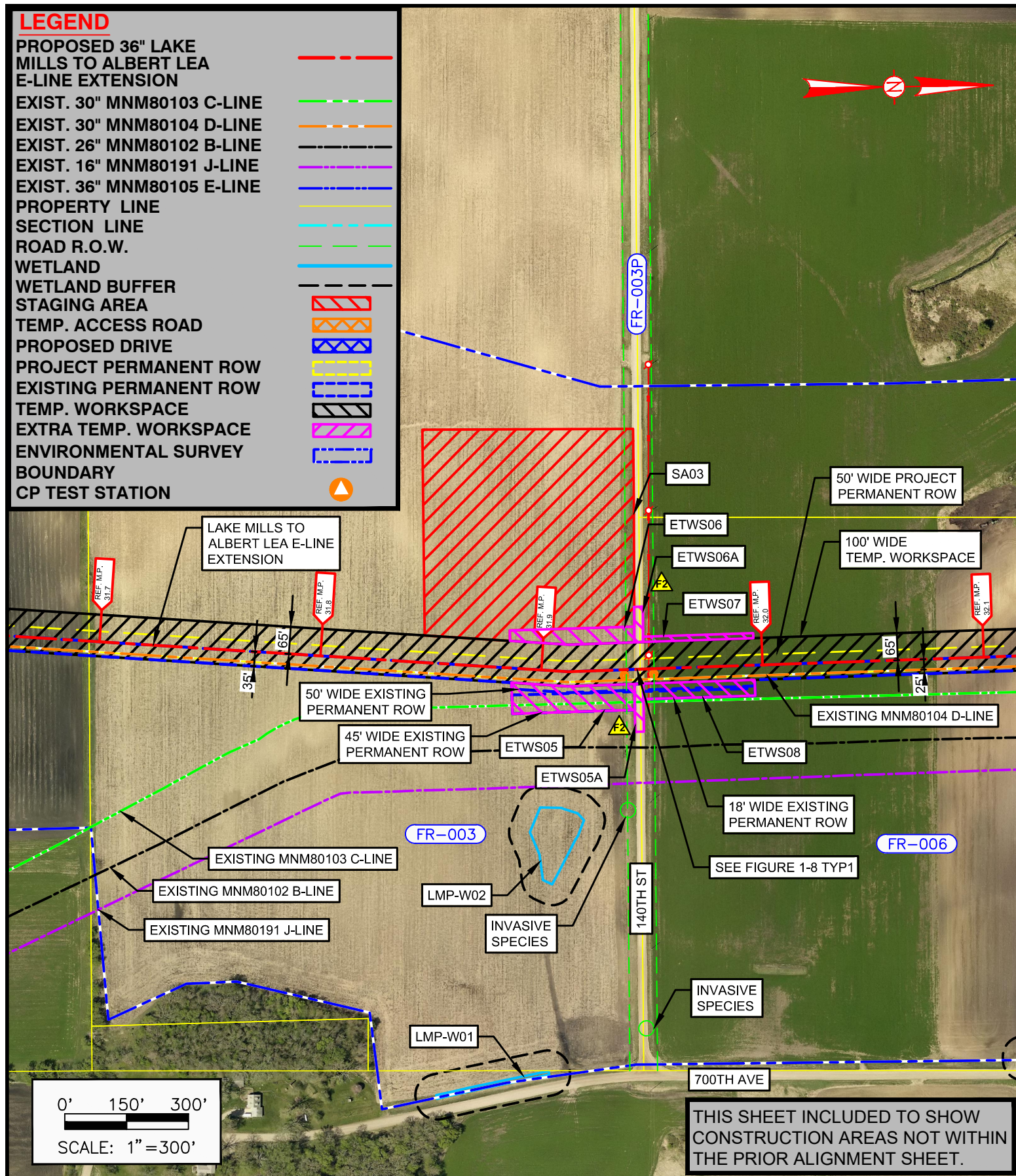
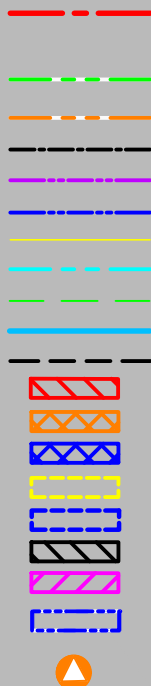
TEMP. WORKSPACE

EXTRA TEMP. WORKSPACE

ENVIRONMENTAL SURVEY

BOUNDARY

CP TEST STATION



NORTHERN LIGHTS 2025 EXPANSION
LAKE MILLS TO ALBERT LEA E-LINE EXTENSION
TRACT FR-003, 003P, 006
SEC. 9, T101N, R22W
FREMONT COUNTY, MINNESOTA

Figure 1-4

Re-Issued For Ferc
 Sheet LML AR-02
 Date: 6/23/25
 Scale: 1"=300'

Figure 1-4

FILED WITH FERC
ANY CHANGES FROM WHAT IS
SHOWN MUST BE IDENTIFIED
AND REVIEWED BY
REGULATORY BEFORE
IMPLEMENTATION

NO.	REVISION - DESCRIPTION	BY	DATE	CHK'D	APP'D
	ADDED ETWS10A & ETWS09A	MB	6/23/25	ED	GC
F1	RE-ISSUED FOR FERC (NO CHANGE)	JM	1/14/25	ED	GC
F	ISSUED FOR FERC	AC	2/2/24	ED	GC

STATUS	BY	DATE	BY	DATE
PRELIM				
BID				
CONST.				

FAC. CODE:	REL. W.O.
PL#	CONST. YR
STA#	PO#
DESIGN	BY
DRAWN	DATE
ASBUILT	
FILE NO.	
SCALE:	

NORTHERN LIGHTS 2025 EXPANSION PROJECT
LAKE MILLS TO ALBERT LEA E-LINE EXTENSION
ALIGNMENT SHEET
SEC. 4, T101N, R22W
FREEBORN COUNTY, MINNESOTA

PROJECT NO.
01146980
DWG. NO.
LML P3-6

Figure 1-4

LEGEND

PROPOSED 36" LAKE
MILLS TO ALBERT LEA
E-LINE EXTENSION

EXIST. 30" MNM80103 C-LINE

EXIST. 30" MNM80104 D-LINE

EXIST. 26" MNM80102 B-LINE

EXIST. 16" MNM80191 J-LINE

EXIST. 36" MNM80105 E-LINE

PROPERTY LINE

SECTION LINE

ROAD R.O.W.

WETLAND

WETLAND BUFFER

STAGING AREA

TEMP. ACCESS ROAD

PROPOSED DRIVE

PROJECT PERMANENT ROW

EXISTING PERMANENT ROW

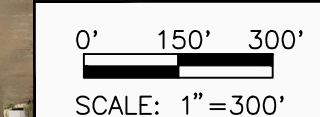
TEMP. WORKSPACE

EXTRA TEMP. WORKSPACE

ENVIRONMENTAL SURVEY

BOUNDARY

CP TEST STATION



NORTHERN LIGHTS 2025 EXPANSION
LAKE MILLS TO ALBERT LEA E-LINE EXTENSION
TRACT FR-010, 010P, 012
SEC. 4, T101N, R22W
FREMONT COUNTY, MINNESOTA

Figure 1-4

Re-Issued For Ferc
 Sheet LML AR-03
 Date: 6/23/25
 Scale: 1"=300'

THIS SHEET INCLUDED TO SHOW
 CONSTRUCTION AREAS NOT WITHIN
 THE PRIOR ALIGNMENT SHEET.