FEDERAL ENERGY REGULATORY COMMISSION
FIELD INSPECTION REPORT

Date July 8, 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	
0	Problem Areas
0	Noncompliances
No	Follow-Up Letter Required
No	Refer to Enforcement

Introduction

On July 8, 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 Lea 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 right-of-way (ROW).

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 July 8, 2025, the weather was partly cloudy in nearby Minneapolis, Minesota; Tomah, Wisconsin; and Albert Lea, Minnesota. Temperatures ranged from 71°F to 85°F across the Project area, at the time of the inspection. During the two weeks before the inspection, Minneapolis received over 5 inches of rain, Tomah received over 13 inches, and Albert Lea received over 10 inches of rain. Soil conditions along the Lake Mills to Albert Lea E-line ROW were wet with ponding in low areas. Soil conditions along the Tomah Branch Line Loop ROW were wet but stable due to sandy soil. The soil along the Elk River 3rd Branch Line and Farmington to Hugo C-Line ROWs was wet but stable.

The inspection covered the Lake Mills to Albert Lea E-Line (Photo Numbers [Nos.] 1 through 5), Elk River 3rd Branch Line (Photo Nos. 6 through 10), Farmington to Hugo C-Line (Photo Nos. 11 through 15), and Tomah Branch Line Loop (Photo Nos. 16 through 20).

<u>Lake Mills to Albert Lea E-Line</u>

Overall, soil conditions were wet from recent rains and some construction was temporarily halted due to saturated soil conditions. Construction was progressing acceptably and no erosion, off-ROW impacts, or other environmental concerns were observed.

The inspection began at milepost (MP) 34.2, where construction was slowed due to recent heavy rainfall that made soil conditions too wet to work, according to NNG (Photo No. 1). At MP 33.19, a short section of pipe was installed, but the ditch was filled with water and work was stopped until the ROW dried out, according to NNG (Photo No. 2). At MP 32.0, pipe segments were strung and welded, but work was stopped until ROW conditions were drier, according to NNG (Photo No. 3). No active construction was observed at a valve site at MP 31.2, where the excavation was filled with water (Photo No. 4). No environmental concerns were observed at MP 31.2 at the anticipated tie-in to the existing pipeline.

At all locations inspected, topsoil was properly segregated and stockpiled, stabilized with seed and mulch, and further stabilized with vegetation. Erosion control devices (ECDs) were properly installed and in good repair; and the ROW was stable with no erosion, off-ROW impacts, or environmental concerns identified.

Elk River 3rd Branch Line

At MP 3.2 along the Elk River 3rd Branch Line ROW, two pipeline strings were welded and ready to be installed, including one pipeline string that will be installed along a horizontal directional drill (HDD) crossing (Photo No. 6). Topsoil was graded, stockpiled, and stabilized with vegetation. At MP 3.3 the pipe was installed under a roadway via road bore crossing, but the trench box was filled with water from recent rains. A drill pad and sound barrier were observed nearby (Photo No. 7). Pipe for the HDD pullback string was staged and ready to be welded at MP 1.9. Equipment mats and other ECDs were installed (Photo Nos. 8 and 9). The pipeline was lowered into the ground and mostly backfilled near MP 1.0. An open excavation remained at the tie-in, which was surrounded with orange exclusion fence. The topsoil stockpile was surrounded with silt fence and partially stabilized with vegetation (Photo No. 10). At all locations inspected, the ROW was stable with no erosion, off-ROW impacts, or environmental concerns identified.

Farmington to Hugo C-Line

The ROW was graded; topsoil was segregated; and pipe was being strung, welded, and coated along the Farmington to Hugo C-Line ROW from MP 0.1 to MP 1.8 (Photo Nos. 11 through 15). At all locations inspected, ECDs were properly installed and in good repair, topsoil stockpiles were vegetated, and the ROW was stable with no erosion, off-ROW impacts, or environmental concerns identified.

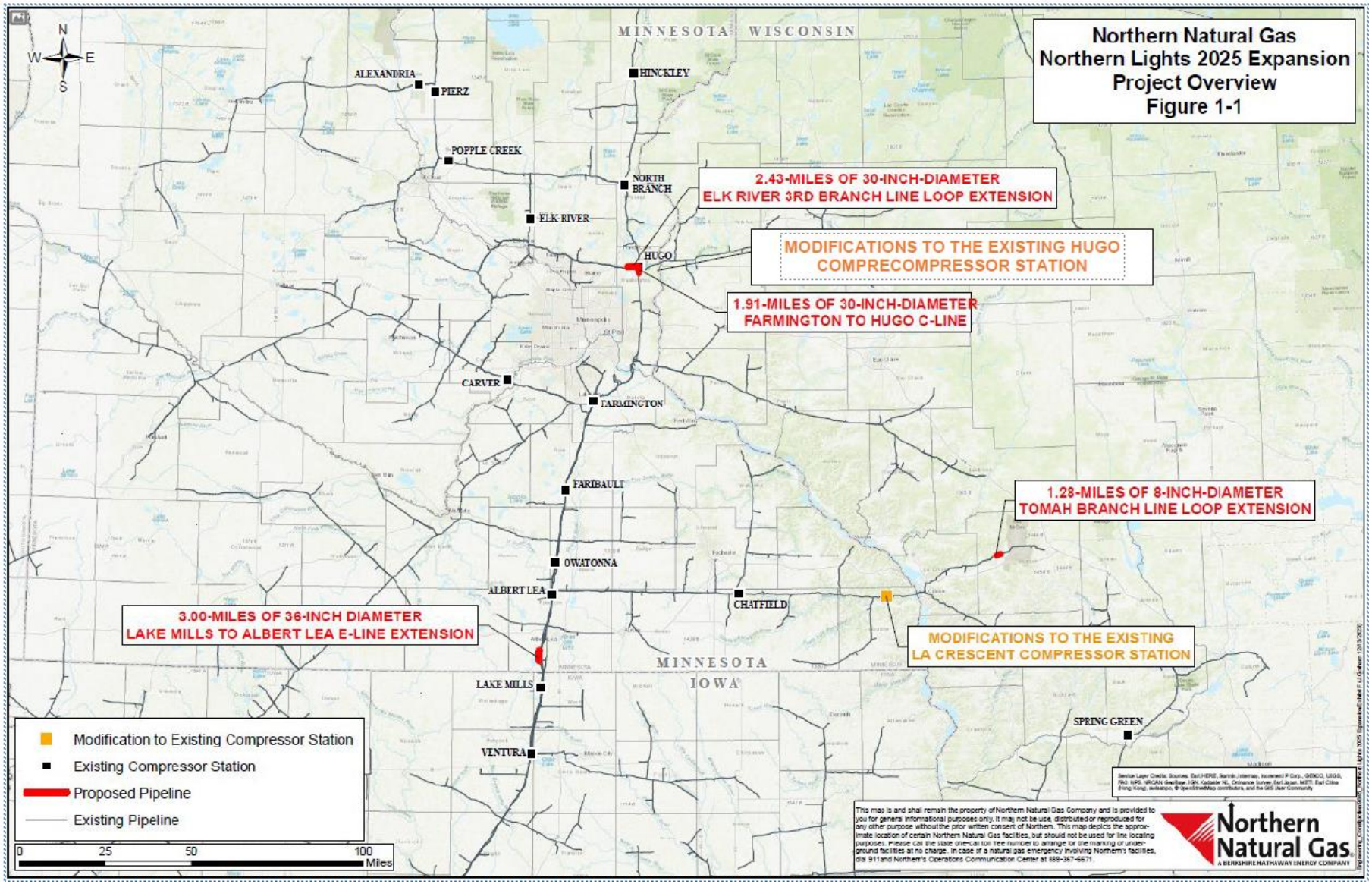
Tomah Branch Line Loop

NNG reported that crews were making repairs along the ROW following two weeks – and 13 inches – of rain. Despite the heavy rainfall, no significant erosion, off-ROW impacts, or other environmental concerns were observed. At MP 3.5 along the Tomah Branch Lind Loop, an active HDD crossing was in progress. NNG reported that there was an inadvertent release of drilling mud estimated to be 100 gallons, but the drilling mud was contained (Photo No. 16). At MP 2.5, the ROW, and an extra workspace for an expected HDD road crossing, was graded and temporary ECDs were installed (Photo No. 17). A timbe pile within the ROW limits was scheduled to be removed, according to NNG. At MP 2.54, NNG reported that Baltimore oriole chicks had fledged and left their nest, so the tree that the birds were nesting in, which was on the ROW, was removed (Photo No. 18). The working side of the ROW from MP 2.5 was stabilized with equipment mats, and topsoil was stockpiled and stabilized with vegetation (Photo No. 19). An existing valve site at the end of the Project area (approximately MP 2.2) was scheduled to be removed, according to NNG. An excavation to expose the underground valve piping was in progress, but was delayed due to the heavy rains, according to NNG (Photo No. 20). Otherwise, the valve site was stable. At all locations inspected, the ROW was stable; with no erosion, 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 August 4, 2025.

SITE MAP


Northern Natural Gas
Northern Lights 2025 Expansion
Project Overview
Figure 1-1
MINNESOTA
WISCONSIN
ALEXANDRIA
PIERZ
HINCKLEY
POPPLE CREEK
NORTH BRANCH
2.43-MILES OF 30-INCH-DIAMETER
ELK RIVER 3RD BRANCH LINE LOOP EXTENSION
ELK RIVER
HUGO
MODIFICATIONS TO THE EXISTING HUGO
COMPRECOMPRESSOR STATION
1.91-MILES OF 30-INCH-DIAMETER
FARMINGTON TO HUGO C-LINE
CARVER
FARMINGTON
FARIBAULT
1.28-MILES OF 8-INCH-DIAMETER
TOMAH BRANCH LINE LOOP EXTENSION
OWATONNA
ALBERT LEA
CHATFIELD
3.00-MILES OF 36-INCH DIAMETER
LAKE MILLS TO ALBERT LEA E-LINE EXTENSION
MODIFICATIONS TO THE EXISTING
LA CRESCENT COMPRESSOR STATION
MINNESOTA
IOWA
LAKE MILLS
SPRING GREEN
VENTURA
Modification to Existing Compressor Station
Existing Compressor Station
Proposed Pipeline
Existing Pipeline
0
25
50
100
Miles
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Northern Natural Gas
A BERKSHIRE HATHAWAY ENERGY COMPANY

FEDERAL ENERGY REGULATORY COMMISSION
PHOTOGRAPHIC RECORD

Company: Northern Natural Gas Company

Docket No.: CP24-60-000

Project: Northern Lights 2025 Expansion

Spread: Lake Mills to Albert Lea E-Line

Photo No.: 1

MP/Sta. No.: 34.2

Direction: South/Southwest

Assessment: Acceptable

Comments: Agricultural ROW, Lake Mills to Albert Lea E-line. NNG reported that construction was underway, but excessive rain had slowed progress and that the ROW was too wet to work. The ROW was stable with no erosion, off-ROW impacts, or other environmental concerns identified.

Photo No.: 2

MP/Sta. No.: 33.19

Direction: Southwest

Assessment: Acceptable

Comments: Agricultural ROW, Lake Mills to Albert Lea E-line. A short section of pipe was installed, but the ditch was filled with water and work was stopped until the ROW dried out, according to NNG. The ROW was stable with no erosion, off-ROW impacts, or other environmental concerns were identified.

FEDERAL ENERGY REGULATORY COMMISSION
PHOTOGRAPHIC RECORD

Company: Northern Natural Gas Company

Docket No.: CP24-60-000

Project: Northern Lights 2025 Expansion

Spread: Lake Mills to Albert Lea E-Line

Photo No.: 3

MP/Sta. No.: 32.0

Direction: Southwest

Assessment: Acceptable

Comments: Agricultural ROW, Lake Mills to Albert Lea E-line. Pipe segments were strung and welded, but work was stopped until ROW conditions were drier and water was no longer ponding in low areas, according to NNG. The ROW was stable with no erosion, off-ROW impacts, or environmental concerns identified.

Photo No.: 4

MP/Sta. No.: 31.2

Direction: North

Assessment: Acceptable

Comments: Agricultural ROW, Lake Mills to Albert Lea E-line. No active construction was observed at a valve site. An excavation at the valve site was filled with water. The ROW was stable with no erosion, off-ROW impacts, or environmental concerns identified.

FEDERAL ENERGY REGULATORY COMMISSION
PHOTOGRAPHIC RECORD

Company: Northern Natural Gas Company

Docket No.: CP24-60-000

Project: Northern Lights 2025 Expansion

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

Photo No.: 5

MP/Sta. No.: 31.2

Direction: South

Assessment: Acceptable

Comments: Agricultural ROW, Lake Mills to Albert Lea E-line. The end of the construction ROW. An excavation was lined on the bottom with equipment mats in preparation for a stopple that was expected to be installed at the tie-in to the existing pipeline. The ROW was stable with no erosion, off-ROW impacts, or environmental concerns identified.

Photo No.: 6

MP/Sta. No: 3.2

Direction: East

Assessment: Acceptable

Comments: Open and Forested ROW, Elk River 3rd Branch Line. Two pipeline strings were welded and waiting to be installed – including one for the directional drill crossing . Topsoil was graded, stockpiled along the ROW, and stabilized with vegetation. The ROW was stable with no erosion, off-ROW impacts, or environmental concerns identified.

FEDERAL ENERGY REGULATORY COMMISSION
PHOTOGRAPHIC RECORD

Company: Northern Natural Gas Company

Docket No.: CP24-60-000

Project: Northern Lights 2025 Expansion

Spread: Elk River 3rd Branch Line

Photo No.: 7

MP/Sta. No: 3.3

Direction: East

Assessment: Acceptable

Comments: Open and Forested ROW, Elk River 3rd Branch Line. The pipe was installed at the road bore crossing. The trench box was filled with water from recent rains. A drill pad with sound barrier was observed in the distance. The ROW was stable with no erosion, off-ROW impacts, or environmental concerns identified.

Photo No.: 8

MP/Sta. No: 1.9

Direction: East

Assessment: Acceptable

Comments: Forested and Open ROW, Elk River 3rd Branch Line. Pipe for the HDD pullback string was ready to be welded. Equipment mats were installed, and the ROW appeared to be stable with no erosion, off-ROW impacts, or environmental concerns identified.

FEDERAL ENERGY REGULATORY COMMISSION
PHOTOGRAPHIC RECORD

Company: Northern Natural Gas Company

Docket No.: CP24-60-000

Project: Northern Lights 2025 Expansion

Spread: Elk River 3rd Branch Line

Photo No.: 9

MP/Sta. No: 1.9

Direction: West

Assessment: Acceptable

Comments: Open ROW, Elk River 3rd Branch Line. A side boom, water tank, and generator were staged at the hydrostatic test site for the of the HDD crossing pipeline. No off-ROW impacts or environmental concerns were identified.

Photo No.: 10

MP/Sta. No: 1.0

Direction: North/Northeast

Assessment: Acceptable

Comments: Open and Forested ROW, Elk River 3rd Branch Line. The pipeline was lowered into the ground and mostly backfilled. An open excavation remained at the tie-in – which was surrounded with orange exclusion fence. The topsoil stockpile was surrounded with silt fence and partially stabilized with vegetation and stable. There The ROW was stable with no erosion, off-ROW impacts, or environmental concerns identified.

FEDERAL ENERGY REGULATORY COMMISSION
PHOTOGRAPHIC RECORD

Company: Northern Natural Gas Company

Docket No.: CP24-60-000

Project: Northern Lights 2025 Expansion

Spread: Farmington to Hugo C-Line

Photo No.: 11

MP/Sta. No.: 0.1

Direction: South

Assessment: Acceptable

Comments: Open ROW, Farmington to Hugo C-Line. Topsoil was graded and stabilized with vegetation, and pipe was strung along the ROW. Silt fence was installed along the ROW limits. The site was stable with no environmental concerns identified.

Photo No.: 12

MP/Sta. No.: 0.6

Direction: Southwest

Assessment: Acceptable

Comments: Forested and Open ROW, Farmington to Hugo C-Line. The ROW was graded, and topsoil was stockpiled along the edge of the ROW. Part of the workspace was stabilized with equipment mats and hay bales. The site was stable with no environmental concerns identified.

FEDERAL ENERGY REGULATORY COMMISSION
PHOTOGRAPHIC RECORD

Company: Northern Natural Gas Company

Docket No.: CP24-60-000

Project: Northern Lights 2025 Expansion

Spread: Farmington to Hugo C-Line

Photo No.: 13

MP/Sta. No.: 1.8

Direction: South/Southwest

Assessment: Acceptable

Comments: Open ROW, Farmington to Hugo C-Line. The ROW was graded, and topsoil was stockpiled and stabilized with vegetation. Equipment mats and hay bales were installed at the access road. The site was stable with no environmental concerns identified.

Photo No.: 14

MP/Sta. No.: 1.8

Direction: North/Northwest

Assessment: Acceptable

Comments: Open ROW, Farmington to Hugo C-Line. Two joints of pipe had been stacked by the access near a road crossing. The ROW was graded, and topsoil was stockpiled and seeded. The site was stable with no environmental concerns identified.

FEDERAL ENERGY REGULATORY COMMISSION
PHOTOGRAPHIC RECORD

Company: Northern Natural Gas Company

Docket No.: CP24-60-000

Project: Northern Lights 2025 Expansion

Spreads: Farmington to Hugo C-Line / Tomah Branch Line Loop

Photo No.: 15

MP/Sta. No.: 1.8

Direction: North

Assessment: Acceptable

Comments: Open/Pasture ROW, Farmington to Hugo C-Line. The pipeline string was welded, and a crew was sandblasting and painting the welded pipe joints. Plastic was placed on the ground to catch the sandblast media and paint overspray. The ROW was stable with no erosion, off-ROW impacts, or other environmental concerns identified.

Photo No.: 16

MP/Sta. No: 3.5

Direction: North/Northeast

Assessment: Acceptable

Comments: Open ROW, Tomah Branch Line. An active HDD crossing was observed during the inspection. NNG reported that there was an inadvertent release of drilling mud. NNG stated that approximately 100 gallons of drilling mud was released, but that the drilling mud was contained.

FEDERAL ENERGY REGULATORY COMMISSION
PHOTOGRAPHIC RECORD

Company: Northern Natural Gas Company

Docket No.: CP24-60-000

Project: Northern Lights 2025 Expansion

Spread: Tomah Branch Line Loop

Photo No.: 17

MP/Sta. No: 2.5

Direction: South/Southeast

Assessment: Acceptable

Comments: Forested and Residential ROW, Tomah Branch Line. The ROW, and the extra workspace for an expected HDD crossing under the county road, was graded and temporary ECDs were installed. NNG stated that the timber pile seen in the middle ground of the photo was schedule to be removed. NNG further reported that crews were making repairs along the ROW following two weeks of rain, with over 13 inches of rainfall recorded. The site was stable with no environmental concerns identified.

Photo No.: 18

MP/Sta. No: 2.5

Direction: West/Southwest

Assessment: Acceptable

Comments: Residential, Open, Forested, and Agricultural ROW, Tomah Branch Line. NNG reported that Baltimore oriole chicks had fledged and left their nest, so the tree that the birds were nesting in, which was on the ROW, was removed. The ROW was graded and topsoil was stockpiled and stabilized with seed and mulch. Grading was underway. The ROW was stable with no erosion, off-ROW impacts, or other environmental concerns identified.

FEDERAL ENERGY REGULATORY COMMISSION
PHOTOGRAPHIC RECORD

Company: Northern Natural Gas Company

Docket No.: CP24-60-000

Project: Northern Lights 2025 Expansion

Spread: Tomah Branch Line Loop

Photo No.: 19

MP/Sta. No: 2.2

Direction: Southeast

Assessment: Acceptable

Comments: Open, Forested, and Agricultural ROW, Tomah Branch Line. The working side of the ROW was stabilized with equipment mats, and a pipe string was welded and set on skids. Topsoil was stockpiled and stabilized with vegetation. The ROW was stable with no erosion, off-ROW impacts, or environmental concerns identified.

Photo No.: 20

MP/Sta. No: 2.2

Direction: South

Assessment: Acceptable

Comments: Open and Agricultural ROW, Tomah Branch Line. An existing valve site at the end of the project area was scheduled to be removed, according to NNG. An excavation to expose the valve was in progress, but was delayed due to heavy rains, according to NNG. The valve site was stable with no erosion, off-ROW impacts, or environmental concerns identified.