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

August 29, 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 – Utilize Temporary Pipeline Evacuation System for Tie-in Activities – Elk River 3rd Branch Line

Dear Ms. Reese:

In accordance with Condition 1 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 a temporary pipeline evacuation system (compression) to accommodate tie-in activities for the Elk River 3rd branch line extension (Elk River extension).

Specifically, Northern is requesting approval to utilize a 300-horsepower pipeline evacuation system to depressurize the existing Elk River MNB87701 branch line in order to complete the tie-in of the Elk River extension. During preparations for the tie-in, Northern determined the original plan was not viable and is therefore proposing use of the pipeline evacuation system to recompress gas from the existing MNB87701 branch line into the adjacent MNB87702 Elk River loop. Once the MNB87701 branch line has been depressurized, the Elk River extension will be tied-in to both the MNB87701 branch line and the MNB87702 loop at the new valve setting as originally proposed.

The proposed pipeline evacuation system will be staged at the northeast corner of the Hugo compressor station within the approved workspace designated for the Farmington to Hugo C-line extension (alignment sheet FAR P3-1) Approximately 14.8 miles of the MNB87701 branch line will be isolated starting at the Hugo compressor station to a block valve BYB03 in Section 26, Township 32N Range 23W, Anoka County, Minnesota[1]; no additional workspace will be required other than the approved workspace at the Hugo compressor

[1] No modifications or workspace will be required at the block valve. Northern's field personnel will close the valve in order to isolate the pipeline as in normal pipeline maintenance activities.

station and there will be no impacts on sensitive resources. The pipeline evacuation system will run continuously for 48 hours until the pipeline is at 50 pounds per square inch. Northern will vent the remaining 0.708 MMcf of natural gas at the Hugo compressor station; resulting in a savings of approximately 6.797 MMcf of natural gas that would otherwise vent to the atmosphere without the proposed depressurization

Stantec Consulting Ltd., on behalf of Northern, calculated the noise impact resulting from the pipeline evacuation system. Attached is the noise evaluation report showing that the mitigated noise impact at the noise sensitive areas is less than 55 dBA L_{dn}. Northern will communicate with the identified landowners regarding the proposed activities at least forty eight hours in advance of the work and will provide a telephone number of Northern's right of way representative should they feel inconvenienced.

Northern respectfully requests Commission staff to issue approval as expeditiously as possible to utilize the proposed pipeline evacuation system to accommodate the tie-in of the Elk River extension. The contractor is scheduled to mobilize to the site September 22, 2025, and commence depressurization September 23, 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

Stantec Consulting
1165 Scheuring Rd., De Pere, WI

August 29, 2025
File: Docket No. CP24-60-000

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

Reference: Northern Natural Gas Company FERC Docket No. CP24-60-000; Northern Lights 2025 Expansion Project – FERC Order Issuing Certificate and Approving Abandonment (Order) – Request for Temporary Compression

Dear Ms. Reese,

INTRODUCTION

Northern Natural Gas (Northern) owns and operates an approximately 14,300-mile-long natural gas transmission pipeline system and associated aboveground facilities, including pipeline facilities in Minnesota and Wisconsin. As part of the Northern Lights 2025 Expansion Project, Northern is installing a 2.43-mile extension of its 30-inch-diameter Elk River 3rd branch line. Northern is requesting approval for temporary compression to depressurize the existing Elk River MNB87701 branch line in order to complete tie-ins using an in-service welding technique that requires low pipeline pressure. Northern is proposing temporary compression to recompress gas from the existing MNB87701 line into the MNB87702.

A 300-horsepower (HP) pipeline evacuation system will be located at the northeast corner of Northern's Hugo compressor station located at 10600 180th Street North in Marine on St. Croix, Washington County, Minnesota, (45°12'36.2"N 92°53'19.2"W). One 300 HP pipeline evacuation system will be required to be operated for a continuous 48-hour duration.

To support this request, Northern has requested that Stantec Consulting Ltd. (Stantec) evaluate the noise impact of the proposed temporary compression on NSAs within 0.5 mile of the Hugo compressor station.

METHODOLOGY

Sound levels were modelled using CADNA/A acoustic modelling software (version 2021 MR2) published by Datakustik GmbH, configured to implement ISO-9613-2 environmental noise propagation algorithms. The predicted levels consider geometrical divergence, attenuation from barriers and intervening structures, ground effects, and air absorption. This standard also makes provisions to include a correction to address for downwind or ground-based temperature inversion conditions.

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NOISE CRITERIA

FERC regulations refer to the day-night sound level (L_{dn}) to evaluate the noise impact of operation and construction activities on nearby NSAs. The L_{dn} is the equivalent sound level (L_{eq}) plus 10 decibels added to nighttime levels to account for greater human sensitivity to noise during nighttime hours.

The L_{dn} is calculated according to the following formula:

$$L_{dn} = 10 \times Log_{10}\left(15/24 \times 10^{(L_{eq(day)}/10)} + 9/24 \times 10^{((L_{eq(night)}+10)/10)}\right)$$

FERC regulations at 18 CFR § 380.12(k)(2) require that any applicable state or local noise regulations be identified. It is further required at 18 CFR § 380.12 (k)(4)(v) to specify how the proposed Project will meet the regulations. In the absence of any applicable state or local noise regulation, FERC guidance states that construction activities that could or may occur during nighttime hours should be performed with the goal that the activity contribute noise levels at or below 55 dBA Ldn and 48.6 dBA Leq-24hr, or no more than 10 dBA over background if ambient noise levels are above 55 dBA Ldn.

MODELLED SOUND POWER

Representative sound power data from previous project experience has been used to estimate sound emissions from the 300-horsepower natural-gas driven compressor. A sound power level of **109 dBA** has been used as a conservative estimate for the compressor.

NOISE SENSITIVE AREAS

Noise sensitive areas within 0.5 mile of the Hugo Compressor station were identified by Stantec to evaluate the impact of the proposed temporary compression. A summary of the worst-case representative NSAs are provided in Table 1.

Table 1 Representative NSAs

NSA ID	**Description**	**Longitude**	**Latitude**	**Distance and Direction from Compression Site (feet)**
NSA01	Residence at 10830 180th St. North	45.2107	-92.8869	517 ft. Northeast
NSA02	Residence at 17280 Manning Trail North	45.2075	-92.8865	1,101 ft. Southeast

Reference: **Northern Natural Gas Company FERC Docket No. CP24-60-000; Northern Lights 2025 Expansion Project – FERC Order Issuing Certificate and Approving Abandonment (Order) – Request for Temporary Compression**

NSA03	Residence at 18180 Manning Trail North	45.2120	-92.8897	748 ft. North
NSA04	Residence at 10520 180th Street North	45.2105	-92.8932	1,177 ft. West
NSA05	Residence at 10411 180th Street North	45.2078	-92.8934	1,471 ft. Southwest

RESULTS

A summary of modelled noise impacts at the representative NSAs is provided as Table 1. A contour plot of the noise impact of the compressor is provided as Figure 1. Noise mitigation measures are required as noise impacts are exceeded to exceeded the applicable FERC 55 dBA Ldn noise criteria

Table 2 Unmitigated NSA Noise Impact Table

NSA ID	**Description**	Noise Impact (Ldn) [dBA]	Applicable Noise Criteria (Ldn) [dBA]
NSA01	Residence at 10830 180th St. North	59	55
NSA02	Residence at 17280 Manning Trail North	53	55
NSA03	Residence at 18180 Manning Trail North	56	55
NSA04	Residence at 10520 180th Street North	53	55
NSA05	Residence at 10411 180th Street North	50	55

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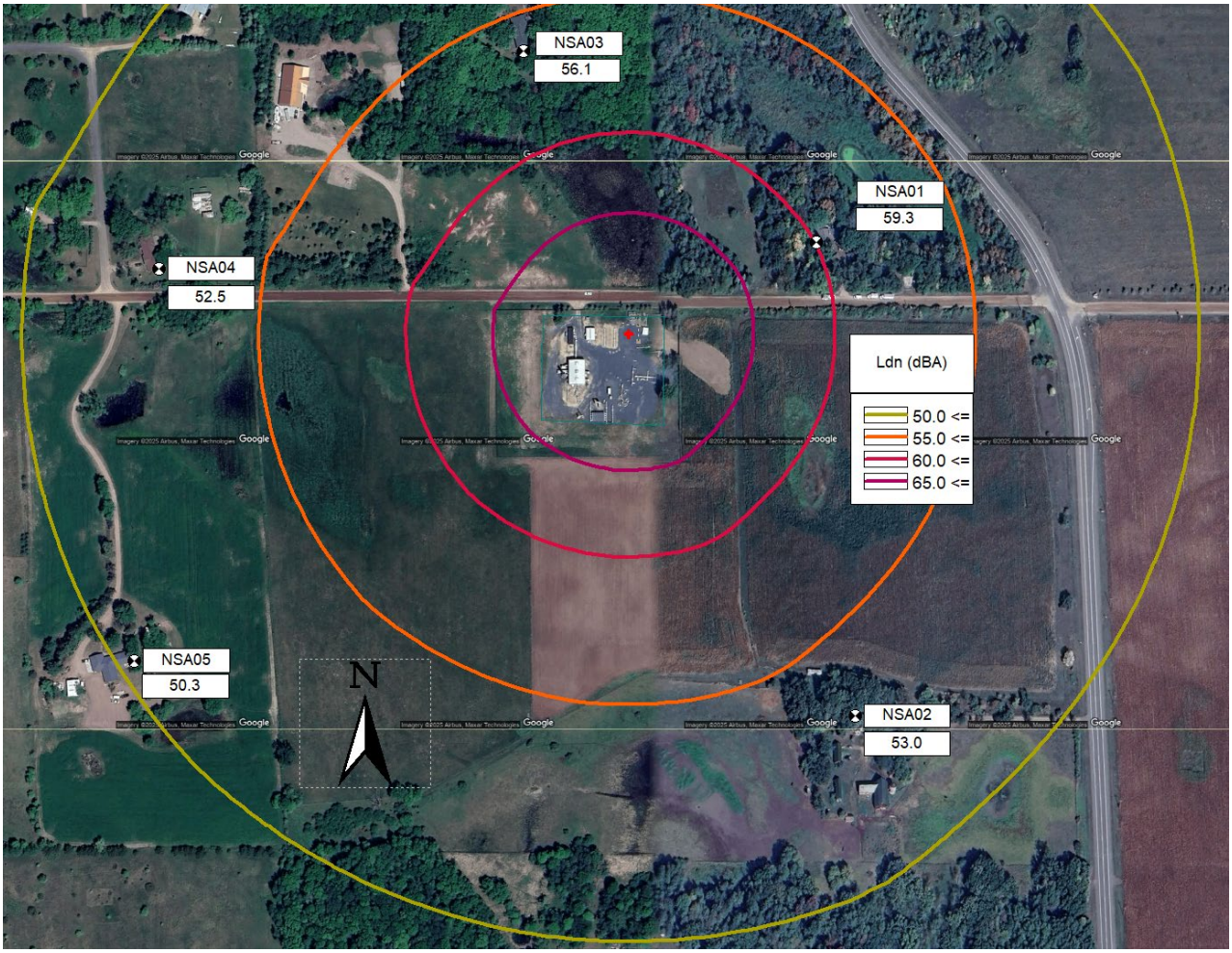

Figure 1 Unmitigated Noise Impact Contours Ldn (4.5m AG) [dBA]

MITIGATED RESULTS

Northern is proposing to install a 4-meter high 25 meter long L-shaped barrier wall along the northern and eastern sides of the temporary compression activities as predicted sound levels are anticipated to exceed the applicable FERC 55 dBA Ldn criteria. Mitigated noise levels are presented in Table 3. A mitigated noise impact contour plot is provided as Figure 3.

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Table 3 Mitigated NSA Noise Impact Table

NSA ID	**Description**	Noise Impact (Ldn) [dBA]	Applicable Noise Criteria (Ldn) [dBA]
NSA01	Residence at 10830 180th St. North	49	55
NSA02	Residence at 17280 Manning Trail North	53	55
NSA03	Residence at 18180 Manning Trail North	48	55
NSA04	Residence at 10520 180th Street North	53	55
NSA05	Residence at 10411 180th Street North	50	55

Reference: **Northern Natural Gas Company FERC Docket No. CP24-60-000; Northern Lights 2025 Expansion Project – FERC Order Issuing Certificate and Approving Abandonment (Order) – Request for Temporary Compression**

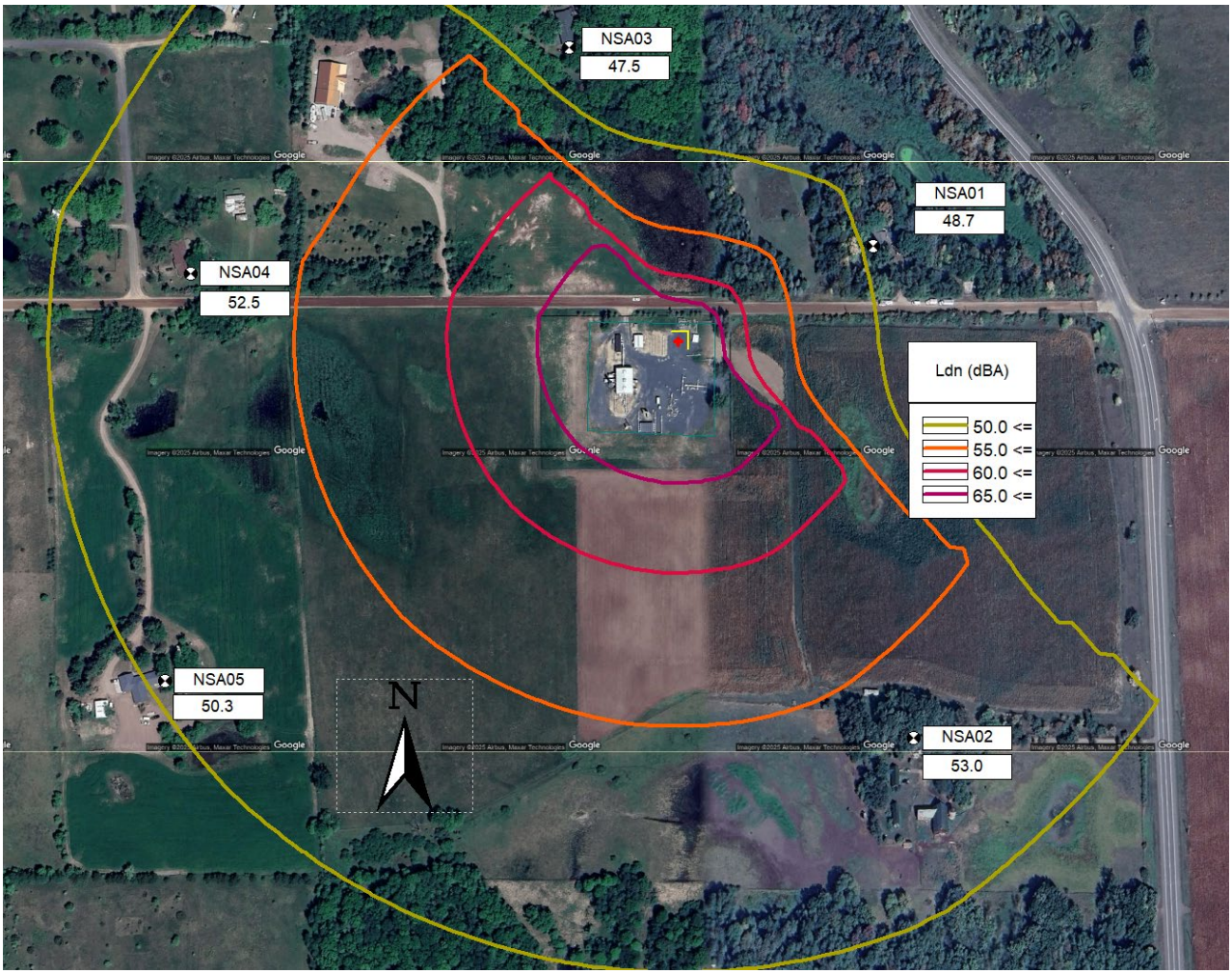

Figure 2 Mitigated Noise Impact Contours Ldn (4.5m AG) [dBA]

Stantec Consulting
1165 Scheuring Rd., De Pere, WI

CLOSING

Stantec has completed noise modelling of the proposed temporary compression as part of the Elk River 3rd branch line construction activities. The predicted mitigated noise impact at nearby NSAs is anticipated to be less than the applicable FERC noise level limit of 55 dBA Ldn based on the implementation of an L-shaped barrier wall.

Should you have any questions or concerns, please do not hesitate to contact the undersigned.

Regards,

Stantec Consulting

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