FEDERAL ENERGY REGULATORY COMMISSION
FIELD INSPECTION REPORT

Date August 26 and 27, 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 August 26 and 27, 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 and restoration 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 August 26 and 27, 2025, the weather was partly cloudy in nearby Minneapolis, Minesota; Tomah, Wisconsin; and Albert Lea, Minnesota. Temperatures ranged from 49°F to 75°F across the Project area, at the time of the inspection. During the two weeks prior the inspection, the Lake Mills to Albert Lea E-Line ROW had approximately 2.0 inches of rain, Elk River 3rd Branch Line and Farmington to Hugo C-Line had approximately 2.0 inches of rain, and Tomah had approximately 5.5 inches of rain. Soil conditions on the Lake Mills to Albert Lea E-Line ROW were saturated, and there was ponding in the low-lying areas along the entire ROW. Soil conditions on the Elk River 3rd Branch Line and Farmington to Hugo C-Line ranged from saturated to dry, depending on soil type, with some low-lying areas of ponding along both ROWs. Soil conditions on the Tomah ROW were dry, due to the sandy soil.

The inspection covered the Lake Mills to Albert Lea E-Line (Photo Numbers [Nos.] 1 through 3), Elk River 3rd Branch Line (Photo Nos. 4 through 8), Farmington to Hugo C-Line (Photo Nos. 9 through 14), and Tomah Branch Line Loop (Photo Nos. 15 through 20).

Lake Mills to Albert Lea E-Line

Overall, soil conditions were saturated, with ponding along low-lying areas after heavy rains over the past two months. Construction had progressed slowly, with approximately one-third of the pipeline not yet installed.

The inspection began at milepost (MP) 34.2, where the pipeline was installed; however, due to saturated soils, no cleanup or restoration work could yet be done (Photo No. 1). At MP 32.19 pipe was installed, and the trench was backfilled. The excavation for the road crossing tie-in was full of water (Photo No. 2). At MP 34.2, the mainline tie-in was exposed, and the excavation was full of water (Photo No. 3). No erosion, off-ROW impacts, or other environmental concerns were observed.

Elk River 3rd Branch Line

Overall, conditions along the ROW were good, and much of the pipeline was installed. HDD crossings were in progress, but progressing slowly. Additional HDD rigs were being mobilized to the Project to complete the crossings. At MP 3.05, the pipeline was installed, and the trench was backfilled. Two HDD pullback pipe strings were welded and ready for installation (Photo No. 4). At MP 3.05, an active

HDD crossing was making the final ream pass (Photo No. 5). The site was stabilized with equipment mats, and a sound barrier wall was in place. At MP 2.4 two HDD pullback pipe strings remained in place, ready for installation (Photo No. 6); and pipe was staged for welding and installation to tie into the completed HDD crossing (Photo No. 7). At MP 1.0, the HDD drill pad was stabilized with equipment mats, and a sound barrier was in place (Photo No. 8). The topsoil pile was moved to fit the drill pad and reseeded for stabilization. Additional silt fence was installed, and the site was stable. At all locations inspected, the ROW was stable with no erosion, off-ROW impacts, or environmental concerns identified.

Farmington to Hugo C-Line

At the ROW kickoff, adjacent to the CS, two HDD pullback pipe strings remained in place (Photo No. 9). Additional HDD rigs were mobilized to expedite the crossings. Drill pads at both MP 0.1 and MP 0.55 were stabilized with equipment mats, and sound barrier walls were in place (Photo Nos. 9 and 10). At MP 1.82, the pipeline was installed, the trench was backfilled, and restoration was completed on half of the ROW where revegetation was progressing (Photo Nos. 11 and 12). The adjacent side of the ROW remained in use as the travel lane to the mainline tie-in site. At MP 0.22, an inadvertent release of drilling mud happened during the inspection. Silt fence was installed around the return, and a vacuum truck was mobilized to the location for cleanup (Photo No. 13). The vacuum truck was parked on-ROW on equipment mats (Photo No. 14). At all locations inspected, erosion control devices (ECDs) were properly installed and maintained, topsoil stockpiles were stabilized with vegetation, and the ROW was stable with no erosion, off-ROW impacts, or environmental concerns identified.

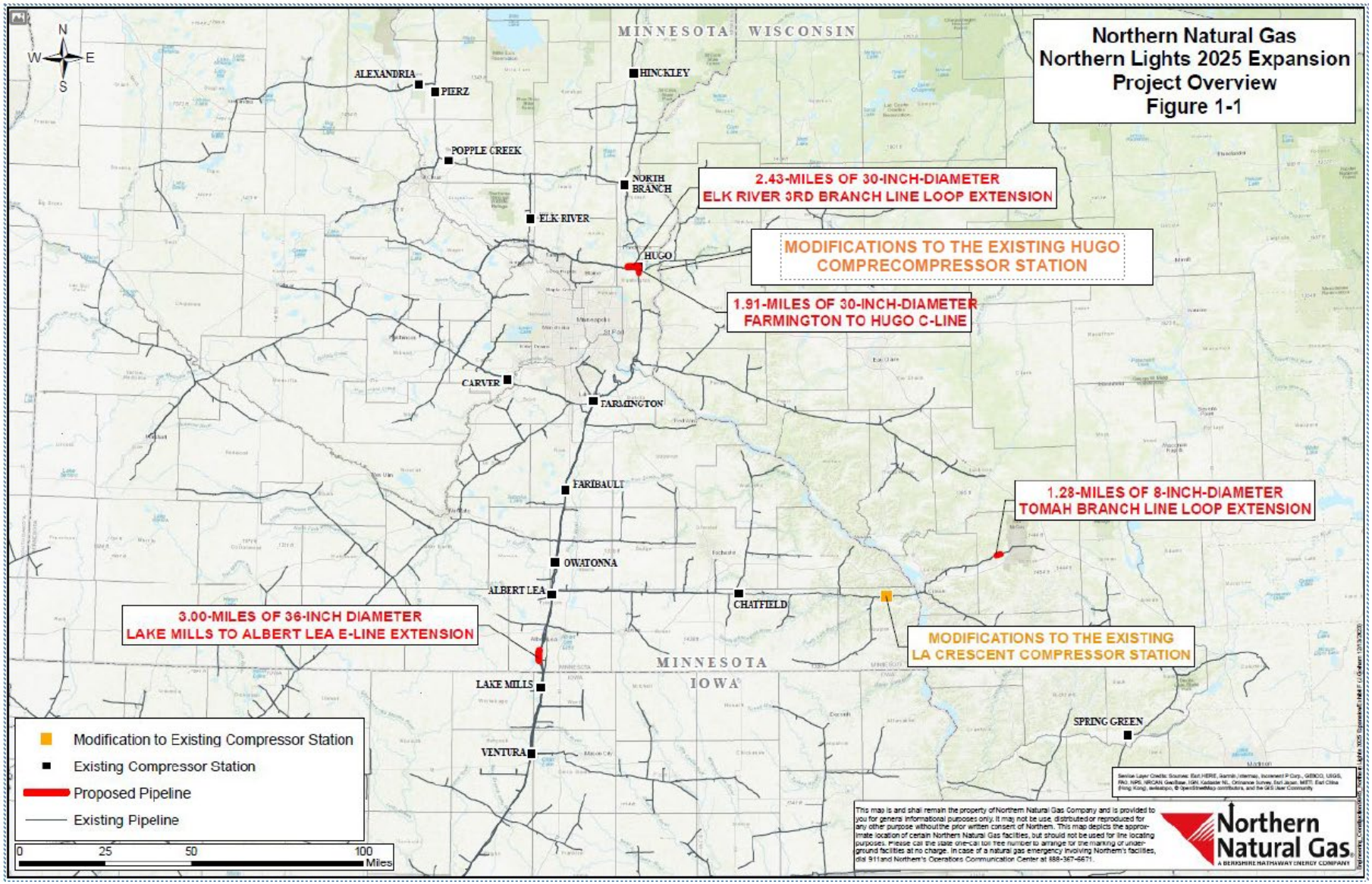
Tomah Branch Line Loop

Along the Tomah Branch Line Loop, the pipeline was installed and tied into the mainline. Restoration was in progress from MP 2.25 to MP 2.35 with hydroseed being applied (Photo Nos. 15 and 16). At MP 2.35, due to the sandy soil, which would not hold a slope breaker, a temporary double row of staked straw bales was installed (Photo No. 16). Cleanup was in progress along the remainder of the ROW in preparation for restoration (Photo Nos. 17 through 20). The pipeline had been excavated and exposed in two locations (MP 2.5 and MP 3.15) to install cathodic protection (Photo Nos. 17 and 20, respectively). At all locations inspected, ECDs were properly installed and maintained, topsoil stockpiles were stabilized with vegetation, and 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 September 22, 2025.

SITE MAP


Northern Natural Gas
Northern Lights 2025 Expansion
Project Overview
Figure 1-1
2.43-MILES OF 30-INCH-DIAMETER
ELK RIVER 3RD BRANCH LINE LOOP EXTENSION
MODIFICATIONS TO THE EXISTING HUGO
COMPRECOMPRESSOR STATION
1.91-MILES OF 30-INCH-DIAMETER
FARMINGTON TO HUGO C-LINE
1.28-MILES OF 8-INCH-DIAMETER
TOMAH BRANCH LINE LOOP EXTENSION
3.00-MILES OF 36-INCH DIAMETER
LAKE MILLS TO ALBERT LEA E-LINE EXTENSION
MODIFICATIONS TO THE EXISTING
LA CRESCENT COMPRESSOR STATION
MINNESOTA
WISCONSIN
MINNESOTA
IOWA
ALEXANDRIA
PIERZ
HINCKLEY
POPPLE CREEK
NORTH BRANCH
ELK RIVER
HUGO
CARVER
FARMINGTON
FARIBAULT
OWATONNA
ALBERT LEA
CHATFIELD
LAKE MILLS
VENTURA
SPRING GREEN
N
W
E
S
Modification to Existing Compressor Station
Existing Compressor Station
Proposed Pipeline
Existing Pipeline
0
25
50
100
Miles
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. The rains had cleared, but much of the ROW remained wet, with saturated soil and ponding along low-lying areas. Silt fence along the edge of the ROW was being maintained and functioning as designed. No off-ROW impacts or other environmental concerns were identified.

Photo No.: 2

MP/Sta. No.: 32.19

Direction: North

Assessment: Acceptable

Comments: Agricultural ROW, Lake Mills to Albert Lea E-line. The pipeline was installed through this section. Beyond the hill in the distance, there was ponding, and the pipe had not yet been installed. Topsoil piles were stabilized with vegetation. The excavation for the road crossing tie-in was filled with water. No 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/Elk River 3rd Branch Line

Photo No.: 3

MP/Sta. No.: 34.2

Direction: North

Assessment: Acceptable

Comments: Agricultural ROW, Lake Mills to Albert Lea E-line. The tie-in excavation was holding water, but the walls appeared stable. Orange exclusion fence was in place around the excavation. Pipeline was strung and welded, ready to be installed once conditions allowed. No off-ROW impacts or other environmental concerns were identified.

Photo No.: 4

MP/Sta. No.: 3.05

Direction: West

Assessment: Acceptable

Comments: Open and Forested ROW, Elk River 3rd Branch Line. The ROW was holding water from recent rains. HDD pullback pipe strings were staged along the ROW, ready for installation. Topsoil piles were stabilized with vegetation. ECDs were maintained and functioning as designed. 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

Project: Northern Lights 2025 Expansion

Spreads: Elk River 3rd Branch Line

Photo No.: 5

MP/Sta. No.: 3.05

Direction: East

Assessment: Acceptable

Comments: Open and Forested ROW, Elk River 3rd Branch Line. The active HDD site was stabilized equipment mats, and a sound barrier wall was in place. The ECDs surrounding the site were maintained and functioning as designed. The drill pad was stable with no off-ROW impacts or environmental concerns identified.

Photo No.: 6

MP/Sta. No: 2.4

Direction: East

Assessment: Acceptable

Comments: Open and Forested ROW, Elk River 3rd Branch Line. Two HDD pullback pipe stings were hydrostatically pressure tested and ready for installation. 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: 2.4

Direction: Southwest

Assessment: Acceptable

Comments: Open and Forested ROW, Elk River 3rd Branch Line. Pipe was staged for welding and installation to tie into the completed HDD crossing. The topsoil pile was stabilized with vegetation. Silt fence was maintained and functioning as designed. The ROW was stable with no erosion, off-ROW impacts, or environmental concerns identified.

Photo No.: 8

MP/Sta. No: 1.0

Direction: Northeast

Assessment: Acceptable

Comments: Forested and Open ROW, Elk River 3rd Branch Line. The HDD pad was stabilized with equipment mats, and a sound barrier wall was in place. The topsoil pile was moved to fit the drill pad and reseeded for stabilization. Additional silt fence was installed, and the site was stable. No erosion, off-ROW impacts, or 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: Farmington to Hugo C-Line

Photo No.: 9

MP/Sta. No: 0.1

Direction: South

Assessment: Acceptable

Comments: Open ROW, Farmington to Hugo C-Line. An HDD pullback pipe string was welded and staged for installation. Hydrostatic pressure testing water tanks remained at the edge of the ROW. The spoil pile was stabilized with vegetation. Maintained silt fence lined both edges of the ROW. No off-ROW impacts or environmental concerns were identified.

Photo No.: 10

MP/Sta. No: 0.55

Direction: Northwest

Assessment: Acceptable

Comments: Open and Forested ROW, Farmington to Hugo C-Line. The active drill site was stabilized with equipment mats, and sound barrier walls were in place. The HDD crossing had an inadvertent release at MP 0.22 (see Photo No. 13). The drill pad was stable with no 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.: 1.82

Direction: North/Northeast

Assessment: Acceptable

Comments: Open ROW, Farmington to Hugo C-Line. The pipeline was installed from this point to the tree line in the distance. Pipe was staged for the HDD crossing beneath the trees. Silt fence was maintained along the edge of the ROW. The ROW was stable, with no environmental concerns identified.

Photo No.: 12

MP/Sta. No.: 1.82

Direction: South

Assessment: Acceptable

Comments: Open ROW, Farmington to Hugo C-Line. Half of the ROW was restored, and revegetation was progressing well. The travel lane remained in place for access to the mainline tie-in site. Topsoil piles were vegetated and stable. Entrance to the ROW off the farm road was blocked with moveable straw bales. The location 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.: 0.22

Direction: South

Assessment: Acceptable

Comments: Open ROW, Farmington to Hugo C-Line. An inadvertent release was contained within silt fence. A small amount of drilling mud had breached beneath the silt fence and was being cleaned up.

Photo No.: 14

MP/Sta. No.: 0.18

Direction: North

Assessment: Acceptable

Comments: Open and Forested ROW, Farmington to Hugo C-Line. The vacuum truck was parked on equipment mats during cleanup of the inadvertent release. No 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

Spreads: Tomah Branch Line Loop

Photo No.: 15

MP/Sta. No.: 2.25

Direction: East

Assessment: Acceptable

Comments: Open and Forested ROW, Tomah Branch Line Loop. The ROW was being restored. Equipment mats remained in place at the tie-in site. The ROW was stable with no erosion, off-ROW impacts, or other environmental concerns identified.

Photo No.: 16

MP/Sta. No: 2.35

Direction: West/Southwest

Assessment: Acceptable

Comments: Open ROW, Tomah Branch Line Loop. The ROW was recently sprayed with hydroseed. Due to the sandy soil, which would not hold a slope breaker, a temporary double row of staked straw bales was installed. The ROW was stable with no erosion 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: Tomah Branch Line Loop

Photo No.: 17

MP/Sta. No: 2.5

Direction: West/Southwest

Assessment: Acceptable

Comments: Forested and Residential ROW, Tomah Branch Line Loop. The pipeline was installed down the slope and under the county road. Temporary slope breakers were in place on the slope. Once topsoil is reapplied along the ROW, the slope breakers will be directed away from the house. Topsoil piles remained stabilized with vegetation. A bell hole was excavated to install cathodic protection (foreground). The site was stable with no environmental concerns identified.

Photo No.: 18

MP/Sta. No: 2.55

Direction: East/Northeast

Assessment: Acceptable

Comments: Residential, Open, Forested, and Agricultural ROW, Tomah Branch Line Loop. The pipeline was installed, the trench was backfilled, and the ROW was being cleaned up for restoration. Topsoil piles were stabilized with vegetation. 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: 3.0

Direction: Southwest

Assessment: Acceptable

Comments: Open, Forested, and Agricultural ROW, Tomah Branch Line Loop. The pipeline was installed, the trench was backfilled, and the ROW was being cleaned up for restoration. The low-lying are of the ROW was holding water. Silt fence remained in place and was functioning as designed on the down-gradient edge of the ROW. The ROW was stable with no erosion, off-ROW impacts, or environmental concerns identified.

Photo No.: 20

MP/Sta. No: 3.15

Direction: East

Assessment: Acceptable

Comments: Open and Agricultural ROW, Tomah Branch Line Loop. The east end of the ROW was being cleaned up for restoration. The trench was excavated to install cathodic protection. Topsoil piles remained stabilized with vegetation. The ROW was stable with no erosion, off-ROW impacts, or environmental concerns identified.