



Northern Natural Gas Company
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September 18, 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 – Lake Mills to Albert Lea E-line Extension, Elk River 3rd
Branch Line Extension, and Farmington to Hugo C-line Extension – Extended
Construction Hours

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 extended hours to conduct construction activities for the Lake Mills to Albert Lea E-line extension (Lake Mills extension), Elk River 3rd branch line extension (Elk River extension), and the Farmington to Hugo C-line extension (Farmington extension). Specifically, Northern is requesting approval to conduct construction activities on Sundays from 7 a.m. to 5 p.m. to ensure these pipeline facilities are completed and in service by November 1, 2025, in order to meet customer requirements.

Due to the heavy rainfall which has occurred within the Lake Mills extension project area over the past four months, construction activities have been delayed and Northern runs the risk of the extension not being ready for the contracted November 1, 2025, in-service date. For the Farmington and Elk River extensions, delays in the horizontal directional drills due to unexpected subsurface conditions have delayed installation of the pipe and associated tie-ins between drills. In addition to the drilling delays, the Farmington extension experienced an additional two-month delay due to a bald eagle nest exclusion zone located within the Farmington workspace. On the Farmington extension project, the Minnesota Department of Natural Resources Keystone Woods Wildlife Management Area (Keystone Woods) plans to commence reconstruction of their existing access road October 15, 2025; this is the same access road (PD05) Northern is using to access its work area (Alignment Sheet FAR P3-5, Aerial AR-02). Allowing Sunday work should enable Northern's contractor to complete the work within Keystone Woods prior to October 15, 2025, limiting impact to Keystone Woods.

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Construction activities to be completed during Sundays include:

- Trench ditching
- Pipeline lowering
- Welding the pipeline in the ditch
 - Coating welds and nondestructive testing of welds
- Trench backfill
 - Includes trench breaker installation
- Restoration
 - Subsoil grading and decompaction
 - Topsoil replacement and decompaction
 - Drain tile repairs
 - Hydroseeding/Drill seeding

Northern will provide communication to landowners regarding the Sunday construction work activities. There are no places of worship located within the construction work areas.

Northern respectfully requests Commission staff to issue approval by September 24, 2025, to allow Sunday construction for the Lake Mills extension, the Farmington extension and the Elk River extension in order to ensure the pipelines are completed and ready to provide service by November 1, 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