



Northern Natural Gas Company
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October 21, 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 Company
Northern Lights 2025
Docket No. CP24-60-000
Bi-weekly Status Report No. 17

Dear Ms. Reese:

Pursuant to Condition 8 of the Order Issuing Certificate and Approving Abandonment issued by the Federal Energy Regulatory Commission February 19, 2025, Northern Natural Gas hereby submits for filing in the above-referenced docket its biweekly environmental inspector report for the period ending October 12, 2025.

Any questions regarding the filing should be directed at the undersigned at (402) 398-7138.

Respectfully submitted,

/s/ Donna Martens

Donna Martens
Senior Regulatory Analyst

Northern Natural Gas Company
Northern Lights 2025 (CP24-60-000)
Biweekly Status Report No. 17
Period Ending October 12, 2025

PROJECT DESCRIPTION

Northern Natural Gas (Northern) will construct and operate the Project, which will consist of (1) a 3.00-mile extension of its 36-inch-diameter Lake Mills to Albert Lea E-line; (2) a 2.42-mile extension of its 30-inch-diameter Elk River 3rd branch line; (3) a non-contiguous 1.90-mile extension of its 30-inch-diameter Farmington to Hugo C-line¹; (4) a 1.28-mile extension of its 8-inch-diameter Tomah branch line loop; (5) minor modifications to its existing La Crescent compressor station; and (6) aboveground facilities including a launcher, receiver and tie-in valve settings. All Project components are located in various counties in Minnesota and Wisconsin.

FEDERAL AUTHORIZATION STATUS

Northern has received all federal and state permits required under federal law for the Project.

Lake Mills to Albert Lea E-line

Northern will construct and operate an approximately 3.00-mile extension of its 36-inch-diameter MNM80105 Lake Mills to Albert Lea E-line in Freeborn County, Minnesota. Northern will remove the existing aboveground valve setting located in Section 16, Township 101 North, Range 22 West (Section 16, T101N, R22W), Freeborn County, Minnesota. Northern will construct and operate an aboveground valve setting at the terminus of the new extension on the north side of 165th Street in Section 33, T102N, R22W, Freeborn County, Minnesota.

Environmental Training

One contractor will construct the Lake Mills to Albert Lea E-line and associated aboveground facilities. The environmental training totals listed below reflect all training conducted to date for this component.

On-site Contractor: K & K, Inc. (K&K)

Overall Construction Start Date: Commenced April 21, 2025

Environmental Training Conducted: This reporting period: 0 Total to date: 40

Construction Status: K&K continued subsoil decompaction and topsoil restoration north of County Road 9/135th Street². Hodgman Drainage Company, Inc. (Hodgman), subcontractor for K&K, continued drain tile repairs between County Road 9/135th Street and 140th Street. K&K continued removal of buried timber mats and broken laminated mats from the project site. K&K completed lowering-in 36-inch-diameter mainline pipe between milepost (MP) 31.2 and MP 34.2. K&K completed the final mainline trench tie-in for the E-Line extension. K&K continued backfilling the trench north of 140th Street. K&K continued grading subsoil south of 165th Street. K&K commenced and completed filling the E-line extension with hydrostatic test water. K&K successfully completed an eight-hour hydrostatic pressure test for the E-line extension. K&K

¹ The total pipeline length of the Farmington to Hugo C-line extension was reduced from 1.91 miles to 1.90 miles as described in Northern's implementation plan and response to the conditions of the order (condition 5) filed with the Federal Energy Regulatory Commission (FERC) March 6, 2025.

² County Road 9 is also referred to as 135th Street.

completed removal of hydrostatic test water from the E-line extension. K&K completed installation of two launcher/receivers, one for the north end and one for the south end, of the E-line extension. K&K completed pushing a calibration pig through the E-line extension. K&K commenced mechanical excavation for the valve setting removal north of County Road 9/135th Street. K&K commenced backfill of the bell hole south of County Road 9/135th Street.

Construction Modifications:

No construction modifications occurred during this reporting period.

Stream Crossings and Environmentally Sensitive Areas

No stream crossings or other environmentally sensitive areas were impacted during this reporting period.

Rain Events

No rain event of 0.50 inch or greater occurred during this reporting period. To date, the project has received 34.99 inches of precipitation.

Lake Mills to Albert Lea E-line Construction Progress			
Activity	Start Date	Completed	Notes
Survey	4/16/2025	99%	Survey is ongoing
Clearing	N/A	N/A	N/A
Grading	4/21/2025	5/30/2025	Grading is complete
Stringing	5/5/2025	5/19/2025	Stringing is complete
Welding	5/16/2025	99%	Welding is ongoing
Ditching	6/6/2025	99%	Ditching is ongoing
Lower-in	6/6/2025	98%	Lowering-in is ongoing
Backfill	6/6/2025	94%	Backfill is ongoing
Topsoil Restoration	9/27/2025	18%	K&K continued topsoil restoration
Removal of existing E-line tie-over valve setting	5/15/2025	15%	K&K completed excavation
New Lake Mills tie-in valve setting	6/15/2025	15%	K&K completed excavation
Clean-up			
Seeding	6/17/2025	20%	Seeding is ongoing
*Completed totals include either percentage completed or date all completed. All totals are approximate.			

Two-Week Projection

1. Continue sandblasting and coating
2. Complete trenching
3. Complete lowering-in
4. Complete backfill
5. Complete drain tile repairs
6. Continue restoration
7. Dispose of hydrostatic test water
8. Remove existing E-line tie-over valve setting
9. Install new Lake Mills tie-in valve setting

Lake Mills to Albert Lea E-line Related Spill

K&K had two hydrostatic pressure test spills during this reporting period. On October 5, 2025, K&K spilled approximately 500 gallons of hydrostatic pressure test water to the subsoil. K&K was in the process of

filling the newly installed pipe with water for a hydrostatic pressure test. While pushing water and a pig from north to south, K&K added a fire hose to direct water into a frac tank and failed to secure the hose to the hatchway at the top of the tank. The pressure from the water and air ahead of the pig caused the hose to come out of the tank. It took approximately one minute to shut down the pumps at the north end.

On October 7, 2025, K&K spilled approximately 160 gallons of hydrostatic pressure test water to subsoil. K&K was in the process of draining the pipe after a successful hydrostatic pressure test. While pushing water and a pig from south to north, the fill pipe hanging on the side of the lake tank came off following the burst of air when the pig reached the north end. The hose fill pipe has been secured. The water infiltrated into the soil within the workspace. The spills were reported to the Minnesota Duty Officer and photos have been provided to the Minnesota Pollution Control Agency (MPCA). The photos provided to the MPCA are included at the end of the Lake Mills photo section of this report.

Elk River 3rd Branch Line

Northern will construct and operate an approximately 2.42-mile extension of its 30-inch-diameter MNB87703 Elk River 3rd branch line in Washington County, Minnesota. The new extension will be tied in below ground approximately 260 feet north of the current terminus in Section 36, T32N, R21W, Washington County, Minnesota; the existing aboveground valve setting located on the east side of July Avenue in Section 36, T32N, R21W, Washington County, Minnesota, will be removed. The downstream tie-in to both Northern's 20-inch-diameter MNB87701 Elk River branch line and 20-inch-diameter MNB87702 Elk River loop will be completed with a new valve setting at the west side of Henna Avenue North in Section 3, T31N, R21W, Washington County, Minnesota.

Environmental Training

One contractor will construct the Elk River 3rd branch line extension. The environmental training totals listed below reflect all training conducted to date for this component.

On-site Contractor: Otis Minnesota Services, LLC (Otis)

Overall Construction Start Date: Commenced April 24, 2025

Environmental Training Conducted³: This reporting period: 0 Total to date: 90

Construction Status:

Otis continued stringing, bending, welding and coating the line pipe. Mears Group Inc. (Mears), a third-party horizontal directional drill (HDD) sub-contractor for Otis, continued the removal of the bore pipe on HDD P4-5 due to the bore pipe hanging up during the pull back. On October 7, 2025, the removal of the bore pipe was successful; however, a new subsidence occurred in ERT-W34 (see discussion below in agency communication section). Otis completed trench backfill from MP 2.13 to MP 2.15. Otis completed restoration from MP 1.67 to MP 1.9. Otis commenced road approach restoration near MP 1.91, MP 3.29 and MP 3.4 and Otis commenced erosion control device (ECD) removal where restoration has been completed.

The HDD noise report is attached. All sound levels are recorded as dBA.

Construction Modifications: There were no construction modifications during this reporting period.

³ The same contractor and crews are constructing the Elk River 3rd branch line and Farmington-to-Hugo C-Line extension projects. The numbers reflect the training provided to the one contractor and any subcontractors; however, are double counted between the two projects.

Stream Crossings and Environmentally Sensitive Areas

Removal of HDD P4-5 bore pipe occurred under Wetlands ERT-W34 and ERT-W35 and stream ERT-S01 during this reporting period.

Rain Events

No rain event of 0.50 inch or greater occurred during this reporting period. To date the project has received 23.15 inches of precipitation.

Elk River 3rd Branch Line Construction Progress			
Activity	Start Date	Completed	Notes
Survey	4/10/2025	5/2/2025	Primary survey is complete
Clearing	4/28/2025	5/10/2025	Clearing is complete
Grading	5/6/2025	6/7/2025	Grading is complete
Stringing	5/15/2025	6/21/2025	Stringing is complete
Welding	5/16/2025	78%	Welding is ongoing
Ditching	7/9/2025	45%	Otis continued ditching
HDD ERT P4-1	9/6/2025	9/24/2025	North Country completed the HDD
HDD ERT P4-2	7/15/2025	8/15/2025	Mears completed the HDD
HDD ERT P4-3	5/22/2025	6/14/2025	Mears completed the HDD
HDD ERT P4-4	9/6/2025	9/12/2025	North Country completed the HDD
HDD ERT P4-5	6/20/2025	0%	Mears extracted the HDD pipe 10/7/2025
HDD ERT P4-6	6/20/2025	6/25/2025	Mears completed the HDD
HDD ERT P4-7	7/01/2025	7/3/2025	Mears completed the HDD
Lower-in	7/9/2025	45%	Otis continued lowering-in
Backfill	7/9/2025	45%	Otis continued backfill
Topsoil Restoration	7/28/2025	30%	Otis continued restoration
Existing Elk River tie-over valve setting to be removed			
New Elk River tie-in valve setting			
Clean-up	10/1/2025	10%	Otis commenced cleanup
Seeding	10/1/2025	25%	Otis commenced seeding
*Completed totals include either percentage completed or date all completed. All totals are approximate.			

Two-Week Projection

1. Continue welding, sandblasting and coating
2. Continue stopple bypass at MP 1.0
3. Continue ditching, lowering-in and backfill
4. Continue restoration
5. Review installation of P4-5 pipe

Elk River 3rd Branch Line Related Spill

No spills occurred during this reporting period.

Farmington to Hugo C-Line Extension

Northern will construct and operate a non-contiguous 1.90-mile extension of its 30-inch-diameter Farmington to Hugo C-line in Washington County, Minnesota. The new extension will be tied in below ground within Northern's existing Hugo compressor station in Section 6, T31N, R20W, Washington County, Minnesota. The downstream tie-in to Northern's 24-inch-diameter MNM86501 B-line will be

completed at a new below-ground⁴ valve setting in Section 7, T31N, R20W, Washington County, Minnesota.

Environmental Training

One contractor will construct the Farmington to Hugo C-line extension and associated aboveground facilities. The environmental training totals listed below reflect all training conducted to date for this component.

On-site Contractor: Otis Minnesota Services, LLC (Otis)

Overall Construction Start Date: May 3, 2025

Environmental Training Conducted⁴: This reporting period: 0 Total to date: 90

Construction Status:

Otis continued backfill and completed tie-ins within the Hugo compressor station. Otis continued stringing and welding line pipe. Otis continued sandblasting line and bore pipe. Otis continued ditching and lowering-in. Otis commenced restoration of the topsoil. Otis completed restoration of wetland FRM-W13.

Construction Modifications: There were no construction modifications during this reporting period.

Stream Crossings and Environmentally Sensitive Areas

Wetland FRM-W13 was crossed by open cut methods and restored during this reporting period.

Rain Events

No rain event of 0.50 inch or greater occurred during this reporting period. To date the project has received 23.12 inches of precipitation.

Farmington to Hugo C-Line Construction Progress			
Activity	Start Date	Completed	Notes
Survey	4/26/2025	5/5/2025	Survey is complete
Clearing	5/3/2025	5/9/2025	Clearing is complete
Grading	6/9/2025	8/15/2025	Grading is complete
Stringing	6/18/2025	96%	Stringing is ongoing
Welding	6/20/2025	98%	Welding is ongoing
Ditching	7/24/2025	80%	Otis continued ditching
HDD FAR P4-1	8/19/2025	9/17/2025	North Country completed HDD
HDD FAR P4-2	8/26/2025	9/26/2025	North Country completed HDD
Lower-in	7/24/2025	80%	Otis continued lowering-in
Backfill	7/28/2025	80%	Otis continued backfill
Topsoil Restoration	7/1/2025	20%	Topsoil restoration will resume after HDDs are complete
Hugo compressor station launcher and valves	5/22/2025	95%	Otis continued backfill and tie-ins
Farmington tie-over valve setting	6/17/2025	80%	Otis completed testing
Clean-up			
Seeding			
*Completed totals include either percentage completed or date all completed. All totals are approximate.			

⁴ As described in Northern's implementation plan and response to the conditions of the order (condition 5) filed with FERC March 6, 2025, the new downstream valve setting for the Farmington to Hugo C-line extension will be below ground in accordance with the landowner's request rather than aboveground as originally proposed.

Two-Week Projection

1. Continue backfill in the Hugo compressor station
2. Continue stringing
3. Continue welding
4. Continue sandblasting and coating
5. Continue ditching
6. Continue lowering-in
7. Continue backfill
8. Continue restoration

Farmington to Hugo C-line Related Spill Totals

No spills occurred during this reporting period.

Tomah Branch Line Loop

Northern constructed and is operating an approximately 1.28-mile extension of its 8-inch-diameter WIB11902 Tomah branch line loop in Monroe County, Wisconsin. The new extension was tied in below ground to the current terminus of the Tomah branch line loop in Section 1, T17N, R4W, Monroe County, Wisconsin, and the existing tie-in valve setting and receiver facility at this location were removed. The down-stream tie-in to Northern's 6-inch-diameter WIB11901 branch line is located in Section 6, T17N, R3W, Monroe County, Wisconsin.

Environmental Training

One contractor constructed the Tomah branch line loop.

On-site Contractor: K & K, Inc. (K&K)

Overall Construction Start Date: Commenced May 12, 2025

Construction Status: K&K continued restoring topsoil. K&K continued harley raking, drill seeding and mulching the right of way (ROW). K&K continued removal of road approaches. K&K continued cleaning up construction debris from the staging area. K&K continued hauling off mats, skids and equipment from staging area. K&K commenced installation of erosion control blankets (ECBs) in roadside ditches where road approaches were removed. K&K completed installation of pipeline markers.

FERC granted approval to place the Tomah branch line loop extension into service on September 24, 2025; the pipeline extension was placed in service September 30, 2025.

Construction Modifications: There were no construction modifications during this reporting period.

Stream Crossings and Environmentally Sensitive Areas

No stream crossings or other environmentally sensitive areas were impacted during this reporting period.

Rain Events

One rain event of 0.50 inch or greater occurred during this reporting period. One rain event of 0.70 inch occurred October 7, 2025. To date, the project has received 30.20 inches of precipitation.

Tomah Branch Line Loop Construction Progress			
Activity	Start Date	Completed	Notes
Survey	4/22/2025	98%	Survey is ongoing
Clearing	5/14/2025	5/23/2025	Clearing is complete
Grading	5/16/2025	8/2/2025	Grading is complete
Stringing	6/2/2025	7/9/2025	Stringing is complete
Welding	6/3/2025	8/23/2025	Welding is complete
Ditching	7/9/2025	8/4/2025	Ditching is complete
HDD TBL P4-1	7/15/2025	7/16/2025	P4-1 is complete
HDD TBL P4-2	7/7/2025	7/12/2025	P4-2 is complete
Lower-in	7/10/2025	8/4/2025	Lowering-in is complete
Backfill	7/14/2025	8/30/2025	Backfill is complete
Topsoil Restoration	8/9/2025	99%	Restoration ongoing
Remove Tomah branch line loop receiver facility	6/11/2025	8/23/2025	K&K completed removal at receiver site
Remove Tomah Tie-over valve setting	6/12/2025	8/23/2025	K&K completed removal of valve setting
Clean-up	8/9/2025	99%	Clean-up ongoing
Seeding	8/14/2025	99%	Seeding ongoing
*Completed totals include either percentage completed or date all completed. All totals are approximate.			

Two-Week Projection

1. Complete restoration
2. Complete clean-up
3. Complete seeding
4. Complete demobilization

La Crescent Compressor Station

Northern completed minor aboveground facility modifications within its existing La Crescent compressor station facility. The facility modifications consisted of the replacement of the current blind flanges with compressor cylinder end caps.

Archrock Services LP (Archrock) made the modifications at the La Crescent compressor station.

Construction Status: Construction was completed August 27, 2025. FERC granted Northern's request to place the facility in service September 15, 2025. The modifications were placed in service September 26, 2025.

La Crescent Compressor Station Modifications Construction Progress			
Activity	Start Date	Completed	Notes
Compressor modifications	7/22/2025	8/27/2025	Compressor modifications are complete
*Completed totals include either percentage completed or date all completed. All totals are approximate.			

PROJECT-WIDE AGENCY COMMUNICATIONS AND SITE VISITS

On October 5 and 7, 2025, Northern reported two hydrostatic pressure test water spills to the Minnesota Duty Officer as discussed above in the Lake Mills-to-Albert Lea E-line extension section. On October 9, 2025, the MPCA called requesting additional information, including photographs. Northern provided the requested photographs October 10, 2025; as noted above, the photographs provided to the MPCA are included at the end of the Lake Mills photo section of this report.

On October 1, 2025, Northern filed notice of in-service for the modifications at the La Crescent compressor station (in service September 26, 2025) and the Tomah branch line loop extension (in service September 30, 2025).

On October 8 and 10, 2025, Northern discussed remediation of subsidence areas and potential methods for completion of the P4-5 HDD on the Elk River 3rd branch line with Minnesota Department of Natural Resources (MDNR) staff. On October 13, 2025, Northern submitted a two-step plan to the MDNR area hydrologist to stabilize the HDD hole per Northern's HDD plan and a wetland restoration plan for the subsidence in wetland ERT-W34; MDNR approval was received October 14, 2025 (see attached correspondence). Northern is developing a variance request to file with FERC seeking approval for additional workspace to restore the subsidence areas.

PROJECT-WIDE LANDOWNER CONCERNS

No project-wide landowner concerns were raised during this reporting period.

PROJECT-WIDE NON-COMPLIANCE CONCERNS

No project-wide non-compliance concerns were raised during this reporting period.

PHOTOS

Lake Mills to Albert Lea E-line



Facing south at MP 31.5, K&K restoring topsoil to grade south of County Road 9/135th Street



Facing south at MP 31.95, topsoil brought to grade south of 140th Street



Facing north at MP 31.7, topsoil brought to grade south of 140th Street



Facing south at MP 31.45, topsoil brought to grade south of 140th Street



Facing west at MP 31.63, completed a drain tile repair



Facing southwest at MP 33.7, K&K lowering-in a four-joint section of mainline pipe south of 165th Street



Facing southwest at MP 31.8, K&K bringing subsoil to grade south of 140th Street



Facing southwest at MP 33.7, K&K completing a mainline trench tie-in weld



Facing southeast at MP 31.8, K&K backfilling trench north of 140th Street



Facing north at MP 34.2, hydrostatic test in progress with secondary containment in place for dewatering line connection



Facing southwest at MP 34.2, dewatering hydrostatic test water to lake tank



Facing northeast at MP 34.2, K&K installing launcher/receiver north of 165th Street



Facing northeast at MP 31.2, foam pig that will be used to remove remaining hydrostatic test water from mainline



Facing north at MP 31.2, K&K hand excavating near valve setting

As discussed above, the following photos for Lake Mills were provided to the MPCA regarding hydrostatic pressure test water spills



Facing north at Milepost 31.2, north of County Highway 9/135th Street, spilled hydrostatic pressure test water within the topsoiled ROW, did not leave silt fenced perimeter, October 5, 2025



Facing north at Milepost 31.2, north of County Highway 9/135th Street, closer view of spilled hydrostatic pressure test water within the topsoiled ROW, recently excavated and stabilized subsoil piles in background, October 5, 2025



Hose that came out of frac tank has been secured to the hatch



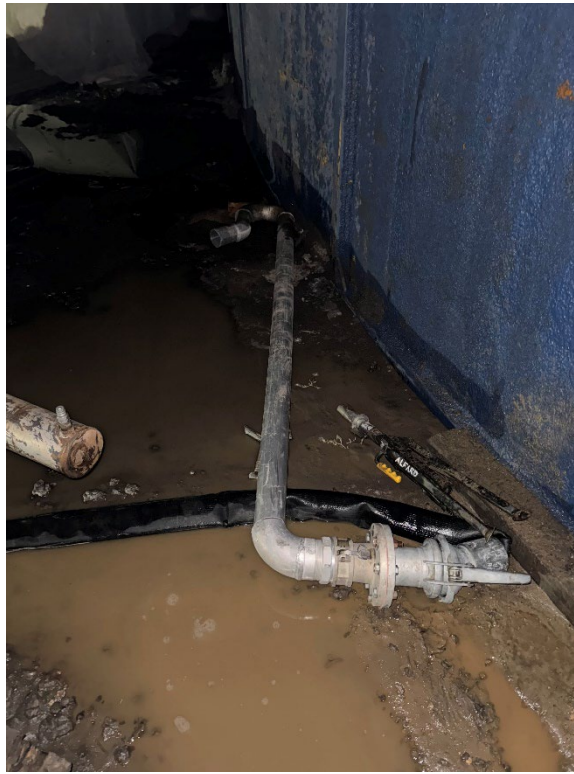
Facing south at Milepost 31.2, north of County Highway 9/135th Street, origin point of the hose that came out of the tank, during filling of the pipe October 5, 2025



Facing north at MP 31.2, north of County Highway 9/135th Street, majority of the water has infiltrated into the ground and the frac tank relocated



Facing northwest at MP 34.2, north of 165th Street, spilled hydrostatic pressure test water within the topsoiled ROW, did not leave silt fenced perimeter, during draining of the pipe October 7, 2025



Facing west at Milepost 34.2, north of 165th Street, discharge pipe that shook off the rim of the lake tank resulting in the hydrostatic pressure test spill October 7, 2025



Facing northwest at Milepost 34.2, north of 165th Street, majority of water has infiltrated into the ground, contractor has lashed discharge piping to lake tank



Facing northwest at Milepost 34.2, north of 165th Street, contractor has lashed discharge piping to lake tank



Facing northeast near milepost 34.2, secondary containment build under fill pipes and hose connections

Elk River 3rd Branch Line



Facing east near MP 1.9, restoration completed



Facing west near MP 2.14, ECD removal ongoing



Facing west near MP 2.15, restoration completed



Facing east near MP 3.25, topsoil decompaction commenced



Facing north near MP 3.4, road approach restoration commenced



Facing east near MP 2.13, backfill ongoing



Facing east HDD P4-5 bore pipe extraction was completed

Farmington-Hugo C-Line Extension



Facing north at MP 1.52, view of Otis commencing restoration of the topsoil



Facing north at MP 1.52, view of Otis continuing restoration of the topsoil



Facing north at MP 1.41, view of Otis ditching



Facing north at MP 1.38, view of Otis backfilling the wetland (FRM-W13) from timber mats



Facing west at MP 1.4, view of Otis reinstalling the redundant silt fence after completing wetland (FRM-W12) restoration



Facing north at MP 1.45, view of Otis lowering-in pipe



Facing east MP 0.01, view of Otis completing the last tie-in at the Hugo compressor station



Facing east at MP 0.01, view of Otis backfilling with compaction in the Hugo compressor station

Tomah Branch Line Loop



Facing west near MP 2.53, K&K installing pipeline markers



Facing south near MP 3.5, K&K installing ECBs at entrance to staging area



Facing west on west side County Road B, K&K crimping in straw



Facing east near MP 3.5, K&K drill seeding cover crop



Facing north on west side County Road B, K&K mulching row



Environmental Procedure
Appendix M: Horizontal Directional Drill Daily Report

380.203m
1 of 1

Project: NL25 Elk River 3rd BL Extension

WO: 1146979

Drill:	P4-5	Date:	10/2/2025	Footage:	183 Feet	Depth:	N/A	Phase:	Extraction
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Drilling Fluids:	MAXGEL	Approved by DES	Yes
	Water	Approved by DES	Yes
	Soda Ash Right Turn Supply, Drill-Plex HDD, Platinum Pac UL, Clay Crusher, Seal Force, Magma Fiber		Approved by DES

Person Walking Drill Path	Michael Hussong	Role	El	Frequency	Hourly	IR Detected	No
	Andre Burgess		Contractor		Continuously		
	Zach Miller		Contractor		Hourly		

NSA#	Time	1:00	3:00	5:00	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	Daytime Average	Nighttime Average
NSA-28		N/A	N/A	N/A	N/A	40.8	53.3	46.4	N/A	45.8	N/A	N/A	N/A	46.58	
NSA-29		N/A	N/A	N/A	N/A	41.1	48.6	45.1	N/A	44.3	N/A	N/A	N/A	44.78	
NSA-32		N/A	N/A	N/A	N/A	41.3	58.8	44.8	N/A	57.2	N/A	N/A	N/A	50.53	
NSA-33		N/A	N/A	N/A	N/A	41.8	57.0	42.6	N/A	58.6	N/A	N/A	N/A	50.00	

The daily footage pulled back into the exit pit on HDD drill P4-5 was 183 feet today. Mears HDD continued the pullback on HDD drill P4-5 today, ending the day with 183 feet pulled back into the exit pit.



Environmental Procedure
Appendix M: Horizontal Directional Drill Daily Report

380.203m
1 of 1

Project: NL25 Elk River 3rd BL Extension

WO: 1146979

Drill:	P4-5	Date:	10/3/2025	Footage:	4 Feet	Depth:	N/A	Phase:	Extraction
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Drilling Fluids:	MAXGEL	Approved by DES	Yes
	Water	Approved by DES	Yes
	Soda Ash Right Turn Supply, Drill-Plex HDD, Platinum Pac UL, Clay Crusher, Seal Force, Magma Fiber		Approved by DES

Person Walking Drill Path	Michael Hussong	Role	El	Frequency	Hourly	IR Detected	No
	Andre Burgess		Contractor		Continuously		
	Zach Miller		Contractor		Hourly		

NSA#	Time	1:00	3:00	5:00	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	Daytime Average	Nighttime Average
NSA-28		N/A	N/A	N/A	N/A	41.3	42.3	43.6	36.8	38.1	N/A	N/A	N/A	40.42	
NSA-29		N/A	N/A	N/A	N/A	43.4	40.1	42.4	35.3	36.7	N/A	N/A	N/A	39.58	
NSA-32		N/A	N/A	N/A	N/A	45.8	37.2	39.6	43.4	41.6	N/A	N/A	N/A	41.52	
NSA-33		N/A	N/A	N/A	N/A	49.1	39.4	42.8	47.0	45.3	N/A	N/A	N/A	44.72	

The daily footage pulled back into the exit pit on HDD drill P4-5 was 4 feet today. Mears HDD continued the pullback on HDD drill P4-5 today, ending the day with 4 feet pulled back into the exit pit.



Environmental Procedure
Appendix M: Horizontal Directional Drill Daily Report

380.203m
1 of 1

Project: NL25 Elk River 3rd BL Extension

WO: 1146979

Drill:	P4-5	Date:	10/4/2025	Footage:	176 Feet	Depth:	N/A	Phase:	Extraction
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Drilling Fluids:	MAXGEL	Approved by DES	Yes
	Water	Approved by DES	Yes
	Soda Ash Right Turn Supply, Drill-Plex HDD, Platinum Pac UL, Clay Crusher, Seal Force, Magma Fiber		Approved by DES

Person Walking Drill Path	Michael Hussong	Role	El	Frequency	Hourly	IR Detected	No
	Andre Burgess		Contractor		Continuously		
	Zach Miller		Contractor		Hourly		

NSA#	Time	1:00	3:00	5:00	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	Daytime Average	Nighttime Average
NSA-28		N/A	N/A	N/A	N/A	44.6	43.4	49.1	50.3	N/A	N/A	N/A	N/A	46.85	
NSA-29		N/A	N/A	N/A	N/A	41.8	44.6	48.7	49.8	N/A	N/A	N/A	N/A	46.23	
NSA-32		N/A	N/A	N/A	N/A	46.3	45.2	50.6	48.4	N/A	N/A	N/A	N/A	47.63	
NSA-33		N/A	N/A	N/A	N/A	45.5	47.8	49.9	52.6	N/A	N/A	N/A	N/A	48.95	

Today, the HDD drill P4-5 pulled back 176 feet into the exit pit. Windy conditions with gusts up to 20 mph affected sound monitoring.



Environmental Procedure
Appendix M: Horizontal Directional Drill Daily Report

380.203m
1 of 1

Project: NL25 Elk River 3rd BL Extension

WO: 1146979

Drill:	P4-5	Date:	10/6/2025	Footage:	381 Feet	Depth:	N/A	Phase:	Extraction
--------	------	-------	-----------	----------	----------	--------	-----	--------	------------

Drilling Fluids:	MAXGEL	Approved by DES	Yes
	Water	Approved by DES	Yes
	Soda Ash Right Turn Supply, Drill-Plex HDD, Platinum Pac UL, Clay Crusher, Seal Force, Magma Fiber		Approved by DES

Person Walking Drill Path	Michael Hussong	Role	El	Frequency	Hourly	IR Detected	No
	Andre Burgess		Contractor		Continuously		
	Zach Miller		Contractor		Hourly		

NSA#	Time	1:00	3:00	5:00	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	Daytime Average	Nighttime Average
NSA-28		N/A	N/A	N/A	N/A	40.1	43.6	44.9	42.5	41.3	N/A	N/A	N/A	42.48	
NSA-29		N/A	N/A	N/A	N/A	43.4	41.1	43.6	45.3	44.2	N/A	N/A	N/A	43.52	
NSA-32		N/A	N/A	N/A	N/A	42.6	43.3	47.3	48.1	46.1	N/A	N/A	N/A	45.48	
NSA-33		N/A	N/A	N/A	N/A	41.8	44.2	52.0	49.6	48.7	N/A	N/A	N/A	47.26	

Today, the HDD drill P4-5 pulled back 381 feet into the exit pit. Extraction will continue tomorrow morning after 9:00 AM.



Environmental Procedure
Appendix M: Horizontal Directional Drill Daily Report

380.203m
1 of 1

Project: NL25 Elk River 3rd BL Extension

WO: 1146979

Drill:	P4-5	Date:	10/7/2025	Footage:	847 Feet	Depth:	N/A	Phase:	Extraction
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Drilling Fluids:	MAXGEL	Approved by DES	Yes
	Water	Approved by DES	Yes
	Soda Ash Right Turn Supply, Drill-Plex HDD, Platinum Pac UL, Clay Crusher, Seal Force, Magma Fiber		Approved by DES

Person Walking Drill Path	Michael Hussong	Role	EI	Frequency	Hourly	IR Detected	No
	Andre Burgess		Contractor		Continuously		
	Zach Miller		Contractor		Hourly		

NSA#	Time	1:00	3:00	5:00	7:00	9:00	11:00	13:00	15:00	17:00	19:00	21:00	23:00	Daytime Average	Nighttime Average
NSA-28		N/A	N/A	N/A	N/A	48.3	49.6	N/A	N/A	N/A	N/A	N/A	N/A	48.95	
NSA-29		N/A	N/A	N/A	N/A	46.2	47.5	N/A	N/A	N/A	N/A	N/A	N/A	46.85	
NSA-32		N/A	N/A	N/A	N/A	47.6	49.3	N/A	N/A	N/A	N/A	N/A	N/A	48.45	
NSA-33		N/A	N/A	N/A	N/A	49.3	54.8	N/A	N/A	N/A	N/A	N/A	N/A	52.05	

Today, the HDD drill P4-5 pulled back 847 feet into the exit pit. Extraction was completed today of the bore pipe on HDD drill P4-5.

Martens, Donna (Northern Natural Gas)

From: Scollan, Daniel (DNR) <daniel.scollan@state.mn.us>
Sent: Tuesday, October 14, 2025 10:37 AM
To: Noland, Nathan
Cc: Knabe, Susan; Plucker, Terry (Northern Natural Gas)
Subject: RE: Northern Natural Gas - Subsidence in ERT-W34 (public water - 82020700)

Hello Nathan,

I've reviewed the plan, and have no questions or concerns. It is approved. I will save the plan and this approval to the Permit file.

Best Regards,

Dan Scollan

East Metro Area Hydrologist – Ramsey and Washington Counties
Division of Ecological and Water Resources

Minnesota Department of Natural Resources

1200 Warner Road
St. Paul, MN 55106
Phone: 651-259-5732
Fax: 651-772-7977
Email: daniel.scollan@state.mn.us
mndnr.gov



From: Noland, Nathan <Nathan.Noland@stantec.com>
Sent: Monday, October 13, 2025 5:03 PM
To: Scollan, Daniel (DNR) <daniel.scollan@state.mn.us>
Cc: Knabe, Susan <Susan.Knabe@stantec.com>; Plucker, Terry (Northern Natural Gas) <terry.plucker@nngco.com>
Subject: Northern Natural Gas - Subsidence in ERT-W34 (public water - 82020700)

You don't often get email from nathan.noland@stantec.com. [Learn why this is important](#)

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Dan, as we discussed on the phone on Friday, attached is the draft restoration plan for restoring the area in wetland ERT-W34 (Public Water unnamed wetland 82020700) where subsidence occurred during construction on the Northern Lights 2025 – Elk River 3rd Branch Line Project. The subsidence in this wetland formed on October 7, 2025, as the stuck horizontal directional drill (HDD) pipe was removed underneath the wetland (see attached figure for location of event). All

HDD activities have been halted, and the HDD pipe has been removed from the ground. The subsidence has been stabilized and no additional features have formed within the wetland.

Attached is the draft restoration plan for your review and comments, or approval to allow Northern's contractor to restore the area as described within the draft plan. Once you have been able to review the plan we would like to setup a virtual meeting to discuss any comments and/or questions you might have, as necessary.

Thank you for your time and we will look for your feedback. If a meeting is needed to discuss questions or comments you have we would like to set that up this week in order to expedite initiation of restoration activities onsite.

Nathan

Environmental Scientist

Direct: (763) 479 4228

nathan.noland@stantec.com

Stantec

One Carlson Parkway North, Suite 100, Plymouth MN 55447-4440, United States



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V:\1726\Active\172608212\03_data\gis_cad\gis\mxd\172608212_NL2025_Delineation_Report\172608212_NL2025_Delineation_Report.aprx Revised: 2025-02-06 By: jnarty

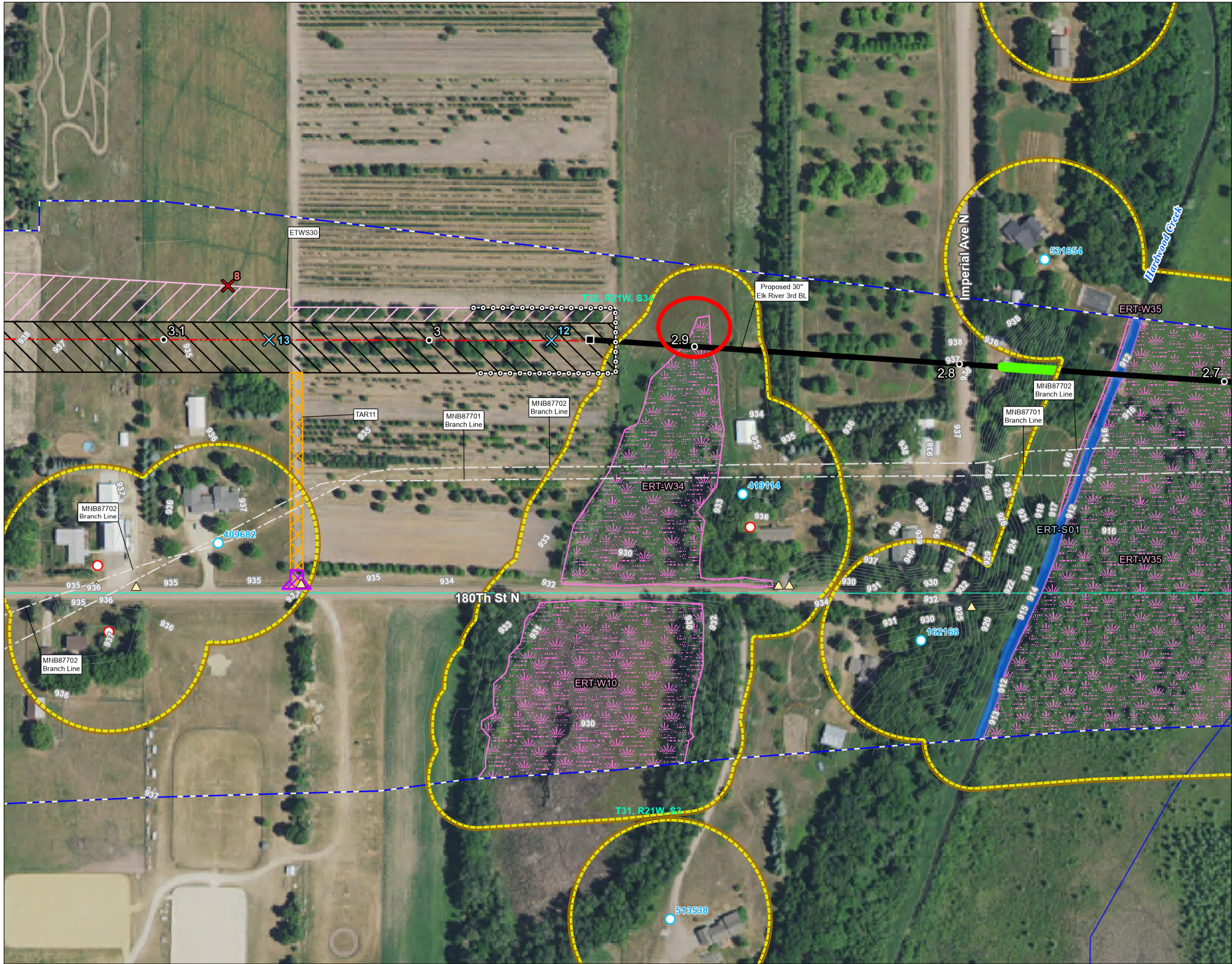
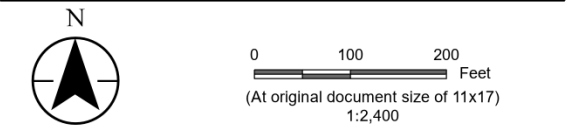


Figure No. 1
Title Erosion Control Plan
Client/Project Northern Natural Gas
Northern Lights 2025 Expansion Project
Wetland Delineation - Elk River 3rd BL Extension
Project Location Washington Co., MN
Prepared by DJG on 2023-12-11
TR by SF on 2023-12-19
IR by SK on 2025-01-15

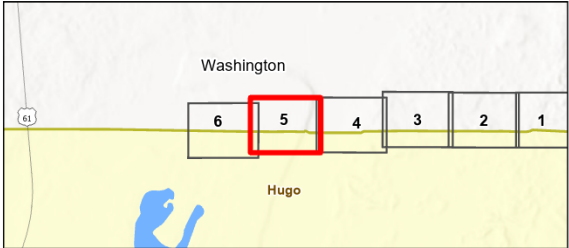


- Legend
- Milepost
 - HDD Entry/Exit
 - Environmental Survey Boundary
 - Extra Temporary Workspace
 - Temporary Access Road
 - Temporary Workspace
 - Proposed Centerline
 - HDD Segment
 - Existing Centerline
 - 1ft Contour Elevation Line
 - 5-15 Percent Slope*
 - Well Location
 - Culvert
 - Field Delineated Waterway Area
 - Field Delineated Wetland
 - Dewatering Installation
 - Dewatering Discharge
 - Silt Fence
 - Tracking Pad
 - Refueling Hazardous Liquid Storage Exclusion Zone
 - National Hydrography Dataset / DNR 24k Hydrography
 - Perennial Stream
 - Intermittent Stream
 - Waterbody

*Percent slope only displayed within 10 feet of centerline and slope 5% or greater.

Erosion Control Notes:

- Erosion control devices and tracking pad locations will be determined in the field by the EI and contractor, based on site conditions and safety.
- Slope breakers and other BMPs will be installed in areas with slopes greater than 5%.
- Erosion mats may be used during final restoration in areas with slopes greater than 5%.
- Dewatering locations may be determined in the field by the EI as needed.
- Silt fence that crosses the centerline will be in place prior to and post-excavation activities.



Notes

- Coordinate System: NAD 1983 UTM Zone 15N
- Data Sources: Stantec, NNG, NADS, USGS, WDNR, MnDNR
- Background: 2021 NAIP



Preliminary Grouting Plan for Elk River HDD P4-5 Near the Public Water Wetland

The current horizontal directional drill (HDD) crossing of Hardwood Creek, Corrie's Swamp and MN Public Water Wetland 82020700 was unsuccessful. Prior to the start of the HDD, Northern obtained a Minnesota Department of Natural Resources (MDNR) Public Waters Work Permit # 2025-0663 for the HDD crossing.

During the HDD drilling activities, several small subsidence features formed on the exit side of the drill (west side) and one subsidence feature formed near the entry side (east side). All HDD activities have been halted and the HDD pipe has been removed from the ground. The subsidence features have stabilized and no additional features have formed.

All subsidence areas are in an upland with the exception of one approximately 11-foot by 8-foot area in ERT-W34, which is MDNR public water wetland 82020700. Due to safety concerns, personnel have not been able to determine the depth of the subsidence. The subsidence in this wetland formed on October 7, 2025 as the stuck HDD pipe was removed. Below is a screenshot of the subsidence in the wetland area.



Northern has a two-step plan to stabilize and restore this area before resuming any construction and is asking for MDNR to review and approve the summary below.

1. Step one will be to stabilize the current HDD hole as the pipe has been removed. The onsite contractor will install approximately 400 feet of tremie pipe from both the entry and exit sides; they will use a high-viscosity drilling

mud with stabilizers to grout the HDD annular space and reduce future risk of subsidence. The contractor will complete the grouting in stages to ensure the hole is being filled – every 100 feet, they will pump in approximately 40 cubic yards of grout through the tremie line. Once that is filled, the tremie pipe will be pulled back another 100 feet and 40 more cubic yards of grout will be installed. This process will continue until they reach the HDD exit pit. The contractor will fill the HDD exit pit with compacted sand and approximately 12 inches of topsoil.

2. Once the HDD borehole is stabilized, Step 2 will address the surface subsidence restoration in the public water wetland. The onsite contractor will install an approximate 230-foot long by 16-foot wide timber mat road parallel to the subsidence to safely operate equipment to restore the area and minimize further wetland impacts. The contractor will next install sand in several-foot lifts that will be compacted to ensure a solid surface. The upper 18-inches will be backfilled with a combination of topsoil and peat moss (high organic matter content) from a certified vendor/clean fill. Northern will oversee the area with quick oats for winter stabilization and monitor the area next spring. If wetland vegetation does not establish, Northern will overseed the subsidence area with a seed mix comparable to Minnesota Board of Water & Soil Resources (BWSR) Seed Mix #34 -371 from our wetland restoration plan.
3. Upland areas will be restored in a similar fashion with the exception of using only topsoil in the upper 18 inches and a BWSR-approved upland seed mix or landowner requested seed mix.