



Northern Natural Gas Company
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Omaha NE 68103-0330
402 398-7200

October 23, 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 – Additional Extra Temporary Workspace – Elk River 3rd
Branch Line Extension

Dear Ms. Reese:

In accordance with Condition 5 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 additional extra temporary workspace (ETWS) on the Elk River 3rd Branch Line extension (Elk River extension).

Specifically, Northern is requesting approval to utilize a new 230 foot by 16 foot timber mat road (ETWS36), which will be accessed from the temporary workspace at milepost 2.93 (alignment sheet ERT P3-5) and centered over the approved horizontal directional drill (HDD) six-foot-wide travel lane. ETWS36 is located on Tract Numbers WA-079 and WA-081 and will result in a temporary impact of an additional 0.05 acre.

Approval for the proposed ETWS is being requested to remediate and restore subsidence areas which occurred during HDD P4-5 activities on the Elk River extension. As discussed in the biweekly reports, multiple subsidence areas developed along the HDD P4-5 path. The contractor installed silt fence around the subsidence path as a safety precaution. Northern and its contractor closely monitored the subsidence areas for any changes until HDD P4-5 was completed and the subsidence areas could be safely repaired. During HDD P4-5 pullback activities, the pipe got hung up and the contractor was unable to complete pullback activities. The contractor was able to remove the HDD P4-5 pipe from the hole, but as the pipe was pulled from under Wetland ERT-W34 a new subsidence developed within the wetland. The proposed workspace is needed to safely access the subsidence areas and implement the attached grouting plan in accordance with Northern's HDD Plan and remediate and restore the subsidence areas.

Northern Natural Gas Company
Northern Lights 2025 Expansion

The proposed ETWS is located within the environmentally cleared area. Northern consulted with the Minnesota Department of Natural Resources (MN DNR) regarding the grouting and remediation plan to be implemented near/at wetland ERT-W34, and the MN DNR approved the plan (see attached correspondence). The impacted area is located within Conservation Reserve Program land and wetland ERT-W34, no other sensitive resources will be impacted, and no additional agency consultation is required. Northern received written landowner approval from Tract WA-081 on October 16, 2025, and from Tract WA-079 on October 20, 2025, to use the proposed ETWS.

The attached alignment sheets (public and privileged version) depict the proposed ETWS36, which is highlighted with a Delta F3 symbol. The privileged alignment sheet contains confidential information regarding landowner names and has therefore been labeled **“CUI//PRIV ---DO NOT RELEASE (PRIVILEGED).”** Pursuant to 18 CFR Section 388.112, Northern requests confidential and privileged treatment of the privileged alignment sheets due to the confidential nature of the contents.

The person to be contacted regarding the request for privileged and confidential treatment is as follows:

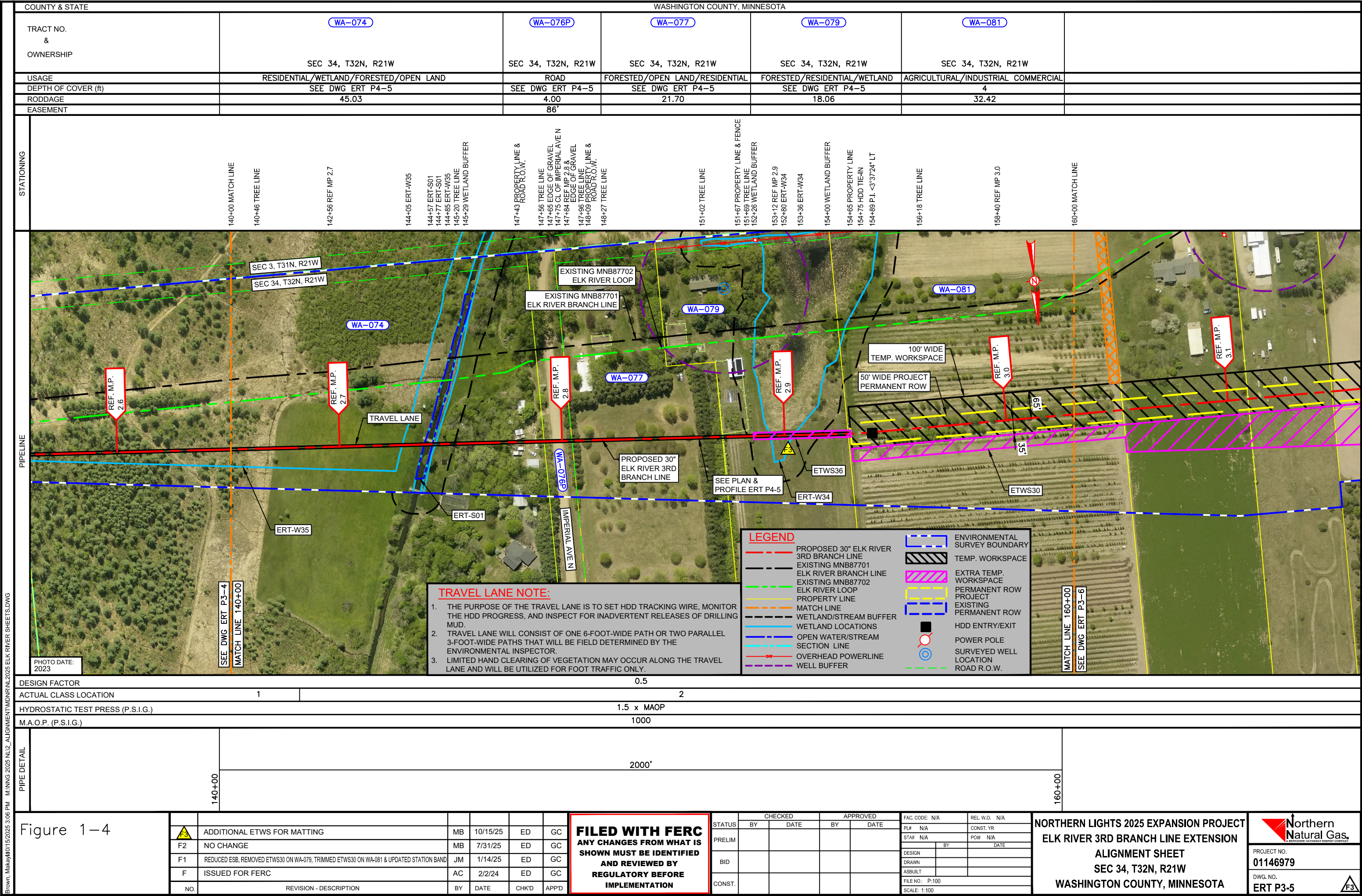
Donna Martens
Senior Regulatory Analyst
Northern Natural Gas Company
1111 South 103rd Street
Omaha, NE 68124-1000
Telephone: 402-398-7138
Email: donna.martens@nngco.com

Northern respectfully requests Commission staff to issue approval as expeditiously as possible, but no later than October 28, 2025, for the proposed extra temporary workspace to safely remediate and restore the subsidence areas on the Elk River extension. 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



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

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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

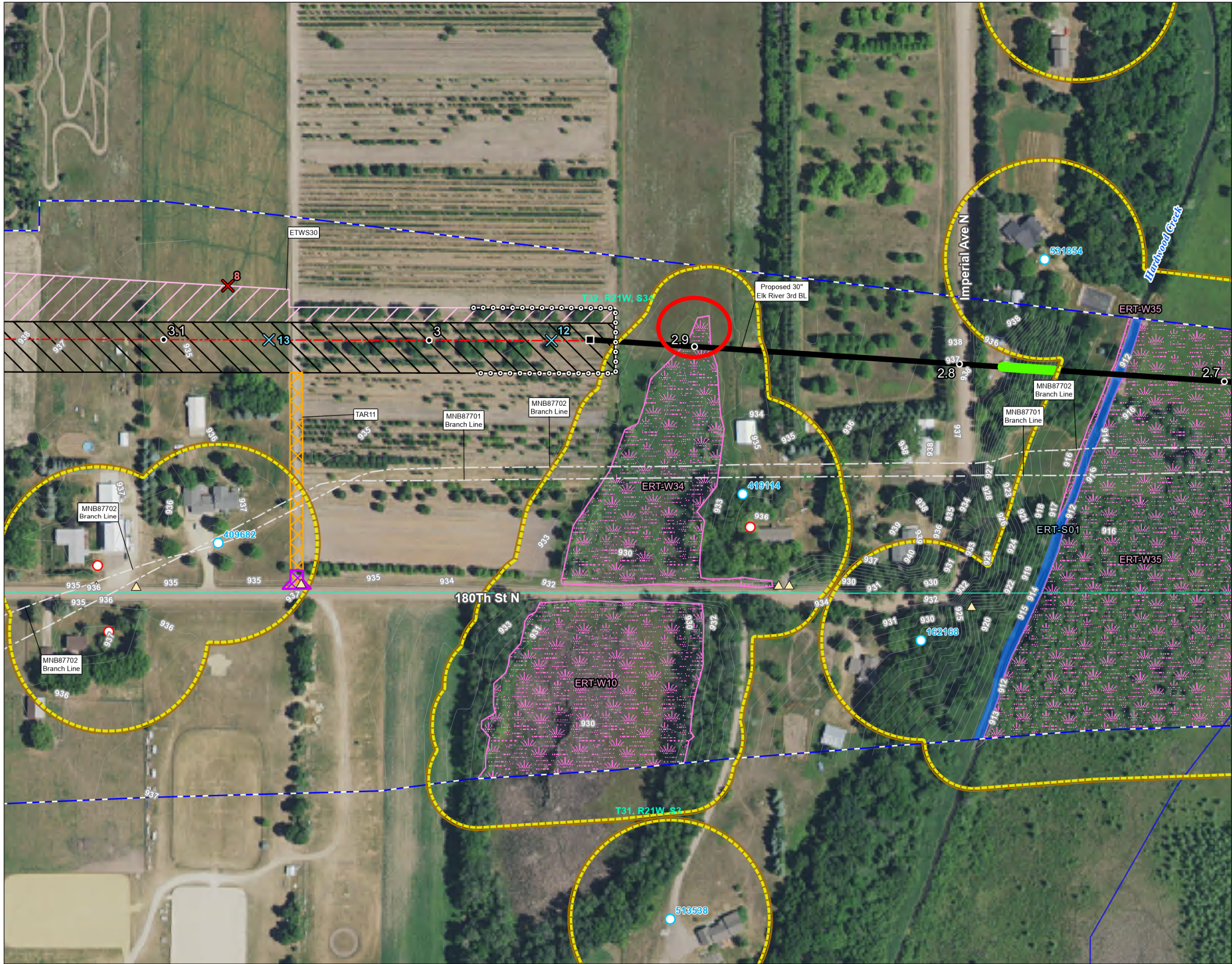
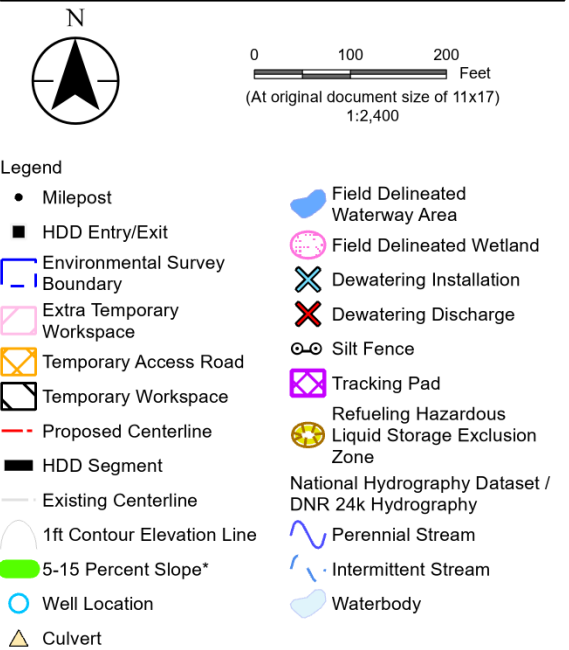


Figure No. 1
Title Erosion Control Plan

Client/Project Northern Natural Gas
Northern Lights 2025 Expansion Project
Wetland Delineation - Elk River 3rd BL Extension

Project Location Washington Co., MN

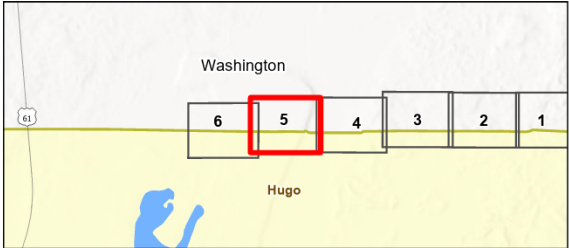
Prepared by DJG on 2023-12-11
TR by SF on 2023-12-19
IR by SK on 2025-01-15



*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.