



FEDERAL ENERGY REGULATORY COMMISSION FIELD INSPECTION REPORT

Date September 23 and 24, 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	
<u>0</u>	Problem Areas
<u>0</u>	Noncompliances
<u>No</u>	Follow-Up Letter Required
<u>No</u>	Refer to Enforcement

Introduction

On September 23 and 24, 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 September 23 and 24, 2025, the weather was partly cloudy in nearby Minneapolis, Minnesota; Tomah, Wisconsin; and Albert Lea, Minnesota. Temperatures ranged from 52°F to 80°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, the Elk River 3rd Branch Line, and the Farmington to Hugo C-Line received approximately 0.5 inch of rain each. The Tomah Branch Line Loop received approximately 6.0 inches of rain the week before the inspection. Soil conditions along the Lake Mills to Albert Lea E-Line ROW were saturated, with ponding in low-lying areas along the entire ROW. Soil conditions along the Elk River 3rd Branch Line and Farmington to Hugo C-Line ranged from saturated to dry, depending upon the soil type. Soil conditions on the Tomah Branch Line Loop ROW were damp but not saturated, due to the sandy soil.

The inspection covered the Lake Mills to Albert Lea E-Line (Photo Numbers [Nos.] 1 through 6), Elk River 3rd Branch Line (Photo Nos. 7 through 10), Farmington to Hugo C-Line (Photo Nos. 11 through 15), and Tomah Branch Line Loop (Photo Nos. 15 through 20).

Lake Mills to Albert Lea E-Line

Overall, soil conditions were wet but stable along higher sections of the ROW, with saturated soils and ponding along low-lying areas, due to the heavy clay soils and the heavy rains throughout the summer. Construction has progressed slowly, with approximately 3,000 feet of pipeline yet to be installed.

At milepost (MP) 31.57, at the southern end of the ROW, rough grading of the subsoil was in progress. The dozer was equipped with a three-tine chisel to drag the ROW to ensure that no equipment mats or skids were left in the muddy subsoil (Photo Nos. 1 and 2). Segregated topsoil remained stabilized with seeded vegetation. At MP 32.15, subsoil had been graded into piles and was being worked to help the ROW dry out (Photo No. 3). At MP 33.85, saturated soils and ponding had temporarily stopped work (Photo No. 4). A drain tile was reinstalled across the ROW at MP 34.0 (Photo No. 5). At the pipe yard and terminus of the ROW, preparations for hydrostatic pressure testing of the line were in progress (Photo No. 6). Overall, the Lake Mills to Albert Lea E-Line ROW was stable, with no erosion, off-ROW impacts, or other environmental concerns were identified.

Elk River 3rd Branch Line

At MP 1.0, the horizontal directional drill (HDD) P4-1 crossing was complete (Photo No. 7). The drilling pad was stabilized with equipment mats, and the sound barriers remained in place. Per NNG, sound readings during drilling were below the limit. The drilling site was organized and stable, with no erosion around the pad and no environmental concerns identified. At MP 2.4, two attempts were made to pull the HDD pullback pipe into the bore, with the pipe becoming lodged both times (Photo No. 8). The second pull was able to reach 1,700 feet before becoming lodged. The HDD pad site remained completely stabilized with equipment mats and was well organized. At MP 3.05, the pullback pipe strings were ready for installation, once the lodged string is removed and the borehole is confirmed (Photo No. 9). At MP 3.0, the pullback pipe string was lodged and unable to be moved (Photo No. 10). Overall, the ROW was stable, topsoil piles were well vegetated, and erosion control devices (ECDs) were maintained. No off-ROW impacts or environmental concerns were identified.

Farmington to Hugo C-Line

At MP 1.72 and the terminus of the Project, the western half of the ROW was restored, leaving the eastern half of the ROW as a travel lane (Photo No. 11). At MP 0.55, the HDD crossing was completed, and the drilling pad was being demobilized (Photo No. 12). At the compressor station at MP 0.22, preparations for tie-in were in progress (Photo No. 13). The existing mainline was exposed for tie-in (Photo No. 14), and water was being pumped from the excavation onto the ROW through a filter bag (Photo Nos. 14 and 15). This water was ponding but remaining within the ROW. At all locations inspected, ECDs were properly installed and maintained, topsoil piles were stabilized with vegetation, and the ROW was stable with no erosion, off-ROW impacts, or other environmental concerns identified.

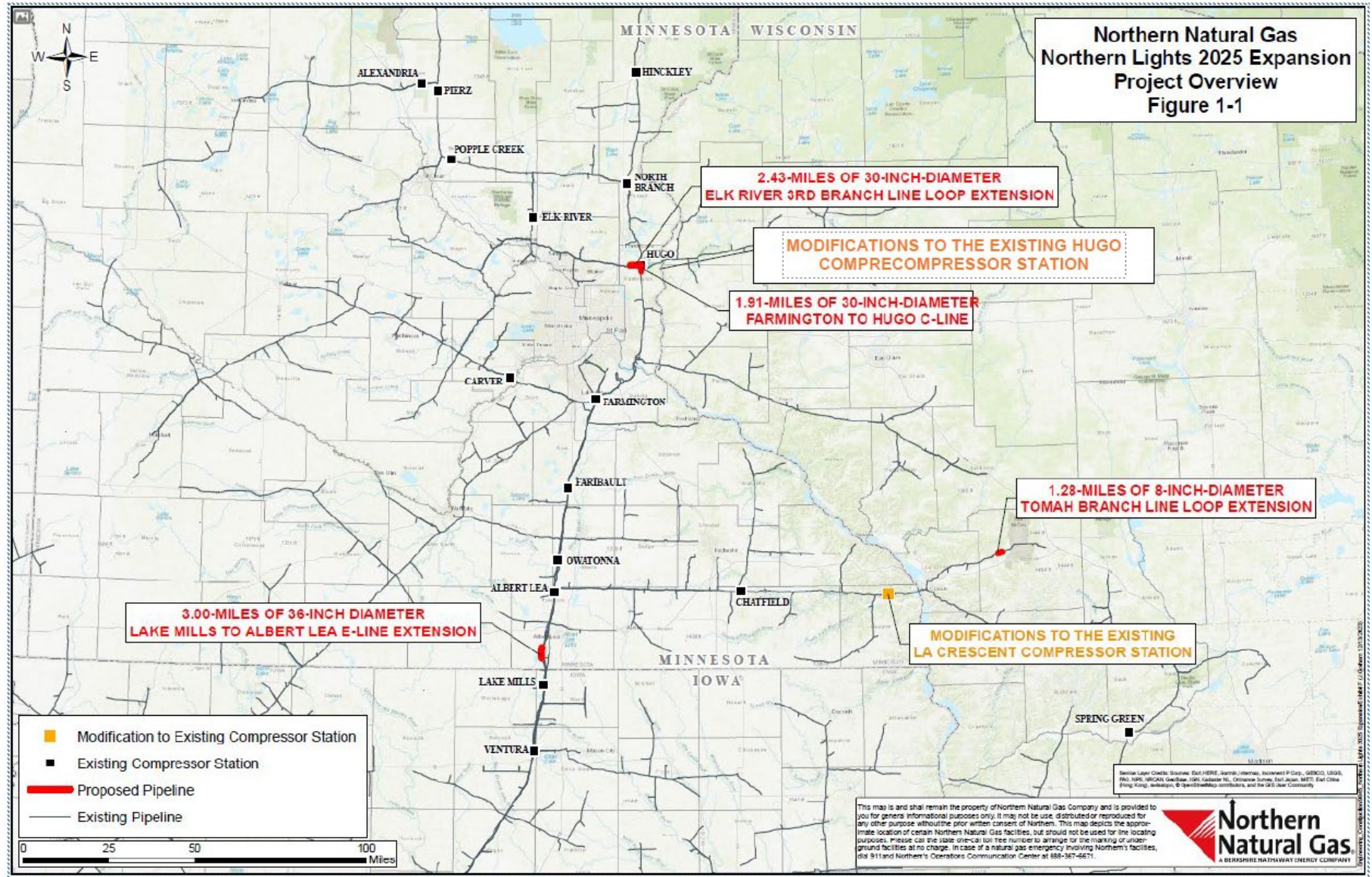
Tomah Branch Line Loop

The Tomah Branch Line Loop ROW was in the process of final restoration, with the majority of the ROW becoming stabilized with revegetation and no erosion or environmental concerns identified (Photo Nos. 16 through 19). However, minor rill erosion was identified at MP 2.25 and MP 2.2 (Photo Nos. 16 through 18). Although seed and mulch were recently applied to these areas, the ROW received approximately 6.0 inches of rain the previous week, before vegetation was established. These sections of ROW were scheduled to be reworked within the week. Across the steep slope near MP 2.2, shallow trench slope breakers lined with staked-in strawbales were installed across the ROW (Photo No. 17). Mounded slope breakers would not hold because of the sandy soil. The slope had been sprayed with hydroseed, with grass becoming established. At the MP 3.15 pipe yard, the tie-in to the existing pipeline was completed, and the ROW was being restored (Photo No. 20). Trailers and equipment were scheduled to be demobilized in the next week. ECDs remained in place throughout the ROW and will be removed once revegetation is successful.

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 October 20, 2025.

SITE MAP



**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.: 31.57

Direction: North

Assessment: Acceptable

Comments: Agricultural ROW, Lake Mills to Albert Lea E-line. Soils along the ROW remained saturated, with ponding in low-lying areas. The pipeline was installed along this section of ROW, and final grade was established; however, topsoil was not yet returned to the ROW. This will be completed once soil conditions allow. No off-ROW impacts or other environmental concerns were identified.



Photo No.: 2

MP/Sta. No.: 31.57

Direction: North/Northeast

Assessment: Acceptable

Comments: Agricultural ROW, Lake Mills to Albert Lea E-line. A bulldozer working on rough-grading the subsoil was equipped with a three-tine chisel that was being used to bring any buried mats or skids to the surface, ensuring no construction debris is left on the ROW. Topsoil piles were well vegetated and stable. 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



Photo No.: 3

MP/Sta. No.: 32.15

Direction: North

Assessment: Acceptable

Comments: Agricultural ROW, Lake Mills to Albert Lea E-line. Subsoil was graded into piles and turned over in an attempt to dry the ROW more quickly. Low-lying areas of ponding remained along the ROW. No off-ROW impacts or other environmental concerns were identified.



Photo No.: 4

MP/Sta. No.: 33.85

Direction: South

Assessment: Acceptable

Comments: Agricultural ROW, Lake Mills to Albert Lea E-line. Soils along higher sections of the ROW were drying; however, ponding remained along low-lying areas. Topsoil piles were stabilized with seeded vegetation. Silt fence on the ROW side of the topsoil piles was slated for removal, as cleanup continues. 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: Lake Mills to Albert Lea E-Line



Photo No.: 5

MP/Sta. No.: 34.0

Direction: Southeast

Assessment: Acceptable

Comments: Agricultural ROW, Lake Mills to Albert Lea E-line. A drain tile was reinstalled across the ROW. No off-ROW impacts or environmental concerns identified.



Photo No.: 6

MP/Sta. No: 34.19

Direction: North

Assessment: Acceptable

Comments: Agricultural ROW, Lake Mills to Albert Lea E-line. In the pipe yard, at the terminus of the ROW, preparations for hydrostatic pressure testing of the line were in progress. The ROW and the pipe yard were 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: 1.0

Direction: West

Assessment: Acceptable

Comments: Open and Forested ROW, Elk River 3rd Branch Line. The HDD P4-1 crossing was complete. The drilling pad was fully stabilized with equipment mats, and the sound barriers remained in place. Per NNG, sound readings during drilling were below the limit. The drilling site was organized and stable, with no erosion around the pad and no environmental concerns identified.



Photo No.: 8

MP/Sta. No: 2.4

Direction: West

Assessment: Acceptable

Comments: Forested and Open ROW, Elk River 3rd Branch Line. Two attempts were made to pull the pullback pipe into the bore, with the pipe becoming lodged both times. The second pull was able to reach 1,700 feet before becoming lodged. The HDD pad site was completely stabilized with equipment mats and was well organized. 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

Spread: Elk River 3rd Branch Line



Photo No.: 9

MP/Sta. No: 3.05

Direction: West

Assessment: Acceptable

Comments: Forested and Open ROW, Elk River 3rd Branch Line. The pullback pipe strings were ready for installation, once the lodged string is removed and the borehole is confirmed. The ROW was stable, the topsoil piles are well vegetated, and ECDs were maintained. No off-ROW impacts or environmental concerns were identified.



Photo No.: 10

MP/Sta. No: 3.0

Direction: East

Assessment: Acceptable

Comments: Forested and Open ROW, Elk River 3rd Branch Line. The pullback pipe string was lodged and unable to be moved. Water was being pumped out of the pipe. 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.: 1.72

Direction: South

Assessment: Acceptable

Comments: Open ROW, Farmington to Hugo C-Line. The kickoff of the ROW is visible in the distance. The western side of the ROW was restored, with well-established vegetation. The eastern side of the ROW was being used as a travel lane. Topsoil piles remained stabilized with seeded vegetation. ECDs remained in place and were maintained. The ROW was stable, with no environmental concerns identified.



Photo No.: 12

MP/Sta. No.: 0.55

Direction: Northwest

Assessment: Acceptable

Comments: Forested and Open ROW, Farmington to Hugo C-Line. The HDD crossing was complete. The drill pad equipment mats and sound barrier wall remained in place. The site 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: Aboveground Facility, Farmington to Hugo C-Line. At the compressor station, preparations for tie-in were in progress. No environmental concerns were identified.



Photo No.: 14

MP/Sta. No.: 0.11

Direction: East

Assessment: Acceptable

Comments: Open and Forested ROW, Farmington to Hugo C-Line. The existing pipeline was exposed, in preparation for tie-in. Water from the excavation was being pumped onto the ROW through a filter bag. 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: Farmington to Hugo C-Line/Tomah Branch
Line Loop



Photo No.: 15

MP/Sta. No.: 2.25

Direction: East

Assessment: Acceptable

Comments: Open and Forested ROW, Farmington to Hugo C-Line. Water from the nearby excavation (Photo No. 14) was being pumped onto the ROW through a filter bag. Pumping was stopped, so the filter bag could be changed. The water pumped through the filter bag was ponding, but was contained within the ROW. The ROW and extra workspace were stable, with no off-ROW impacts or other environmental concerns identified.



Photo No.: 16

MP/Sta. No.: 2.25

Direction: East

Assessment: Acceptable

Comments: Open and Forested ROW, Tomah Branch Line Loop. Revegetation was progressing along the upper hydroseeded portion of the ROW. The recently seeded area along the lower portion of the ROW had developed minor rill erosion, due to approximately 6.0 inches of rain over the previous week. This section of ROW was scheduled to be reworked within the next two days. Overall, the ROW was stable, with no 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.: 17

MP/Sta. No: 2.2

Direction: West

Assessment: Acceptable

Comments: Forested and Residential ROW, Tomah Branch Line Loop. Shallow trench slope breakers lined with staked-in strawbales were installed across the ROW. Mounded slope breakers would not hold because of the sandy soil. The slope had been sprayed with hydroseed, with grass becoming established. The approximately 6.0 inches of rain over the previous week had caused minor rill erosion. These areas were scheduled to be reworked. No other environmental concerns were identified.



Photo No.: 18

MP/Sta. No: 2.2

Direction: East/Northeast

Assessment: Acceptable

Comments: Residential, Open, Forested, and Agricultural ROW, Tomah Branch Line Loop. This section of ROW (foreground) was recently seeded and stabilized with mulch. Minor erosion developed, due to approximately 6.0 inches of rain during the previous week. This area was scheduled to be reworked. Revegetation along the ROW beyond was established and progressing well. 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: Tomah Branch Line Loop



Photo No.: 19

MP/Sta. No: 3.5

Direction: West/Southwest

Assessment: Acceptable

Comments: Open, Forested, and Agricultural ROW, Tomah Branch Line Loop. The ROW was stabilized with slope breakers and revegetation. No erosion, off ROW impacts, or other environmental concerns were identified.



Photo No.: 20

MP/Sta. No: 3.15

Direction: East

Assessment: Acceptable

Comments: Open and Agricultural ROW, Tomah Branch Line Loop. The pipe yard, where the tie-in to the existing pipeline was completed, was being restored. Trailers and equipment were scheduled to be demobilized in the next week. The ROW and pipe yard were stable, with no erosion, off-ROW impacts, or other environmental concerns identified.