



Northern Natural Gas Company
P.O. Box 3330
Omaha NE 68103-0330
402 398-7200

November 7, 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 (FERC), Northern Natural Gas (Northern) hereby submits for filing in the above-referenced docket a request for approval to utilize an 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 timber mat road (ETWS29A), which will be accessed at mile post 2.43 from existing temporary workspace and centered over the horizontal directional drill (HDD) six-foot-wide travel lane for HDD P4-5. The proposed ETWS is more fully described in the following table.

Proposed New ETWS	Mile Post/Alignment Sheet	Dimensions (feet)	Additional Temporary Impact (acre)	Affected Tract Number
ETWS29A	2.43 – 2.46 ERT P3-4	150 x 16	0.06	WA-062

Approval for the proposed ETWS is being requested to remediate and restore additional subsidence, which developed during stabilization of the bore hole for the failed HDD P4-5 on the Elk River extension. The ETWS will provide Northern's contractor with safe access to remediate and restore the subsidence area.

Northern Natural Gas Company
Northern Lights 2025 Expansion

The proposed ETWS is located within the environmentally cleared area, and no further agency consultation is required. Approximately 0.02 acre of ETWS29A is located within wetland ERT-W35, which is covered under the non-reporting requirements of the U.S. Army Corps of Engineers (USACE) Utility Regional General Permit; therefore, no further consultation with the USACE is required. Aside from the wetland, the impacted area is pasture, and no other sensitive resources will be impacted. Northern received written landowner approval from Tract WA-62 on November 6, 2025, to use the proposed ETWS.

The attached alignment sheets (public and privileged version) depict the proposed ETWS, which is highlighted with a Delta F4 symbol. The privileged alignment sheet provides 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 sheet due to the confidential nature of the contents.

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

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 FERC staff to issue approval as expeditiously as possible, but no later than November 14, 2025, for the proposed extra temporary workspace to safely remediate and restore the subsidence area 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

TRACT NO. & OWNERSHIP

SEC 35, T32N, R21W

WA-060

SEC 35, T32N, R21W

WA-061

SEC 35, T32N, R21W

WA-062

SEC 35, T32N, R21W

WA-074

SEC 34, T32N, R21W

USAGE

OPEN LAND/DRIVEWAY

OPEN LAND/RESIDENTIAL

OPEN LAND/RESIDENTIAL/WETLAND/OPEN WATER/DRIVEWAY

RESIDENTIAL/WETLAND/FORESTED/OPEN LAND

DEPTH OF COVER (ft)

4

4

SEE DWG ERT P4-5

SEE DWG ERT P4-5

RODDAGE

8.12

4.85

77.82

30.42

EASEMENT

100'

60'

60'

STATIONING

120+00 MATCH LINE

120+35 OVERHEAD POWERLINE

121+15 FENCE

121+26 EDGE OF GRAVEL

121+34 PROPERTY LINE & CL OF PRIVATE DRIVEWAY

121+37 EDGE OF GRAVEL

121+40 OVERHEAD POWERLINE

121+44 REF MP 2.3

122+14 PROPERTY LINE

122+45 P.I. <8°10'7" RT.

123+51 P.I. <1°11'04" LT

125+56 EDGE OF GRAVEL DRIVEWAY

125+63 CL OF PRIVATE DRIVEWAY

126+17 FENCE

126+56 P.I. <44°20'0" RT. (P-4076)

126+72 REF MP 2.4

126+91 EXIST. 20" MNB87701 (DEPTH = 5.0')

127+45 EXIST. 20" MNB87702 (DEPTH = 4.0')

128+00 P.I. <39°38'49" LT. (P-4076)

128+14 HDD TIE-IN

128+77 WETLAND BUFFER

132+00 REF MP 2.5

132+42 ERT-W35

133+46 TREE LINE

134+98 PROPERTY LINE & SECTION LINE

137+28 REF MP 2.6

140+00 MATCH LINE

PIPELINE

180TH ST N

ETWS26A

REF. M.P. 2.2

SEE DWG ERT P3-3

MATCH LINE 120+00

WA-060

100' WIDE TEMP. WORKSPACE

ETWS27

TAR09

REF. M.P. 2.3

WA-061

75' WIDE TEMP. WORKSPACE

ERT-W06

ERT-OW4

TAR10

ETWS29

REF. M.P. 2.4

100' WIDE TEMP. WORKSPACE

50' WIDE PROJECT PERMANENT ROW

35' WIDE EXISTING PERMANENT ROW

65' WIDE EXISTING PERMANENT ROW

ETWS28

ETWS29A

PROPOSED 30" ELK RIVER 3RD BRANCH LINE

SEE PLAN & PROFILE ERT P4-5

EXISTING MNB87702 ELK RIVER LOOP

EXISTING MNB87701 ELK RIVER BRANCH LINE

REF. M.P. 2.5

REF. M.P. 2.6

REF. M.P. 2.7

TRAVEL LANE

WA-062

WA-074

SEC 2, T31N, R21W

SEC 3, T31N, R21W

SEC 35, T32N, R21W

SEC 34, T32N, R21W

MATCH LINE 140+00

SEE DWG ERT P3-5

LEGEND

PROPOSED 30" ELK RIVER 3RD BRANCH LINE

EXISTING MNB87701 ELK RIVER BRANCH LINE

EXISTING MNB87702 ELK RIVER LOOP

PROPERTY LINE

MATCH LINE

WETLAND/STREAM BUFFER

WETLAND LOCATIONS SECTION LINE

OVERHEAD POWERLINE

SECTION CORNER

ENVIRONMENTAL SURVEY BOUNDARY

TEMP. WORKSPACE

EXTRA TEMP. WORKSPACE

PERMANENT ROW PROJECT

EXISTING PERMANENT ROW

TEMPORARY ACCESS ROAD

OPEN WATER

HDD ENTRY/EXIT

POWER POLE ROAD R.O.W.

TRAVEL LANE NOTE:

1. THE PURPOSE OF THE TRAVEL LANE IS TO SET HDD TRACKING WIRE, MONITOR THE HDD PROGRESS, AND INSPECT FOR INADVERTENT RELEASES OF DRILLING MUD.

2. TRAVEL LANE WILL CONSIST OF ONE 6-FOOT-WIDE PATH OR TWO PARALLEL 3-FOOT-WIDE PATHS THAT WILL BE FIELD DETERMINED BY THE ENVIRONMENTAL INSPECTOR.

3. LIMITED HAND CLEARING OF VEGETATION MAY OCCUR ALONG THE TRAVEL LANE AND WILL BE UTILIZED FOR FOOT TRAFFIC ONLY.

DESIGN FACTOR

ACTUAL CLASS LOCATION

HYDROSTATIC TEST PRESS (P.S.I.G.)

M.A.O.P. (P.S.I.G.)

2000'

120+00

140+00

Figure 1-4

ADDED ETWS29A	MB	11/4/25	ED	GC
NO CHANGE	MB	10/15/25	ED	GC
NO CHANGE	MB	7/31/25	ED	GC
ADDED ETWS26A & UPDATED STATION BAND	JM	1/14/25	ED	GC
ISSUED FOR FERC	AC	2/2/24	ED	GC
NO.	BY	DATE	CHK'D	APPD

FILED WITH FERC

ANY CHANGES FROM WHAT IS SHOWN MUST BE IDENTIFIED AND REVIEWED BY REGULATORY BEFORE IMPLEMENTATION

STATUS	BY	DATE	BY	DATE
PRELIM				
BID				
CONST.				

FAC. CODE: N/A	REL. W.O. N/A
PL# N/A	CONST. YR
STA# N/A	PO# N/A
DESIGN	BY
DRAWN	DATE
ASBUILT	
FILE NO.: P:100	
SCALE: 1:100	

NORTHERN LIGHTS 2025 EXPANSION PROJECT

ELK RIVER 3RD BRANCH LINE EXTENSION

ALIGNMENT SHEET

SEC 35 & 34, T32N, R21W

WASHINGTON COUNTY, MINNESOTA

PROJECT NO.

01146979

DWG. NO.

ERT P3-4

Northern Natural Gas

A MEMBER OF THE ENERGY COMPANY GROUP

F4