

FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, D.C. 20426
OFFICE OF ENERGY PROJECTS

In Reply Refer To:

OEP/DG2E/Gas Branch 3
Northern Natural Gas Company
Ventura to Farmington A-Line
Abandonment and Capacity Replacement
Project and Northern Lights 2027 Expansion
Project
Docket No. CP26-130-000
§ 375.308(x)

June 1, 2026

VIA FERC Service

Donna Martens
Northern Natural Gas Company
1111 South 103rd Street
Omaha, Nebraska 68124-1000

Re: Environmental Information Request

Dear Ms. Martens:

The information described in the enclosure is required for our analysis of the above-referenced application. **Please file a complete response within 20 days of the date of this letter.** If certain information cannot be provided within this time frame, please indicate which items will be delayed and provide a projected filing date. **You should be aware that the information described in the enclosure is necessary for us to continue preparation of the National Environmental Policy Act document. We will establish a schedule for completing the environmental document based upon an expectation of timely and complete responses to our information requests.**

File your response in accordance with the provisions of the Commission's Rules of Practice and Procedure. In particular, 18 CFR 385.2005 requires all responses to be filed under oath by an authorized Northern Natural Gas Company representative, and 18 CFR 385.2010 (Rule 2010) requires service to each person whose name appears on the official service list for this proceeding.

Electronic filing is encouraged using the Commission's eFiling system (see <https://ferconline.ferc.gov/eFiling.aspx>). Be sure to prepare separate volumes/files, as outlined on the Commission's website at <https://www.ferc.gov/sites/default/files/2020->

[04/CEII-Filing-guidelines.pdf](#), and label all controlled unclassified information (CUI) as described at <https://www.ferc.gov/cui>. Critical Energy Infrastructure Information (CEII) (e.g., plot plans showing equipment or piping details) and privileged information (PRIV) (e.g., cultural resources material containing location, character, or ownership information; trade secret information; proprietary information) should be filed as non-public and labeled as: “**CUI//CEII**” (18 CFR 388.113), “**CUI//PRIV**” (18 CFR 388.112), and as otherwise appropriate with other statutes for labeling CUI (e.g., “**CUI//CEII/SSI**” and in accordance with 49 CFR 15.13 marking requirements). All CUI should be filed separately from the remaining information, which should be marked “**Public.**” For assistance with the Commission’s eFiling system, please contact FERC Online Support at FERCOnlineSupport@ferc.gov, (866) 208-3676 (toll free), or (202) 502-8659 (TTY).

If you have any questions, please contact me at (202) 502-8847. Thank you for your cooperation.

Sincerely,

Allison King
Environmental Project Manager
Office of Energy Projects

Enclosure

ENVIRONMENTAL INFORMATION REQUEST
Ventura To Farmington A-Line Abandonment and Capacity Replacement Project and
Northern Lights 2027 Expansion Project (Project)
Docket No. CP26-130-000

Resource Report 1 – General Project Description

1. Provide the anticipated start/end dates for work at the Hugo compressor station.
2. Clarify how many public gravel roads will be open-cut for the Northern Lights 2027 Expansion Project (NL27 Project). Resource Report 1 states 10 roads, but the Traffic Plan states 11.
3. Provide justification for performing construction activities beyond daylight hours (7:00 pm to 10:00 pm). Indicate if lighting would be required.
4. Provide an updated table 1.11-2 (Federal, State, and Local Permits and Approvals). Provide any additional agency correspondence not previously filed with the Commission. Records of communication must show both directions of correspondence (i.e., what information was sent to the agency and the agency's response). Clearly identify which landowner/agency-recommended mitigation measures Northern would and would not adopt (e.g., timing windows, Conservation Reserve Program, county drainage tile system, permitting requirements).
5. Provide a table that identifies past, present, and reasonably foreseeable future projects within the resource-specific geographic scopes identified in the table below. Include Blanket Certificate and Section 2.55(a) projects indicated in tables 1.1-1 and 1.1-2, as appropriate, and provide the timeline for their construction and operation. This table should also include the following information:
 - a. project name and sponsor/proponent;
 - b. a description of the project;
 - c. location (city/county);
 - d. approximate distance and direction of the project from the Project facilities;
 - e. the milepost location where it crosses the proposed facilities or the nearest proposed project facility milepost;
 - f. footprint/layout and quantitative effects on specific resources, if available (acres of land/resource [wetlands, vegetation, habitat, etc.] affected);
 - g. any known permits/authorizations or environmental review required; and
 - h. the current status and schedule of the project.

Also, include qualitative and quantitative descriptions of cumulative and/or overlapping effects these projects and the FERC Project would have on each environmental resource. Lastly, include a map showing the identified projects in relation to the Project.

Understanding that knowledge of the specific characteristics of a project area may dictate an alternative geographic scope for the cumulative effects analysis, you may suggest

another geographic scope. However, include a detailed justification of why use of this scope is appropriate.

Geographic Scope for Cumulative Effect Analysis	
Environmental Resource	Area of Effect
Soils and Geology	Construction workspaces
Groundwater, Wetlands, Vegetation, Wildlife	Hydrologic Unit Code (HUC) 12 Watershed
Surface Water Resources	HUC 12 Watershed. For direct in-water work (e.g. dredging) include potential overlapping effects from sedimentation, turbidity, and water quality
Cultural Resources	Overlapping effects within the Area of Potential Effects
Land Use	1 mile radius
Visual	For aboveground facilities, distance that the tallest feature at the planned facility would be visible from neighboring communities. For pipelines, use 0.25 mile and existing visual access points (e.g., road crossings)
Noise – Operations	Other facilities that would affect any noise sensitive area (NSA) located within 1 mile of the fenceline of a compressor station, storage facility, or LNG facility; and 1/2 mile from meter and regulator stations
Noise – Construction	0.25 mile from pipeline or aboveground facilities. 0.5 mile from horizontal directional drill or direct pipe installation
Air Quality – Operations	5 kilometers from minor sources (Hugo compressor station)
Air Quality – Construction	0.25 mile from pipeline or aboveground facilities
Socioeconomics	Affected counties and municipalities

6. Provide the status of any new permanent easements that still need to be obtained.
7. Provide an update of any surveys that were scheduled for spring 2026. As applicable, provide the completed reports.
8. Clarify/confirm that the terminus of the extension for the Ventura to Farmington A-Line Abandonment and Capacity Replacement Project (V2F) overlaps with the start of NL27 for Lake Mills M500 E-line and Albert Lea M500 E-line. End mileposts in table 2.2-2 for V2F project, including Faribault M500 D-line, do not correspond with tables in Resource Report 1.
9. Clarify why plan and profile drawings for numerous proposed horizontal directional drills (HDD) depict the “HDD Exit” at depths of up to 20 feet below the existing grade (for example, drawings LMA-P4-2, -4, and -6; LMA-P4-7, -8, -9, and -10; ALO-P4-2; FAR-P4-6; FAR-P4-8; LMA-P4-1, and -2; ALO-P4-1, -2, -3, -4, and -5; WDC-P4-1, -2, -3, -5, -7, and -8; and SPR-P4-5).

10. Clarify the need for temporary workspace between HDD entry and exit points where not associated with HDD equipment workspaces (for example, for crossings ALO-P4-2, ALO-P4-3, WIL-P4-2, WDC-P4-7, PAY-P4-2, SPR-P4-4, LMA-P4-2, LMA-P4-4, LMA-P4-5, LMA-P4-6, LMA-P4-7, and LMA-P4-9).

Resource Report 2 – Water Resources

11. Clarify and elaborate on the following activities at the Farmington Compressor Station.
 - a. Section 1.5.3 states that water would be discharged directly into an unnamed ditch that is connected to a wetland at the Farmington Compressor Station as requested by Minnesota Department of Natural Resources (MDNR). Provide correspondence from MDNR approving this usage, including a copy of the National Pollutant Discharge Elimination System (NPDES) Permit, as applicable.
 - b. Table 2.3-1 indicates that the wetland (FCS-W01) affected by V2F Project activities may be potentially under USACE's jurisdiction. Provide an update or status of a Clean Water Act Section 404 permit, as applicable. This 0.19-acre wetland is also mentioned in section 8.1.1 as "used for dewatering." Clarify/confirm wetland FCS-W01 would be a recipient of discharge water from dewatering activities instead of a source.
 - c. Section 3.1.2.1 mentions potential impacts to Vermilion River, which is a cold-water trout stream, from dewatering activities for the disconnect site at the Farmington Compressor Station and compliance with seasonal discharge restrictions. Vermilion River appears to be over 500 feet south of the edge of construction workspace. Thus, provide the discharge location(s), distance to the Vermilion River, and indicate the potential seasonal discharge restrictions from MDNR that would be implemented.
12. Confirm that all waterbodies per the definition in FERC Procedures I.B.1 were delineated for the Project. Section 2.2.3 mentioned that no ephemeral waterbodies in Minnesota are considered public waters; "therefore, no ephemeral streams are displayed on the figures as delineated jurisdictional features."
13. Specify the wetlands that would be crossed with the open-cut method for the NL27 project, which would require a 100-foot-wide construction right-of-way. Table 1.5-6 listed four; however, the text before and after the table indicated two wetlands and six wetlands.
14. Clarify if the Project would include construction of new permanent aboveground features in the 100-year floodplain and, if so, provide the resulting loss of floodplain storage capacity (in cubic feet).
15. Tables 2.1-1 and 2.1-2 identify a total of four private water wells within Project workspace. Clarify how Northern would protect surface completions for water supply wells within Project workspaces from physical damage during construction activities.
16. Section 2.1.7 states "water quality testing of the adjacent wells will occur with landowner approval prior to and following construction activities." Confirm that Northern would

offer this testing to owners of water supply wells within 150 feet of all construction workspaces.

Resource Report 3 – Fisheries, Vegetation, and Wildlife Resources

17. Data in tables 3.2-1 and 3.2-2 are from 2011 National Land Cover Database (NLCD) and section 3.2 refers to land use and vegetation cover type. Explain why the 2021 NLCD dataset was not used and clarify/confirm that vegetation data in section 3.2 reflects acreage affected by construction and operation based on field surveys. For example, it is indicated that no vegetation would be removed from temporary compression sites, while table 3.2-1 contains values for these sites. As appropriate, provide a revised vegetation table with data from field surveys and without industrial and residential categories as these are not vegetation types.
18. Clarify the acreage of trees to be cleared for the V2F project. For example, table 3.2-1 for V2F portion of the Project indicated 3.18 acres of forests would be affected temporarily (during construction), while section 3.2.3 states that “no tree removal is planned for Project components in Iowa” and that “Northern plans to clear trees between February and March 2027...”
19. The official species list and IPaC results from the USFWS’s Information for Planning and Consultation database is from January 2025 for V2F project. Submit an updated official species list and review for listed, proposed, candidate species since January 2025. As applicable, complete the appropriate determination keys using the most current version.
20. Consultation letters to MDNR and USFWS are separated by project components and only for specific components. Under Endangered Species Act Section 7 informal consultation, USFWS assesses effects of the proposed action in its entirety (i.e., all facilities for the V2F project and NL27 project). Therefore, clarify and elaborate on whether USFWS and MDNR are aware of the multiple project codes for the V2F and NL27 projects.

Resource Report 4 – Cultural Resources

All material filed with the Commission containing **location, character, and ownership** information about cultural resources must have the cover and any relevant pages therein clearly labeled in bold lettering: **“CUI//PRIV – DO NOT RELEASE.”**

21. The description of the 12 newly recorded architectural resources for the NL27 Project states on page 4-20 that “[t]he resources include six historical building complexes and six historical drainage ditches”. However, this is not illustrated in table 4.3-6. Provide a revised table that reflects the resources identified for the Project. Include the disposition, NRHP eligibility, project extension, and/or avoidance methods of the new resources and the 14 previously documented architectural/aboveground resources documented in the background literature review.
22. The survey results for the visual APE for NL27 states on page 4-20 that “Lake Mills M500 E-line (...) have historical resources in them.” Identify what these resources are as previously in RR4 it is stated twice that there are no resources along that extension.

23. Revise the *Unanticipated Discoveries Plan* (Appendices 4G and 4H) as follows: add the FERC contact as Archaeologist Allison King (202-502-8847). Provide the revised plan.
24. Provide any previously unfiled correspondence with the Iowa and Minnesota State Historic Preservation Offices (SHPO), including the SHPO's comments on all survey reports.
25. Resource Report 4 mentions a 2018 agreement between the Minnesota SHPO and Northern defining the visual APE to a 500-foot line-of-sight radius outward from the limits of new aboveground appurtenances and appurtenant facilities not exceeding 10 feet in height. Provide this agreement, the expiration date, and all updates/extensions obtained since its execution.
26. Confirm that Northern would avoid unevaluated or eligibility-contributing portions of site 21CR0025. Provide an avoidance plan for how the Project will avoid effecting portions of site 21CR0025 outside the area of potential effect to the FERC and Minnesota SHPO. Provide any SHPO comments on the plan.

Resource Report 6 – Geology

27. Based on review of the plan and profile for HDD PAY-P4-1, as well as the boring log for the associated geotechnical boring (BH-05 Paynesville 2nd Line), while poor quality (decomposed) gabbro bedrock is present to an elevation of approximately 1,060 feet, the drill may encounter higher quality bedrock near the bottom tangent of the drill. Therefore, clarify the apparent discrepancy with Northern's statement in section 6.7 that, with regard to HDDs for the NL27 project, "none...will encounter bedrock therefore, Northern designed them to meet the parameters of the unconsolidated materials along the profiles;" as well as if the design of HDD PAY-P4-1 accounts for the potential to encounter gabbro bedrock, as applicable.

Resource Report 7 – Soils

28. Section 7.4.3 references use of "other tackifiers" and section 9.1.5 references "commercially available dust control agents" for fugitive dust control. The site-specific residential construction plan for the NL27 project (dwg. no. CA-016) additionally references a Fugitive Dust Mitigation Plan which does not appear to be included in application material. Therefore:
 - a. file the referenced Fugitive Dust Mitigation Plan; and
 - b. identify and provide safety data sheets for proposed dust suppressants and describe how their use and storage would not result in adverse environmental impacts, especially on agricultural land and in proximity to surface waters.

Resource Report 8 – Land Use and Aesthetics

29. Provide additional information obtained regarding the Conservation Reserve Program located between mileposts 101.62 and 102.18 on the V2F Project.

30. Confirm/clarify that construction and operation acreages for land use presented in table 8.1-2 reflect land affected by the Project. See related question RR3, Q1. As applicable, submit a revised table 8.1-2, without the wetland category. Wetlands under active cultivation should be included in the agricultural land use acreage.

Resource Report 9 – Air Quality and Noise

31. Indicate any equipment, procedures, or measures that Northern would commit to implement to mitigate exhaust emissions from construction equipment. These may include idling restrictions, use of low-sulfur fuel, commitment to use newest tier IV equipment, use of natural gas or electric powered equipment/vehicles, installation of controls on temporary stationary equipment, etc.
32. For the Hugo compressor station, describe the expected types of blowdown facilities (e.g., individual unit, full station, etc.), estimate the average number of yearly blowdowns by type, the amount of gas released per event type for methane and greenhouse gas in tons of CO_{2e}, and the estimated annual amount. Indicate whether the blowdown(s) would be installed with a silencer and the technical specifications, and estimate the noise impact at the nearest noise sensitive areas.
33. Indicate if Northern would install specific equipment or implement operational changes to reduce fugitive methane emissions such as those identified in EPA's Natural Gas STAR program, by state agencies, or in peer-reviewed studies. Additionally, discuss how Northern would identify leaking valves, seals, or other equipment on the pipeline, compressor, and other aboveground facilities, and the criteria for repair/replacement.
34. Provide an air dispersion modeling analysis (screening using AERSCREEN or refined analysis using AERMOD or EPA-approved alternative) of the Hugo compressor station disclosing the incremental increase in air quality impacts from criteria pollutants emitted from the entire facility in comparison of the National Ambient Air Quality Standards (NAAQS); and state ambient air quality standards, if different. Northern should:
- identify existing modeled emission rates of criteria pollutants from the station, and provide modeling results to identify existing local impact levels of criteria pollutants;
 - identify proposed modeled emission rates of criteria pollutants from the station, provide modeling results to identify the local impacts of the new equipment in addition to the existing equipment at the compressor station;
 - Provide a summary table indicating the significance analysis of the proposed facility at maximum impact level (1st highest high) for each NAAQS averaging period, the largest Radius of Impact (ROI) for any pollutant above the Significant Impact Levels; and
 - Provide a summary table indicating the NAAQS analysis for each averaging period that includes both ambient background, and total facility impact.

Provide all source input parameters (emission rate, stack height, stack temperature, exit velocity, etc.), and justify the bases for any assumptions. Provide a description on how the modeling was performed (for example, identify the specific model number, meteorological data source, terrain data, source parameters, building information, receptor grids, NO₂/NO_x conversion, post-processing assumptions, etc.). Provide the background monitors used and justify their use. Provide input data, as well as output data showing maximum impacts outside the fenceline (the EPA-defined ambient air boundary), and at sensitive receptors in the area (schools, hospitals, nursing homes, etc.). Provide the input and output files as outlined in the attached document titled *Guidance for Filers: How to Transmit Files that cannot be eFiled to FERC* or contact FERC staff for directions on how to submit the modeling files.

Provide a narrative of the air dispersion modeling required for the Minnesota Pollution Control Agency air permitting process for the Storage Facility modification. If air dispersion modeling is not required per the states' permitting process, explain the information, criteria, or methodology that Minnesota Pollution Control Agency will require of Northern to demonstrate compliance with the Clean Air Act.

35. Quantify the existing noise environment at the existing Hugo compressor and the nearby noise-sensitive areas (NSA). Include a large scale (1:3,600 or greater) plot plan identifying the noise measurement locations. Provide a description of the ambient noise survey that includes, but is not limited to: documentation of dominant noise sources at the measurement sites; wind speed and direction at the measurement sites, duration of measurement, time and date of measurements, description of noise meter used, and any filtering, or post-measurement processing used. The operational status of the facility during the noise survey should be indicated. Existing sound levels should be reported as the time averaged A-weighted sound level (L_{eq} dBA) for both day and night, and day-night averaged A-weighted sound level (L_{dn} dBA).
36. Provide an acoustical analysis of the modified Hugo Compressor Station to quantify the magnitude and frequency spectrum (1/3 or whole octave bands) of principal noise sources associated with the proposed operation of the station. Noise sources should include all noise-producing equipment at the facility including: engine, turbine, electric motors, compressors, boilers, gas coolers, oil coolers, vent fans, intake and exhaust noise, and all appurtenant equipment. Identify and quantify mitigation measures, including specific noise control equipment and propagate the resultant A-weighted noise (L_{eq} and L_{dn}) at the nearest NSAs. The data should represent the maximum load/noise of the proposed equipment, identify the major source engine manufacturer and model, and specify noise control measures. Include a narrative discussing data sources and basis for any calculations or noise models used to generate noise estimates.