



FEDERAL ENERGY REGULATORY COMMISSION FIELD INSPECTION REPORT

Date May 12, 2026

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 May 12, 2026, Clay Roesler of Tetra Tech performed an environmental compliance 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 May 12, 2026, the weather was clear with sunny skies and good visibility. The Project region was experiencing a drought with low snow fall through the winter and very little rain this Spring – consequently, soil conditions along the Elk River 3rd Branch Line were dry but stable at the time of the inspection.

The inspection covered the Elk River 3rd Branch Line ROW. The inspection focused on assessing restoration progress and verifying that erosion and sediment control devices were properly installed and functioning as intended, confirming that topsoil piles were stable, and checking that the pad for the horizontal directional drill (HDD) crossing was properly installed and that sound barriers were in place (Photo Numbers [Nos.] 1 through 10).

Elk River 3rd Branch Line

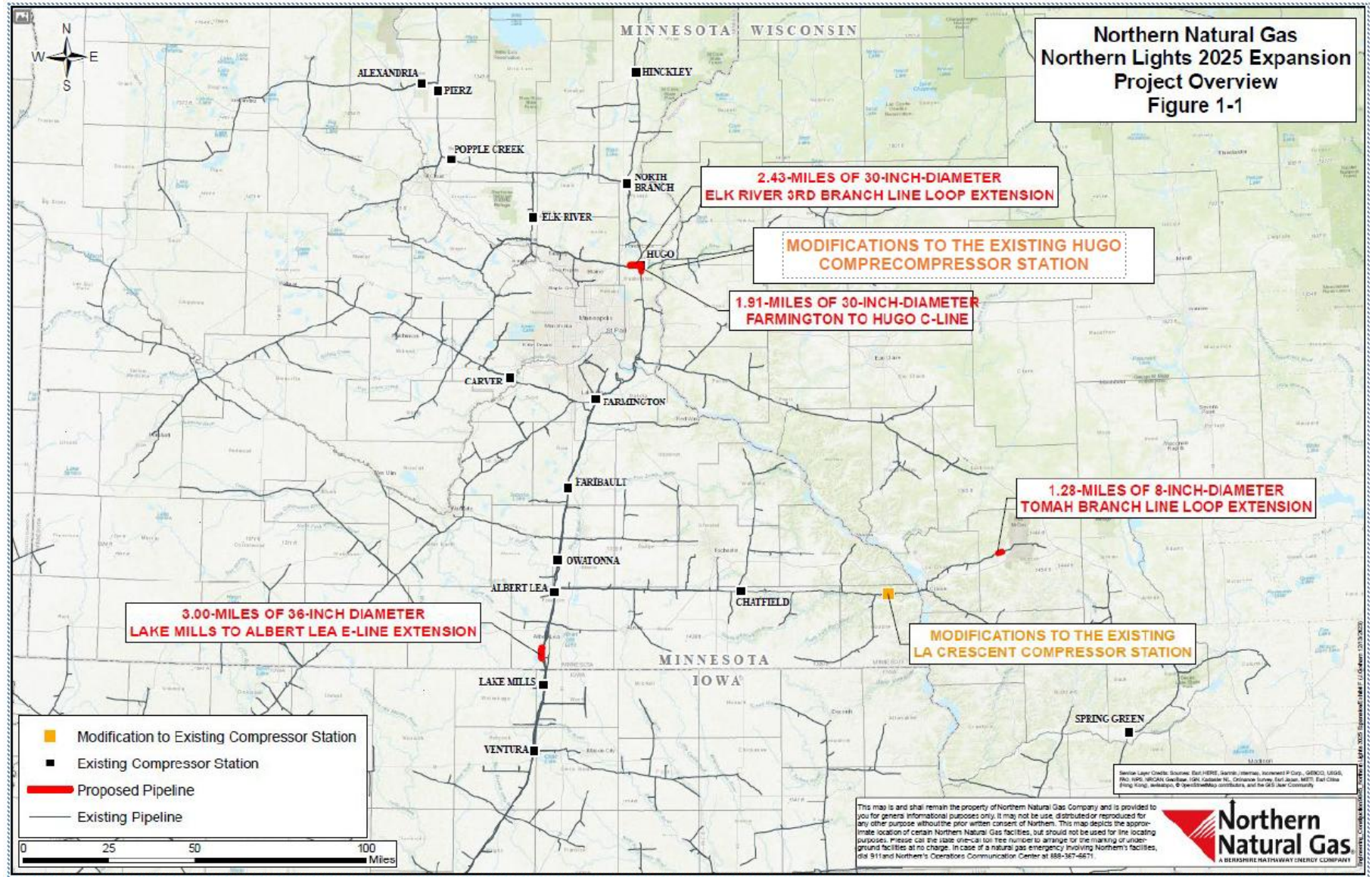
From the beginning of the ROW at milepost (MP) 1.0 through MP 2.13, the ROW was stable, with silt fence installed as needed and in good repair. Topsoil piles were stable, although windy conditions were making it difficult to keep the piles covered with mulch. Reseeding of the topsoil piles was in progress (Photo Nos. 1 through 4). At MP 2.39, the contractor had installed a large HDD pad, and the drill rig had arrived on site. Sound barriers were installed, and the topsoil pile adjacent to the pad was stabilized with no erosion noted (Photo Nos. 5 through 7). Sound barrier was also installed at the HDD exit site, at MP 3.0 (Photo No. 8). At MP 3.1, a crew was cutting the pipe from the 2025 HDD installation into sections for removal due to integrity concerns, having been installed and removed during a failed HDD attempt. This year's HDD crossing will have new pipe installed (Photo No. 9). At MP 3.4, at the end of the Project ROW, all silt fence was removed, with the ROW turned back over to the landowner. The entire area – both on and off the ROW – was disced and ready for planting (Photo No. 10). No off-ROW impacts or environmental concerns were identified.

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 and restoration efforts were progressing satisfactorily, and no environmental concerns were identified. The next inspection is scheduled for the week of June 8, 2026.

SITE MAP



**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.: 1

MP/Sta. No.: 1.0

Direction: North

Assessment: Acceptable

Comments: Agricultural, Open, and Forested ROW, Elk River 3rd Branch Line, Kickoff. The ROW was stable, with no erosion noted. The topsoil pile was stable and was recently reseeded. No environmental concerns were identified.



Photo No.: 2

MP/Sta. No.: 1.3

Direction: West

Assessment: Acceptable

Comments: Agricultural, Open, and Forested ROW, Elk River 3rd Branch Line. The agricultural ROW was stable and recently amended with manure. Grass was emerging along the low-lying area between the sections of silt fence – which was in good repair. 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.: 3

MP/Sta. No.: 1.9

Direction: East

Assessment: Acceptable

Comments: Agricultural, Open, and Forested ROW, Elk River 3rd Branch Line. Grass was emerging along the ROW and roadside ditch, matching off-ROW conditions. Silt fence was in good repair. No environmental concerns were identified.



Photo No.: 4

MP/Sta. No.: 2.13

Direction: West

Assessment: Acceptable

Comments: Agricultural, Open, and Forested ROW, Elk River 3rd Branch Line. Revegetation was progressing along the ROW, matching off-ROW conditions. Silt fence was in good repair. 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: Elk River 3rd Branch Line



Photo No.: 5

MP/Sta. No.: 2.39

Direction: South/Southwest

Assessment: Acceptable

Comments: Agricultural, Open, and Forested ROW, Elk River 3rd Branch Line. The equipment mat drill pad for the HDD crossing was installed. The topsoil pile was stabilized with mulch, with no erosion noted. The silt fence surrounding the topsoil pile and drill pad was in good repair. No environmental concerns were identified.

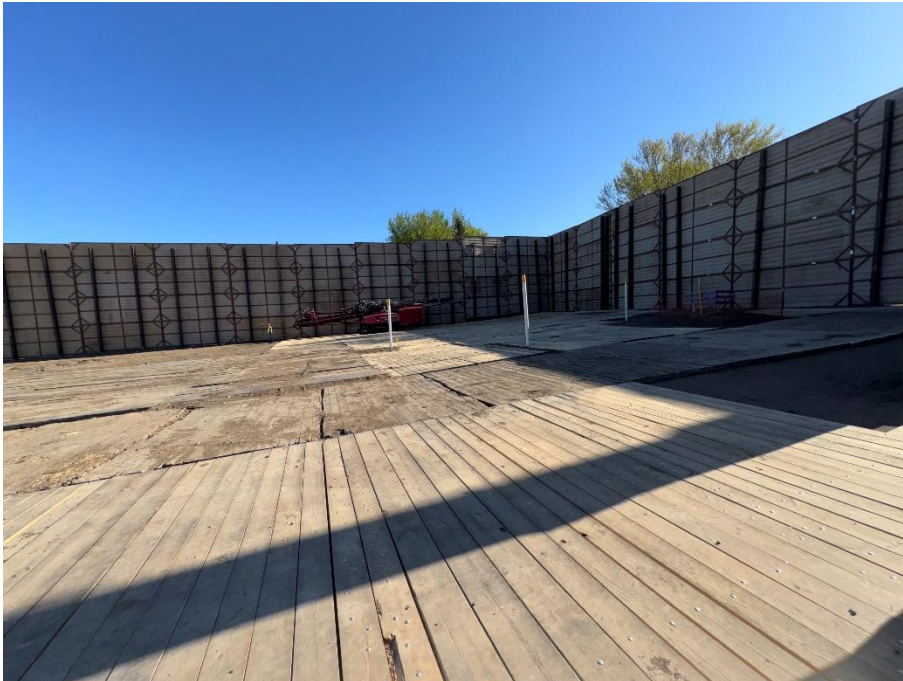


Photo No.: 6

MP/Sta. No.: 2.39

Direction: North

Assessment: Acceptable

Comments: Agricultural, Open, and Forested ROW, Elk River 3rd Branch Line. The equipment mat drill pad was stable, and the sound barrier was installed. 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.: 7

MP/Sta. No: 2.39

Direction: West

Assessment: Acceptable

Comments: Agricultural, Open, and Forested ROW, Elk River 3rd Branch Line. The drill rig arrived on site the day before the inspection. Crews were preparing the site to begin drilling the pilot hole within one week. No environmental concerns were identified.



Photo No.: 8

MP/Sta. No: 3.0

Direction: West

Assessment: Acceptable

Comments: Agricultural, Open, and Forested ROW, Elk River 3rd Branch Line. At the HDD exit site, the sound barrier was installed. The topsoil pile was stabilized with vegetation, and silt fence along the edge of the ROW was in good repair. 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: 3.1

Direction: West

Assessment: Acceptable

Comments: Agricultural, Open, and Forested ROW, Elk River 3rd Branch Line. A crew was cutting last year's HDD pipe into sections that will be transported off the ROW. The pipe was removed from the failed HDD attempt in 2025 and will not be used again. New pipe was being brought in for the 2026 HDD installation. No environmental concerns were identified.



Photo No.: 10

MP/Sta. No: 3.4

Direction: Northeast

Assessment: Acceptable

Comments: Agricultural, Open, and Forested ROW, Elk River 3rd Branch Line, Terminus. At the terminus of the line, across from the construction yard, silt fence was removed, with the ROW turned back over to the landowner. On- and off-ROW, the agricultural parcel was disced and ready for planting. No environmental concerns were identified.