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

June 22, 2026

Via eFiling

Ms. Debbie-Anne Reese, Acting Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: OEP/DG2E/Gas Branch 3
Northern Natural Gas Company
Ventura to Farmington A-Line Abandonment and Capacity Replacement Project (V2F) and Northern Lights 2027 Expansion Project (NL27)
Docket No. CP26-130-000
§ 375.308(x)

Dear Ms. Reese:

Northern Natural Gas Company (Northern) hereby submits for filing with the Federal Energy Regulatory Commission (FERC) in the above-referenced docket Northern's responses to the data request issued by FERC staff June 1, 2026. Northern is finalizing its response to DR5 (cumulative impacts) and will submit it no later than June 26, 2026. FERC's requests and Northern's responses are attached.

Parts of Northern's responses to DR 21, 22, and 24, which contain confidential information regarding specific information on the location of cultural resources have been labeled "**CUI//PRIV --- DO NOT RELEASE** (**PRIVILEGED).**" Pursuant to 18 CFR section 388.112, Northern requests confidential and privileged treatment of the information due to the confidential nature of the contents.

A zip file containing modeling files for DR 34 has been downloaded on a CD and is being sent to the Secretary via overnight mail.

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 Natural Gas Company
V2F and NL27

Any questions regarding the filing should be directed to the undersigned at (402) 398-7103.

Respectfully submitted,

/signed/ Donna Martens

Donna Martens
Senior Regulatory Analyst

cc: Parties of record

VERIFICATION

STATE OF NEBRASKA)

COUNTY OF DOUGLAS)

Brian Garcia, being duly sworn, on oath, states that he is Vice President, Field Operations, for Northern Natural Gas and is duly authorized to make this affidavit; that he has read the foregoing Data Responses of such Company and is familiar with the contents thereof; that all the facts therein are true and correct to the best of his knowledge, information and belief.

Signed:

Brian Garcia
Vice President, Field Operations

SUBSCRIBED AND SWORN TO, before me, this 22nd day of June 2026.

GENERAL NOTARY - State of Nebraska
CYNTHIA L. KRAJICEK
My Comm. Exp. August 23, 2026

Cynthia L. Krajicek
Notary Public in and for
Douglas County, Nebraska

My commission expires: August 23, 2026

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated this 22 day of June 2026.

Donna Martens

Donna Martens
Sr. Regulatory Analyst
Northern Natural Gas
P.O. Box 3330
Omaha, Nebraska 68103-0330
Telephone: (402) 398-7138

Northern Natural Gas Company
Data Response Form For Docket No. CP26-130-000
Ventura to Farmington A-line Abandonment and Capacity Replacement Project (V2F) and Northern Lights 2027 Expansion Project (NL27)

Requesting Party:	FERC
Reference No:	FERC-DR1-01
Requester's Name:	Allison King
Subject:	Hugo Compressor Station – Start and End Dates

Data Request 1 (Resource Report 1 – General Project Description):

Provide the anticipated start/end dates for work at the Hugo compressor station.

Response:

Approximate construction dates for the Hugo compressor station uprate: 7/12/27 - 9/19/27

Posted: 06/22/2026 Responsibility: Brian Garcia

Traffic Control Plan

Ventura to Farmington A-line Abandonment and Capacity Replacement Project and Northern Lights 2027 Expansion Project

February 2026

Contents

1.0 INTRODUCTION

Northern Natural Gas (Northern) is planning construction of the Ventura to Farmington A-line Abandonment and Capacity Replacement Project (V2F Project) between 2027 and 2029 in Minnesota and Iowa. The proposed facilities include:

- Approximately 17.88 miles of pipeline extensions

Installation and removal of appurtenant facilities include:

- Disconnect activities for the A-line and J-line at two compressor stations
- Installing temporary compression to evacuate gas from the A-line to an adjacent mainline
- Three temporary compression sites for the installation of the extensions

Additionally, Northern is planning construction of the Northern Lights Expansion Project (NL27 Project) in 2027, in Minnesota. The proposed facilities include:

- Approximately 28.43 miles of pipeline extensions
- Uprate at the Hugo compressor station

Installation and removal of appurtenant facilities include:

- Two new receiver facilities that include relocation of existing receivers
- Relocation of one existing receiver
- Nine new valve settings and associated valves and piping, including one new RMV facility
- Expansion of one existing block valve setting
- Removal of one receiver facility and three existing tie-in valve settings

2.0 PURPOSE

V2F Project

Northern is planning to construct three pipeline extensions of the M500 D-line and M500 E-line pipeline and associated aboveground appurtenances to replace lost capacity and to enhance the safety, reliability, security, and operational efficiency of Northern's pipeline system by abandoning in-place approximately 131.11 miles of the A-line from Ventura, Iowa, to Farmington, Minnesota and extending its E- and D-lines, consisting of approximately 17.88 miles of pipeline in Freeborn, Steele, and Dakota counties, Minnesota. Northern is planning to commence the pipeline extension construction activities in the spring of 2027 for the Lake Mills and Albert Lea M500 E-lines, or upon FERC authorization and be in service no later than November 1, 2027. Northern is planning to commence the pipeline extension construction activities in the spring of 2028 for the Faribault M500 D-line and placed in service no later than November 1, 2028. Northern plans to complete tree clearing activities for the three extensions in early 2027 to minimize impacts on proposed, threatened and endangered species.

NL27 Project

Northern is planning to construct 10 pipeline extensions associated with its natural gas transmission pipeline system and associated aboveground facilities to serve the firm transportation requirements of Northern's customers in Minnesota. Northern is planning to commence construction of the pipeline extensions in the spring of 2027, or upon FERC authorization, and be in service no later than November 1, 2027. Northern plans to complete tree clearing activities for the pipeline components in

February and March 2027 to minimize impacts on proposed, threatened and endangered species. The uprate for the Hugo compressor station also will be completed in 2027.

Construction of the V2F and NL27 Projects will result in minor, short-term impacts on the transportation system in the V2F and NL27 Project areas. Potential temporary effects associated with roadway crossings include disruption of traffic flows, disturbance of existing underground utilities such as water and sewer lines, and hindrance of emergency vehicle access. In addition, construction employees will utilize approved access roads to maneuver crews and equipment to and from the proposed right of way (ROW). This Traffic Control Plan details the process Northern will enact to minimize impacts on traffic, emergency services and landowner access to residences while maintaining the safety of the public and Northern contractors and employees. Northern will comply with all requirements of the Minnesota and Iowa Departments of Transportation during construction and restoration of both Projects.

The purpose of this Traffic Control Plan is to identify best management practices for construction activities.

3.0 CONSTRUCTION OF PIPELINES ACROSS ROADWAYS

3.1 CROSSING METHODS

V2F Project

The decision to install the pipeline under public roadways, using either trenchless or open-cut methods, was based on site conditions, traffic flow and road crossing permit requirements. Northern will cross eight public roadways and two private driveways via open cut and the remaining public roads will be crossed via horizonal directional drill (HDD) methods. Generally, all paved public roads will be crossed using trenchless crossing methods. An open-cut road crossing will be used if a trenchless method is not feasible or where the open-cut crossing method is approved by the local regulatory agency. Resource Report 1, Table 1.5-9 lists the methods by which all public roads will be crossed by the V2F Project. The pipelines will be installed at least four feet below the roadside ditches and will be designed to withstand anticipated external loading pressures.

The construction methods for HDDs are discussed in Resource Report 1, Section 1.5.6.4, special construction techniques. Northern plans to open cut the four public road crossings on the Lake Mills M500E-line; four public road crossings on the Faribault M500D-line; no other components contain open-cut public road crossings. In addition to the methods described, Northern will require its contractor to employ signage, flagging, construction entrances, and barricades where necessary. All activities will comply with Minnesota or Iowa DOT and local jurisdiction requirements. Vehicles will not be allowed to park along the public roads but will be required to use the designated parking areas at each crossing. Northern will post reduced speed limit signage where appropriate. Northern does not propose to open cut any public roads in Iowa.

NL27 Project

The decision to install the pipeline under public roadways, using either trenchless or open-cut methods, was based on site conditions, traffic flow and road crossing permit requirements. Northern will cross 10 public roadways and 12 private driveways via open cut and the remaining public roads will be crossed via HDD methods. Generally, all paved public roads will be crossed using trenchless crossing methods. An open-cut road crossing will be used if a trenchless method is not feasible or where the open-cut crossing method is approved by the local regulatory agency. Resource Report 1,

Table 1.5-10 lists the methods by which all public roads will be crossed by the Project. The pipelines will be installed at least four feet below the roadside ditches and will be designed to withstand anticipated external loading pressures.

The construction methods for HDDs are discussed in Resource Report 1, Section 1.5.6.4, special construction techniques. Northern plans to open cut the 10 public road crossings between the NL27 pipeline extensions. In addition to the methods described, Northern will require its contractor to employ signage, flagging, construction entrances, and barricades where necessary. These activities will comply with Minnesota DOT and local jurisdiction requirements. Vehicles will not be allowed to park along the public roads but will be required to use the designated parking areas at each crossing. Northern will post reduced speed limit signage where appropriate.

For an open-cut road crossing associated with the Projects, Northern will provide two weeks' advance notice, or as required by the local permitting agency, to the residents and local authorities. To minimize traffic delays at open-cut road crossings, Northern will establish detours before initiating an open cut of a road. Appropriate traffic management and signage will be set up and necessary safety measures will be developed in compliance with applicable permits for work on public roadways. Northern will comply with all applicable state, county and municipal requirements during construction of the Project. The One Call system for Minnesota will be contacted to allow utility operators to verify and mark all underground utilities (e.g., cables, conduits and pipelines) located within the construction work areas. If any utilities are inadvertently disrupted during construction, Northern will ensure that they are restored as quickly as possible. Construction work in roadways will be scheduled so as to avoid commuter traffic and schedules for school buses to the greatest extent practicable and to minimize landowner inconvenience if the road leads to a residence. In addition, steel plates will be maintained on-site to cover the open trench quickly should emergency vehicles need to travel through the work area.

Road crossings that will be open cut involve the excavation of a trench across the roadway and will result in a temporary road closure for four to six hours during the excavation of the roadway. After the pipe is installed, steel plates will be placed on one side of the open excavation to allow the traffic flow to resume through one lane. Once the excavation is filled, the steel plates will be moved to the other side of the filled roadway and the remaining side will then be filled. The steel plates will remain in-place overnight. Northern intends to keep excess materials on-site to ensure the trench can be backfilled immediately after the pipe is installed to minimize the impacts to area traffic. The roadways will be rebuilt to the specifications of the county or local permitting agency.

3.2 UTILIZATION OF ROADWAYS DURING CONSTRUCTION

In addition to the traffic impacts caused by the open-cut road crossings, the movement of construction equipment and materials and the daily commuting of workers to and from the construction work areas may increase traffic volumes in localized areas throughout the V2F and NL27 Project areas. Both V2F and NL27 Project-related construction traffic will typically occur during the early morning hours and evening hours when construction workers commute to and from the construction work areas. Construction workers will be deployed in various locations along the pipeline such that no single area will experience significant traffic impacts. Access roads utilized during construction are pre-approved by FERC, landowners, and the appropriate permitting agencies, and Northern is responsible for ensuring the construction employees utilize only pre-approved access roads. Pipeline construction is typically scheduled to take advantage of daytime hours (six days a week). Because construction will move sequentially along the pipeline route, traffic flow impacts that do arise will be temporary on any given section of roadway. Accordingly, Northern does not anticipate significant traffic impacts

during construction. To maintain safe conditions, Northern will require its construction contractors to ensure enforcement of local weight restrictions and limitations by its vehicles. Specifically, Northern will require its contractors to obtain road and highway permits and bonding, as required, for the use of public roads to transport construction equipment and materials, especially for any overweight or oversized equipment. Damage to public and private roadways due to construction will be repaired by Northern's contractors. At points of access to the ROW from hard-surfaced roads, a stabilized construction entrance will be installed as a construction entrance to control dirt tracking onto the highway. Flagging and signage will be utilized as appropriate and in accordance with all applicable regulations.

4.0 POST-CONSTRUCTION

Northern is responsible for post-construction restoration and maintenance at any roads that are open cut during construction of the V2F and NL27 Projects. Northern will obtain all applicable state, county and local permits for utilization of and construction across roadways. Northern is currently communicating with the appropriate agencies and individuals at the state, county and municipal levels regarding road construction and post-construction restoration for public road crossings. Northern will continue this communication throughout the V2F and NL27 Projects.

5.0 ROAD CONDITION ASSESSMENT

Northern will conduct windshield surveys along the construction ROW in the spring following completion of construction (either 2028 or 2029) for all construction areas. The surveys will identify areas at public road crossings that may need repair. Northern will coordinate with its contractors and the roadway permitting agencies to complete these repairs.

Northern Natural Gas Company
Data Response Form For Docket No. CP26-130-000
Ventura to Farmington A-line Abandonment and Capacity Replacement Project (V2F) and Northern Lights 2027 Expansion Project (NL27)

Requesting Party:	FERC
Reference No:	FERC-DR1-02
Requester's Name:	Allison King
Subject:	NL27 – Open Cut Gravel Roads

Data Request 2 (Resource Report 1 – General Project Description):

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.

Response:
Northern will open cut ten public gravel roads for the Northern Lights 2027 Expansion Project. An updated Traffic Control Plan is attached.

Posted: 06/22/2026 Responsibility: Brian Garcia

Northern Natural Gas Company
Data Response Form For Docket No. CP26-130-000
Ventura to Farmington A-line Abandonment and Capacity Replacement Project (V2F) and Northern Lights 2027 Expansion Project (NL27)

Requesting Party:	FERC
Reference No:	FERC-DR1-03
Requester's Name:	Allison King
Subject:	Construction Activities Beyond 7pm to 10pm

Data Request 3 (Resource Report 1 – General Project Description):

Provide justification for performing construction activities beyond daylight hours (7:00 pm to 10:00 pm). Indicate if lighting would be required.

Response:

Activities that extend past 7:00 p.m. are limited to those that cannot be safely or effectively halted once initiated. Many of these tasks involve continuous processes where stopping mid-operation would:

- **Compromise safety**, such as leaving partially completed work in a condition that could pose risks to workers.
- **Damage materials or equipment**, requiring rework or replacement.
- **Reduce quality or integrity of the work**, particularly for activities that depend on controlled conditions or uninterrupted execution.
- **Increase duration of impacts**, as restarting work can take significantly more time than completing it in a single continuous effort.

For these reasons, once such activities begin, they must proceed until completion, even if that extends into nighttime hours. This approach minimizes the need for rework, reduces total construction duration, and helps ensure that work is completed safely and in accordance with applicable standards and best practices.

All extended-hour activities are planned in advance and carried out in compliance with applicable permit conditions, including requirements for noise control, lighting management, and stakeholder notification. Northern Natural Gas' safety procedures require that lighting be present for all activities during nighttime activities.