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-DR1-06
Requester's Name:	Allison King
Subject:	Permanent Easements

Data Request 6 (Resource Report 1 – General Project Description):

Provide the status of any new permanent easements that still need to be obtained.

Response:

Northern is scheduled to begin acquisition for the new permanent easements July 2026.

Posted: 06/22/2026 Responsibility: Brian Garcia

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Requesting Party:	FERC
Reference No:	FERC-DR1-07
Requester's Name:	Allison King
Subject:	Surveys Scheduled For Spring 2026

Data Request 7 (Resource Report 1 – General Project Description):

Provide an update of any surveys that were scheduled for spring 2026. As applicable, provide the completed reports.

Response:
Northern's environmental consultant, Stantec, Inc., commenced presence/absence surveys for edible valerian (*Valeriana edulis)* and habitat surveys for rusty patched bumblebee (*Bombus affinis*) June 1, 2026. Habitat surveys and presence/absence surveys require several mobilizations and are scheduled to be completed September 2026. Survey reports will be submitted once completed.

Northern has not completed additional surveys for cultural and wetland resources on parcels that remain denied access.

Posted: 06/22/2026 Responsibility: Brian Garcia

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Requesting Party:	FERC
Reference No:	FERC-DR1-08
Requester's Name:	Allison King
Subject:	Pipeline Extension Overlap For V2F and NL27

Data Request 8 (Resource Report 1 – General Project Description):

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.

Response:
Northern confirms 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.

The end milepost (MP) in Table 2.2-2 is correct. For the Faribault M500 D-line, the pipeline extension ends at MP 104.87; however, the workspace for a line stop extends approximately 0.02 mile further east of the end of the pipeline. To accurately account for all workspace, Northern utilized an end MP which is 0.02 mile beyond the end of the pipeline, which is reflected as MP 104.89 in Table 2.2-2.

Posted: 06/22/2026 Responsibility: Brian Garcia

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Requesting Party:	FERC
Reference No:	FERC-DR1-09
Requester's Name:	Allison King
Subject:	Horizontal Directional Drill Depths

Data Request 9 (Resource Report 1 – General Project Description):
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).

Response:
For plan and profile drawings V2F LMA-P4-2, -4, -6, -9, -10; ALO-P4-2; FAR-P4-8 and NL27 LMA-P4-1, -2; ALO-P4-1, -4, -5; WIL-P4-1; WDC-P4-1, -2, -3, -5, -7, -8; SPR-P4-5, the construction methods are described in Section 1.5.6.4 of Resource Report 1 and are copied here for reference.

HDD Road Crossings
HDD installations at roads are different from longer HDDs designed to avoid sensitive resources. These shorter installations, often referred to as "mini-HDDs", utilize standard small HDD rigs and equipment but use modified construction techniques similar to auger bores. They are generally considered to be more efficient and have a lower overall constructability risk due to their shorter lengths, shallower depths, lower annular pressures, and decreased volumes of drilling fluid. To achieve this setup, the entry and exit pits are excavated on both sides of the roadway which allows the drill path to remain relatively flat. Due to the minimal elevation change in the pipe profile and deeper tie-ins, it promotes better fluid returns and minimizes the risk of an inadvertent return (IR).

All but four of the HDDs listed above are short, trenchless road crossings with tie-in depths ranging from 7 feet to 20 feet that are installed in accordance with the construction methodology described above. Due to the length of the proposed drills, the entry and exit pits are excavated on both sides of the roadway down to the proposed pipe tie-ins.

For plan and profile drawings V2F LMA-P4-7, LMA-P4-8, FAR-P4-6, and NL27 ALO-P4-2, the same drilling construction methodology is applied to the wetlands and waterways with tie-in depths ranging from 7 feet to 20 feet. To facilitate the shorter HDD approach for these crossings, the entry and exit locations are positioned as close as practical to the wetland boundaries, allowing the drill profile to remain relatively flat while maintaining necessary cover beneath the wetland. The minimal elevation change along the bore profile and deeper tie-in locations promote improved drilling fluid returns and reduce the potential for an IR. Additionally, the shorter bore length minimizes the duration of drilling operations adjacent to the wetland.

Please note that NL27 ALO P4-3 is a standard HDD with entry and exit pits at the surface.

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Requesting Party:	FERC
Reference No:	FERC-DR1-10
Requester's Name:	Allison King
Subject:	Temporary Workspace Between Horizontal Drill Depth Entry and Exit Points

Data Request 10 (Resource Report 1 – General Project Description):

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).

Response:
Northern designed extra temporary workspace (ETWS) between horizontal directional drill (HDD) entry and exit points for utility potholing, railroad crossing requirements, and inadvertent return (IR) response. Below is a detailed summary of each HDD that has ETWS not associated with the equipment workspaces with a corresponding justification.

Where Northern crosses existing utilities, its engineering procedures require daylighting of the existing facilities to visually confirm their depths and inspect during the drilling operations.

- V2F LMA-P4-2, P4-3, P4-4, P4-6, P4-9, P4-10
- V2F ALO-P4-2
- V2F FAR-P4-8
- NL27 LMA-P4-1, P4-2, P4-3
- NL27 ALO-P4-4, P4-5
- NL27 WIL-P4-1, P4-2
- NL27 WDC-P4-1, P4-2, P4-3, P4-6, P4-7
- NL27 PAY-P4-2
- NL27-SPR-P4-4, P4-5
- NL27 MIC-P4-3
- NL27 ALX-P4-2

Where Northern crosses the Canadian Pacific Kansas City Railroad (CPKC) via HDD, CPKC requires installation and inspection of settlement monitoring points along their tracks during the HDD activities. Northen included ETWS to install these settlement monitoring points.

- V2F LMA-P4-5

Where Northern crosses waterbodies on V2F Lake Mills M500 E-line, the NL27 Albert Lea M500 E-line, and the NL27 Willmar Upstream 3rd branch line, ETWS was added as a contingency in the unlikely event

of an IR during the HDD. Equipment like hydrovac trucks could utilize this ETWS to safely maneuver, turn around, and maintain a hose length short enough to maintain a rapid response.

- V2F LMA P4-7
- NL27 ALO P4-3
- NL27 WIL-P4-3

Posted: 06/22/2026 Responsibility: Brian Garcia

Northern Natural Gas Company
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Requesting Party:	FERC
Reference No:	FERC-DR1-11a, b and c
Requester's Name:	Allison King
Subject:	Farmington Compression Station – MDNR Correspondence, Wetland FCS-W01, Vermilion River

Data Request 11 (Resource Report 2 – Water Resources):

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.

Response:

a. On June 8, 2026, Northern submitted an email to the MDNR hydrologist to provide a summary of all conditions on approved previously issued permits for dewatering at and around the Farmington compressor station. A copy of the email request is attached. Northern will provide MDNR's response upon receipt.

b. On February 19, 2026, Northern received an email response from USACE regarding the submittal of the Utility Regional General Permit Wetland Application stating "The proposed work appears to be authorized by a general permit that does not require pre-construction notification to USACE. This means you can proceed without additional approval from USACE, provided you ensure your project meets the terms and conditions of the general permit and applicable Section 401 Water Quality Certification (WQC)." Northern agrees wetland FCS-W01 is under USACE jurisdiction and confirms the wetland impacts meet the terms and conditions of the Utility Regional General Permit and applicable 401 WQC. A copy of the email is included in the response to DR1-4.

Wetland FCS-W01 will not be a receipt of discharged water from dewatering activities; Northern will cross this wetland with a timber mat travel lane and will utilize hoses to get to the approved dewatering location on the north side of the facility.

c. The workspace on the south side of 212 Street West is the closest disturbance to the Vermillion River; Northern anticipates its nearest dewatering discharge point will be in the southeast corner of FCS ETWS-001, which is located approximately 620 feet north of the Vermillion River. Northern will follow previous guidance from the MDNR and will not discharge into the Vermillion River after August 31 to minimize potential impacts to trout spawning. Northern anticipates minor dewatering volumes at this location as the construction activities are limited to a disconnect of the A-line.

   Water from the north side of 212 Street W will be discharged into the drainage ditch that runs along the north side of the Farmington compressor station. This drainage feature flows north approximately 785 feet where it discharges into a tributary of the Vermillion River.

Knabe, Susan

From: Knabe, Susan
Sent: Monday, June 8, 2026 10:09 AM
To: 'Richter, Joe G (DNR)'
Cc: Noland, Nathan
Subject: Request for additional information on dewatering at Farmington Compressor Station

Hi Joe

Northern Natural Gas is planning an upcoming Ventura to Farmington A-line abandonment Project-which will require some dewatering inside the Farmington compressor station and on the south side of Highway 50/212 Street West.

The Federal Energy Regulatory Commission has requested correspondence regarding the Minnesota Department of Natural Resources (MDNR) preferred dewatering plan in that area due to the proximity of the Vermillion River. Therefore, Northern is requesting that you complete a review of past permit authorizations and summarize the previous permit conditions. Northern understands that any new dewatering authorizations would be required to abide by these previous permit conditions.

Northern understands that one of the dewatering conditions will be no discharge is permitted between September 1 and April 1 due to the trout in the Vermillion River. Please provide a response with MDNR's other conditions.

Thank you
Sue

Susan Knabe
Senior Principal

Mobile: 920-655-7215
susan.knabe@stantec.com

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Northern Natural Gas Company
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Requesting Party:	FERC
Reference No:	FERC-DR1-12
Requester's Name:	Allison King
Subject:	Delineated Waterbodies

Data Request 12 (Resource Report 2 – Water Resources):

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."

Response:

Northern confirms all waterbodies per the definition in FERC Procedures I.B.1 were delineated for the Project.

Posted: 06/22/2026 Responsibility: Brian Garcia

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Requesting Party:	FERC
Reference No:	FERC-DR1-13
Requester's Name:	Allison King
Subject:	NL27 – Open Cut Wetlands

Data Request 13 (Resource Report 2 – Water Resources):

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.

Response:
Northern confirms that four wetlands will be crossed with the open-cut method for the NL27 project using a 100-foot-wide construction right-of-way. The wetlands listed in Table 1.5-6 are correct. The text before and after Table 1.5-6 that indicates two and six wetlands is incorrect.

Posted: 06/22/2026 Responsibility: Brian Garcia

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Requesting Party:	FERC
Reference No:	FERC-DR1-14
Requester's Name:	Allison King
Subject:	New Permanent Aboveground Facilities In 100-Year Floodplain

Data Request 14 (Resource Report 2 – Water Resources):

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).

Response:
The Project will not include construction of new permanent aboveground facilities in the 100-year floodplain.

Posted: 06/22/2026 Responsibility: Brian Garcia

Northern Natural Gas Company
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Requesting Party:	FERC
Reference No:	FERC-DR1-15
Requester's Name:	Allison King
Subject:	Private Water Wells

Data Request 15 (Resource Report 2 – Water Resources):

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.

Response:
Northern will install four-foot-tall orange safety fencing around the wellheads prior to commencement of construction. The installation contractor will maintain the safety fencing during construction and remove the fencing upon completion of topsoil restoration.

Posted: 06/22/2026 Responsibility: Brian Garcia

Northern Natural Gas Company
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Ventura to Farmington A-line Abandonment and Capacity Replacement Project (V2F) and Northern Lights 2027 Expansion Project (NL27)

Requesting Party:	FERC
Reference No:	FERC-DR1-16
Requester's Name:	Allison King
Subject:	Water Well Testing

Data Request 16 (Resource Report 2 – Water Resources):

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.

Response:
Northern will offer water quality testing to landowners of water supply wells within 150 feet of all construction workspaces.

Posted: 06/22/2026 Responsibility: Brian Garcia

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Requesting Party:	FERC
Reference No:	FERC-DR1-17
Requester's Name:	Allison King
Subject:	Vegetation Data

Data Request 17 (Resource Report 3 – Fisheries, Vegetation, and Wildlife Resources):

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.

Response:
Northern confirms the 2021 National Land Cover Database (NLCD) was utilized. Northern also confirms the vegetation data in Section 3.2 reflects the correct acreage affected by construction and operations of the Projects. Northern refined the information in the 2021 NLCD with its more accurate field-collected vegetation data that was recorded during the biological field surveys.

While Northern will not remove vegetation or clear topsoil from the temporary compression sites, timber mats will be placed on existing vegetation for driving and parking at the temporary compression sites for several months which will impact existing vegetation. Based on previous guidance from FERC staff, Northern included these acres in the impact tables as some reseeding of the temporary compression sites may be required if the vegetation does not regenerate naturally.

Seven general vegetation types were identified and field verified within the Project area. Industrial/commercial land did not support habitat or vegetation communities for any listed T&E species and therefore is not included in the tables below. The temporary and permanent impacts from construction and operation of the Project by vegetation type are included in the tables below. Additional land use information is provided in Section 8.

The residential vegetation category was recategorized as Developed Land (Urban or Landscape Vegetation); this category was not removed from the vegetation tables as one of the federally listed threatened and endangered species, the rusty-patched bumble bee, uses this developed/urban land during summer foraging.

Below are the updated vegetation impact tables for the V2F and NL27 Projects.

Table 3.2-1 Vegetation Impacts by Land Cover Type for V2F Project

Project Component	Agricultural (acres)		Forested (acres)		Open Land (acres)		Developed Land (Urban or Landscape) (acres)		Wetland (acres)		Open Water (acres)		Total (acres)	
	Temp	Perm	Temp	Perm	Temp	Perm	Temp	Perm	Temp	Perm	Temp	Perm	Temp	Perm
Pipeline Extensions														
Lake Mills M500 E-line	168.53	42.63	0.69	0.14	7.45	0.59	0.52	0.00	1.37	0.94	0.00	0.00	178.56	44.3
Albert Lea M500 E-line	41.98	9.76	0.22	0.15	0.84	0.12	0.00	0.00	0.24	0.01	0.00	0.00	43.28	10.04
Faribault M500 D-line	148.91	31.28	1.65	0.62	17.48	4.02	0.07	0.00	2.32	0.98	0.00	0.00	170.43	36.9
Subtotal	**359.42**	**83.67**	**2.56**	**0.91**	**25.77**	**4.73**	**0.59**	**0.00**	**3.93**	**1.93**	**0.00**	**0.00**	**392.27**	**91.24**
A-Line Pipeline Disconnect Sites														
Ventura compressor station	0.76	0.00	0.00	0.00	0.02	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.79	0.00
Farmington compressor station	0.00	0.00	0.62	0.00	0.68	0.00	0.00	0.00	0.19	0.00	0.01	0.00	1.50	0.00
Subtotal	**0.76**	**0.00**	**0.62**	**0.00**	**0.70**	**0.00**	**0.00**	**0.00**	**0.20**	**0.00**	**0.01**	**0.00**	**2.29**	**0.00**
Temporary Compression Sites														
La Crosse BL MNB73201 launcher/ABA 05	1.30	0.00	0.00	0.00	0.44	0.00	0.00	0.00	0.07	0.00	0.00	0.00	1.81	0.00
Lake Mills compressor station	0.00	0.00	0.00	0.00	0.32	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.32	0.00
Owatonna compressor station	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0.00
Northfield #1	2.30	0.00	0.00	0.00	0.31	0.00	0.00	0.00	0.14	0.00	0.00	0.00	2.75	0.00
Subtotal	**3.60**	**0.00**	**0.00**	**0.00**	**1.07**	**0.00**	**0.00**	**0.00**	**0.21**	**0.00**	**0.00**	**0.00**	**4.88**	**0.00**
V2F Project Total	**363.78**	**83.67**	**3.18**	**0.91**	**27.54**	**4.73**	**0.59**	**0.00**	**4.34**	**1.93**	**0.01**	**0.00**	**399.44**	**91.24**

Source: 2021 National Land Cover Database and Field Survey Data from 2025

Table 3.2-2 Vegetation Impacts by Land Cover Type for NL27 Project

Project Component	Agricultural (acres)		Forested (acres)		Open Land (acres)		Developed Land (Urban or Landscape) (acres)		Wetland (acres)		Open Water (acres)		Total (acres)	
	Temp	Perm	Temp	Perm	Temp	Perm	Temp	Perm	Temp	Perm	Temp	Perm	Temp	Perm
Pipeline Extensions														
Lake Mills M500 E-line	36.75	11.27	0.40	0.24	9.38	3.71	0.27	0.27	0.00	0.00	0.00	0.00	**46.8**	**15.49**
Albert Lea M500 E-line	58.71	17.06	0.24	0.09	11.22	1.74	0.02	0	0.27	0.11	0.00	0.00	**70.46**	**19.00**
Willmar 3rd Branch Line Upstream	5.52	1.17	2.45	0.92	14.02	2.72	6.72	1.87	1.19[1]	0.72[2]	0.02	0.00	**29.92**	**7.40**
Willmar 3rd Branch Line Downstream	89.46	21.34	0.94	0.33	16.78	4.14	0.94	0.00	1.44	0.90	0.00	0.00	**109.56**	**26.71**
Welcome 2nd line	27.37	7.41	0.00	0.00	0.72	0.12	0.00	0.00	0.00	0.00	0.00	0.00	**28.09**	**7.53**
Paynesville 2nd Branch Line	19.36	4.03	3.43	1.47	18.27	5.17	0.44	0.21	0.78	0.39	0.00	0.00	**42.28**	**11.27**
Worthington 2nd Branch Line	32.78	12.04	0.08	0.00	2.87	0.93	0.00	0.00	0.00	0.00	0.00	0.00	**35.73**	**12.97**
Springfield 2nd Branch Line	106.77	36.82	0.71	0.24	10.87	4.15	0.09	0.00	0.28	0.05	0.00	0.00	**118.72**	**41.26**
Minnesota Interconnect 2nd Branch Line	26.91	5.21	2.92	0.00	9.12	1.31	0.02	0.00	0.07	0.00	0.00	0.00	**39.04**	**6.52**
Alexandria 2nd Branch Line	10.85	2.01	1.03	0.29	10.02	2.04	1.44	0.76	1.28	0.78	0.00	0.00	**24.62**	**5.88**
Subtotal	**414.48**	**118.36**	**12.20**	**3.58**	**103.27**	**26.03**	**9.94**	**3.11**	**5.31**	**2.95**	**0.02**	**0.00**	545.22	154.03
Aboveground Facility														
Hugo Compressor Station	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	**0.00**	**0.00**
Subtotal	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**
NL27 Project Total	**414.48**	**118.36**	**12.20**	**3.58**	**103.27**	**26.03**	**9.94**	**3.11**	**5.31**	**2.95**	**0.02**	**0.00**	545.22	154.03

Source: 2021 National Land Cover Database and Field Survey Data from 2025

[1]Includes 0.45 acre of temporary wetland type conversion of forested and scrub-shrub wetland.
[2]Includes 0.17 acre of permanent wetland type conversion of forested wetland and 0.02 acre of permanent wetland type conversion of scrub-shrub wetland.

Northern Natural Gas Company
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Requesting Party:	FERC
Reference No:	FERC-DR1-18
Requester's Name:	Allison King
Subject:	V2F Tree Clearing

Data Request 18 (Resource Report 3 – Fisheries, Vegetation, and Wildlife Resources):

Clarify the acreage of trees to be cleared for the V2F project. For example, table 3.2-1 for V2F potion 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…"

Response:
Northern will clear 3.18 acres of trees for the V2F Project. All tree clearing will occur on the Minnesota project components; no tree removal will occur for the Iowa project components. The acres of tree removal in Table 3.2-1 are accurate.

Posted: 06/22/2026 Responsibility: Brian Garcia