



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

January 29, 2024

Via eFiling

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: OEP/DG2E/Gas Branch 3 Northern Natural Gas Company
Northern Lights 2023 Expansion Project
Docket No. CP22-138-000
§ 375.308(x)

Dear Ms. Bose:

Northern Natural Gas (Northern) hereby submits for filing with the Federal Energy Regulatory Commission (FERC) in the above-referenced docket Northern's response to the data request issued by FERC staff January 18, 2024. Northern is still compiling information for its response to Data Request 6 and 7 and will file the responses upon completion, which is expected to be no later than February 9, 2024.

The attached privileged alignment sheets (Figure 1-5) contain confidential information regarding landowner names and have therefore been segregated and labeled **CUI//PRIV -- DO NOT RELEASE**. Pursuant to 18 CFR § 388.112, Northern requests confidential and privileged treatment of the privileged data.

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

Kimberly D. Bose, Secretary
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Any questions regarding the filing should be directed to the undersigned at (402) 398-7138.

Respectfully submitted,

/signed/ Donna Martens

Donna Martens
Senior Regulatory Analyst

cc: Parties of record

VERIFICATION

STATE OF NEBRASKA)

COUNTY OF DOUGLAS)

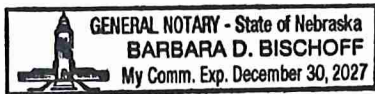
Brian Mundt, being duly sworn, on oath, states that he is Vice President, Operations, for Northern Natural Gas and is duly authorized to make this affidavit; that he has read the foregoing Data Response of such Company and is familiar with the contents thereof; that all the facts therein are true and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

Signed:



Brian Mundt
Vice President, Operations

SUBSCRIBED AND SWORN TO, before me, this *29* day of January 2024.



Barbara D. Bischoff
Notary Public in and for
Douglas County, Nebraska

My commission expires: *Dec 30, 2027*

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 29th day of January 2024.

/s/ Matthew R. Bley

Matthew R. Bley
Director, Gas Transmission Certificates
10700 Energy Way
Glen Allen, VA 23060

Northern Natural Gas Company
Data Response Form For Docket No. CP22-138-000
Northern Lights 2023 Expansion

Requesting Party: FERC
Reference No: FERC-envirJan18_24 - 001
Requester's Name: Paul Friedman
Subject: SWPPP, Construction Erosion and
Sediment Control Plan, HDD Plan,
Other Unfiled Plans

Data Request:

1. Provide Northern's final Stormwater Pollution and Prevention Plans, Construction Erosion and Sediment Control Plan, and any additional plans that have not yet been filed as part of its Application, Supplemental Filings, or the Implementation Plan (IP). Additionally, provide the final version of the complete Horizontal Directional Drill (HDD) Monitoring, Inadvertent Return Response and Contingency Plan, including the most recent versions of all attachments.

Response: Northern is providing the final Stormwater Pollution and Prevention Plans, Construction Erosion and Sediment Control Plan, and the HDD Monitoring, Inadvertent Return Response and Contingency Plan (HDD Plan). Northern removed the sound wall information from the site specific plans in the HDD Plan and will include the Project sound wall information in the response to data request No. 7 that will be submitted no later than February 9, 2024. Northern is not aware of any other plans that have not yet been filed as part of its application, supplemental filings, or the Implementation Plan.

Posted: 01/29/2024

Responsibility: Brian Mundt

Northern Natural Gas Company
Data Response Form For Docket No. CP22-138-000
Northern Lights 2023 Expansion

Requesting Party: FERC
Reference No: FERC-envirJan18_24 - 002
Requester's Name: Paul Friedman
Subject: Princeton Tie-over Valve Setting
Driveway

Data Request:

2. Verify if the existing drive at the Princeton tie-over valve setting, proposed for abandonment, would be used as the permanent drive for the expanded remote monitoring valve site to be constructed at the same site. Update the associated alignment sheet to include the existing drive as the permanent access to the site.

Response: Northern confirmed the existing drive will be used as the permanent drive for access to the remote monitoring valve site on the north side of 281st Avenue. Alignment sheet PRB P3-1 has been updated and the revision is depicted by a delta (F4) symbol on the alignment sheet. A complete set of alignment sheets (Figure 1-4/public and Figure 1-5/privileged) are provided as a separate attachment.

Posted: 01/29/2024

Responsibility: Brian Mundt

Northern Natural Gas Company
Data Response Form For Docket No. CP22-138-000
Northern Lights 2023 Expansion

Requesting Party: FERC
Reference No: FERC-envirJan18_24 - 003
Requester's Name: Paul Friedman
Subject: Update Alignment Sheets – Private
Water Wells/Buffer

Data Request:

3. Update alignment sheets to include all private water wells (as listed in table 4.3.1-1 of the Final Environmental Impact Statement [EIS]) and include the 200-foot refueling and storage buffer for each well.

Response: Northern has attached a revised set of alignment sheets (Figure 1-4/public and Figure 1-5/privileged) that include the private water well locations within 150 feet of the Project workspaces as indicated on table 4.3.1-1 of the final EIS. The alignment sheets have also been updated to add the 200-foot refueling and storage buffer for each of the private water wells. The updates are depicted with a delta (F4) symbol on the alignment sheets.

Northern confirmed four of the wells during civil survey: the wells located at approximate MP 2.3 and 2.5 on the Willmar Extension, one of the wells located at approximate MP 9.7 on the Princeton Extension, and the well located at approximate MP 1.2 on the Paynesville Loop. These wells are depicted with a blue double circle symbol and labeled “Survey Well Location”. The remaining wells that have not been confirmed are depicted with a purple filled circle symbol and labeled “Private Water Well (not located in the field) EI will field verify”. The on-site environmental inspectors will field verify all well locations included on the alignment sheets prior to construction and field update the alignment sheets accordingly.

Posted: 01/29/2024

Responsibility: Brian Mundt

Northern Natural Gas Company
Data Response Form For Docket No. CP22-138-000
Northern Lights 2023 Expansion

Requesting Party: FERC
Reference No: FERC-envirJan18_24 - 004
Requester's Name: Paul Friedman
Subject: Discrepancies – IP Alignment Sheets
and FEIS Table 8.1-6

Data Request:

4. Clarify the following discrepancies between the updated alignment sheets provided in the IP and the tables in the final EIS:

- a. Elk River Loop AR01 is not depicted or labeled on the alignment sheet. Condition 5 of Northern's IP states that ETWS07 was reduced and no longer crosses tract WA-008. Verify if Northern will no longer require AR01, which was also on tract WA-008, and update the access road table (see Information Request Comment 1, above).
- b. Wilmar Extension PD01 is not depicted or labeled on the alignment sheets.
- c. Ventura Extension staging area SA01 is not labeled on alignment sheets.

Response:

4a. Northern confirmed access road AR01 was removed from the Elk River 3rd branch line as part of the reduction in size of ETWS07. The updated access road and permanent driveways table (Table 8.1-6) is attached.

4b. Northern removed PD01 from the Willmar D branch extension. Northern was unable to secure a PD01 access road permit from the county. The updated access road and permanent driveways table (Table 8.1-6) is attached.

4c. Northern confirmed staging area SA01 is labelled on alignment sheet VBL P3-1; however, Northern added a label for staging area SA02, which was missing, on alignment sheet VBL P3-1. A complete set of alignment sheets (Figure 1-4/public and Figure 1-5/privileged) is provided as a separate attachment.

Posted: 01/29/2024

Responsibility: Brian Mundt

Table 8.1-6 Access Roads and Permanent Driveways (revised January 29, 2024)

| ID | MP | Type | Description | Length (feet) | Width (feet) | Existing Land Use (Subtotals) | Total Area (acres) |
|---|-----------|-------------|---|----------------------|---------------------|--------------------------------------|---------------------------|
| Ventura Northern E-line | | | | | | | |
| AR1 | 28.42 | Temporary | From 110th Street to workspace | 75 | 50-30 | Agricultural | 0.08 |
| AR2 | 29.00 | Temporary | From 705th Avenue to workspace | 490 | 50 | Agricultural 0.36 | 0.56 |
| | | | | | | Open Land 0.20 | |
| AR3 | 29.79 | Temporary | From 120th Street to workspace | 1,305 | 100-50 | Agricultural | 1.53 |
| AR4 | 29.88 | Temporary | From U.S. Hwy 69 to workspace | 65 | 55 | Agricultural 0.05 | 0.08 |
| | | | | | | Industrial/Commercial 0.03 | |
| AR5 | 29.93 | Temporary | Access between SA04 and ETWS18 | 945 | 50 | Agricultural | 1.47 |
| AR6 | 30.48 | Temporary | From U.S. Hwy 69 to workspace | 1,850 | 50 | Agricultural | 2.13 |
| AR7 | 31.19 | Temporary | From County Hwy 9 to Staging area | 845 | 45 | Industrial/Commercial 0.01 | 0.78 |
| | | | | | | Open Land 0.77 | |
| PD1 | 31.19 | Permanent | From County Hwy 9 to proposed valve | 75 | 20 | Open Land | 0.05 |
| Subtotal for Ventura Northern E-line | | | | | | | 6.68 |
| Elk River 3rd branch line | | | | | | | |
| PD1 | 1.07 | Permanent | From private driveway to proposed valve | 25 | 45 | Residential | 0.04 |
| Subtotal for Elk River 3rd branch line | | | | | | | 0.04 |
| Willmar D branch line | | | | | | | |
| AR1 | 2.21 | Temporary | From Huntington Way to workspace | 560 | 50 | Industrial/Commercial 0.01 | 0.65 |
| | | | | | | Open Land 0.52 | |
| | | | | | | Residential 0.12 | |
| AR2 | 2.27 | Temporary | From Huntington Way to workspace | 80 | 50 | Industrial/Commercial 0.01 | 0.09 |
| | | | | | | Open Land 0.08 | |
| AR3 | 2.45 | Temporary | From Huntington Way to workspace | 665 | 45-20 | Forested/Woodland 0.3 | 0.36 |
| | | | | | | Open Land 0.02 | |
| | | | | | | Wetland 0.04 | |
| AR4 | 2.55 | Temporary | From Lynn Drive to workspace | 220 | 15 | Residential | 0.07 |

Northern Natural Gas Company
Data Response Form For Docket No. CP22-138-000
Northern Lights 2023 Expansion

Requesting Party: FERC
Reference No: FERC-envirJan18_24 - 005
Requester's Name: Paul Friedman
Subject: Princeton Extension (MP 11.0) –
Workspace and Septic Field Distance

Data Request:

5. Verify the distance between the workspace (ETWS25) at Princeton Extension Milepost 11.0, and the identified septic field. If the distance is less than 50 feet, verify that Northern would follow the mitigation measures outlined in the final EIS section 4.8.2.

Response: Northern verified the distance between workspace ETWS25 and the identified septic field on the Princeton tie-over loop (Princeton extension) at milepost 11.0 is approximately 22 feet. Northern confirms it will follow the mitigation measures outlined in section 4.8.2 of the final EIS by including these requirements in Northern's construction contract documents.

Posted: 01/29/2024

Responsibility: Brian Mundt

Northern Natural Gas Company
Data Response Form For Docket No. CP22-138-000
Northern Lights 2023 Expansion

Requesting Party: FERC
Reference No: FERC-envirJan18_24 - 008
Requester's Name: Paul Friedman
Subject: HDD Nighttime Duration

Data Request:

8. Confirm the maximum number of nights Northern anticipates needing to conduct overnight HDD construction at each of the three HDDs requiring nighttime construction.

Response:

Northern confirms the maximum number of nights Northern anticipates needing to conduct overnight HDD construction at each of the three HDDs requiring nighttime construction is two nights for pullback activities.

Posted: 01/29/2024

Responsibility: Brian Mundt