



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

April 9, 2019

Via eFiling

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

Re: Northern Natural Gas Company
Northern Lights 2019 Expansion Project and Rochester Project
Docket No. CP18-534-000
Supplemental Cultural Resources Report Condition 15

Dear Ms. Bose:

In accordance with Condition 15 of the Order Issuing Certificate and Approving Abandonment issued February 21, 2019, Northern Natural Gas Company (Northern) hereby submits for filing with the Federal Energy Regulatory Commission the attached supplemental cultural resource report for the Alexandria branch line loop extension. The Alexandria report represents the completion of cultural resources surveys for all the Northern Lights 2019 and Rochester project facilities. Northern will file any comments received from the State Historic Preservation Office and the Tribal Historic Preservation Office once received.

The attached includes correspondence, cultural reports and alignment sheets that contain confidential information regarding specific information on the location of cultural resources; this information has been labeled "**CUI//PRIV --DO NOT RELEASE (PRIVILEGED).**" Pursuant to 18 CFR Section 388.112, Northern requests confidential and privileged treatment of these documents due to the confidential nature of the contents.

The person to be contacted regarding the request for privileged and confidential treatment is as follows:

Michael T. Loeffler
Senior Director, Certificates and External Affairs
Northern Natural Gas Company
1111 South 103rd Street
Omaha, NE 68124-1000
Telephone: 402-398-7077
FAX: 402-398-7190
Email: mike.loeffler@nngco.com

Kimberly D. Bose, Secretary
Page 2 of 2

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

Respectfully submitted,

/signed/ Michael T. Loeffler

Michael T. Loeffler
Senior Director, Certificates and External Affairs



1111 South 103rd Street
Omaha, NE 68124

April 8, 2019

Ms. Kelly Gragg-Johnson
State Historic Preservation Office
Administration Building #203
50 Sherburne Ave.
Saint Paul, MN 55155

Re: Northern Natural Gas Company – Northern Lights 2019 Expansion Project and Rochester Project – Carver, Freeborn, Hennepin, Le Sueur, Morrison, Mower, Rice, Steele and Wright counties, Minnesota; MN SHPO Number: 2018-0262; FERC Docket No. PF18-1-000 and CP18-534-000

Dear Ms. Gragg-Johnson,

Northern Natural Gas Company (Northern) is proposing to construct the Rochester Project (Rochester Project) and Northern Lights 2019 Expansion Project (NL 2019 Project) (collectively, the ‘Projects’). On April 23 and August 23, 2018, Northern submitted a preliminary evaluation and a supplemental report, respectively, detailing the results of two rounds of cultural resources investigations. These reports were completed by Phase One Archaeological Services, Inc. On September 27, 2018, the Minnesota SHPO office concurred with the findings in the two cultural investigation reports described above.

Northern is submitting a cultural resources letter report detailing the completion of cultural resources surveys for the Alexandria branch line loop extension component of the Northern Lights 2019 Expansion Project. The additional survey was completed in March and April 2019 by Commonwealth Heritage Group (CHG).

Alexandria Branch Line Loop Extension

As of March 2019, three parcels remained un-surveyed for the Alexandria branch line loop extension in Morrison County, Minnesota. The mileposts and correlating parcel ID numbers are listed in Table 1 below. These parcels include temporary workspace (TWS), extra temporary workspace (ETWS), staging areas, and horizontal directional drill (HDD) areas, as shown on the attached alignment sheets. The cultural resource survey for these parcels were completed March 29, and April 1 through 4, 2019, by CHG.

Please note the Alexandria branch line loop extension is located on the west and east side of the Mississippi River; however, no new pipe will be installed or removed under the river.

Table 1

Component name	Mileposts (MPs) Not Surveyed Due to Landowner Access	Parcel IDs	Workspace Type	Cultural Survey Status
NL 2019 Project				
Alexandria branch line loop extension	12.48 – 12.50	MO-000	Potential workspace for tie in	Complete
	13.65 – 13.91	MO-010	TWS, ETWS, staging area, and HDD	Complete
	14.00 – 14.26	OL-016	TWS and ETWS	Complete

CHG had good ground visibility throughout the surveyed areas as depicted in the photographs included in their report. Fourteen archaeological sites have been reported within one mile of the 2019 survey area. Of the 14, only two sites (21MO0120 Lindbergh Farm) and site 21MO0196 (archaic scatter) interest with the APE. No cultural resources have been recovered from the southern parcel of 21MO0120); therefore, this parcel has been removed from the site database. Northern’s project no longer intersects 21MO0120 as it is now limited to the area around the Charles Lindberg State Park (approximately one mile from the APE). Site 21MO0196 was investigated during 2018 and no cultural resources were found. Northern has off-set the pipeline centerline approximately 25 feet from the site and will also complete an HDD approximately 25 feet below grade in the vicinity of the site.

CHG conducted pedestrian surveys for the APE on the west side of the Mississippi River as ground surface visibility was 90 percent during the survey. The APE east of the Mississippi River consisted of a grass-covered field and was subject to shovel testing. CHG used a heated drum to thaw frozen ground to allow for excavation and screening at the shovel test locations. CHG’s report provides additional description and photos regarding the shovel testing. No cultural resources were observed within the APE surveyed in March/April 2019.

Completion of this investigation represents 100% survey completion for the Alexandria branch line loop extension and also the Northern Lights 2019 Expansion Project. No archaeological resources were identified within the final APE for this Project component. The final APE was reduced to match final construction workspaces for the un-surveyed parcels as depicted on the attached P&C alignment sheets. Northern respectfully requests your expedited review and concurrence with a finding that no historic properties will be affected by the Alexandria branch line loop extension.

Northern is concurrently submitting the results of the above survey to the Upper Sioux Community Tribal Historic Preservation Officer and the Federal Energy Regulatory Commission for their review and concurrence.

Northern Natural Gas Company
Northern Lights 2019 Expansion Project and Rochester Project
April 8, 2019

Northern respectfully requests your expedited review of the enclosed report and the above findings and recommendations. Your expedited review will allow Northern to ensure that all Project components can be constructed and ready for service in time for the Minnesota winter heating season. Should you have any questions or concerns please contact me (402-398-7226 or terry.plucker@mngco.com) or Susan Knabe of Stantec (920-278-3220 or Susan.Knabe@stantec.com).

Sincerely,



Terry Plucker
Manager of Construction Environmental Compliance
Northern Natural Gas Company

Enclosures: Additional Phase I Investigations: Northern Natural Gas Company Proposed
Alexandria Branch Line Loop Extension Project, Morrison County, Minnesota
Appendix B- Alignment Sheets

CC: Susan Knabe, Stantec Consulting

Appendix A

CHG Investigation Results

Additional Phase I Investigations: Northern Natural Gas Company
Proposed Alexandria Branch Line Loop Extension Project,
Morrison County, Minnesota

Appendix B

Alignment Sheets (2019 Survey Parcels in Green)

Alexandria Branch Line Loop Extension



1111 South 103rd Street
Omaha, NE 68124

April 8, 2019

Samantha Odegard, THPO
Upper Sioux Community
P.O. Box 147
Granite Falls, Minnesota 56241

Re: Northern Natural Gas Company – Northern Lights 2019 Expansion Project and Rochester Project – Carver, Freeborn, Hennepin, Le Sueur, Morrison, Mower, Rice, Steele and Wright counties, Minnesota; FERC Docket No. PF18-1-000 and CP18-534-000

Dear Ms. Odegard,

Northern Natural Gas Company (Northern) is proposing to construct the Rochester Project (Rochester Project) and Northern Lights 2019 Expansion Project (NL 2019 Project) (collectively, the ‘Projects’). On April 23 and August 23, 2018, Northern submitted a preliminary evaluation and a supplemental report, respectively, detailing the results of two rounds of cultural resources investigations. These reports were completed by Phase One Archaeological Services, Inc. In May, June, and December 2018; and March 2019, the Upper Sioux Community Tribal Historic Preservation Office (THPO) contacted Northern to discuss the two cultural investigation reports described above. Northern has agreed to a tribal cultural resources monitor for the Alexandria branch line loop extension, final survey for which will follow under a separate letter once complete. During the March 2019 discussion, Northern informed your office of the intention to complete the remaining surveys within the next month and that a concurrent and expedited review would be appreciated.

Northern is submitting a cultural resources letter report detailing the completion of cultural resources surveys for the Alexandria branch line loop extension component of the Northern Lights 2019 Expansion Project. The additional survey was completed in March and April 2019 by Commonwealth Heritage Group (CHG).

Alexandria Branch Line Loop Extension

As of March 2019, three parcels remained un-surveyed for the Alexandria branch line loop extension in Morrison County, Minnesota. The mileposts and correlating parcel ID numbers are listed in Table 1 below. These parcels include temporary workspace (TWS), extra temporary workspace (ETWS), staging areas, and horizontal directional drill (HDD) areas, as shown on the attached alignment sheets. The cultural resource survey for these parcels were completed March 29, and April 1 through 4, 2019, by CHG.

Please note the Alexandria branch line loop extension is located on the west and east side of the Mississippi River; however, no new pipe will be installed or removed under the river.

Table 1

Component name	Mileposts (MPs) Not Surveyed Due to Landowner Access	Parcel IDs	Workspace Type	Cultural Survey Status
NL 2019 Project				
Alexandria branch line loop extension	12.48 – 12.50	MO-000	Potential workspace for tie in	Complete
	13.65 – 13.91	MO-010	TWS, ETWS, staging area, and HDD	Complete
	14.00 – 14.26	OL-016	TWS and ETWS	Complete

CHG had good ground visibility throughout the surveyed areas as depicted in the photographs included in their report. Fourteen archaeological sites have been reported within one mile of the 2019 survey area. Of the 14, only two sites (21MO0120 Lindbergh Farm) and site 21MO0196 (archaic scatter) interest with the APE. No cultural resources have been recovered from the southern parcel of 21MO0120); therefore, this parcel has been removed from the site database. Northern’s project no longer intersects 21MO0120 as it is now limited to the area around the Charles Lindberg State Park (approximately one mile from the APE). Site 21MO0196 was investigated during 2018 and no cultural resources were found. Northern has off-set the pipeline centerline approximately 25 feet from the site and will also complete an HDD approximately 25 feet below grade in the vicinity of the site.

CHG conducted pedestrian surveys for the APE on the west side of the Mississippi River as ground surface visibility was 90 percent during the survey. The APE east of the Mississippi River consisted of a grass-covered field and was subject to shovel testing. CHG used a heated drum to thaw frozen ground to allow for excavation and screening at the shovel test locations. CHG’s report provides additional description and photos regarding the shovel testing. No cultural resources were observed within the APE surveyed in March/April 2019.

Completion of this investigation represents 100% survey completion for the Alexandria branch line loop extension and also the Northern Lights 2019 Expansion Project. No archaeological resources were identified within the final APE for this Project component. The final APE was reduced to match final construction workspaces for the un-surveyed parcels as depicted on the attached P&C alignment sheets. Northern respectfully requests your expedited review and concurrence with a finding that no historic properties of tribal significance will be adversely affected due to avoidance measures and tribal cultural resources monitoring during construction of the Alexandria branch line loop extension.

Northern has already agreed to having a cultural resources monitor representing the Upper Sioux Community on the Alexandria branch line loop extension during construction, due to the proximity of nearby sites of significance to the Upper Sioux Community. In your April 3, 2019,

Northern Natural Gas Company
Northern Lights 2019 Expansion Project and Rochester Project
April 8, 2019

email your office also requested to have a monitor on the Rockford to Buffalo greenfield lateral when construction is taking place near the approximate boundaries of 21WRAt which was not relocated during field investigations. You also conducted a site visit in the vicinity of 21WR84 on April 5, 2019. Northern concurs that cultural monitor is appropriate for portions of the Rockford to Buffalo project and awaits your official response letter.

Northern is concurrently submitting the results of the above survey to the Minnesota State Historic Preservation Office and the Federal Energy Regulatory Commission for their review and concurrence.

While the regulations for implementing Section 106 (36 Code of Federal Regulations Part 800) allow companies like Northern (and their consultants) to gather information, the FERC is responsible for monitoring compliance with the NHPA and determinations pursuant to Section 106. Additionally, the FERC, not Northern, is responsible for government-to-government consultations with American Indian Tribes. In February 2018, the FERC contacted you through a *Notice of Intent to Produce an Environmental Document*. If you would like to communicate directly with the FERC natural gas archaeological staff to discuss its cultural resource review and consultation process, please feel free to contact Laurie Boros, Tribal Coordinator, at 202-502-8046 or laurie.boros@ferc.gov).

Northern respectfully requests your expedited review of the enclosed reports and the above findings and recommendations. Your expedited review will allow Northern to ensure that all Project components can be constructed and ready for service in time for the Minnesota winter heating season. Should you have any questions or concerns please contact me (402-398-7226 or terry.plucker@nngco.com) or Susan Knabe of Stantec (920-278-3220 or Susan.Knabe@stantec.com).

Sincerely,



Terry Plucker
Manager of Construction Environmental Compliance
Northern Natural Gas Company

Enclosures: Additional Phase I Investigations: Northern Natural Gas Company 16" Rochester Greenfield Lateral Project, Olmsted County, Minnesota
Appendix B- Alignment Sheets

CC: Susan Knabe, Stantec Consulting

Northern Natural Gas Company
Northern Lights 2019 Expansion Project and Rochester Project
April 8, 2019

Appendix A

CHG Investigation Results

Additional Phase I Investigations: Northern Natural Gas Company
Proposed Alexandria Branch Line Loop Extension Project,
Morrison County, Minnesota

Northern Natural Gas Company
Northern Lights 2019 Expansion Project and Rochester Project
April 8, 2019

Appendix B

Alignment Sheets (2019 Survey Parcels in Green)

Alexandria Branch Line Loop Extension