



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

April 19, 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  
THPO/SHPO correspondence - 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 the attached correspondence from the Minnesota State Historic Preservation Office (SHPO) and Upper Sioux Community Tribal Historic Preservation Officer (THPO) demonstrating completion of the Section 106 consultation with the SHPO and THPO for all project components. Northern further notes it has acquired the Carver compressor station site in fee.

In its March 21, 2019, letter approving commencement of construction of the Faribault and Owatonna compressor stations and the New Prague branch line loop components of the Project, Commission staff indicated it would consider Northern's request for approval to commence construction on the Carver compressor station once Northern filed the necessary information to allow FERC staff to complete Section 106 consultation.

With the Section 106 documentation complete, agency concurrence with findings of "no adverse effect on cultural/historic resources, or no historic properties affected/present" for all Project components, and the affirmation that Northern holds the necessary land rights, Northern respectfully requests Commission staff issue approval to commence construction on the Carver compressor station expeditiously in order for the station to be in-service to meet customer requirements by November 1, 2019.

The THPO correspondence discusses the specific location of Tribal Cultural Property; this information has, therefore, been labeled "**CU//PRIV ---DO NOT RELEASE (PRIVILEGED).**" Pursuant to 18 CFR Section 388.112, Northern requests confidential and privileged treatment of the THPO correspondence 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

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

April 18, 2019

Mr. Terry Plucker  
Northern Natural Gas Company  
1111 South 103<sup>rd</sup> Street  
Omaha, NE 68124

RE: Docket No. PF18-1-000  
Northern Natural Gas Company, Northern Lights 2019 Expansion Project and Rochester Project  
Carver, Freeborn, Hennepin, Le Sueur, Morrison, Mower, Olmsted, Rice, Steele and Wright Counties  
SHPO Number: 2018-0262

Dear Mr. Plucker,

Thank you for continuing consultation on the above project. Information received in our office on April 1, April 8 and April 9, 2019 has been reviewed pursuant to the responsibilities given the State Historic Preservation Officer by Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA), and implementing federal regulations at 36 CFR § 800.

As we understand it, Northern Natural Gas is proposing to construct natural gas pipelines, pipeline extensions, metering stations, valve assemblies, compressor stations and associated tree clearing, staging areas and access roads in several counties within Minnesota.

We previously reviewed the documentation provided in your August 24, 2018 correspondence in regards to your agency's determination of the area of potential effect (APE) for the Federal undertaking. At that time, based upon the documentation submitted regarding the natural gas projects' parameters and locations, we agreed that this APE determination is generally appropriate to take into account the potential direct and indirect effects of the proposed undertaking as we currently understand it. In the recent submittals, we were not made aware of any changes to the projects' scope or locations and therefore we assume that the previously defined APE is still valid. If this is not the case, and subsequent project design development has resulted in significant change in scope or nature that you have not specified in recent submittals, then you will need to re-initiate consultation with our office.

As you are aware, we last commented on this project in a letter dated September 27, 2018 providing comments and recommendations regarding the results of the Phase I archaeological survey work that had been completed to that point.

We have now received and reviewed the following documents for the previously un-surveyed portions of this project that were included with your April 1, April 8 and April 9 submittals:

- Letter Report: *Additional Phase I Archaeological Investigations, Northern Natural Gas Company Proposed 24" Rockford to Buffalo Greenfield Lateral Project, Wright County, Minnesota* (March 29, 2019, Commonwealth Heritage Group);
- Letter Report: *Additional Phase I Archaeological Investigations, Northern Natural Gas Company Proposed 24" Willmar C-Line Extension Project, Carver County, Minnesota* (March 29, 2019, Commonwealth Heritage Group);
- Letter Report: *Additional Phase I Archaeological Investigations, Northern Natural Gas Company Proposed 16" Rochester Greenfield Lateral Project, Olmsted County, Minnesota* (April 2, 2019, Commonwealth Heritage Group)
- Letter Report: *Additional Phase I Archaeological Investigations, Northern Natural Gas Company Proposed Alexandria Branch Line Loop extension Project, Morrison County, Minnesota* (April 5, 2019, Commonwealth Heritage Group)

Based on our review of this additional information, we provide the following comments:

### Northern Lights 2019 Expansion Project

#### Rockford to Buffalo Greenfield Lateral:

##### ***Archaeological Resources (survey complete)***

According to the recently submitted letter report, no additional archaeological sites were identified within the APE for this portion of the project. As you know, two (2) archaeological sites were identified within the APE for this portion of the project during a previous survey: 21WR0142 and 21WR0143. Site 21WR0142 has not been evaluated to determine its eligibility for listing in the National Register of Historic Places (NRHP). Site 21WR0143 was determined *not eligible* for listing in the NRHP (see September 27, 2018 SHPO letter).

Provided that impacts to site 21WR0142 are avoided by installing the pipeline by horizontal directional drilling (HDD) as stated in your August 24, 2018 correspondence, we agree that this portion of the project will have **no adverse effect** on archaeological site 21WR0142.

##### ***Architecture/History Properties***

No architecture/history properties were identified within the APE for this portion of the project.

Based on information that is available to us at this time, we agree that the Rockford to Buffalo Greenfield Lateral will have **no adverse effect** on historic properties.

#### Alexandria Branch Line Loop Extension:

##### ***Archaeological Resources (survey complete)***

According to the recently submitted letter report, no additional archaeological sites were identified within the APE for this portion of the project. As you know, two previously identified archaeological sites are located within the APE for this portion of the project: 21MO0196 and 21MO0120. These sites have not been evaluated to determine their eligibility for listing in the NRHP. A pedestrian survey was previously completed in the area of site 21MO0196, but no cultural resources were observed. Provided that impacts to this site are avoided by installing the pipeline by HDD as stated in your correspondence, we agree that this project will have **no adverse effect** on site 21MO0196. A pedestrian survey was also completed in the southern portion of the Lindbergh Farm site, site 21MO0120, but no cultural resources were observed. The northern portion of this site has not been surveyed but is no longer in the APE for this project.

##### ***Architecture/History Properties***

No architecture/history properties were identified within the APE for this portion of the project.

Based on information that is available to us at this time, we agree that the Alexandria Branch Line Loop Extension will have **no adverse effect** on historic properties, as currently proposed.

#### New Prague Branch Line Loop:

##### ***Archaeological Resources (survey complete)***

No archaeological resources were identified within the APE for this portion of the project.

##### ***Architecture/History Properties***

One architecture/history property was identified within the APE as a result of the investigations, the John Petrinka House (LE-NPC-064). We have determined that this property is *not eligible* for listing in the NRHP.

As stated in our previous letter dated September 27, 2018, based on information that is available to us at that time, we agree that **no historic properties will be affected** by the New Prague Branch Line Loop, as proposed.

Willmar C-Line Extension:

***Archaeological Resources (survey complete)***

According to the recently submitted and previously reviewed survey reports, no archaeological sites were identified within the APE for this portion of the project.

***Architecture/History Properties***

No architecture/history properties were identified within the APE for this portion of the project.

Based on information that is available to us at this time, we agree that **no historic properties will be affected** by the Willmar C-Line Extension, as currently proposed.

Carver Compressor Station:

***Archaeological Resources (survey complete)***

No archaeological resources were identified within the APE for this portion of the project.

***Architecture/History Properties***

One previously identified historic property is located adjacent to the APE for this portion of the project, **King Oscar's Settlement**, a historic district which is listed in the NRHP. Two additional architecture/history properties were identified within the APE as a result of the investigations, a house (CR-DHL-059) and the Peter Carlson Farmstead (CR-DHL-060). We have determined that these properties are *not eligible* for listing in the NRHP.

As stated in our previous letter dated September 27, 2018, based on information that is available to us at that time, we agreed that the Carver Compression Station, as proposed, will have **no adverse effect** on King Oscar's settlement, due to existing vegetation that screens the historic property from the proposed compressor station.

Faribault Compressor Station:

***Archaeological Resources (survey complete)***

No archaeological resources were identified within the APE for this portion of the project.

***Architecture/History Properties***

One architecture/history property was identified within the APE as a result of the investigations, the Otto Krantz Farmstead (RC-WAR-020). We have determined that this property is *not eligible* for listing in the NRHP.

As stated in our previous letter dated September 27, 2018, based on information that is available to us at that time, we agree that **no historic properties will be affected** by the Faribault Compressor Station, as proposed.

Owatonna Compressor Station:

***Archaeological Resources (survey complete)***

No archaeological resources were identified within the APE for this portion of the project.

***Architecture/History Properties***

No architecture/history properties were identified within the APE for this portion of the project.

As stated in our previous letter dated September 27, 2018, based on information that is available to us at that time, we agree that **no historic properties will be affected** by the Owatonna Compressor Station, as proposed.

## Rochester Project

### Rochester Greenfield Lateral:

#### ***Archaeological Resources (survey complete)***

According to the current and previous survey reports, no archaeological sites were identified within the APE for this portion of the project.

#### ***Architecture/History Properties***

No architecture/history properties were identified within the APE for this portion of the project.

Based on information that is available to us at this time, we agree that **no historic properties will be affected** by the Rochester Greenfield Lateral, as currently proposed.

### La Crosse Branch Line MAOP Uprate:

#### ***Archaeological Resources (survey complete)***

No archaeological resources were identified within the APE for this portion of the project.

#### ***Architecture/History Properties***

No architecture/history properties were identified within the APE for this portion of the project.

As stated in our previous letter dated September 27, 2018, based on information that is available to us at this time, we agree that **no historic properties will be affected** by the La Crosse Branch Line MAOP Uprate, as currently proposed.

### Rochester TBS:

#### ***Archaeological Resources (survey complete)***

No archaeological resources were identified within the APE for this portion of the project.

#### ***Architecture/History Properties***

No architecture/history properties were identified within the APE for this portion of the project.

As stated in our previous letter dated September 27, 2018, based on information that is available to us at that time, we agreed that **no historic properties will be affected** by the Rochester TBS, as proposed.

### MAOP Regulator:

#### ***Archaeological Resources (survey complete)***

No archaeological resources were identified within the APE for this portion of the project.

#### ***Architecture/History Properties***

No architecture/history properties were identified within the APE for this portion of the project.

As stated in our previous letter dated September 27, 2018, based on information that is available to us at that time, we agree that **no historic properties will be affected** by the MAOP Regulator, as proposed.

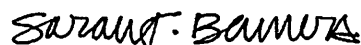
### Summary Assessment of Effects

Based on information that is available to us at this time, including the results of the completed cultural resource investigations, we have determined that the Northern Lights 2019 Expansion Project and the Rochester Project will have **no adverse effect** on historic properties.

Implementation of the undertaking in accordance with this finding, and previous findings, as documented, fulfills the agency's responsibilities under Section 106. If the project is not constructed as proposed, including, but not limited to, a situation where engineering/design changes to the currently proposed project diverts substantially from what was presented at the time of this review, or our earlier review, the agency will need to reopen Section 106 consultation with our office.

Please feel free to contact me at (651) 290-3290 or [sarah.beimers@state.mn.us](mailto:sarah.beimers@state.mn.us) if you have any questions regarding our review of this project.

Sincerely,

A handwritten signature in black ink that reads "Sarah J. Beimers". The signature is written in a cursive, slightly slanted style.

Sarah J. Beimers  
Environmental Review Program Manager