



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

May 15, 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
Request Notice to Proceed with Construction and Approval of Variances

Dear Ms. Bose:

Northern Natural Gas Company (Northern) hereby submits for filing with the Federal Energy Regulatory Commission (FERC or Commission), its request for (1) authorization to commence construction on the Alexandria Branch Line Loop Extension (Alexandria Loop Extension) and (2) approval of the variances requested for the Alexandria Loop Extension in its February 27, 2019, submittal to the Commission – the variances were requested in compliance with Condition 5 of the Order Issuing Certificate and Approving Abandonment issued February 21, 2019 (Order).

In accordance with Condition 9 of the Order, attached is an updated Authorization Status table demonstrating Northern has received all applicable authorizations required under federal law. In addition, on April 19, 2019, in response to Condition 15 of the Order, Northern submitted 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. A table also is attached that describes each of the variances requested for the Alexandria Loop Extension in the February 27, 2019, submittal and demonstrates landowner approval for each of the variances.

With the information provided in this filing, responses submitted to the Commission February 27, 2019; March 13, 2019; March 27, 2019; April 4, 2019 (refiled on April 5, 2019); and April 19, 2019, and the affirmation that Northern holds the necessary land rights, Northern respectfully requests Commission staff issue approval (1) to commence construction on the Alexandria Loop Extension and (2) for the variances requested for the Alexandria Loop Extension expeditiously in order for the facilities to be in-service to meet customer requirements by November 1, 2019.

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

Authorization Status		
Agency Name	Permit/Authorization/Letter of Concurrence	Status
FERC	Certificate for construction and operation of interstate natural gas transmission pipeline facilities ¹	Issued February 21, 2019
EPA	Clean Air Act permits and approvals	Delegated to the state (MPCA)
	CWA Section 401 Water Quality Certification	Delegated to the state (MPCA)
	CWA Section 402 permits for wastewater or stormwater discharges	Delegated to the state (MPCA)
NRCS	Conservation Easement Program and seeding recommendations; Conservation Reserve Program ¹	Consultation complete March 2018.
USACE – St. Paul District	CWA Section 404 – Dredge and Fill Permit; Section 10 Rivers and Harbors Act ¹ Utility Regional General Permit without preconstruction notification	Concurrence December 11, 2018
USFWS – Twin Cities Field Office	Section 7 Endangered Species Act, Bald and Golden Eagle Protection Act, and MBTA ¹ No effect for all species, except northern long-eared bat 4D rule	Consultation complete December 21, 2018
Native American Tribes	NHPA and Section 106 consultation to determine if the project will have impact on receptors of Native American cultural importance ¹	Ongoing coordination with Upper Sioux Community regarding a tribal monitor for the Alexandria branch line loop extension and Rockford to Buffalo greenfield lateral
MPCA	For the Faribault compressor station, Clean Air Act, Prevention of Significant Deterioration Minor Construction/Title V Major Air Operations Permit. For the Carver and Owatonna compressor stations, Clean Air Act, Prevention of Significant Deterioration Minor Construction/Title V Minor Air Operation Permit ²	Permit applications submitted September 28, 2018. Permit for the Owatonna compressor station received February 25, 2019. Faribault received April 26, 2019. Carver received May 9, 2019

Authorization Status		
Agency Name	Permit/Authorization/Letter of Concurrence	Status
	Section 401 Water Quality Certification ¹	Authorization concurrent with USACE Section 404 approval. No individual 401 certification will be required.
	NPDES Stormwater Permit ¹	Owatonna, Faribault, and Carver compressor stations received March 15, 2019. New Prague branch line and Alexandria branch line received April 16, 2019. Rockford to Buffalo received April 26, 2019, Rochester received May 1, 2019. Willmar C-line submitted April 16, 2019, anticipated May 16, 2019.
	NPDES Trench Water Discharge Permit ¹	Owatonna, Faribault, and Carver compressor stations received March 15, 2019. New Prague branch line and Alexandria branch line received April 16, 2019. Rockford to Buffalo received April 26, 2019, Rochester received May 1, 2019. Willmar C-line submitted April 16, 2019, anticipated May 16, 2019.
MDNR	State License to Cross Public Lands and Waters ¹	Received April 25, 2019.
	State Protected Species Consultation ¹	Consultation complete December 20, 2019
	Water Appropriation Permit General Permit 1997-0005 ¹	Faribault compressor station received March 15, 2019. Owatonna compressor

Authorization Status		
Agency Name	Permit/Authorization/Letter of Concurrence	Status
		<p>station received March 19, 2019. Carver compressor station received March 21, 2019.</p> <p>New Prague branch line received April 8, 2019. Alexandria branch line received April 9, 2019. Rockford to Buffalo greenfield received April 11, 2019. La Crosse branch line MAOP uprate and Willmar C-line received April 12, 2019. Rochester received April 26, 2019</p>
Minnesota Historical Society - SHPO	Section 106 Consultation, NHPA ¹	<p>Concurrence of “no historic properties affected” for Faribault and Owatonna compressor stations, New Prague branch line loop, Rochester TBS, La Crosse branch line MAOP regulator station, and La Crosse branch line MAOP uprate; and “no adverse effect on King Oscar’s settlement” for Carver compressor station received September 27, 2018</p> <p>The MN SHPO provided concurrence with findings of either “no historic properties affected,” or “no adverse effect on historic properties” for all project facilities April 18, 2019.</p>
Township Cooperative Planning	Grading permit ³	Obtained May 7, 2019

Authorization Status		
Agency Name	Permit/Authorization/Letter of Concurrence	Status
Association-Olmsted County		
Soil and Water Conservation District-Olmsted County	Grading permit/wetland permit ³	USACE coordinated concurrence December 11, 2018
Hennepin County	Floodplain disturbance permit ²	Not required
Pioneer-Sarah Creek Watershed Management Commission ²	Wetland permit ²	Will be obtained prior to the start of construction
Olmsted County SWCD	Wetland delineation concurrence for the Rochester project	USACE coordinated concurrence December 11, 2018
Wright County SWCD	Wetland delineation concurrence for the Rockford to Buffalo project ²	USACE coordinated concurrence December 11, 2018

¹ Permit applications and authorizations apply to both the Rochester Project and NL 2019 Project

² Permit applications and authorizations apply to only NL 2019 Project

³ Permit applications and authorizations apply to only the Rochester Project

Northern Lights 2019/Rochester Expansion (CP18-534)
 Modifications requested February 27, 2109 with Implementation Plan
 Landowner Approval – Alexandria Branch Line Loop Extension

Alignment Sheets	Parcel(s)	Modification	L.O. Approved
Alexandria Branch Line Loop Extension			
P3-1 – P3-12		: In compliance with Condition 12 of the Order, Northern shifted the pipeline centerline to reduce the proposed 50-foot offset to a 25-foot offset from the adjacent 8-inch-diameter Alexandria branch line (MNB72901). As a result of the shift in the pipeline alignment, the footprints of the extra temporary work space (ETWS) and staging areas have been revised. The horizontal directional drill (HDD) profiles also have been updated to reflect the revised pipeline alignment as shown on the attached Plan and Profiles (WLL-P4-1, 2, 3, 4, 5, 8, 10, 11 and 12) and Site Specific Plans (SSP-001, 002, 003, 004, 005, 008, 0010, 0011 and 0012).	YES
P3-1	MO-000	The workspace was removed from the west side of 140th Avenue. The workspace removal reduced landowner impact by removing parcel MO-000 from the project.	YES
P3-2	MO-002	The pipe pull section workspace for the HDD under wetland ABL-29W1 was straightened. The workspace change will improve HDD constructability and will not increase landowner or environmental impact.	YES
P3-2	MO-003	The width for access road AR-03 was increased from 25 feet to 50 feet. The increase will improve access for large equipment and does not add new affected landowners to the project.	YES
P3-3	MO-006	The ETWS at MP 13.5 was extended to cover the entire receiver and valve site. The entire site is required in the workspace to safely complete the receiver installation.	YES
P3-4	MO-007-009	The ETWS at MP 13.5 was extended to cover the entire receiver and valve site. The entire site is required in the workspace to safely complete the receiver installation.	YES
P3-5	MO-011-014	Two proposed HDDs (MP 13.9-13.97 and MP 14.02-14.06) were combined into one HDD to accommodate a landowner request, and are shown on plan and profile ABL-P4-5. The change reduced landowner impact by removing parcel MO-013 from the project.	YES
P3-6 and P3-7	MO-016	The HDD (ABL-P4-8) was combined with the typical HDD under Highway 238 to maintain a 25 foot depth entirely under the entire environmental sensitive area on P3-7. The drill was also extended to increase the depth under Highway 238 and reduce the risk of an inadvertent release under the highway. The temporary workspace at MP 14.5 was increased to accommodate the longer drill and point of inflection.	YES