



Northern Natural Gas Company  
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Omaha, NE 68103-0330  
402 398-7200

May 16, 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/Rochester Expansion Projects  
Docket No. CP18-534-000  
Alexandria Branch Line Loop Extension – Supplemental Variance  
Information and Request to Proceed with Construction on Rochester  
Greenfield Lateral**

Dear Ms. Bose;

Northern Natural Gas Company (Northern) hereby submits for filing with the Federal Energy Regulatory Commission (FERC or Commission) in the above-referenced docket: (1) supplemental information for a variance request submitted February 27, 2019, for the Alexandria branch line loop extension (Alexandria Loop Extension); (2) approval of the variances requested for the Rochester Lateral 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); and (3) authorization to commence construction on the Rochester Greenfield Lateral (Rochester Lateral).

Northern provided the following description in its February 27 filing for a variance on the Alexandria Loop Extension:

Alignment Sheet P3-6 and P3-7: 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 also was extended to increase the depth under Highway 238 to 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 the point of inflection.

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Northern inadvertently omitted from the February 27 filing the fact that additional workspace also was added at MP 14.9 to accommodate the longer drill and point of inflection. Additional workspace was added on the north side of 130th Street at MP 15.0 (alignment sheet P3-8) to provide adequate space to complete both the 130th Street horizontal directional drill (HDD) and HDD under wetland ABL-P4-10. The additional workspace falls within the environmentally surveyed areas and will not result in any additional impacts to cultural resources, threatened and endangered species, or wetlands. No additional agency consultations are required as a result of the proposed revisions. The land use is the same as the originally proposed alignments. No new landowners are affected by the proposed revisions and the existing landowners are in agreement with the proposed revisions.

In addition, Northern requests authorization to commence construction on the Rochester Lateral. 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. 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 is attached that describes each of the variances requested for the Rochester Lateral in the February 27 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); April 19, 2019, and May 15, 2019, and the affirmation that Northern holds the necessary land rights, Northern respectfully requests Commission staff issue approval (1) of the additional workspace at MP 14.9 and MP 15.0 in addition to the variances included in the February 27 filing for the Alexandria Loop Extension; (2) for the variances requested for the Rochester Lateral and (3) to commence construction on the Rochester Lateral. Northern respectfully request that the Commission issue an order as expeditiously as possible in order for the facilities to be in-service to meet customer requirements by November 1, 2019.

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

Respectfully Submitted,

/s/ 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 <sup>1</sup>  | 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 <sup>1</sup>  | Consultation complete March 2018.  |
| USACE – St. Paul District        | CWA Section 404 – Dredge and Fill Permit; Section 10 Rivers and Harbors Act <sup>1</sup> 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 <sup>1</sup> 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 <sup>1</sup>   | 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 <sup>2</sup> | Permit applications submitted September 28, 2018.<br><br>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 <sup>1</sup>             | Authorization concurrent with USACE Section 404 approval. No individual 401 certification will be required.   |
|                      | NPDES Stormwater Permit <sup>1</sup>                             | 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 <sup>1</sup>                 | 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 <sup>1</sup>      | Received April 25, 2019.  |
|                      | State Protected Species Consultation <sup>1</sup>                | Consultation complete<br>December 20, 2019  |
|                      | Water Appropriation Permit General Permit 1997-0005 <sup>1</sup> | Faribault compressor station received March 15, 2019.<br>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.<br/>           Alexandria branch line received April 9, 2019.<br/>           Rockford to Buffalo greenfield received April 11, 2019. La Crosse branch line MAOP uprate and Willmar C-line received April 12, 2019.<br/>           Rochester received April 26, 2019</p>  |
| Minnesota Historical Society - SHPO | Section 106 Consultation, NHPA <sup>1</sup> | <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 <sup>3</sup>                 | Obtained May 7, 2019  |

| <b>Authorization Status</b>                                      |  |   |
|--|--|---|
| <b>Agency Name</b>   | <b>Permit/Authorization/Letter of Concurrence</b>                                | <b>Status</b>                                       |
| Association-Olmsted County                                       |  |   |
| Soil and Water Conservation District-Olmsted County              | Grading permit/wetland permit <sup>3</sup>                                       | USACE coordinated concurrence December 11, 2018     |
| Hennepin County  | Floodplain disturbance permit <sup>2</sup>                                       | Not required  |
| Pioneer-Sarah Creek Watershed Management Commission <sup>2</sup> | Wetland permit <sup>2</sup>  | 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 <sup>2</sup> | USACE coordinated concurrence December 11, 2018     |

<sup>1</sup> Permit applications and authorizations apply to both the Rochester Project and NL 2019 Project

<sup>2</sup> Permit applications and authorizations apply to only NL 2019 Project

<sup>3</sup> 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 – Rochester Greenfield Lateral

| Alignment Sheets                    | Parcel(s)  | Modification   | Landowner approval |
|-------------------------------------|------------|--|--------------------|
| <b>Rochester Greenfield Lateral</b> |            |  |                    |
| P3-1                                | OL-001     | The ETWS at MP 0.0 was extended to cover the entire launcher and valve site. The entire site is required in the workspace to safely complete the receiver installation.  | YES                |
| P3-3                                | Off OL-007 | Access road was added at MP 1.2. The access road is required to access the temporary workspace during construction.  | YES                |
| P3-3                                | OL-007     | The HDD crossing the wetland at the North Branch Root River was combined with a typical HDD crossing County Road 108. Plan and Profile RGL-P4-2 was updated to reflect the change. The change reduced the landowner and environmental impacts  | YES                |
| P3-9                                | OL-012     | The ETWS at MP 3.1 was reduced to minimize environmental impacts.  | YES                |
| P3-9                                | OL-013     | The staging area at MP 3.2 was removed to accommodate a landowner request. The change reduced the landowner impact.  | N/A                |
| P3-13 – P3-16                       | OL-022-024 | ETWS has been added from MP 4.9 to MP 5.9. The additional work space was added to accommodate the landowner’s request that Northern install the pipeline at a 6-foot-depth instead of the originally planned 4-foot-depth to avoid interfering with the landowner’s planned drain tile installation. The greater depth will require a wider trench and additional work space for soil storage. | YES                |
| P3-14 – P3-15                       | OL-022-024 | The pipeline centerline was shifted between MP 5.1 and MP 5.6 to accommodate a landowner request. The shift does not increase landowner or environmental impact.   | YES                |
| P3-15                               | OL-022-024 | The staging area at MP 5.5 was removed to accommodate a landowner request. The change reduced the landowner impact.  | YES                |
| P3-19 – P3-21                       | OL-029-030 | The pipeline centerline was shifted between MP 6.9 and MP 7.9 to accommodate a landowner request. The shift does not increase landowner or environmental impact.   | YES                |
| P3-24                               | OL-037     | Access road was added at MP 8.8. The access road is required to access the temporary workspace during construction.  | YES                |
| P3-25                               | OL-038     | The staging area at MP 9.4 was removed to accommodate a landowner request. The change reduced the landowner impact.  | YES                |
| P3-25                               | OL-040     | The HDD under 35th Street was extended to reduce environmental impact. An access road from 35th Street was added to maintain access to the temporary workspace with the extended drill length.   | YES                |

|               |                            |  |     |
|---------------|----------------------------|--|-----|
| P3-26 – P3-27 | OL-040<br>OL-041<br>OI-042 | The pipeline centerline was shifted between MP 9.4 and MP 9.95 to accommodate a landowner request. Two plan and profile drawings (RGL-P4-16 and RGL-P4-17) were updated to reflect the new ground profile that resulted from the shift. The shift does not increase landowner or environmental impact. | YES |
| P3-31         | OL-050A                    | The access road at MP11.3 was adjusted to minimize tree clearing and reduce environmental impacts.   | YES |
| P3-33         | OL-051                     | The access road at MP12.2 was adjusted to reduce environmental impacts.  | YES |
| P3-33         | OL-051B                    | The staging area at MP 12.4 was removed to accommodate a landowner request. The change reduced the landowner impact.   | YES |
| P3-33         | OL-051A                    | The ETWS at MP 12.5 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 |