



Northern Natural Gas Company
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May 17, 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
Clarification for Rochester Variance Requests**

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: the following clarifications for two of the variances requested for the Rochester Greenfield Lateral in compliance with Condition 5 of the Order Issuing Certificate and Approving Abandonment issued February 21, 2019 (Order). The variances were filed with the Commission February 27, 2019, with Northern's Implementation Plan.

Alignment Sheet P3-26: The original variance stated, "The horizontal directional drill (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." The original variance also referenced alignment sheet P3-25.

The proposed extended HDD is under a wetland (RGL-094-01) and parallels 35th Street (also called County Road 3 SW) as shown on Alignment Sheet P3-26. An access road off 35th Street (County Road 3 SW) at approximately MP 9.77 (Tract OL-041) was added to maintain access to the temporary workspace with the extended drill length. The landowners have agreed to the proposed modifications.

Alignment Sheet P3-31: The original variance stated, "The access road at MP11.3 was adjusted to minimize tree clearing and reduce environmental impacts." The alignment sheet filed with Northern's Section 7 application shows this access road coming off the temporary workspace at approximately MP 11.35.

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As reflected on revised Alignment Sheet P3-31 that was filed February 27 with Northern's Implementation Plan, the access road has been shifted to the east to come off the extra temporary workspace at approximately MP 11.68. Northern has received landowner approval for the shifted access road.

With the clarifications 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, May 15, 2019, and May 17, 2019, and the affirmation that Northern holds the necessary land rights, Northern respectfully requests Commission staff issue approval (1) for the variances requested for the Rochester Lateral and (2) to commence construction on the Rochester Lateral. Northern respectfully requests 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