



Northern Natural Gas Company  
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402 398-7200

May 22, 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  
Rochester Town Border Station – Request Notice to Proceed  
Alexandria Branch Line Loop Extension and Rochester Greenfield Lateral –  
Notice of Start of Construction**

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 its (1) request for authorization to commence construction on the Rochester Town Border Station (TBS) and (2) notice of the start of construction on the Alexandria branch line loop extension (Alexandria Loop Extension) and the Rochester greenfield lateral (Rochester Lateral).

Northern requests authorization to commence construction on the Rochester TBS. 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. Northern has been granted an easement to utilize the property for the TBS facility.

In addition, Northern issues notice of the start of construction for the Alexandria Loop Extension and the Rochester Lateral. Construction commenced on the Alexandria Loop Extension May 21, 2019, and on May 22, 2019, for the Rochester Lateral.

Northern Natural Gas Company  
Northern Lights 2019/Rochester Expansion Projects

With the information provided in this filing and on April 19, 2019, and the affirmation that Northern holds the necessary land rights, Northern respectfully requests Commission staff issue approval to commence construction on the Rochester TBS. 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

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.  Permit for the Owatonna compressor station received February 25, 2019. Faribault received April 26, 2019. Carver received May 9, 2019

Authorization Status		
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	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 December 20, 2019
	Water Appropriation Permit General Permit 1997-0005 <sup>1</sup>	Faribault compressor station received March 15, 2019. Owatonna compressor

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		<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 <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

Authorization Status		
Agency Name	Permit/Authorization/Letter of Concurrence	Status
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