



Northern Natural Gas Company
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May 31, 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
Rockford to Buffalo Greenfield Lateral (Rockford Lateral) and Willmar C-
line Extension (Willmar Extension) - (1) Updated Variances (2) Request for
Approval of Variances and (3) Request for Approval to Commence
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 (1) an update of the variances requested for the Rockford Lateral and the Willmar 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); (2) a request for approval of the variances for the Rockford Lateral and the Willmar Extension; and (3) a request for authorization to commence construction on the Rockford Lateral and the Willmar C-line.

Northern has attached an updated description of the variances requested for the Rockford Lateral and the Willmar Extension in its February 27th filing. Northern requests approval of the variances in accordance with Condition 5 of the Order.

In addition, Northern requests authorization to commence construction on the Rockford Lateral and the Willmar Extension. 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 1, and 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

Northern Natural Gas Company
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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 Rockford Lateral and the C-line Extension 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; April 1, 2019; and April 19, 2019, and the affirmation that Northern holds the necessary land rights, Northern respectfully requests Commission staff issue approval (1) of the variances requested for the Rockford Lateral and the Willmar Extension and (2) to commence construction on the Rochester Lateral and the Willmar Extension. 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

Rockford to Buffalo Greenfield Lateral and Willmar C-line Extension
Updated Variances (updates variances filed February 27, 2019 with Implementation Plan)
May 31, 2019

Alignment sheets, plan and profiles and other referenced drawings depicting the proposed revisions were included in the February 27 filing. As a result of the pipeline centerline shifts, the workspace dimensions have changed slightly – the revised dimensions were reflected on the alignment sheets filed February 27 and have not been called as variances in the following descriptions. All areas have been surveyed and all changes fall within the environmentally surveyed areas and will not result in any additional impacts to any cultural resources, threatened and endangered species, or wetlands. No additional agency consultations are required as a result of the proposed revisions. Land use is the same as the originally proposed alignment. No new landowners are affected by the proposed modifications unless otherwise specified below; all landowners are in agreement with the proposed revisions.

Rockford-to-Buffalo Greenfield Lateral:

Alignment Sheets P3-1 – P3-4: The pipeline centerline was shifted between MP 0.2 and MP 1.2 to accommodate a landowner request. The temporary workspace (TWS), extra temporary workspace (ETWS), access roads and permanent right of way (ROW) also were shifted and revised accordingly to accommodate the centerline shift. The Crow River horizontal directional drill (HDD) plan and profile (RBL-P4-2) was updated and a new HDD Plan and Profile (RBL-P4-2A) was added to reduce environmental (wetland) impact from the shift. The shift does not increase landowner or environmental impact.

Alignment Sheet P3-4: The length of the HDD crossing the Soo Line Railroad was extended and the HDD depth was increased to comply with the railroad construction crossing requirements. The pipe will only be pulled through a section of the drill hole to the point of inflection (PI) at MP 1.29. The contractor will excavate at the PI at MP 1.29 to tie-in the HDD to the open cut section. A new Plan and Profile (RBL-P4-3) was created to reflect the changes. The HDD was previously designed as a typical HDD. Additional ETWS is required north of 37th Street for the HDD entry point, which adds one landowner to the project. The new landowner impact is temporary and the property will be used only during construction. The change to the HDD, which is required to construct the railroad crossing, does not add any permanent landowner impacts and does not create additional environmental (wetland) impacts.

Alignment Sheet P3-5: The HDD under 37th Street SE was extended to allow sufficient workspace at the drill entry location and to increase the distance between the drill entry point and the landowner's house. The drill extension also reduced the required tree removal in the workspace. As a result of the HDD extension, a specific Plan and Profile (RBL-P4-4) was created for the previous typical HDD. TWS and ETWS were modified to accommodate the change in the HDD.

Alignment Sheet P3-6: A new HDD plan and profile (RBL-P4-4A) was added to reduce environmental impact crossing wetland RBL-47-W2. An access road and additional ETWS also was added between MP 1.92 and MP 2.02 southeast of wetland RBL-47-W2 to provide access to the temporary workspace on the southeast side of the wetland during construction.

Alignment Sheets P3-7: ETWS added at MP 2.55 for additional construction space required at the point of inflection. The additional ETWS does not add any new landowners to the project.

Alignment Sheet P3-8: Access road AR-01A was added at MP 2.95. The access road is required to access the temporary workspace during construction. The ETWS on the east side of the TWS was reduced and additional ETWS was added to the west side of the TWS at MP 2.9 to provide adequate space to complete the HDD.

Alignment Sheet P3-9: Trimmed off the corner of the ETWS that extended beyond the environmental clearance boundary.

Alignment Sheet P3-10: Increased the access road width at MP 3.42 from 30 feet to 50 feet to better accommodate construction traffic and equipment.

Alignment Sheet P3-11: Road approach added at MP 3.82. The road approach is required to access the TWS during construction.

Alignment Sheet P3-11: An access road was added at MP 4.15 on the north side of Highway 55. The access road is required to access the staging area and ETWS during construction. No new landowner is affected with the additional access road.

Alignment Sheet P3-12: Increased the access road width at MP 4.51 from 30 feet to 50 feet to better accommodate construction traffic and equipment and removed the section of access road that overlapped the staging area. The access road also was shifted off of landowner WR-027B, removing the landowner from the project. The ETWS was adjusted accordingly based on the change to the access road.

Alignment Sheet P3-14: Access road was added at MP 5.05 on the southeast side of wetland RBL-118-S1. The access road is required to access the TWS during construction.

Alignment Sheet P3-15: ETWS added at MP 5.42 and MP 5.50 for required topsoil storage. The additional ETWS does not add any landowners or increase environmental impact.

Alignment Sheets P3-16 and P3-17: The pipeline centerline was shifted between MP 6.05 and 6.43 to accommodate a landowner request. The TWS, ETWS and permanent ROW were adjusted as necessary and a small section of ETWS was removed based on the centerline shift. The shift does not increase landowner or environmental impact.

Alignment Sheet P3-18; The width of the access road at MP6.73 was increased to 50 feet from 47 feet to better accommodate construction traffic and equipment.

Alignment Sheet P3-19: Increased the access road width on the south side of Highway 33 at MP 7.0 from 40 feet to 50 feet to better accommodate construction traffic and equipment and adjusted the ETWS accordingly. The width of the access road on the north side of Highway 33 (MP 7.04) will be increased from 30 feet to 50 feet to better accommodate construction traffic and equipment.

Alignment Sheets P3-22 and P3-23: The staging area and access road between MP 8.16 and 8.38 were removed to accommodate a landowner request. The ETWS to the west of wetland RBL-155-W1 and a 55-foot-wide access road off 10th Street NE was added to provide access to the temporary workspace during construction. The change reduced the landowner impact.

Alignment Sheet P3-24: Added ETWS at MP 8.95 on the southwest side of the temporary workspace and reduced the ETWS at MP 8.95 on the northeast side of the temporary workspace to provide adequate space to complete the HDD during construction.

Alignment Sheet P3-25: The exit for the HDD under wetlands (plan and profile RBL-P4-2)2 at MP 9.4 was shifted to the north to shorten the drill. ETWS was added to the west of the temporary workspace at MP 9.4 to provide adequate space to complete the HDD during construction.

Alignment Sheet P3-27: The length of the HDD crossing County Road 134 was reduced and ETWS was added at MP 10.1 to provide adequate space for the pipe pull section. The HDD Plan and Profile (RBL-P4-23) was updated to reflect the changes. The shift does not increase landowner or environmental impact.

Alignment Sheets P3-27: ETWS was reduced at MP 9.95 along 20th Street to line up the ETWS with the temporary workspace.

Willmar C-Line Extension:

Alignment Sheets P3-1 – P3-8: 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 12-inch-diameter Willmar branch line (MNB75601). 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-P4-2 and WLL-P4-5) and Site Specific Plans (SSP-002 and SSP-005).

Alignment Sheet P3-1: The proposed 100 foot by 100 foot valve site has been moved closer to 134 Street to reduce the impact to wetland WLL-1-W.

Alignment Sheet P3-3: The width of the access roads at MP 0.81 and MP 1.08 will be increased from 23 feet to 50 feet to accommodate construction equipment and traffic.

Alignment Sheets P3-6 and P3-7: The new pipeline offset from the existing pipeline increased between MP 1.95 and MP 2.35 to avoid a Carver County Public Works business building; this would have created a high-consequence area on the pipeline. The ETWS, TWS, and permanent ROW were adjusted accordingly based on the increased offset.

Alignment Sheets P3-7: The TWS at MP 2.32 was reduced to only utilize a 75-foot wide temporary workspace through the wetland. Additional ETWS was added at MP 2.36 on the southwest side of the temporary workspace to provide adequate space around the PI during construction.

Alignment Sheet P3-8: The new receiver and valve site and staging area has been moved from the west side of the County Road 153 to the east side. The ETWS, TWS, and permanent ROW were adjusted as necessary to accommodate the site change. The location change reduced landowner impact by removing parcel CA-021 and associated impacts from the project.

Northern Lights 2019/Rochester Expansion (CP18-534)
 Modifications requested February 27, 2109 with Implementation Plan
 Landowner Approval

Alignment Sheets	Parcel(s)	Modification	L.O. Approved
Rockford-to Buffalo Greenfield Lateral			
P3-1 – P3-4	HE-004 and WR-005 WR-006	The pipeline centerline was shifted between MP 0.2 and MP 1.2 to accommodate a landowner request. The temporary workspace (TWS), extra temporary workspace (ETWS), access roads and permanent right of way (ROW) also were shifted and revised accordingly to accommodate the centerline shift. The Crow River horizontal directional drill (HDD) plan and profile (RBL-P4-2) was updated and a new HDD Plan and Profile (RBL-P4-2A) was added to reduce environmental (wetland) impact from the shift. The shift does not increase landowner or environmental impact.	YES
P3-4	WR-011	The length of the HDD crossing the Soo Line Railroad was extended and the HDD depth was increased to comply with the railroad construction crossing requirements. The pipe will only be pulled through a section of the drill hole to the point of inflection (PI) at MP 1.29. The contractor will excavate at the PI at MP 1.29 to tie-in the HDD to the open cut section. A new Plan and Profile (RBL-P4-3) was created to reflect the changes. The HDD was previously designed as a typical HDD. Additional ETWS is required north of 37th Street for the HDD entry point, which adds one landowner to the project. The new landowner impact is temporary and the property will be used only during construction. The change to the HDD, which is required to construct the railroad crossing, does not add any permanent landowner impacts and does not create additional environmental (wetland) impacts.	YES
P3-5	WR-009A	The HDD under 37th Street SE was extended to allow sufficient workspace at the drill entry location and to increase the distance between the drill entry point and the landowner's house. The drill extension also reduced the required tree removal in the workspace. As a result of the HDD extension, a specific Plan and Profile (RBL-P4-4) was created for the previous typical HDD. TWS and ETWS were modified to accommodate the change in the HDD.	YES
P3-6	WR-016	A new HDD plan and profile (RBL-P4-4A) was added to reduce environmental impact crossing wetland RBL-47-W2. An access road and additional ETWS also was added between MP 1.92 and MP 2.02 southeast of wetland RBL-47-W2 to provide access to the temporary workspace on the southeast side of the wetland during construction.	YES

P3-7	WR-018	ETWS added at MP 2.55 for additional construction space required at the point of inflection. The additional ETWS does not add any new landowners to the project.	YES
P3-8	WR-018 and WR-019A	Access road AR-01A was added at MP 2.95. The access road is required to access the temporary workspace during construction. The ETWS on the east side of the TWS was reduced and additional ETWS was added to the west side of the TWS at MP 2.9 to provide adequate space to complete the HDD.	YES
P3-9	WR-021	Trimmed off the corner of the ETWS that extended beyond the environmental clearance boundary.	YES
P3-10	WR-020	Increased the access road width at MP 3.42 from 30 feet to 50 feet to better accommodate construction traffic and equipment.	YES
P3-11	WR-022	Road approach added at MP 3.82. The road approach is required to access the TWS during construction.	YES
P3-11	WR-027	An access road was added at MP 4.15 on the north side of Highway 55. The access road is required to access the staging area and ETWS during construction. No new landowner is affected with the additional access road.	YES
P3-12	WR-027 and WR-028	Increased the access road width at MP 4.51 from 30 feet to 50 feet to better accommodate construction traffic and equipment and removed the section of access road that overlapped the staging area. The access road also was shifted off of landowner WR-027B, removing the landowner from the project. The ETWS was adjusted accordingly based on the change to the access road.	YES
P3-14	WR-030	Access road was added at MP 5.05 on the southeast side of wetland RBL-118-S1. The access road is required to access the TWS during construction.	YES
P3-15	WR-035	ETWS added at MP 5.42 and MP 5.50 for required topsoil storage. The additional ETWS does not add any landowners or increase environmental impact.	YES
P3-16 - P3-17	WR-038 and WR-039	The pipeline centerline was shifted between MP 6.05 and 6.43 to accommodate a landowner request. The TWS, ETWS and permanent ROW were adjusted as necessary and a small section of ETWS was removed based on the centerline shift. The shift does not increase landowner or environmental impact.	YES
P3-18	WR-041	The width of the access road at MP6.73 was increased to 50 feet from 47 feet to better accommodate construction traffic and equipment.	YES
P3-19	WR-041 and WR-043	Increased the access road width on the south side of Highway 33 at MP 7.0 from 40 feet to 50 feet to better accommodate construction traffic and equipment and adjusted the ETWS accordingly. The width of the access road on the north side of	YES

		Highway 33 (MP 7.04) will be increased from 30 feet to 50 feet to better accommodate construction traffic and equipment.	
P3-22 and P3-23	WR-048 and WR-049	The staging area and access road between MP 8.16 and 8.38 were removed to accommodate a landowner request. The ETWS to the west of wetland RBL-155-W1 and a 55-foot-wide access road off 10th Street NE was added to provide access to the temporary workspace during construction. The change reduced the landowner impact.	YES
P3-24	WR-052	Added ETWS at MP 8.95 on the southwest side of the temporary workspace and reduced the ETWS at MP 8.95 on the northeast side of the temporary workspace to provide adequate space to complete the HDD during construction.	YES
P3-25	WR-052	The exit for the HDD under wetlands (plan and profile RBL-P4-22) at MP 9.4 was shifted to the north to shorten the drill. ETWS was added to the west of the temporary workspace at MP 9.4 to provide adequate space to complete the HDD during construction.	YES
P3-27	WR-058	The length of the HDD crossing County Road 134 was reduced and ETWS was added at MP 10.1 to provide adequate space for the pipe pull section. The HDD Plan and Profile (RBL-P4-23) was updated to reflect the changes. The shift does not increase landowner or environmental impact.	YES
P3-27	WR-056	ETWS was reduced at MP 9.95 along 20th Street to line up the ETWS with the temporary workspace.	YES
Willmar C-Line Extension			
P3-1 – P3-8		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 12-inch-diameter Willmar branch line (MNB75601). 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-P4-2 and WLL-P4-5) and Site Specific Plans (SSP-002 and SSP-005).	YES
P3-1	CA-001	The proposed 100 foot by 100 foot valve site has been moved closer to 134 Street to reduce the impact to wetland WLL-1-W.	YES
P3-3	CA-008, CA-009 and CA-010	The width of the access roads at MP 0.81 and MP 1.08 will be increased from 23 feet to 50 feet to accommodate construction equipment and traffic.	YES
P3-6 and P3-7	CA-017	The new pipeline offset from the existing pipeline increased between MP 1.95 and MP 2.35 to avoid a Carver County Public Works business building; this would have created a high-consequence area on the pipeline. The ETWS, TWS, and	YES

		permanent ROW were adjusted accordingly based on the increased offset.	
P3-7	CA-017	The TWS at MP 2.32 was reduced to only utilize a 75-foot wide temporary workspace through the wetland. Additional ETWS was added at MP 2.36 on the southwest side of the temporary workspace to provide adequate space around the PI during construction.	YES
P3-8	CA-019	The new receiver and valve site and staging area has been moved from the west side of the County Road 153 to the east side. The ETWS, TWS, and permanent ROW were adjusted as necessary to accommodate the site change. The location change reduced landowner impact by removing parcel CA-021 and associated impacts from the project.	YES

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	The Upper Sioux Community cultural resources monitor is currently on the Alexandria branch line loop extension project and will be on 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

Authorization Status		
Agency Name	Permit/Authorization/Letter of Concurrence	Status
		received April 26, 2019. Carver received May 9, 2019
	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 received May 10, 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	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.
Township Cooperative Planning Association- Olmsted County	Grading permit ³	Obtained May 7, 2019
Soil and Water Conservation District-Olmsted County	Grading permit/wetland permit ³	USACE coordinated concurrence December 11, 2018
Pioneer-Sarah Creek Watershed Management Commission ²	Wetland permit ²	USACE coordinated concurrence December 11, 2018

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