



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

October 11, 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  
Request 24-hour Horizontal Directional Drill on the Willmar C-line  
Extension**

Dear Ms. Bose;

In accordance with Condition 16 of the Order Issuing Certificate and Approving Abandonment issued February 21, 2019, in the above-referenced docket, Northern Natural Gas Company (Northern) hereby submits for filing with the Federal Energy Regulatory Commission (Commission) a request for written approval to conduct 24-hour horizontal directional drill (HDD) activities on the Willmar C-line extension.

Specifically, Northern is requesting approval to conduct 24-hour horizontal directional drill (HDD) operation to complete the ream pass and the pipe pull for the Twin Cities and Western Railroad (RR)/Highway 212 HDD located between approximate Mile Post (MP) 1.65 and 1.85 (alignment sheet P3-5, Plan and Profile P4-5). Due to delays in receiving appropriate permits from the RR, the contractor is requesting 24-hour operation to maintain the project schedule; the contractor estimates reaming and pullback will be completed within seven days.

The rig will be set on the north end of the HDD and 24-hour operations (reaming and pullback) only will be conducted from the north end. Operations on the south end will only be conducted during the daytime to comply with local noise ordinances.

A copy of the Plan and Profile for this HDD is attached. Also attached is an excerpt from Table 9.2-12, revised Resource Report 9, filed with the Commission August 7, 2018. The table includes, among other information, ambient, unmitigated and mitigated noise readings as well as mitigation measures for this HDD during 24-hour operations. Northern plans to follow the noise mitigation measures provided in the table. As indicated in the attached, the mitigated noise level of the HDD, including ambient

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noise, exceeds ambient noise levels by 2.2 dBA and anticipated noise levels are, therefore, within FERC guidelines. The noise levels will continue to be monitored at the NSA location during the 24-hour activities. Northern will inform the resident in the NSA prior to the commencement of the 24-hour HDD operation and will respond to landowner concerns.

Northern respectfully requests Commission staff issue approval to conduct 24-hour horizontal directional drill activities on the Willmar C-line extension, as described above. Northern requests approval be issued as expeditiously as possible. Any questions regarding this filing should be directed to the undersigned at (402) 398-7103.

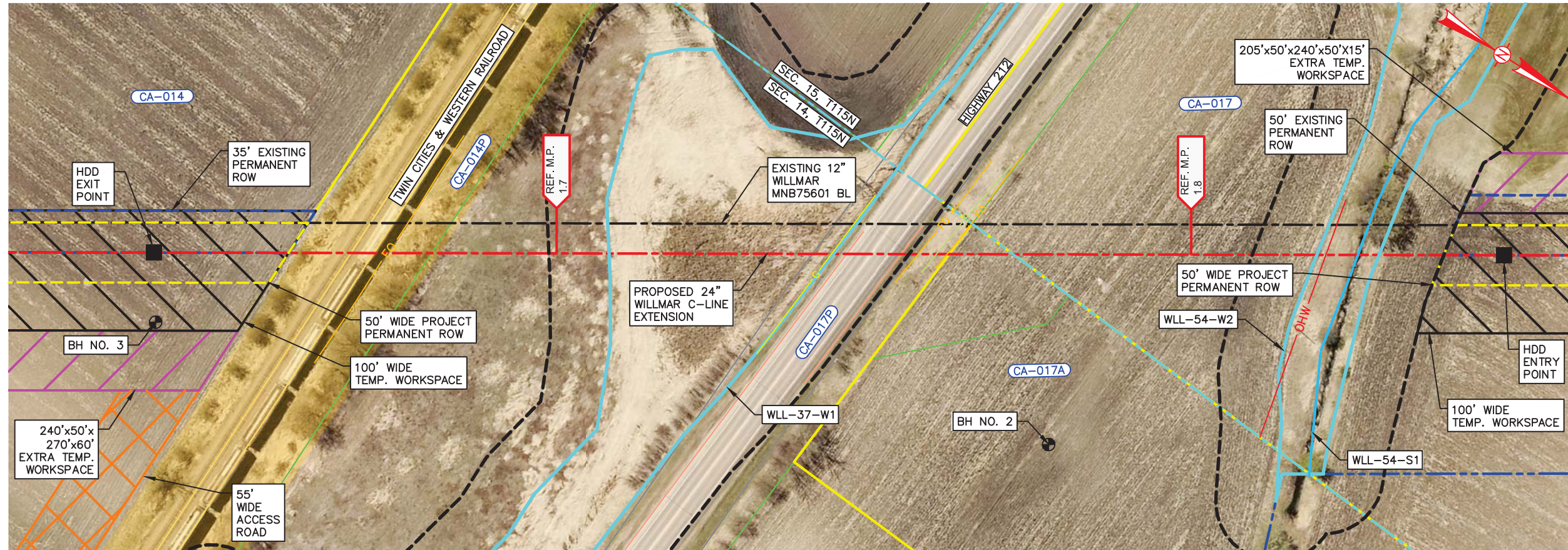
Respectfully Submitted,

/s/ Michael T. Loeffler

Michael T. Loeffler  
Senior Director, Certificates and External Affairs

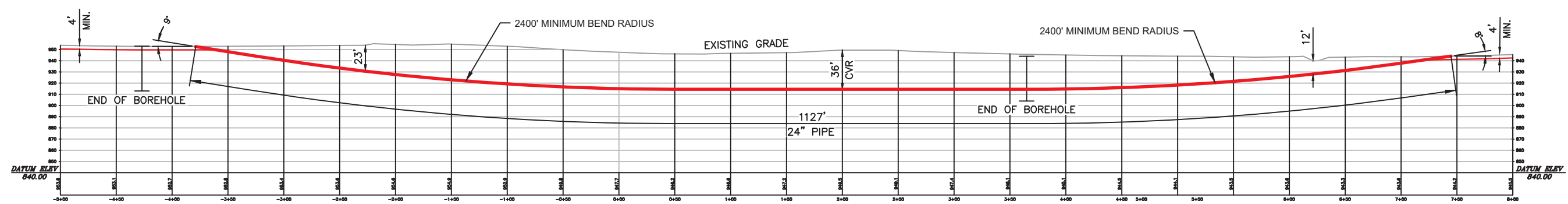
<b>HDD Crossing Drawing Identification Numbers</b> <b>Duration (days)<sup>1</sup></b> <b>NSA</b> <b>Entry</b> <b>Exit</b> <b>Ambient (L<sub>dn</sub>,dBA)</b>						Unmitigated			Mitigated			
						<b>HDD Noise Level (dBA)</b>	<b>HDD + Ambient (L<sub>dn</sub>,dBA)</b>	<b>Increase Above Ambient (dBA)</b>	<b>HDD Noise Level (dBA)</b>	<b>HDD + Ambient (L<sub>dn</sub>,dBA)</b>	<b>Increase Above Ambient (dBA)</b>	<b>Mitigation Measures for HDD, if 24-hour operation is required</b>
<b>Willmar C-Line Extension</b>												
WLL-P4-5	10	F	1037 NE	1299 NNE	65.9	62.3	68.7	2.9	61.7	68.1	2.2	Institute work practices such as reduced idling, fitting equipment with residential mufflers

# PLAN AND PROFILE <sup>of</sup> TWIN CITIES & WESTERN RAILROAD & HIGHWAY 212



**PLAN**  
SCALE: 1"=50'  
SEE DWG. P3-5

-3+81 HDD EXIT  
 -3+77 BH NO. 3  
 -2+83 R.O.W. LINE & PROPERTY LINE  
 -2+15 EDGE OF RAILROAD  
 -2+05 CL OF RAILROAD  
 -1+96 EDGE OF RAILROAD  
 -1+85 BURIED FIBER OPTICS CABLE  
 -1+48 R.O.W. LINE  
 -0+50 WETLAND BUFFER  
 -0+44 REF MP 1.7  
 0+00/90+20 WETLAND  
 1+85 GAS PIPELINE  
 1+86 WETLAND  
 1+97 EDGE OF ROAD  
 2+20 CL OF HIGHWAY 212  
 2+43 EDGE OF ROAD  
 2+49 WETLAND BUFFER  
 2+57 BURIED FIBER OPTICS CABLE  
 2+72 SANITARY LINE  
 2+81 BURIED FIBER OPTICS CABLE  
 3+36 PROPERTY LINE & R.O.W. LINE & SECTION LINE  
 3+66 BH NO. 2  
 4+84 REF MP 1.8  
 5+35 WETLAND BUFFER  
 5+89 WETLAND  
 5+96 O/H WIRE  
 6+40 WETLAND  
 6+94 WETLAND BUFFER  
 7+46 HDD ENTRY



**PROFILE**  
SCALE (VERT): 1"=50'  
SCALE (HORIZ): 1"=50'

**INTERNAL INFORMATION**  
DISTRIBUTION/COPIES LIMITED TO PROJECT NEEDS

NO.	REVISION - DESCRIPTION	BY	DATE	CHK'D	APP'D
F	ISSUED FOR FERC	AM	02/15/19	TH	RAC

**FILED WITH FERC**  
ANY CHANGES FROM WHAT IS SHOWN MUST BE IDENTIFIED AND REVIEWED BY REGULATORY BEFORE IMPLEMENTATION

STATUS	CHECKED		APPROVED	
	BY	DATE	BY	DATE
PRELIM				
BID				
CONST.				

FAC. CODE: ON HOLD	REL. W.O. N/A
PL# MNB75601	CONST. YR 2019
STA# N/A	PC# N/A
DESIGN BY RAC	DATE 2/2/18
DRAWN AM	DATE 2/2/18
ASBUILT	
FILE NO: P105	
SCALE: 1"=50'	

**PROPOSED 24"**  
**WILLMAR C-LINE EXTENSION**  
PLAN & PROFILE OF TWIN CITIES & WESTERN RAILROAD & HIGHWAY 212  
SEC. 14 & 15, T115N, R25W  
CARVER COUNTY, MINNESOTA

**PROJECT NO.**  
01124418  
**DWG. NO.**  
WLL-P4-5

2/18/2019 4:34 PM M:\MING 2019 NL EXPANSION PROJECT\3\_CROSSINGS\WILLMAR D-LINE LOOP\WLL-P4-5 Chan, Ginger

FIGURE 1-14