



Northern Natural Gas
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November 4, 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
Docket No. CP18-534-000
Northern Lights 2019/Rochester Expansion Project
Supplement to November 1, 2019 Request for In-service

Dear Ms. Bose:

Northern Natural Gas Company (Northern) hereby submits for filing with the Federal Energy Regulatory Commission information to supplement its November 1, 2019, request for approval to place the Rockford to Buffalo greenfield lateral (Rockford lateral) into service. Northern clarifies the contractor has completed backfill at the launcher site; topsoil replacement and final grading will be completed November 5, 2019. Backfill at the receiver/Buffalo town border station (TBS) site will be completed today, November 4, 2019; topsoil replacement and final grade will continue through this week. As of the end of today, November 4, 2019, 99 percent of the topsoil is expected to be replaced. The remaining topsoil to be replaced is at the receiver/TBS site which will be replaced once the frac tanks are removed from the site which is expected to be by the end of the week.

Attached is Northern's winter construction plan, which is intended to address areas of project components where final seeding was not completed prior to October 20, 2019, which is the Minnesota Department of Transportation end date for fall seeding.

Northern requests the Director of the Office of Energy Projects issue written approval of the attached winterization plan and authorization to place the Rockford lateral into service. Any questions regarding the filing should be directed to the undersigned at (402) 398-7103.

Respectfully submitted,

/signed/ Mike Loeffler

Mike Loeffler
Sr. Director, Certificates and External Affairs

attachment

**NORTHERN NATURAL GAS COMPANY
NORTHERN LIGHTS 2019 EXPANSION
PROJECT AND ROCHESTER PROJECT**

Winter Construction Plan

FERC Docket No. CP18-534-000

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1.0 INTRODUCTION

Northern Natural Gas Company (Northern) is constructing approximately 22.3 miles of greenfield pipeline and approximately 9 miles of pipeline loops and extensions in Minnesota. These Projects, referred to as the Northern Lights 2019 Project and Rochester Project, will deliver firm load requirements for three local distribution customers in the Rochester and Twin Cities areas.

2.0 PURPOSE

Construction of the Projects began in spring 2019 and has continued into the fourth quarter 2019. Restoration is currently ongoing. There are select areas within the Projects where construction will be completed in fourth quarter 2019; however, restoration activities will continue in 2020. All facilities are anticipated to be placed in service in the fourth quarter 2019. With this schedule, construction activities in the winter season will be required.

The purpose of this *Winter Construction Plan* is to identify best management practices for construction activities during the winter. Under frozen soil conditions, the measures in this plan will supersede relevant or corresponding measures in the Federal Energy Regulatory Commission's (FERC) *Upland Erosion Control, Revegetation, and Maintenance Plan* (Plan) and *Wetland and Waterbody Construction and Mitigation Procedures* (Procedures). In the transitional period between non-frozen and frozen soil conditions, Northern will implement appropriate measures as described in the Plan, Procedures, *Restoration and Rehabilitation Plan*, or this *Winter Construction Plan* based on site-specific conditions (e.g., soil stability) as determined by Northern's Environmental Inspectors (EIs) and environmental compliance manager.

3.0 GENERAL CONSTRUCTION AND RESTORATION MEASURES

EROSION CONTROLS, MULCHING, AND SEEDING

Northern's construction contractors have completed construction and a majority of restoration activities, including final grading and replacement of topsoil. This winter construction plan is intended to address areas of project components where final seeding was not completed prior to October 20, 2019, which is the Minnesota Department of Transportation end date for fall seeding.

Temporary and permanent erosion and sedimentation control measures will be implemented in accordance with the Plan and Procedures or as described below depending on ground conditions. The EIs for the Projects will verify that the erosion and sedimentation control measures are appropriate for the weather conditions. The following measures will be implemented in order for erosion control devices to be effective throughout the winter and able to withstand the runoff that accompanies spring thaw and snow melt conditions:

- Temporary erosion control devices (silt fences in non-frozen conditions or straw bales, straw logs, or snow berms in frozen conditions) will be installed where appropriate during topsoil stripping and grading activities to prevent the movement of disturbed soils off the right of way.
- Mulch will be applied to disturbed areas where final seeding is delayed due to seeding period restrictions to spring 2020.
- Mulch typically will be applied at a rate of two tons/acre. When mulching is

applied before seeding, mulch will be applied at a rate of four tons/acre. Northern will plan to crimp the mulch in place; however, if conditions preclude crimping, Northern may elect to spray water to freeze the mulch in place or apply a biodegradable tackifier.

- In spring 2020, Northern will complete final seeding including the preparation of a seedbed and seeding activities using a drill or a no-till seeder. These reseeding activities will be conducted in accordance with the Plan and Procedures.

4.0 SPRING THAW CONDITIONS

When possible, seeding during spring thaw conditions will be avoided or minimized. If conditions require spring work, the following procedures will be followed.

- Northern's contractors will use equipment best suited to existing ground conditions, e.g., low-ground pressure equipment.
- Northern's contractors will install mats along the travel lane to seeding areas where soils are excessively wet and rutting is occurring to prevent mixing of topsoil and subsoil.
- If the EI and construction manager determine that muddy conditions are severe and rutting occurs, work will be suspended until conditions improve.
- The EI will monitor, report, and initiate repairs in problem areas associated with the spring 2020 thaw.

5.0 SPRING RIGHT-OF-WAY ASSESSMENT

Northern will conduct pedestrian and windshield surveys along the construction right of way in the spring 2020. The surveys will identify erosion control structures in need of repair, areas of slope instability along the construction right of way, areas where settling of soils or subsidence has occurred along the trench line, and areas where erosion is occurring. The EIs will determine the most effective means of correcting problems.

6.0 MONITORING AND REPORTING

Northern will conduct monitoring and reporting in accordance with the Plan and Procedures, and Certificate and permit conditions.

7.0 REFERENCES

Minnesota DOT Seeding Manual 2014 Edition, Office of Environmental Stewardship Erosion Control Engineering Unit. Available online at: <https://www.dot.state.mn.us/environment/erosion/pdf/seedingmanual.pdf> Accessed October 2019.