



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

November 18, 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  
Affirmative Statement of Compliance

Dear Ms. Bose:

Northern Natural Gas (Northern) hereby submits for filing with the Federal Energy Regulatory Commission (FERC) in the above-referenced docket the attached Affirmative Statement in compliance with Condition 11 of the Order Issuing Certificate and Approving Abandonment issued February 21, 2019. The Affirmative Statement addresses Northern's compliance with the Conditions of the Order regarding the Rochester greenfield lateral and town border station (TBS), the Rockford to Buffalo greenfield lateral, the Alexandria branch line loop extension, the LaCrosse branch line maximum allowable operating pressure (MAOP) uprate and the regulator relocate; the Carver compressor station; and the new unit installed at the Faribault and Owatonna compressor stations. An Affirmative Statement for the Willmar C-line extension will be filed once the pipeline has been completed and placed into service.

Please note: pursuant to Condition 17, as Northern indicated in its Implementation Plan filed February 27, 2019, the flow control valve was removed from the scope of the Rochester TBS design. The operational noise attributable to the TBS without the flow control valve will be intermittent, non-detectable, and below 55dBA at any nearby noise sensitive area (NSA).

In addition, because the noise associated with a regulator does not solely correspond with load being transported and can also be tied to pressure differentials, Northern discussed with FERC staff an alternative response that relied on the noise levels as calculated by the vendor. As described in the February 27 filing, the relocated MAOP regulator was modeled for noise at the valve with worst-case design conditions

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as provided by the valve vendor. The noise at the valve was calculated to be approximately 95 dB(A), which equates to 51 dB(A) at the nearest NSA, 500 feet away; the noise levels from the regulator will be intermittent.

As a result, Northern's February 27, 2019, response was determinate that the noise levels at the TBS and regulator would fall below the  $L_{dn}$  of 55 dBA noise requirement. No further response regarding Condition 17, including a noise survey for the TBS or regulator, will be submitted to FERC.

Any questions regarding this filing should be directed to the undersigned at (402) 398-7103.

Respectfully submitted,


Michael T. Loeffler  
Sr. Director, Certificates and External Affairs

Attachment

State of Nebraska )

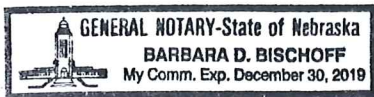
)ss.  
County of Douglas )

Royce A. Ramsay, Vice President of Operations, being duly sworn, hereby attests that he has read the Affirmative Statement submitted on behalf of Northern Natural Gas in the matter of Northern Natural Gas at Docket No. CP18-534-000 and hereby certifies that the Affirmative Statement is true to the best of his knowledge, information and belief.

  
\_\_\_\_\_  
Royce A. Ramsay

Subscribed and sworn to before me, a Notary Public in and for the state of Nebraska, this 18 day of November 2019.

(Seal)



  
\_\_\_\_\_  
Notary Public

My Commission Expires: Dec. 30, 2019

#### AFFIRMATIVE STATEMENT

The Rochester greenfield lateral and town border station (TBS), Rockford to Buffalo greenfield lateral, Alexandria branch line loop extension, and the LaCrosse branch line maximum allowable operating pressure uprate and regulator relocate, the Carver compressor station; and the new units at the Faribault and Owatonna compressor stations constructed pursuant to the Order Issuing Certificate and Approving Abandonment issued February 21, 2019, in Docket No. CP18-534-000 (Order), were completed in compliance with all conditions identified in the Order that are applicable to the subject facilities.

Pursuant to Condition 8 of the Order, Northern will continue to provide the status of restoration of the facilities in the biweekly reports until restoration of the facilities is complete.

Pursuant to Condition 18 of the Order, Northern will file a noise survey no later than December 31, 2019, for the new Carver compressor station and the modified Faribault and Owatonna compressor stations. If full load condition noise surveys are not possible, Northern will provide an interim survey at the maximum possible horsepower load and provide the full load survey within six months. Northern will provide an interim survey at the maximum possible horsepower load and provide the full load survey within six months. If the noise attributable to the operation of any of the compressor stations exceeds an Ldn of 55 dBA at any nearby noise sensitive area, Northern will file a report on what changes are needed and will install additional noise controls to meet that level no later than November 1, 2020. Northern will confirm compliance with the Ldn of 55

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dBA requirement by filing a second noise survey with the Secretary no later than 60 days after it installs the additional noise controls.