

FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, D.C. 20426

OFFICE OF ENERGY PROJECTS

In Reply Refer To:
OEP/DG2E/ Gas Branch 4
Northern Natural Gas
Northern Lights 2021 Expansion Project
Docket No. PF20-1

March 6, 2020

VIA FERC Service

Michael Loeffler
Senior Director, Certificates and External Affairs
Northern Natural Gas Company
111 South 103rd Street
Omaha, Nebraska 68124-1000

Re: Comments on Draft Resource Reports Numbers 1 and 10

Dear Mr. Loeffler:

The enclosure contains the comments of the FERC staff on draft resource reports 1 and 10 for the planned Northern Lights 2021 Expansion Project. The comments ask for clarifications of discrepancies and identify missing information that is necessary to begin substantive preparation of an environmental assessment for the project. To facilitate review of the revised resource reports that will be filed in the application, Northern should include a matrix that identifies the specific locations in the resource reports (i.e., section and page number) where the information requested in these comments may be found.

Electronic filing is encouraged using the Commission's eFiling system (see <http://www.ferc.gov/docs-filing/efiling.asp>). Be sure to prepare separate volumes, as outlined on the Commission's website at <https://www.ferc.gov/resources/guides/filing-guide/file-ceii/ceii-guidelines/guidelines.pdf>, and label all controlled unclassified information (CUI) as described at <https://www.ferc.gov/docs-filing/labeling-guidance.pdf>. Critical Energy Infrastructure Information (CEII) (e.g., plot plans showing equipment or piping details) and privileged information (PRIV) (e.g., cultural resources material containing location, character, or ownership information; trade secret information; proprietary information) are considered CUI. This information should be filed as non-public and labeled as: "**CUI//CEII– DO NOT RELEASE**" (18 CFR 388.113), "**CUI//PRIV – DO NOT RELEASE**" (18 CFR 388.112), and as otherwise appropriate with other statutes for labeling CUI (e.g., "**CUI//CEII/SSI – DO NOT RELEASE**" and in accordance with 49 CFR 15.13 marking requirements). All

CUI should be filed separately from the remaining information, which should be marked **“Public.”** For assistance with the Commission’s eFiling system, please contact FERC Online Support at FERCOnlineSupport@ferc.gov, (866) 208-3676 (toll free), or (202) 502-8659 (TTY).

Thank you for your cooperation. If you have any questions, please contact me at 202-502-6590.

Sincerely,

Douglas Cotton
Environmental Project Manager
Office of Energy Projects

Enclosure

Comments on Draft Resource Reports 1 and 10

1. Include in section 1.0 the Project's capacity to transport natural gas.
2. As referenced in section 1.1.2, provide illustrative right-of-way cross section diagrams along with the alignment sheets and USGS quadrangle maps.
3. What is the diameter of the existing Paynesville branch line?
4. What is the diameter of the existing MNB59002 branch line?
5. The existing MNB69901 branch line to be removed is not shown in the provided map book.
6. In table 1.1-4, report the launcher/receiver information by discrete pipeline loop/line, rather than combined as one entry.
7. In section 1.2, identify the width of the existing permanent right-of-way, the width of the expansion to the existing permanent right-of-way, and the total width of the construction right-of-way.
8. In section 1.2, explain whether the additional 10 to 20 feet of ROW or extra temporary workspace for storage of topsoil is included in the ROW calculations, or would be added to the construction ROW as per Plan section IV.A.2.
9. In table 1.2-2, to avoid double-counting acreage, clarify whether the launcher/receivers are located in the Wilmar, Paynesville, or Carlton pipeline ROW in Table 1.2-1 or within the Pierz CS (Viking).
10. In section 1.3.1, update to the extent possible the number of construction spreads that would be used to construct the project.
11. Under section 1.3.3, identify the method or methods Northern would use for containing and disposing of pipe blasting waste.
12. In section 1.3.4, describe the equipment that would travel between the HDD entrance and exit point and impact minimization measures (mats, temporary bridges over waterbodies, etc.) that would be used commensurate with the equipment/usage and the resource or feature avoided by use of HDD. In the appropriate resource reports, describe the travel lane impacts on the resource.

13. With respect to waterbody crossings on page 1-18, explain what conditions would result in Natural using clear span bridges over waterbodies and conversely, where they would not be needed).
14. Table 1.3-4 identifies public road crossings. Make sure to include traffic management and mitigation measures in the revised Resource Report 1 or in Resource Report 5.
15. Identify the hours of construction for the aboveground facilities in section 1.3.5, describe any routine work activities that would occur outside of daylight hours, and describe any conditions that may require major construction activities at the aboveground facilities during non-daylight hours.
16. Does Natural plan to provide visual screening at any of the aboveground facility sites?
17. Describe whether the installation of cathodic protection systems be within the previously surveyed and certificated areas.