

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

June 2, 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**

Dear Mr. Loeffler:

The enclosure contains the comments of the FERC staff on draft resource reports 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

General

1. Revise and update all sections and tables in the reports as needed, to be consistent with the May 2020 changes to the planned Project scope and most recent project alignment sheets.

Resource Report 1

2. Include in section 1.0 the Project's capacity to transport natural gas and the MAOP of the new pipeline segments.
3. Will Natural provide visual screening at the above-grade valve setting at the terminus of the proposed Willmar D branch line extension as this is in a residential area?
4. If additional temporary workspace would not be set back at least 50 feet from wetlands or waterbodies, provide the distance setback for the reduced buffers.
5. Northern states that it would use the HDD method to install pipelines under obstacles or sensitive areas, such as wetlands. For the Willmar D Branch Line Extension, the alignments sheets show temporary workspace between HDD entry and exist points at the crossing of wetland WIL_W07 (~mileposts 1.9-2.0). Section 1.2 and 3.3.2 of Resource Report 3 indicated that no clearing will occur between HDD entry and exist points. Clarify this discrepancy.
6. Provide description of anticipated environmental impacts, permits required, and who would construct the electric power line to the Hinckley Compressor Station.
7. With respect to Cumulative Impacts, to the extent they would be constructed within the geographic and temporal scope, include Northern's 255 and blanket projects identified previously.
8. Update Appendix 1A to include final geotechnical investigations and the Horizontal Directional Drill (HDD) for the Carlton interconnect loop. Include updates to the HDD Monitoring, Inadvertent Return Response and Contingency Plan; the HDD Plans and Profiles and Site-Specific Plans; and the HDD Feasibility Report.

Resource Report 2

9. Revise and update all sections and tables in RR2, as needed, to be consistent with the May 2020 changes to the planned Project scope and most recent project alignment sheets.
10. Provide an updated percentage of wetland delineations/field surveys completed.
11. According to the most recent project alignment sheets for the Wilmar D Branch Line Extension, wetland WIL_W26 (near milepost 1.7) appears to be within the footprint of the proposed temporary access road. Explain how this wetland would be crossed or otherwise protected.

Resource Report 3

12. Revise and update all sections and tables in RR3, as needed, to be consistent with the May 2020 changes to the Northern Lights 2021 Expansion project scope and most recent project alignment sheets.
13. When providing Noxious Weed Control Plan with the section 7 application, include any documentation of consultation with the Minnesota Department of Agriculture and the Minnesota Department of Natural Resources.
14. Provide copies of any previously unfiled correspondence and telephone communications with the U.S Fish and Wildlife Service and the Minnesota Department of Natural Resources regarding federal- and state- listed endangered and threatened species in the vicinity of the planned Project.
15. Provide a discussion on the potential impacts on aquatic or semi-aquatic state-listed species from inadvertent returns of drilling fluids, specifically the Blanding's turtle. This discuss should also include input from the Minnesota Department of Natural Resources. In addition, confirm or revise the determination of effects for these species, as necessary. Provide any proposed mitigation to substantially minimize or eliminate any negative impacts.

Resource Report 4

NOTE REGARDING CULTURAL RESOURCES:

All material filed with the Commission containing location, character, and ownership information about cultural resources must have the cover and any relevant pages therein clearly labeled in bold lettering: **“CUI//PRIV – DO NOT RELEASE.”**

16. Provide addendum/supplemental archaeological and architectural resources survey reports for outstanding survey areas, and the Minnesota SHPO's comments on the report(s).

17. Provide any previously unfiled correspondence (including any attachments, in color, if originally provided in color) or documentation of communications with the Native American tribes contacted. Ensure that any tribe requesting additional information, or the survey report(s) receives them. Provide the transmittal letter(s) and any resulting comments. Indicate any follow-up activities Northern has conducted with the tribes. Provide any follow-up results.
18. Specify the Carlton interconnect loop and Viking interconnect branch line cultural resources survey corridor width(s) (or provide a width range, if applicable) for the pipelines.
19. Revise the Unanticipated Discoveries Plan as follows. Provide the revised plan and update the FERC Contact to: Christopher Brosman, 202-502-8573, Christopher.Brosman@ferc.gov.

Resource Report 5

20. Include in section 5.2.2. Northern's estimated breakdown of local versus outside construction workforce hires.
21. In section 5.2.4 provide an estimate of impact and proposed mitigation measures for construction at Hinckley Compressor Station access road.
22. Identify the hours of construction and related traffic ingress/egress at the Hinckley Compressor Station site.
23. In section 5.2.5 provide an estimate of Project-related property taxes that would be paid to county or local governments for the Hinckley and Pirz Compressor Stations.

Resource Report 7

24. Update section 7.3 to include an assessment of acreages of permanent Prime Farmland impacts compared to the total acres of Prime Farmland in the Project counties.

Resource Report 9

25. Explain the rationale for basing sound pressure readings for the Pierz Compressor Station on "NNG study of Spring Green Compressor Station on December 18, 2007" as indicated in calculations found in appendix 9B.

26. Provide detailed calculations demonstrating how the mitigated day-night sound level (Ldn) noise contributions of planned horizontal directional drills at nearby NSAs shown in appendix 9B were estimated. Identify all planned mitigation measures used as the basis for these calculations that Northern commits to employ for each of the HDDs. Provide diagrams illustrating planned placement of noise barriers, sound enclosures, equipment, etc. at each planned HDD site. Identify the acoustic specifications of each noise barrier or sound enclosure (sound transmission class rating, dimensions, thickness, materials of construction, etc) planned.
27. Identify the specific noise mitigation measures including noise reduction specifications (sound transmission class ratings, estimated sound transmission losses, maximum sound level ratings, etc.) incorporated into the noise analyses for the planned Hinckley Compressor Station and modified Pierz Compressor Station. Confirm that Northern commits to employ all noise mitigation measures assumed for these analyses.
28. We note that the air modeling report and results for the new Hinckley CS has not yet been filed.