



Northern Natural Gas
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July 19, 2022

Via eFiling

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: OEP/DG2E/Gas Branch 3
Northern Natural Gas Company
Northern Lights 2023 Expansion Project
Docket No. CP22-138-000
§ 375.308(x)

Dear Ms. Bose:

Northern Natural Gas (Northern) hereby submits for filing with the Federal Energy Regulatory Commission (FERC) in the above-referenced docket Northern's responses to the data request issued by FERC staff June 29, 2022. Northern also is providing its responses to stakeholder comments received during the scoping period; a table providing the stakeholder comments and Northern's responses to those comments can be found directly following this transmittal letter. Northern's responses to the U.S. Environmental Protection Agency's comments received during the scoping period are attached to Data Request No. 21. FERC's requests and Northern's responses are attached.

Correspondence with the Minnesota Department of Natural Resources (MNDNR) that is attached to Northern's response to Data Request No. 9 provides specific locations of fens-protected plant communities and has therefore been segregated and labeled "**CUI//PRIV --- DO NOT RELEASE (PRIVILEGED)**." Pursuant to 18 CFR section 388.112, Northern requests confidential and privileged treatment of the MNDNR correspondence due to the confidential nature of the contents.

The person to be contacted regarding the request for privileged and confidential treatment is as follows:

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

Respectfully submitted,

/signed/ Michael T. Loeffler

Michael T. Loeffler
Senior Director, Certificates and External Affairs

cc: Parties of record

Northern Lights 2023 Expansion Project Stakeholder Comments

Comments filed June 16, 2022, by Zach Guttormson, Assistant Zoning Director, Sherburne County, Minnesota	
County Wetland Conservation Act permits must be filed prior to impacting wetlands (Zach.Guttormson@co.sherburne.mn.us)	Northern will review the requirements for a permit and make application as required.
The county requires a Stormwater and Erosion Control Permit (Mitch.Glines@co.sherburne.mn.us)	Northern will review the requirements for a permit and make application as required.
Comments filed June 16, 2022, by Minnesota Department of Natural Resources, Division of Ecological & Water Resource	
MNDNR appreciates the formation of an avoidance plan for the Blanding's turtle	Northern commits to developing an avoidance plan, which will be sent to the MNDNR.
The environmental document should acknowledge listed species, the gopher snake and the rusty patched bumblebee, within the project vicinity as well as measures to avoid or minimize impacts to these rare animals.	Northern commits to filing an avoidance plan to the MNDNR for these specific species.
The environmental document should address the importance of using native seed mixes.	See Resource Report 1. In wetlands, Northern will replenish the native seed bank upon restoration of wetlands. Northern will plant native grasses and the seeds of butterfly-friendly foliage within the 10-foot buffer of its fenced facilities.
The environmental document should address any potential impacts to calcareous fens.	Northern has consulted with the MDNR regarding nearby fens, and the MDNR determined there would be no issues due to the distance of the fens from the project.
The filed permit table (Table 1.6-1) does not include a DNR utility crossing license. The environmental document should acknowledge that a DNR utility crossing license will be required for the Project.	Northern will submit a DNR utility crossing license request for the Princeton tie-over loop project. No other utility crossing license request is required.
The Paynesville Branch Line is located within a Wellhead Protection Area and Drinking Water Supply Management Area. The environmental document should discuss measures to avoid any spills or activity that could pollute groundwater.	Groundwater impact mitigation is discussed in Resource Report 2, section 2.1.5.

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<p>To prevent soil compaction, our agency recommends using poly and/or timber construction mats when working within wetland boundaries in unfrozen conditions. The environmental document should discuss measures to prevent or minimize soil compaction.</p>	<p>Resource Report 2, section 2.3.2. notes soil compaction will be minimized by limiting equipment operation in wetlands and installing temporary equipment mats, as necessary. Northern will use timber mats when working within wetland boundaries in unfrozen conditions.</p>
<p>The DNR advises that chloride products that are released into the environment do not break down and can accumulate to levels that are toxic to plants and wildlife. Our agency recommends that the environmental document discuss dust abatement as well as the avoidance of chemical dust suppressants containing chloride.</p>	<p>As noted in Resource Report 1, Section 1.3.4, only water will be utilized for the control and mitigation of fugitive dust in areas disturbed for construction.</p>
<p>The DNR advises that hydro-mulch products may contain small synthetic (plastic) fibers to aid in its matrix strength. These loose fibers could potentially re-suspend and make their way into water bodies. Our agency also advises that the dye Malachite Green is an industrial colorant used in some hydro-mulch presents an ecotoxicity concern for aquatic species with a potential for bioaccumulation in insects, amphibians, and fish. The DNR recommends that the environmental document discuss the avoidance of hydro-mulch containing synthetic fibers or the colorant Malachite Green.</p>	<p>Northern commits to not using hydro-mulch containing synthetic fibers or the colorant Malachite Green.</p>
<p>Comments filed June 17, 2022, by Minnesota Department of Transportation, Office of Land Management</p>	
<p>Based on the information provided thus far, it appears that the Ventura North E-Line Segment will cross US 69 in Freeborn County. Permits the Applicant will seek from MnDOT to cross trunk highways will need to address matters such as construction methods for boring under highways, impact on other utilities, traffic control in construction areas, authorized access points for construction activities, impact on highway drainage, impact on highway vegetation, and other similar concerns.</p>	<p>Northern will review the requirements for a permit and make application as required.</p>
<p>MnDOT should be included on the permit table (Resource Report 1, Table 1.6-1) for the permit required for highway crossings. Early coordination with MnDOT is encouraged.</p>	<p>Northern will review the requirements for a permit and make application as required.</p>

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<p>All applicable MnDOT utility permit applications are subject to review by our Office of Environmental Stewardship as a standard part of our permit review process. These reviews may result in additional construction criteria and/or a request to move portions of a planned project outside of any given area of concern.</p>	<p>Northern will review the requirements for a permit and make application as required.</p>
<p>There may be highway-related considerations related to oversize/overweight hauling of the pipeline and equipment. Specifically, these large loads of freight are often transported along nearby interregional corridors (IRC) such as I-35 (a High Priority IRC). Because MnDOT's highway construction activities could impact the Applicant's plans to haul oversize loads to the proposed sites, the Applicant will need to coordinate with MnDOT when planning such loads.</p>	<p>Northern will review the requirements for a permit and make application as required.</p>
<p>Comments filed June 14, 2022, by Teamsters National Pipeline Labor Management Corporation Trust</p>	
<p>The LMCT representing the Teamsters Union and the Pipe Line Contractors Association includes a skilled and trained workforce. FERC should mandate that any pipeline projects be performed under a Union Project Labor Agreement as a condition for Project approval.</p>	<p>Northern notes that the requested mandate is outside the scope of the environmental review.</p>
<p>Comments filed May 25, 2022, by Anna Grace, Rice Creek Watershed District</p>	
<p>Any work within the Rice Creek Watershed District will require a permit for erosion and sediment control to ensure the impact meets the thresholds established by Rule D, 2(a).</p>	<p>Northern will review the requirements for a permit and make application as required.</p>
<p>Work performed within the Carnelian Marine St. Croix Watershed District may also require a permit.</p>	<p>Northern will review the requirements for a permit and make application as required.</p>
<p>For work on the Elk River branch line, permits may be required from the City of Lake Forest, May Township, city of Scandia and the Carnelian-Marine St. Croix Watershed District.</p>	<p>Northern will review the requirements for a permit and make application as required.</p>

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Comments filed July 13, 2022, on behalf of landowner Scott Marpe

Landowner stated he did not receive appropriate filings and maps, expressed concerns about crop loss, and argued an EIS was appropriate environmental review document.

Northern provided all notices and a landowner-specific map at the open house he attended. Since the filing, Northern reached out to the landowner; Northern is working with the landowner, who has stated he does not oppose the project *per se*, and Northern expects to resolve all issues.