

FEDERAL ENERGY REGULATORY COMMISSION  
WASHINGTON, D.C. 20426  
OFFICE OF ENERGY PROJECTS

**In Reply Refer To:**

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

January 18, 2024

VIA Electronic Mail

Nicole Spitzenberger  
Senior Attorney  
Northern Natural Gas Company  
E-mail: [Nicole.Spitzenberger@nngco.com](mailto:Nicole.Spitzenberger@nngco.com)

**Re: Environmental Information Request**

Dear Ms. Spitzenberger:

The information described in the enclosure is required for our analysis of the above-referenced application. **Please file a complete response within 10 days of the date of this letter.**

If certain information cannot be provided within this time frame, please indicate which items would be delayed and provide a projected filing date. **You should be aware that filing complete responses to the information requests described in the enclosure within the time frame requested is necessary to process your request for the issuance of the Notice to Proceed with construction for this Project.**

File your response in accordance with the provisions of the Commission's Rules of Practice and Procedure. In particular, 18 CFR 385.2005 requires all responses to be filed under oath by an authorized Northern Natural Gas Company (Northern) representative, and 18 CFR 385.2010 (Rule 2010) requires service to each person whose name appears on the official service list for this proceeding.

Electronic filing is encouraged using the Commission's eFiling system (see <https://ferconline.ferc.gov/eFiling.aspx>). Be sure to prepare separate volumes, as outlined on the Commission's website at <https://www.ferc.gov/sites/default/files/2020-04/CEII-Filing-guidelines.pdf>, and label all controlled unclassified information (CUI) as described at <https://www.ferc.gov/cui>. 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) should be filed as non-public and labeled as: “**CUI//CEII**” (18 CFR 388.113), “**CUI//PRIV**” (18 CFR 388.112), and as otherwise appropriate with other statutes for labeling CUI (e.g., “**CUI//CEII/SSI**” 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](mailto:FERCOnlineSupport@ferc.gov), (866) 208-3676 (toll free), or (202) 502-8659 (TTY).

Additionally, in response to your request in the Implementation Plan regarding the frequency of status reports prior to construction, Northern is approved to file bi-weekly status reports until the start of construction, when it will be required to file weekly status reports, as described in Condition 8 of the Order.

If you have any questions, please contact me at (202) 502-8059; or email: [paul.friedman@ferc.gov](mailto:paul.friedman@ferc.gov). Thank you for your cooperation.

Sincerely,

Paul Friedman  
Environmental Project Manager  
Office of Energy Projects

Enclosure

Northern Natural Gas Company (Northern)  
Northern Lights 2023 Expansion Project  
Docket No. CP22-138-000

**ENVIRONMENTAL INFORMATION REQUEST**

1. Provide Northern's final Stormwater Pollution and Prevention Plans, Construction Erosion and Sediment Control Plan, and any additional plans that have not yet been filed as part of its Application, Supplemental Filings, or the Implementation Plan (IP). Additionally, provide the final version of the complete Horizontal Directional Drill (HDD) Monitoring, Inadvertent Return Response and Contingency Plan, including the most recent versions of all attachments.
2. Verify if the existing drive at the Princeton tie-over valve setting, proposed for abandonment, would be used as the permanent drive for the expanded remote monitoring valve site to be constructed at the same site. Update the associated alignment sheet to include the existing drive as the permanent access to the site.
3. Update alignment sheets to include all private water wells (as listed in table 4.3.1-1 of the Final Environmental Impact Statement [EIS]) and include the 200-foot refueling and storage buffer for each well.
4. Clarify the following discrepancies between the updated alignment sheets provided in the IP and the tables in the final EIS:
  - a. Elk River Loop AR01 is not depicted or labeled on the alignment sheet. Condition 5 of Northern's IP states that ETWS07 was reduced and no longer crosses tract WA-008. Verify if Northern will no longer require AR01, which was also on tract WA-008, and update the access road table (see Information Request Comment 1, above).
  - b. Wilmar Extension PD01 is not depicted or labeled on the alignment sheets.
  - c. Ventura Extension staging area SA01 is not labeled on alignment sheets.
5. Verify the distance between the workspace (ETWS25) at Princeton Extension Milepost 11.0, and the identified septic field. If the distance is less than 50 feet, verify that Northern would follow the mitigation measures outlined in the final EIS section 4.8.2.
6. Regarding the noise analysis provided in response to Condition 14:
  - a. clarify the apparent discrepancy in the distance to each noise sensitive area (NSA) presented. Distances appear consistent with those provided in Northern's August 2022 filing under accession no. 20220816-5029; however, in September 2022, Northern revised its noise analysis to more accurately represent distances to each NSA (see accession no. 20220922-5153); and

- b. verify the existing ambient value presented for HDD WIL P4-3 is accurate and consistent with previously filed information.
7. Provide a single, comprehensive noise analysis and mitigation plan for the Project, given noise impact analyses and mitigation measures have been presented in multiple filings, including Resource Report 9, subsequent filings, and the IP. Include the following information for each HDD entry or exit location with NSAs within 0.5 mile:
  - a. methodology and assumptions used to conduct the analysis, including a summary of the model inputs for the modeling package, CadnaA, as well as calculations based upon ISO 9613-2. State whether topographic information is included in the analysis, as well as the equipment included in the sound level assessment at each HDD location (separately identifying equipment that would be used at the entry and exit sites).
  - b. the existing day-night average noise ( $L_{dn}$ ) at the nearest NSAs and the estimated A-weighted day-night average ( $L_{dn}$ ) attributable to HDD operations alone, as well as the cumulative  $L_{dn}$  attributable to HDD operations and ambient noise with and without mitigation. The analysis should incorporate clarifications identified in Information Request 6, above.
  - c. a description and/or depiction of all applicable noise mitigation which would be implemented during drilling activity to reduce noise impacts at the NSAs below 55 A-weighted decibels  $L_{dn}$ . Include:
    - i. dimensions of proposed sound barriers by height and width;
    - ii. sound rating for the sound barriers specifically proposed for use;
    - iii. topographic characteristics considered with sound barrier placement;
    - iv. orientation of the NSAs relative to the HDD drill sites (e.g., as depicted in topographic maps filed under accession no. 20220720-5007, updated for current Project configuration and distances to the nearest NSAs); and,
    - v. other mitigation options considered, specifically where noise impacts do not meet a sound level of 55 A-weighted decibels.
8. Confirm the maximum number of nights Northern anticipates needing to conduct overnight HDD construction at each of the three HDDs requiring nighttime construction.