

FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, D.C. 20426

OFFICE OF ENERGY PROJECTS

In Reply Refer To:
OEP/DG2E/Gas Branch 1
Northern Natural Gas Company
Northern Lights 2025 Expansion
Docket No. CP24-60-000
§ 375.308(x)

May 15, 2024

VIA FERC Service

Donna Martens
Senior Regulatory Analyst
Northern Natural Gas Company
P.O. Box 3330
Omaha, Nebraska 68103-0330

Re: Environmental Information Request

Dear Ms. Martens:

The information described in the enclosure is required for our analysis of the above-referenced application. **Please file a complete response within 20 days of the date of this letter.**

If certain information cannot be provided within this time frame, please indicate which items will 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 maintain the schedule for issuance of the Environmental Assessment (EA). If a schedule change becomes necessary, additional notice will be provided.**

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/files, 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, (866) 208-3676 (toll free), or (202) 502-8659 (TTY).

If you have any questions, please contact me at (202) 502-6082. Thank you for your cooperation.

Sincerely,

Jessica Miller
Environmental Project Manager
Office of Energy Projects

Enclosure

cc: VIA FERC Service:

Kirk Lavengood, Vice President
General Counsel and Regulatory Affairs
Nicole Spitzenberger
Senior Attorney
Northern Natural Gas Company
P.O. Box 3330
Omaha, NE 68103-0330

Northern Natural Gas Company (Northern)
Docket No. CP24-60-000

ENVIRONMENTAL INFORMATION REQUEST

Resource Report 1: General Project Description

1. Section 1.1.2 states that the first 0.4 mile of the proposed Elk River 3rd Branch Line (3rd Branch Line) deviates from paralleling the existing branch lines to avoid two residences. The placement of the proposed 3rd Branch Line on drawing ERT P3-1 of the alignment sheets shows the line just south of the residences and closer to residences than the existing lines. Provide further justification for proposed 3rd Branch line deviation. Include in the justification:
 - a. distances between the proposed 3rd branch line and each residence, compared to distances between the 3rd branch line and each residence, if the line parallels the existing rights-of-way; and
 - b. all setback requirements that would prevent you from siting the 3rd Branch line parallel to the existing rights-of-way.
2. Provide a description of construction and operational practices that would be followed to address concerns outlined in the comments of Christel Johnson (accession number 20240416-5007)
3. Provide an updated table 1.6-1 (Required Permits and Clearances). Provide any additional agency correspondence not previously filed with the Commission. Records of communication must show both the information sent to the agency and the agency's response. Clearly identify which agency-recommended mitigation measures Northern would and would not adopt.

4. Provide an updated table 1.9-3 (Proposed or Permitted Actions Considered in the Cumulative Impacts Analysis for the Proposed Project). This table should include the following information:
 - a. all additional projects identified by the agencies that have not responded to your initial request;
 - b. all areas within your geographic scope (i.e. not every HUC 12 watershed is confined to one county);
 - c. other sources of publicly available data such as federal, state, and county GIS files, or city planning minutes;
 - d. project name and sponsor/proponent;
 - e. location (city/county); and
 - f. any known permits/authorizations or environmental review required.
5. Include a map showing the identified projects, within the geographic and temporal scope, in relation to the Northern Lights 2025 Expansion Project.

Resource Report 3: Fish, Wildlife and Vegetation

6. Discuss the restoration measures Northern would use to restore the Regionally Significant Ecological Areas affected by the Project. File any specialized restoration measures recommended by the Minnesota Department of Natural Resources and Northern's responses to those recommendations.
7. File the responses/correspondence with the Natural Resource Conservation Service that Northern received in January 2022. If any recommendations are given, confirm if Northern would follow and implement them or provide justification.
8. Identify the impacts on wildlife and plants from the 3.5 acres of forest removal with regard to fragmentation of contiguous forest and related edge impacts/effects.
9. Confirm that Northern would follow all avoidance and mitigation measures, and conservation recommendations, for all federal and state listed rare, threatened, and endangered species and migratory birds, listed in Stantec's Northern Lights 2025 Expansion Project Rare, Threatened, and Endangered Species Reports.

10. Northern indicated that it would conduct pre-construction surveys for nesting migratory birds and raptors within the construction areas, and set up buffers where no construction would be permitted around any active nest until additional consultation with appropriate agencies is conducted. Indicate if Northern would follow the same protocols if active migratory bird or raptor nests are discovered during construction.
11. File Northern's survey protocols for the rusty patch bumble bee and the Karner blue butterfly at the Elk River 3rd branch line and the Tomah branch line loop extensions that has been approved by US Fish and Wildlife Service (USFWS). Additionally, provide any available survey data that has been collected to date.
12. Northern indicated that the project may affect the rusty patch bumble bee. Indicate if Northern would follow USFWS Rusty Patched Bumble Bee Voluntary Implementation Guidance. Additionally, indicate if Northern has consulted with USFWS for guidance on additional avoidance and mitigation measures.
13. Northern indicated that the project may affect the Karner blue butterfly. Provide the May 2024 lupine survey results for the Karner blue butterfly. In addition, list any implementation guidelines that Northern would follow.
14. On March 21, 2024, the Minnesota Department of Natural Resources (MDNR) provided correspondence to Northern's request for consultation. Confirm that Northern would follow MDNR list of recommendations for all state-listed species.
15. Northern indicated that Blanding's turtle may be present near the Elk River 3rd branch line, Farmington to Hugo C-line, and Tomah Branch line loop and that the Project is not likely to adversely affect the species. Provide correspondence from MDNR agreeing with the not likely to adversely affect determination for Blanding's turtle. Additionally, Provide any updates to Northern's Blanding's Turtle Avoidance Plan.

Resource Report 4: Cultural Resources

16. How many acres of outstanding surveys remain in the area of potential effect (APE)? Provide a copy of the final 2024 Class III cultural resources survey report.
17. The project's APE includes an area of line-of-site extending 500 feet outward from the limits of the planned fixtures or aboveground appurtenant facilities. Provide the total acreage of the direct and indirect APE.

18. Provide a table with all previously recorded archaeology sites within a 1.0 mile radius of the Project APE and include the distance of each recorded site to the area of potential effects.
19. Provide a status update on Northern's Section 106 reviews with the Minnesota and Wisconsin State Historic Preservation Offices.
20. Provide all previously unfiled correspondence to and from the Native American tribes contacted. Indicate any follow-up activities Northern has conducted with the tribes.
21. In Northern's Northern Lights 2025 Expansion Project Unanticipated Discoveries Plan, update section "E. FERC Contact," to reflect the following:

FERC Contact :
Brad Wazaney, Staff Archaeologist
Phone: 202-502-6696
Email Bradford.Wazaney@FERC.gov

Resource Report 5: Socioeconomics and Environmental Justice

22. Update all tables that used 2017 through 2021 American Community Survey 5-Year Estimates with the current 2022 American Community Survey 5-Year Estimates. Make certain that contractor parking lots and contractor yards are included in table 5.3-1.
23. Update Environmental Justice figures as needed to reflect the updated results from the tables (include a 1-mile radius around the compressor station, contractor parking lots, and contractor yards). In the legend replace the terms "% People of Color" and "Households in Poverty" with "Minority Population" and "Low Income Population."
24. Provide an estimate of the total number of average daily round trips generated by construction activities at each pipeline spread and each aboveground facility.
25. For each aboveground facility, identify the roadway that would provide primary access to the site during construction, and provide the average daily traffic or roadway designation/capacity for that roadway. Evaluate the level of service/capacity impacts for construction and operational activities at each compressor station site.

26. Identify residence locations closest to the proposed facility(s) and construction access roads within identified environmental justice communities, provide their distances from project facilities, and describe any proposed mitigation measures to avoid or minimize construction impacts.
27. Provide an expanded project mailing list that includes addresses for environmental justice stakeholders who may be interested in the project, including but not limited to: civic associations; minority business associations; environmental and environmental justice organizations; legal aid providers; homeowners', tenants', and neighborhood watch groups; rural cooperatives; business and trade organizations; community and social service organizations; universities, colleges, vocational and other schools; labor organizations; civil rights organizations; local schools and libraries; senior citizens' groups; public health agencies and clinics; religious organizations; and other places where people gather in the community.
28. Provide a summary of key issues identified that resulted from the public outreach that was conducted in the environmental justice communities.
29. Describe future plans to engage minority populations, low-income populations, and tribes during construction and operations.

Resource Report 8: Land Use, Recreation and Aesthetics

30. For residences closer than 25 feet from Project activities, file:
 - a. evidence of landowner concurrence if the construction work area and/or fencing would be within 10 feet of a residence (e.g., the single-family residence identified in table 1.3-6 at milepost 2.51 of the Tomah Branch Line Loop); and
 - b. any site-specific conditions (e.g., not to remove certain trees, time-of-day construction would occur, exclusion and silt fence installation).
31. Section 1.3.4 states that four residential construction plans are included as Figure 8-1. Only one plan is include as Figure 8-1. Provide the other three plans.
32. Section 8.2.1 states that Northern attempted to contact the Planning and Zoning Administrator for Freeborn County, Minnesota regarding planned residential and commercial development near the Lake Mills to Albert Lea E-line, and is awaiting a response. File the response upon receipt.
33. Identify and describe lands crossed or within 0.25 mile of project facilities that are known contaminated areas or are used for landfills, hazardous waste sites,

quarries, mines, or other special use areas. Describe any discussions with landowners and agencies to identify special construction techniques and mitigation measures to be implemented in these areas.