

## WARNING LETTER

### CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 19, 2009

Mr. Daniel B. Martin  
Senior Vice President of Operations  
El Paso Corporation  
1001 Louisiana St.  
Houston, TX 77002

**CPF 5-2009-5008W**

Dear Mr. Martin:

From September 29, 2008 to October 3, 2008, representatives of the Arizona Corporation Commission acting as an agent for the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, inspected records pertaining to the operation and maintenance of your Arizona natural gas pipelines in Phoenix, Arizona.

As a result of the inspection, it appears that you have committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The items inspected and the probable violation is:

**1. §192.625 Odorization of gas**

**(e) Equipment for odorization must introduce the odorant without wide variations in the level of odorant.**

**(f) To assure the proper concentration of odorant in accordance with this section, each operator must conduct periodic sampling of combustible gases using an instrument capable of determining the percentage of gas in air at which the odor becomes readily detectable. Operators of master meter systems may comply with this requirement by–**

**(1) Receiving written verification from their gas source that the gas has the proper concentration of odorant.**

The percentage of gas in air results for odorant tests conducted on pipeline 2025 on 9-16-2008 and pipeline 2026 on 1-14-2008 were improperly calculated.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$100,000 for each violation for each day the violation persists up to a maximum of \$1,000,000 for any related series of violations. We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the item(s) identified in this letter. Failure to do so will result in El Paso Corporation being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 5-2009-5008W**. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

Sincerely,

Chris Hoidal  
Director, Western Region  
Pipeline and Hazardous Materials Safety Administration

cc: PHP-60 Compliance Registry  
PHP-500 J. Haddow (#120760)  
Arizona Corporation Commission-Mr. Robert Miller