



El Paso Natural Gas
Company, L.L.C.
a Kinder Morgan company

October 8, 2026

Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Attention: Ms. Debbie-Anne A. Reese, Secretary

Re: El Paso Natural Gas Company, L.L.C.;
Docket No. CP26-156-000
Request for Alternative Measures

Dear Ms. Reese:

El Paso Natural Gas Company, L.L.C. ("EPNG") is herein filing with the Federal Energy Regulatory Commission ("Commission"), in Docket No. CP26-156-000, an alternative measures request under Section IV.A.1 of the Commission's Upland Erosion Control, Revegetation, and Mitigation Plan related to its Permian West Expansion Project ("Project") Prior Notice Application ("Application").

Description of Proceeding

On March 27, 2026, EPNG submitted a Request for Prior Notice Authorization Pursuant to Blanket Certificate in the above-referenced docket seeking authorization to construct, install, operate and maintain an approximately nine-mile, 30-inch outside diameter pipeline loop extension and related appurtenances, located in Hudspeth County, Texas as part of its Project.¹ The Project is designed to provide additional firm transportation capacity on EPNG's Line No. 1100 system.

Request for Alternative Measures

Between September 23 and 24, 2026, a monsoonal rainfall event resulted in flash flooding within portions of the construction right of way ("ROW"). During this event, the project area received approximately 6-7 inches of rain within a 24-hour period, which triggered flash flooding that ran through the Project construction area. The flooding damaged Project access roads which has since limited and/or restricted access for Project-related construction use. In order to restore full access via the access roads, EPNG needs to make repairs to the access roads that will require construction-related activity outside of the limits of disturbance approved for the Project.

¹ On April 6, 2026, the Commission issued a Notice of Request Under Blanket Authorization initiating the 60-day comment period that concluded on June 5, 2026. Construction activities related to the Project commenced on July 23, 2026.

In this request, EPNG is requesting Commission approval for the following work as detailed below.

Repair of Permanent Access Road No. 2:

As a result of the aforementioned flooding, Permanent Access Road No. 2 ("PAR-2")² experienced severe rutting damage that needs to be repaired. EPNG is herein requesting approval to make repairs to PAR-2.³ EPNG has determined that repairs required for PAR-2 will include bringing fill in to build up and fill holes from washouts created by the rain event. In order to do this work though, EPNG will need to work outside of PAR-2 limits by approximately 5-feet on each side along an approximate 5.3-mile segment of PAR-2.⁴ EPNG believes this alternative measure request will allow EPNG to stabilize PAR-2 to its previous state and permit safe and efficient equipment and personnel access. Furthermore, restoring full access along PAR-2 will help ensure EPNG's Project is completed on time.

In support of this request, EPNG notes that the additional workspaces to be used by this request were originally included in the cultural surveys and analysis that received a no-effect on historic properties and cultural resources from the Texas Historical Preservation Commission ("TXHPC") for the Project. Therefore, no additional consultations with the TXHPC are required for this request. Similarly, no additional consultations with the United States Fish and Wildlife Service ("USFWS") are required since the requested remediation work area was covered in the original surveys/reviews and USFWS consultations undertaken by EPNG. Lastly, EPNG has secured landowner approvals from the two landowners affected by the proposed alternative measures request.

As part of this request, EPNG is herein providing the following information:

- **Attachment 1:** Aerial alignment sheets depicting the required length of PAR-2 that will require remediation as described in this request; and
- **Attachment 2:** A revised land disturbance table, Table 8.3-1.

Because of the urgency associated with restoring full Project construction access, EPNG respectfully requests written approval for this request by October 9, 2026.

² While both access roads on this Project are existing, permanent roads, EPNG currently has temporary rights of access for the construction related to this Project.

³ During the flooding event, Permanent Access Road – 1 ("PAR-1") also experienced significant damage. EPNG is currently evaluating repairs needed for PAR-1 and will file a variance request for approval of those repairs pending confirmation on workspace requirements and agency consultations needed.

⁴ The required remediation work will result in a total of approximately 6.1 acres of additional disturbance along both sides of PAR-2.

Filing Information

EPNG is e-Filing this letter and attachments with the Commission's Secretary in accordance with the Commission's Order No. 703, *Filing Via the Internet*, guidelines issued on November 15, 2007 in Docket No. RM07-16-000.

Respectfully submitted,

EL PASO NATURAL GAS COMPANY, L.L.C.

By _____/s/_____
Francisco Tarin
Director, Regulatory

Enclosures

Cc. Ms. Kristen Trinh, OEP
Ms. Celeste Horton, OEP

HUDSPETH COUNTY, TEXAS

COUNTY &
STATE

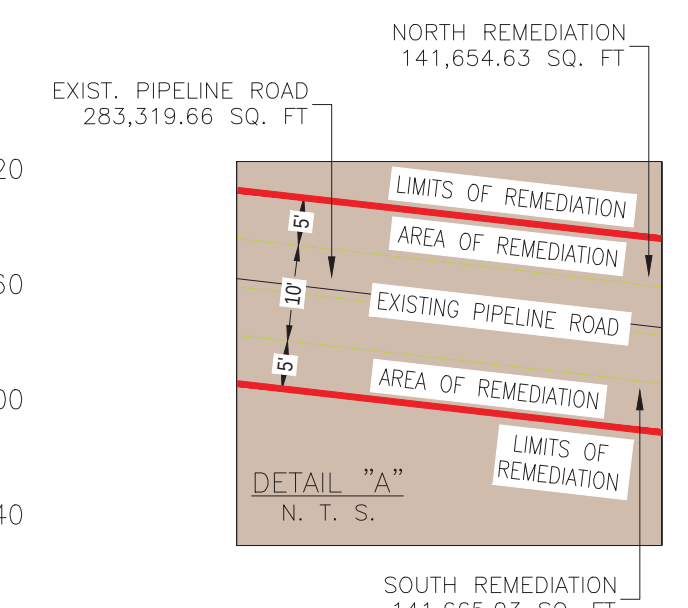
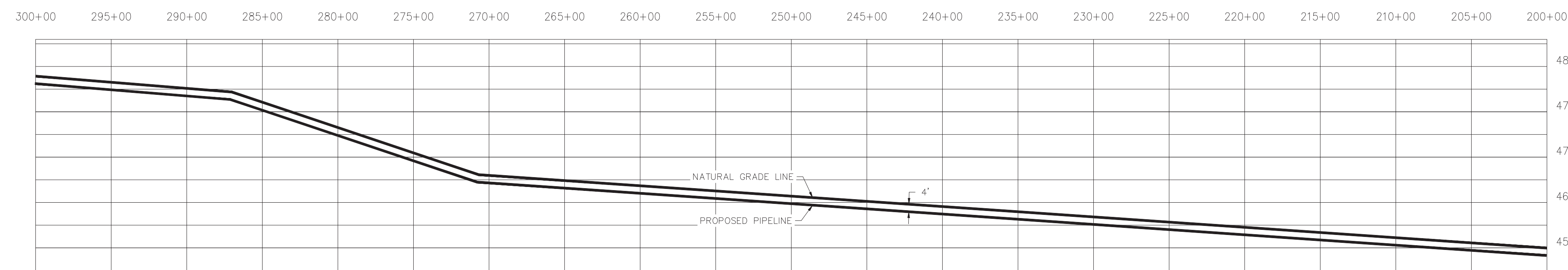
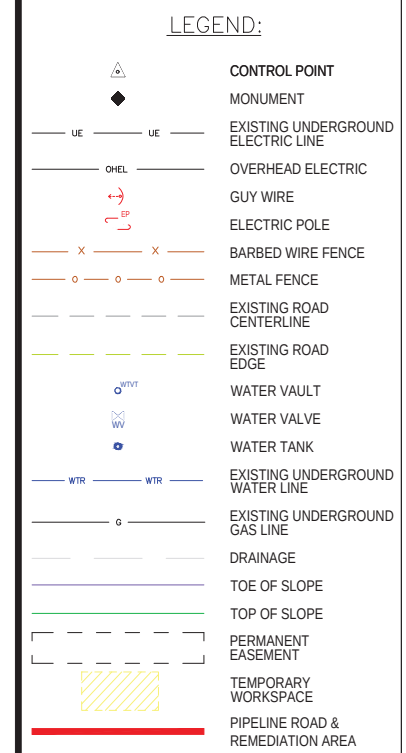
OWNERSHIP &
TRACT NO.

300+00

10000'
606.06 RODS

200+00	
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STATIONING



PROFILE

PIPE DETAIL

GENERAL NOTES

BILL OF MATERIALS

[illegible]

REFERENCE DRAWINGS

[illegible]

REVISIONS

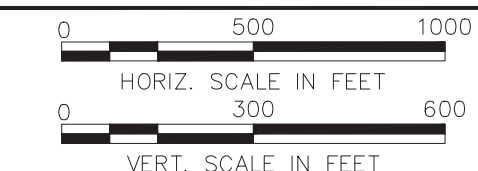
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EXCAVATION

**KINDER MORGAN**

APPROVALS

	DRAWN BY	DATE
	AGVA	
	CHECKED BY	DATE
	SS	02/03/2026
	P.M. APPROVAL	DATE



EPNG PERMIAN WEST EXPANSION

PROJECT NO.	SCALE	INDEX	SYSTEM	DRAWING NO.	REV.
LS25121036	AS SHOWN			3 OF 3	

ATTACHMENT 2 – Revised Land Disturbance Table
Docket No. CP26-156-000

REVISED Table Error! No text of specified style in document.-1 Land Use Impacts by Type (acres)		
Facility	Construction Acreage	Operational Acreage
Temporary Workspace (TWS)	27.03	0.00
Barren land	0.41	0.00
Developed ¹	1.07	0.00
Grassland/Herbaceous	4.33	0.00
Shrub/Scrub	21.22	0.00
Additional Temporary Workspace (ATWS)	10.91	0.00
Developed*	1.05	0.00
Grassland/Herbaceous	0.74	0.00
Shrub/Scrub	9.12	0.00
Permanent Easement	54.77	54.77
Barren land	0.84	0.84
Developed ¹	15.08	15.08
Grassland/Herbaceous	10.54	10.54
Shrub/Scrub	28.31	28.31
Relocated Pig Launcher (new permanent location)¹	0.29	0.29
Grassland/Herbaceous	0.05	0.05
Scrub/shrub	0.24	0.24
Pig Launcher Abandonment	0.29	0.00
Developed ¹	0.28	0.00
Shrub/Scrub	0.01	0.00
New Proposed Access Road	1.49	0.00
Grassland/Herbaceous	0.75	0.00
Shrub/Scrub	0.74	0.00
PAR-1	16.51	0.00
Barren land	0.14	0.00
Developed ¹	10.42	0.00
Grassland/Herbaceous	1.89	0.00
Shrub/Scrub	4.06	0.00
PAR-2¹	~~14.38~~ 20.49	0.00
Barren land	0.30	0.00
Developed ¹	~~5.88~~ 9.99	0.00
Grassland/Herbaceous	~~6.38~~ 7.03	0.00
Shrub/Scrub	~~1.82~~ 3.17	0.00
Project Total	~~125.68~~ 131.79	55.06
¹ Estimates are based on a combination of aerial interpretation and use of NLCD data. The determination of developed land use cover was determined by aerial interpretation as significant portions of the road were mapped as native land cover types while clearly demonstrating lack of vegetation. This is consistent with how acreages were developed for the original filing. Increased acreage results from an additional five feet of width being added to both sides of the road to facilitate restoration activities.		

Certificate of Service

I hereby certify that I have this day caused a copy of the foregoing documents to be served upon each person designated on the official service list compiled by the Commission's Secretary in this proceeding in accordance with the requirements of Section 385.2010 of the Federal Energy Regulatory Commission's Rules of Practice and Procedure.

Dated at Colorado Springs, Colorado as of this 8th day of October 2026.

/s/

Francisco Tarín

Two North Nevada Avenue
Colorado Springs, Colorado 80903
(719) 667-7517