

135 FERC ¶ 61,079
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Jon Wellinghoff, Chairman;
Marc Spitzer, Philip D. Moeller,
John R. Norris, and Cheryl A. LaFleur.

El Paso Natural Gas Company

Docket No. CP11-17-000

ORDER DENYING PETITION FOR TEMPORARY ACTS
AND OPERATIONS UNDER NGA SECTION 7(c)(1)(B)

(Issued April 27, 2011)

1. On October 29, 2010, El Paso Natural Gas Company (El Paso) filed a petition pursuant to section 7(c)(1)(B) of the Natural Gas Act (NGA)¹ and Rule 207(a)(5) of the Commission's Rules of Practice and Procedure² for an exemption from existing certificate requirements to authorize the temporary deactivation of twenty-one compressor units at nine compressor facilities in New Mexico and Arizona. As discussed below, we deny El Paso's petition.

I. Background and Proposal

2. El Paso is a natural gas company under section 2(6) of the NGA³ that is engaged in the business of transporting natural gas in interstate commerce subject to the jurisdiction of the Commission. El Paso owns and operates an interstate pipeline system that extends from natural gas production areas in the southwestern United States through Texas, New Mexico, Colorado, Arizona, and California.

¹ 15 U.S.C. § 717f(c)(1)(B) (2006). This section authorizes the Commission to exempt by regulation from the requirements of section 7 of the NGA "temporary acts or operations for which the issuance of a certificate will not be required in the public interest."

² 18 C.F.R. § 385.207 (2010).

³ 15 U.S.C. § 717a(6) (2006).

3. El Paso's North Mainline System extends from production areas in New Mexico and Colorado to the border between Arizona and California, where El Paso's interstate system interconnects with Mojave Pipeline Company at Topock, Arizona, and state-regulated pipelines in California. El Paso's South Mainline System extends from production areas in west Texas and southeastern New Mexico to an interconnection with El Paso's Line No. 1903 near Ehrenberg, Arizona. El Paso's North and South Mainline Systems are connected through Line No. 1903, as well as El Paso's Havasu and Permian-San Juan Crossover laterals. El Paso's San Juan Triangle System and its North Mainline System were constructed to transport gas from the San Juan Basin production area to meet market demands throughout the southwest and in California.

4. El Paso requests authorization pursuant to section 7(c)(1)(B) of the NGA to temporarily deactivate for up to four years twenty-one compressor units totaling 138,060 horsepower (hp), located at nine compressor stations in New Mexico and Arizona on the South Mainline, North Mainline, and San Juan Triangle Systems.⁴ El Paso was granted certificate authorization pursuant to section 7(c) of the NGA to install and operate the units in order to provide jurisdictional services.⁵ El Paso states that the temporary deactivation of these units will reduce the capacity on its South Mainline System by 277 million cubic feet (MMcf) per day, reduce the capacity of its North Mainline System by 61 MMcf per day, and reduce the capacity of its San Juan Triangle System by 170 MMcf per day. El Paso also requests that the Commission recognize the decrease in capacity and allow El Paso to reflect the reduction in the available unsubscribed capacity section of its electronic bulletin board for the duration of the temporary deactivation. El Paso states that, before the end of the four-year time period, it will file a notice with the Commission of the planned reactivation of facilities or will seek authorization to permanently abandon the compressor facilities.

5. El Paso states that the compressor units are underutilized and unnecessary for its current long-term firm transportation obligations.⁶ El Paso asserts that it has evaluated the use of its facilities and determined that, while the compressor units may be utilized occasionally, they primarily serve in an idle state as backup or spare compression. El Paso explains that it is not seeking authorization to permanently abandon these compressors because it prefers to keep open the option to reactivate the units in the future if the market changes. In contrast to a permanent abandonment under section 7(b) of the

⁴ See Appendix B for a full list of facilities to be temporarily deactivated.

⁵ *El Paso Natural Gas Co.*, 45 FERC ¶ 61,175 (1988); *El Paso Natural Gas Co.*, 20 FERC ¶ 62,454 (1982).

⁶ El Paso states that on October 20, 2010, it posted an Open Season Notice for available capacity and received no bids.

NGA, El Paso asserts that a temporary deactivation will allow it the option of reactivating the compressor units without the administrative burden of seeking renewed section 7(c) certificate authority.

6. El Paso argues that the temporary deactivation of the units will benefit its customers through reduced operating and maintenance costs, reduced depreciation expense, reduced allowance for return on investment, and a reduction in El Paso's cost-of-service and system-wide rates, while not affecting existing shippers' tariff rights, contracted pressure commitments, or contracted firm capacities.⁷

II. Notice, Interventions, Protests, and Motions

7. Public notice of El Paso's petition was published in the *Federal Register* on November 17, 2010.⁸ Several parties filed timely, unopposed motions to intervene.⁹ The Arizona Corporation Commission (Arizona Commission) filed a motion to intervene out of time. We will grant the Arizona Commission's untimely motion pursuant to Rule 214(d) of the Commission's Rules of Practice and Procedure.¹⁰

8. BP America Production Company, BP Energy Company, ConocoPhillips Company, and Shell Energy North America (US), L.P. (collectively, Indicated Shippers); Southern California Edison (SoCal Edison); Southern California Gas Company (SoCal Gas); San Diego Gas and Electric (San Diego Gas); and the California Public Utilities Commission (California PUC) filed protests opposing El Paso's petition. Salt River Project Agricultural Improvement and Power District (Salt River) filed comments on the petition.

9. Salt River, the Arizona Public Service Company (Arizona PSC), and the California PUC filed motions to consolidate this proceeding with related El Paso proceedings involving El Paso's proposed permanent abandonment of other compression facilities in Docket No. CP10-510-000, El Paso's pending NGA section 4 general rate case in Docket No. RP10-1398-000, and El Paso's proposed tariff modifications in

⁷ El Paso proposes to transfer the gross plant value of the assets into FERC Account No. 105 and has reflected the reduced costs in its recently-filed system-wide rate case in Docket No. RP10-1398-000.

⁸ 75 Fed. Reg. 70,225 (Nov. 17, 2010).

⁹ The parties are listed in Appendix A to this Order. Timely, unopposed motions to intervene are granted by operation of Rule 214 of the Commission's Rules of Practice and Procedure. 18 C.F.R. § 385.214 (2010).

¹⁰ 18 C.F.R. § 385.214(d) (2010).

Docket No. RP11-1451-000.¹¹ Arizona Electric Power Cooperative, Inc., New Harquahala Generating Company, LLC, and Sempra Global (collectively, Electric Generator Coalition), and Indicated Shippers filed answers in support of the motions to consolidate. Salt River and California PUC also requested that the proceeding be set for a full trial-type evidentiary hearing.

10. On November 19, 2010, and December 15, 2010, El Paso filed answers responding to the protests and motions for consolidation. Rule 213(a)(2) prohibits answers to protests.¹² However, we find good cause to waive the rule to admit El Paso's answers because doing so at this stage of the proceeding will not cause undue delay or unfairly prejudice any parties, and the answers may assist in our decision-making process.

III. Discussion

A. Preliminary Matters

11. In support of consolidating the proceedings, the parties state that it is impossible to evaluate the merits of the proposed deactivation without the information provided in El Paso's NGA section 4 rate case, that there are common issues of fact and law between the proceedings, and that consolidating the proceedings will promote efficiency and uniform results. The parties state that the central issue to be addressed by both the rate case and this proceeding is the declining demand for capacity on El Paso's system. Further, the parties assert that there is insufficient evidence to determine the impact of El Paso's proposed accounting measures associated with this petition unless the issue is addressed in the context of the rate case.

12. El Paso responds that the parties requesting consolidation have failed to demonstrate a connection between the proceedings. El Paso notes that the rate and

¹¹ El Paso's proposed tariff revisions, filed in Docket No. RP11-1451-000, would have allowed El Paso to deny a shipper's request for redesignation of primary points, due to the presumed temporary deactivation of compression facilities, based solely on El Paso's discretion and judgment as to whether such a request would be economically justified. However, on November 24, 2010, the Commission issued an order rejecting El Paso's tariff filing in Docket No. RP11-1451-000 because the proposal would result in undue discrimination since El Paso's tariff provides for decisions on redesignation requests on other parts of its system to be evaluated based on operational feasibility and lack of harm to other shippers. *El Paso Natural Gas Co.*, 133 FERC ¶ 61,176 (2010). This mooted the requests to consolidate this proceeding with that docket.

¹² 18 C.F.R. § 385.213(a)(2) (2010).

certificate issues are distinct issues with separate standards of review, and that the distinct issues are best addressed in the separate proceedings in which they are raised. In addition, El Paso opposes the request for a full trial-type evidentiary hearing in this proceeding, and states the Commission can and should proceed to resolve any issues of fact based on the paper record in this docket.

13. An evidentiary trial-type hearing is necessary only when material issues of fact are in dispute that cannot be resolved on the basis of the written record.¹³ We find that the written record provides a sufficient basis upon which to resolve the factual issues presented in this case. Consequently, there is no need for an evidentiary hearing in this proceeding.

14. Furthermore, we will deny the requests to consolidate this proceeding with El Paso's rate case in Docket No. RP10-1398-000 and its application for authority to permanently abandon other compression facilities in Docket No. CP10-510-000. The Commission consolidates matters only if a hearing is required to resolve common issues of law and fact, and consolidation will ultimately result in greater administrative efficiency.¹⁴ We find the record in this proceeding is adequate for us to make a determination regarding the proposed deactivation. We do not believe administrative efficiency would be served by consolidating El Paso's rate proceeding and its application to abandon other compression facilities with the petition in this docket for authorization to temporarily deactivate certain compressor units. While the facts among the cases may be similar because the proceedings involve the same El Paso pipelines, the cases involve different questions of law, and different statutory provisions and standards. Moreover, our denial of El Paso's petition in this proceeding moots the protestors' concerns regarding the potential rate impacts.

B. NGA Section 7(c)(1)(B)

15. El Paso was granted certificate authorization pursuant to section 7(c) of the NGA to install and operate the subject compressor units in order to provide jurisdictional services. In this proceeding, El Paso seeks authorization under section 7(c)(1)(B) of the NGA to remove the compressors from use for a period of up to four years.

¹³ See, e.g., *Southern Union Gas Co. v. FERC*, 840 F.2d 964, 970 (D.C. Cir. 1988); *Cerro Wire & Cable Co. v. FERC*, 677 F.2d 124 (D.C. Cir. 1982); *Citizens for Allegan County, Inc. v. FPC*, 414 F.2d 1125, 1128 (D.C. Cir. 1969).

¹⁴ See, e.g., *Midcontinent Express Pipeline, Inc.*, 124 FERC ¶ 61,089, at P 27 (2008).

16. As an initial matter, the Commission notes that section 7(c)(1)(B) provides, in pertinent part, that “the Commission may issue a temporary certificate in cases of emergency, to assure maintenance of adequate service or to serve particular customers, without notice or hearing, pending the determination of an application for a certificate.”¹⁵ It further provides that the Commission may exempt from the requirements of section 7 “temporary acts or operations for which the issuance of a certificate will not be required by the public interest.”¹⁶ Thus, on their face, these provisions address circumstances under which the Commission may grant the type of authority which would normally be conferred by a certificate (i.e., construction and operation) without adherence to all the procedures which preface the issuance of a certificate. Accordingly, the Commission has granted exemptions under section 7(c)(1)(B) to allow minor operations of a temporary nature that have not affected the ratepayer, the quality of service provided by the pipeline, or the public as a whole.¹⁷

17. The authority granted the Commission under section 7(c)(1)(B) has most often been employed to allow entities to perform drilling activities to obtain data to evaluate a potential interstate natural gas storage facility. However, we acknowledge that the Commission has also invoked section 7(c)(1)(B) in a few instances to authorize the temporary cessation of service; specifically, the temporary deactivation of certificated compressor facilities for a limited time period to allow companies to assess whether to replace or abandon those facilities.¹⁸ Going forward, we believe it is consistent with a better reading of the statute to address proposals for the cessation of services and/or deactivation of facilities pursuant to section 7(b) of the NGA, which authorizes the Commission to grant abandonment authorization on a finding that the present or future public convenience or necessity permits such abandonment.¹⁹ We do not believe, as a practical matter, that our consideration of requests to temporarily deactivate compressors under section 7(b) instead of under section 7(c)(1)(B) will lead to different outcomes. Rather, as discussed above, this change in practice is driven by our reexamination of the

¹⁵ 15 U.S.C. § 717f(c)(1)(B) (2006).

¹⁶ *Id.*

¹⁷ *See, e.g., Perryville Gas Storage LLC*, 133 FERC ¶ 61,201 (2010) (authorizing exemption from certificate requirements to perform temporary drilling activities to obtain data on potential natural gas storage facility).

¹⁸ *See, e.g., Stingray Pipeline Co., L.L.C.*, 128 FERC ¶ 61,177 (2009); *Stingray Pipeline Co., L.L.C.*, 108 FERC ¶ 61,058 (2004); *Midwestern Gas Transmission Co.*, 94 FERC ¶ 61,192 (2001); *Koch Gateway Pipeline Co.*, 80 FERC ¶ 61,287 (1997).

¹⁹ 15 U.S.C. § 717f(b)(2006).

statutory language. In any event, as is discussed below, regardless of which statutory provision is applied, we find that El Paso has not borne the burden of demonstrating that its proposed deactivation of facilities is in the public interest.

1. Protestors' Arguments

18. Salt River states that El Paso has not presented sufficient information to evaluate whether its proposal will affect ratepayers, the quality of service, or the public as a whole. SoCal Gas, San Diego Gas, and the California PUC state that El Paso has failed to address the effect that the proposed deactivation could have on hourly load variations or peak demand conditions. Additionally, SoCal Gas and San Diego Gas contend that the proposed deactivation could result in reduced flexibility in the El Paso system, and may require El Paso to rely to a greater extent on the critical operating conditions provisions of its tariff.²⁰ The California PUC states that El Paso has failed to show specific evidence of the cost savings that would result from the proposed deactivation of compressor units, and notes that El Paso has failed to discuss the conditions under which the units may be placed back into service.

19. Indicated Shippers argue that El Paso has not met its burden to demonstrate that its proposal would have no adverse impacts on existing customers. Specifically, Indicated Shippers believe a temporary deactivation will reduce the volumes that El Paso is able to transport for shippers and reduce shipper flexibility to nominate to alternate points or redesignate to new primary points. Further, Indicated Shippers state that El Paso's proposal does not address whether there would be an effect on existing, short-term firm service or interruptible service. Additionally, Indicated Shippers argue that El Paso's proposal to deactivate the compressor facilities for purely economic reasons is contrary to the Commission's abandonment precedent,²¹ and to the Commission's precedent regarding temporary deactivation of facilities because El Paso has made no showing that the compressor units would need to be replaced if left in service.

20. SoCal Edison states that it does not necessarily oppose El Paso's proposal, but that El Paso has not provided sufficient information and analysis to determine whether the temporary deactivation would be in the public interest. Like Indicated Shippers, SoCal

²⁰ These tariff provisions allow El Paso to charge penalties, when capacity on a pipeline is constrained, if a shipper is not operating in balance (i.e., taking only scheduled volumes of gas).

²¹ In support of its claim, Indicated Shippers cites *Mich. Consolidated Gas Co. v. FPC*, 283 F.2d 204 (D.C. Cir. 1960) (*MichCon*) for the proposition that a pipeline's desire "to be rid of what it considers vexatious servitude" is not reason for granting an abandonment request. *Id.* at 214.

Edison also states that previous uses of the section 7(c)(1)(B) exemption for temporary acts involved compressor units that would need to be replaced in the event that they were not deactivated, whereas El Paso's proposal makes no such claim. SoCal Edison shares the concern that if the compressor facilities are deactivated, El Paso's system may be unable to supply peak daily and hourly demands. Lastly, SoCal Edison asserts that temporarily deactivating the compressor units will increase El Paso's market power and could enable El Paso to demand higher rates for short-term transportation services. SoCal Edison notes that El Paso currently has authority to charge for short-term services up to 250 percent of its approved firm service rates.

2. El Paso's Answer

21. In response to the parties' concerns, El Paso states that the proposed deactivation of compressor units is an effort to decrease costs for its shippers. El Paso notes that the *Mich. Consolidated Gas Co. v. FPC* case cited by Indicated Shippers is not applicable because, in that case, the pipeline was attempting to abandon services in order to provide unregulated service at a higher price. El Paso argues that here it is proposing to deactivate the compressor units because they are not needed to meet its long-term firm service obligations. In support of its proposal, El Paso notes that the Commission has previously stated it "will not require a pipeline to retain unneeded jurisdictional facilities" and that the "relevant criterion for the public interest is the pipeline's ability to meet anticipated requests for firm service after the abandonment becomes effective."²² El Paso further argues that the Commission should apply these principles in evaluating El Paso's proposal in this proceeding, regardless of any actual cost benefit to customers.

22. El Paso insists that its proposal is consistent with the Commission's previous policies regarding temporary deactivation of compressor units because the continued operation of the facilities is not economically justified and temporary deactivation will have no affect on its ability to meet its firm service obligations. With respect to peak load demands, El Paso states that the proposed deactivation will not affect its ability to satisfy its contractual obligations to provide firm hourly services. However, El Paso notes that it is not required to hold unsubscribed capacity in reserve based on the possibility that it might be reserved on a firm basis and used in future years. El Paso suggests that the appropriate action for the parties concerned with the long-term availability of capacity is to sign up for additional capacity under firm, long-term contracts. Lastly, El Paso states that because SoCal Gas's and San Diego Gas's concerns about the critical conditions provisions in El Paso's tariff are speculative, analysis of these provisions is unnecessary to determine whether the proposed deactivation should be granted.

²² *Trunkline Gas Co.*, 94 FERC ¶ 61,381 (2001).

3. Commission Response

23. As noted above, the Commission will evaluate all proposals involving cessation of services, on a temporary basis, pursuant to section 7(b) rather than section 7(c)(1)(B). We find that El Paso's request goes beyond the minor operations of a temporary nature that have previously been exempted from certificate requirements under section 7(c)(1)(B).²³ In previous instances where the Commission has authorized the temporary deactivation of compressor units under section 7(c)(1)(B), the cases have involved temporary deactivations for up to 36 months of compressor units that were not being used and would need to be replaced with new or more efficient units if the company decided that compression was needed to provide service. Authorization for the temporary deactivations allowed time for the companies to evaluate whether the market justified the additional expenditures to replace the compressor facilities.

24. For example, in *Koch Gateway Pipeline Co.*, we authorized deactivation of compressor facilities that were old and difficult to operate for 12 to 18 months to allow the company to determine whether to abandon or replace facilities.²⁴ In *Midwestern Gas Transmission Co.*, we recognized the company's need to evaluate whether to replace or abandon one compressor unit by authorizing it to deactivate the unit for up to 24 months because the unit was expensive to replace and difficult to operate, deactivation of the unit would reduce throughput capacity on the company's system by less than one percent, and the company anticipated the possibility that development of natural gas-fired generation in the Midwest might have resulted in the need for additional capacity.²⁵ Similarly, in *Stingray Pipeline Co., L.L.C.*, we recognized the company's need to evaluate whether to replace or abandon seven compressor units at two stations in the Gulf of Mexico by authorizing it to deactivate the units for up to 36 months because the compressor units were expensive and difficult to operate and maintain, and the anticipated development of new gas supplies in the Gulf of Mexico might have resulted in the need for additional capacity, thereby justifying replacing the units.²⁶ Five years later, we again recognized

²³ Indicated Shippers and El Paso cite *MichCon* and *Trunkline*, respectively, to support contrasting positions on the Commission's standard for analyzing requests to permanently abandon service under section 7(b) of the NGA. We note that while there may be aspects of the section 7(b) permanent abandonment analysis and section 7(c)(1)(B) temporary acts analysis that overlap, the analyses under the two statutory sections are not interchangeable. Section 7(c)(1)(B) is limited to a narrow and discrete set of factual circumstances that are not presented here.

²⁴ *Koch*, 80 FERC ¶ 61,287 (1997).

²⁵ *Midwestern*, 94 FERC ¶ 61,192 (2001).

²⁶ *Stingray*, 108 FERC ¶ 61,058 (2004).

Stingray's need to evaluate whether to replace or abandon one compressor unit on the same system by authorizing it to deactivate the unit for up to 18 months because the unit was irreparable due to age, lack of replacement parts, and damage incurred by the two-month shutdown subsequent to Hurricane Ike, the company's flow model indicated that existing horsepower on the system was in excess of that needed to support its certificated capacity, and recovery of natural gas supply fields in the Gulf of Mexico after Hurricanes Ike and Rita might have resulted in the need for additional capacity.²⁷

25. In each of these cases, the compressor units were inoperable or difficult to maintain, replacement of the units was necessary if they were to remain operable, but replacement was not economically justifiable given the company's current transportation capacities at the time. However, in each case, the company anticipated the possible need for additional capacity on its system due to such factors as the development of new natural gas supplies, or the development of natural gas-fired electric generation. Given the near-term uncertainty, the Commission authorized deactivation of the compressor units for a limited term while the companies made the decision whether to replace or abandon the compressor units.

26. The Commission finds that El Paso has not provided sufficient evidence that the public convenience and necessity would permit the requested authorization. Here, El Paso is proposing to deactivate, for up to 48 months, operable compressor facilities, which, when in operation, can increase El Paso's system capacity by 508 MMcf per day.²⁸ El Paso has not provided evidence that the compressor units are in need of replacement because they are inoperable or not repairable. Moreover, while El Paso has stated that deactivation of the subject facilities will result in reduced costs to the company, it has not submitted sufficient information to support its allegation that such cost reductions are likely to result in an actual reduction in El Paso's system-wide rates. At the same time, the Commission agrees with the protestors that the reduction in capacity due to the temporary deactivation would limit El Paso's ability to offer the same

²⁷ *Stingray*, 128 FERC ¶ 61,177 (2009). On February 9, 2011, in an unpublished delegated letter order in Docket No. CP09-430-000, Commission staff denied Stingray's request to extend the deactivation for an additional year.

²⁸ The volume 508 MMcf per day represents a summation of the 338 MMcf per day of capacity to two markets (East of California and California), and 170 MMcf per day of supply capacity on the San Juan Triangle System. The Commission recognizes that the actual reduction in El Paso's receipt point capacity on its system may be less than 508 MMcf per day because supply capacity that originates in the San Juan Triangle System and flows to the East of California or California markets is already accounted for in the reduction in capacity for the two markets.

levels of firm services in the future, including hourly, peaking, and short term firm services, that it currently offers under its approved rate schedules in its tariff.²⁹

27. In view of the above considerations, the Commission denies El Paso's request for an exemption pursuant to section 7(c)(1)(B) of the NGA to authorize temporary deactivation of twenty-one compressor units at nine compressor stations.

28. The Commission, on its own motion, received and made part of the record in this proceeding all evidence, including the application and exhibits thereto, submitted in support of the authorizations sought herein, and upon consideration of the record,

The Commission orders:

(A) El Paso Natural Gas Company's petition to temporarily deactivate twenty-one compressor units at nine compressor stations, as described in this order, is denied.

(B) The motions to consolidate Docket No. CP11-17-000 with other El Paso proceedings, as discussed in this order, are denied.

(C) The requests for a trial-type evidentiary hearing are denied.

By the Commission.

(S E A L)

Nathaniel J. Davis, Sr.,
Deputy Secretary.

²⁹ We note that to the extent El Paso does not need to operate the subject facilities in order to provide requested service, it is not obligated under its certificate to do so. As indicated previously, El Paso currently maintains the compressors primarily in an idle state as backup or spare compression, and it may continue to do so without specific authorization from the Commission.

Appendix A

Timely, unopposed interventions were filed by the following parties:

Apache Nitrogen Products, Inc.
Arizona Electric Power Cooperative, Inc.
Arizona Public Service Company
Atmos Energy Corporation
BP America Production Company
BP Energy Company
California Public Utilities Commission
ConocoPhillips Company
El Paso Electric Company
El Paso Municipal Customer Group
Freeport-McMoRan Corporation
Gila River Power, L.P.
Golden Spread Electric Cooperative, Inc.
MGI Supply Ltd.
New Harquahala Generating Company, LLC
New Mexico Gas Company, Inc.
Pacific Gas and Electric Company
Public Service Company of New Mexico
Salt River Project Agricultural Improvement and Power District
San Diego Gas & Electric Company
Sempra Global
Shell Energy North America (US) L.P.
Sierra Southwest Cooperative Services Inc.
Southern California Edison Company
Southern California Gas Company
Southwest Gas Corporation
Texas Gas Service Company, a division of ONEOK, Inc.
Tucson Electric Power Company
UNS Gas, Inc.

Appendix B

The following table identifies the specific facilities that El Paso proposes to temporarily deactivate:

System	Station Name	State	No. of Compressor Units	Total Horsepower
South Mainline	Afton Station	NM	3	21,450
South Mainline	Casa Grande Station	AZ	2	14,300
South Mainline	Florida Station	NM	3	21,450
South Mainline	Lordsburg Station	NM	2	14,300
South Mainline	San Simon Station	AZ	3	20,010
South Mainline	Vail Station	AZ	3	20,010
San Juan Triangle and North Mainline	San Juan Station	NM	3	3,480
San Juan Triangle and North Mainline	Gallup Station	NM	1	9,610
San Juan Triangle and North Mainline	Dikon Station	AZ	1	13,450
TOTAL			21	138,060