

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

El Paso Natural Gas Company)

Docket No. CP07-448-000

**MOTION FOR LEAVE TO INTERVENE
AND COMMENTS
OF BP AMERICA PRODUCTION COMPANY
AND BP ENERGY COMPANY**

Pursuant to Rules 211, 212 and 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“FERC” or “Commission”), 18 C.F.R. §§ 385.211, 385.212, and 385.214 (2007), BP America Production Company and BP Energy Company (jointly “BP”), hereby file this motion for leave to intervene, and file comments in the above-captioned proceeding.

In support of its motion for leave to intervene, BP states the following:

The names and addresses of the persons upon whom all communications concerning this proceeding should be served are as follows:

* Frederick T. Kolb
BP America Production Company
BP Energy Company
501 WestLake Park Boulevard, Mail Code 16.150
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* Designated to receive service pursuant to Rule 2010 of the Commission’s Rules of Practice and Procedure, 18 C.F.R. § 385.2010 (2007).

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On September 17, 2007, El Paso Natural Gas Company ("El Paso") filed an application for a certificate of public convenience and necessity to construct and operate compression located in Pinal County, Arizona ("Picaho Compressor Station Project" or Project").

BP has a direct interest in the subject filing as a supplier to and/or shipper on El Paso's pipeline system. BP has a substantial interest in and will be directly affected by the outcome of this proceeding. No other party can adequately represent BP's interests.

Given BP's interests in the subject filing, granting its motion to intervene would be in the public interest. 18 C.F.R. § 385.214 (2007).

Further, in the Application, El Paso stated that it was not seeking a pre-determination of roll-in for the Project costs at this time, but that El Paso would address the issue in its next rate case, for non-gas cost issues, or in the next applicable fuel tracker following the in-service date of the Project, for fuel costs. In light of El Paso's statements, BP requests the Commission to clarify that it will not address in this proceeding the issue of the appropriateness (or inappropriateness) of rolled-in rates for the Project. Parties should have the opportunity to examine El Paso's proposed rate treatment of the Project-related costs when El Paso makes its filing on the rate treatment for the Project, and to take whatever positions they deem appropriate at that time.

WHEREFORE, for the foregoing reasons, BP respectfully requests that it be permitted to intervene with full rights as a party in this proceeding, and that the Commission accept these comments.

Respectfully submitted,

**BP AMERICA PRODUCTION COMPANY
BP ENERGY COMPANY**

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By: /s/ Katherine B. Edwards
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Attorneys for
**BP America Production Company
BP Energy Company**

DATED: October 24, 2007

CERTIFICATE OF SERVICE

Pursuant to Rule 2010 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.2010 (2005), I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Alexandria, Virginia this 24th day of October, 2007.

/s/ John Paul Floom
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