

Mail Stop 3561

September 3, 2009

John R. Sult
Senior Vice President, Chief Financial Officer and Controller
El Paso Natural Gas Company
El Paso Building
1001 Louisiana Street
Houston, Texas 77002

Re: El Paso Natural Gas Company
Form 10-K for the Fiscal Year Ended December 31, 2008
Filed March 2, 2009
File No. 001-02700

Dear Mr. Sult:

We have completed our review of the above-referenced filing and have no further comments at this time.

Sincerely,

H. Christopher Owings
Assistant Director

cc: Charles H. Still, Jr.
Bracewell & Giuliani LLP
Via facsimile