STEVEN A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

MARY FALLIN
Governor

October 31, 2011

Douglas L. Foshee
El Paso Corporation
1001 Louisiana Street
PO Box 2511
Houston, TX 77252-2511

Re: El Paso Corporation's Potential Responsibility for Environmental Issues at the Former Wilcox Oil Company, Bristow, Oklahoma

Dear Mr. Foshee:

The Oklahoma Department of Environmental Quality (DEQ) is investigating a former oil refinery, which was known as Wilcox Oil Company (CERCLIS # OK0001010917) located in Bristow, Oklahoma. The property is being investigated by DEQ under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), pursuant to a Cooperative Agreement (#V-96688701) with the U.S. Environmental Protection Agency (EPA). The purpose of these investigations is to collect sufficient information concerning conditions at the site to assess the extent of the threat the site poses to human health and the environment.

The DEQ has determined that the site was owned and operated as a refinery from approximately 1915 to 1963. The Wilcox Oil Company operated a crude oil refinery at the site from the 1920s to early 1960s. Available information indicates that the Wilcox Oil Company merged with Tenneco Oil Company in 1965 and that El Paso Energy Corporation acquired Tenneco Oil Company in 1996.

The former Wilcox refinery site occupies approximately 125 acres and is located in the N/2, NW/4, Section 29, Township 16 North, Range 9 East and in SW/4, SW/4, Section 20, Township 16 North, Range 9 East, Indian Meridian, Creek County, Oklahoma. A large volume of visible waste is present at the site, especially in the process area and crude oil tank farm. Elevated levels of metals and organic compounds have been detected in surface soils and sediments. A church with a playground and six residences are located on the former refinery. Evidence suggests numerous children reside in each residence. Many of the homes have private wells on their property.

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EPA Region 6 is moving towards preparation of a Hazard Ranking System (HRS) package for the site in order to support proposing the site to the National Priorities List. However, Region 6 has allowed DEQ an opportunity to contact the potentially responsible parties (PRPs) to discuss options available through the state's voluntary clean-up program.

The DEQ would like to discuss the possibility of El Paso Corporation entering our Voluntary Cleanup or Brownfields Program to address environmental contamination at the site. Enclosed is specific information indicating the location and ownership of the refinery and the connection to El Paso Corporation.

Please contact me by December 1, 2011, to schedule a meeting to discuss this matter. You may reach me at (405) 702-5157 or amy.brittain@deq.ok.gov. Further information concerning DEQ's cleanup programs can be found on our website http://www.deq.state.ok.us/lpdnew/index.htm.

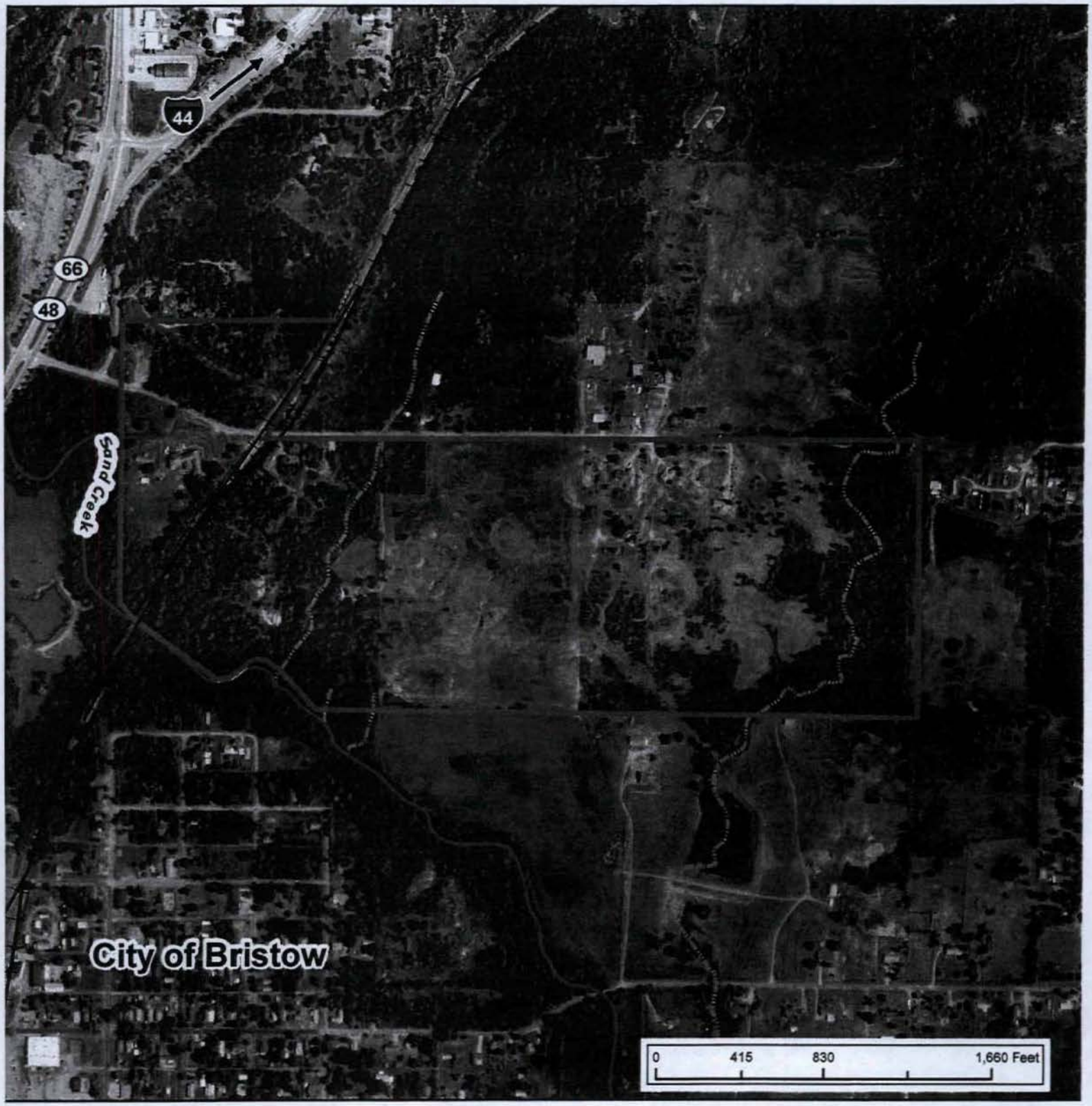
Sincerely,

Amy Brittain
Environmental Programs Manager
Site Remediation Section
Land Protection Division

Enclosure

c. Ray Roberts, DEQ, VCP Section

Former Wilcox Oil Refinery, Creek County, Bristow, Oklahoma



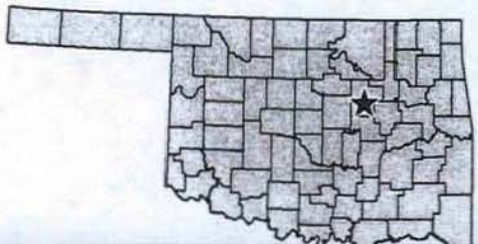
Legend

★ Site Locaiton

Site Boundary

Sand Creek

Intermittent Stream



File #469-00
Paid #45
9-20-65

CONFORMED COPY

CERTIFICATE OF

OWNERSHIP AND MERGER

MERGING WILCOX OIL COMPANY

INTO TENNECO OIL COMPANY

SECRETARY OF STATE
FILED
SEP 20 1965
A.M. 7|8|9|10|11|12|1|2|3|4|5|6 P.M.

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TENNECO OIL COMPANY, a corporation organized and existing under and by virtue of the General Corporation Laws of the State of Delaware, DOES HEREBY CERTIFY:

FIRST: That it is the owner of all the issued and outstanding stock of Wilcox Oil Company, a Delaware corporation.

SECOND: That, in accordance with the provisions of Title 8, Section 253 of The Delaware Code, the Board of Directors of Tenneco Oil Company, at a meeting duly convened and held on September 7, 1965, adopted the following resolutions to merge Wilcox Oil Company into Tenneco Oil Company:

"WHEREAS, Tenneco Oil Company owns all the issued and outstanding stock of Wilcox Oil Company, a Delaware corporation; and

WHEREAS, it is deemed desirable to merge Wilcox Oil Company into Tenneco Oil Company:

NOW, THEREFORE, BE IT

RESOLVED, that Tenneco Oil Company merge into itself, and it does hereby merge into itself, Wilcox Oil Company and assumes all of the liabilities and obligations of said Wilcox Oil Company; and further

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SUPERFUND DIV.
DIRECTOR'S OFC.

RESOLVED, that the President, or a Vice President, and the Secretary, or Treasurer, or an Assistant Secretary, or an Assistant Treasurer, of this Company, be, and they hereby are, authorized and directed to make and execute, under the corporate seal of this Company, a Certificate of Ownership and Merger and to file and record the same in the State of Delaware pursuant to Title 8, Section 253 of The Delaware Code; and further

RESOLVED, that the officers of this Company be, and they hereby are, authorized to do all acts and things which may be necessary or proper to effect said merger and to transfer title of the properties of Wilcox Oil Company to Tenneco Oil Company."

IN WITNESS WHEREOF, said TENNECO OIL COMPANY has caused its corporate seal to be hereunto affixed and this Certificate to be signed by W. E. SCOTT, its President, and L. R. SPENCE, its Secretary, this 7th day of September, 1965.

TENNECO OIL COMPANY

By W. E. Scott
President

By L. R. Spence
Secretary

TENNECO OIL COMPANY
CORPORATE
SEAL
DELAWARE
1960

THE STATE OF TEXAS)
: ss:
COUNTY OF HARRIS)

BE IT REMEMBERED that on this 7th day of September, 1965, personally came before me, a Notary Public in and for the County and State aforesaid, W. E. SCOTT, President of TENNECO OIL COMPANY, a corporation of the State of Delaware, the corporation described in and which executed the foregoing certificate, known to me personally to be such, and he, the said W. E. SCOTT, as such President, duly executed said Certificate before me and acknowledged the said Certificate to be his act and deed and the act and deed of said corporation; that the signatures of the said President and of the Secretary of said corporation to said foregoing Certificate are in the handwriting of the said President and Secretary of said corporation respectively, and that the seal affixed to said Certificate is the common or corporate seal of said corporation.

IN WITNESS WHEREOF, I have hereunto set my hand and seal of office the day and year aforesaid.

NOTARY PUBLIC
SEAL
County of Harris, Texas

Elizabeth M. Forsythe
Elizabeth M. Forsythe, Notary Public in and for Harris County, Texas

My Commission Expires June 1, 1967.

State of Delaware

Office of Secretary of State.

I, **Elisha C. Dukes,** *Secretary of State of the State of Delaware,*

do hereby certify *that the above and foregoing is a true and correct copy of*

Certificate of Ownership of the "TENNECO OIL COMPANY", merging the "WILCOX OIL COMPANY", pursuant to Section 253 of the General Corporation Law of the State of Delaware, as received and filed in this office the ninth day of September, A.D. 1965, at 10 o'clock A.M.

In Testimony Whereof, *I have hereunto set my hand and official seal at Dover this* tenth *day of* September *in the year of our Lord one thousand nine hundred and* sixty-five.

Elisha C. Dukes

Secretary of State

A. Filsons

Ass't Secretary of State

FORM 121

Our History

Following the discovery of oil in the Permian Basin in the 1920s, Houston attorney, Paul Kayser, determined that El Paso, Texas provided a promising market for more cost-effective natural gas. He firmed up supply from several gas wells near Jal, New Mexico, convinced El Paso's industrial facilities to convert to natural gas, and El Paso Natural Gas Company was born.

In the three-quarters of a century since its founding, El Paso has grown from a regional natural gas company to the largest natural gas transmission system in North America.

We invite you to take a few minutes to view an online scrapbook, dedicated to each and every employee—past and present—whose contributions made our company what it is today. The first four decades of our history are now available. We will continue to build upon the scrapbook throughout the year, so check back monthly for updates. And if you have a special memory, an amusing anecdote, or were part of a key event in the development of Team El Paso, please submit your story to history@elpaso.com. Launch our scrapbook.

Year	Summary
1928	Paul Kayser incorporates the pipeline company in Delaware as El Paso Natural Gas Company.
1929	El Paso Natural Gas Company begins construction of its first natural gas pipeline.
1931	El Paso Natural Gas Company expands westward into southern Arizona, southern New Mexico, and Cananea, Mexico.
1936	The New York Stock Exchange lists El Paso Natural Gas' common stock.
1947	El Paso begins construction of its natural gas pipeline to California. The project involves laying more than 700 miles of pipe and building the compressor stations necessary to keep the gas moving.
1955	El Paso Natural Gas celebrates the opening of its downtown El Paso home office building.
1983	El Paso Natural Gas becomes a wholly owned subsidiary of Burlington Northern, Inc. Burlington Northern subsequently spins off El Paso Natural Gas as part of Burlington Resources Inc. in 1988.
1992	El Paso Natural Gas is spun off by Burlington Resources and announces an initial public offering of its stock.
1996	The company acquires the energy business of Tenneco Energy, which was founded in 1940. The acquisition extends El Paso's interstate pipeline system from coast to coast. El Paso moves its corporate headquarters to Houston, Texas and changes its name to El Paso Energy Corporation to reflect the company's expanding role in the energy industry.
1999	El Paso merges with Sonat Inc., which founded its pipeline operations in 1929 as Southern Natural Gas. This merger expands El Paso's pipeline operations into the

southeast United States and initiates the company's entrance into the exploration and production business.

2001 The company changes its name to El Paso Corporation and completes its merger with The Coastal Corporation, which was founded in 1955. The merger brings Colorado Interstate Gas Company and ANR Pipeline Company to the company's pipeline operations. The merger also significantly increases the size of the company's exploration and production business. El Paso Natural Gas moves its headquarters to Colorado Springs, Colorado, joining with Colorado Interstate Gas to form El Paso's Western Pipeline Group. Tennessee Gas Pipeline and ANR Pipeline consolidate their operations in Houston to form El Paso's Eastern Pipeline Group.

2003 El Paso Corporation hires Doug Foshee as president and chief executive officer.

2004 El Paso's 6,000 employees dedicated themselves to working as one team focused on making El Paso Corporation a great turnaround story by meeting challenges and seizing opportunities.

2005 Every employee from the top down is committed to upholding our values of Stewardship, Integrity, Safety, Accountability, and Excellence in all we do. We are building upon our legacy of success by returning to our roots, and we will prevail over the industry-changing events that have altered the face of the company.

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LAND PROTECTION DIVISION
CONTROL SHEET

Subject: Wilcox PRP letter Program Code 292015810

Type of Letter: _____

Date Draft Submitted: 10/19/2011

Send Copies to: _____

		Initials	Date
1.	Typist	AB	10/19/2011
2.	Preparer (Add or mark through names listed below as appropriate for review of this letter)	AB	10/19/2011

Letters to be submitted in draft (not on letterhead) form to the following:

3.	Preparer's Supervisor Rita	RK	10/21/11
4.	Compliance		
5.	Attorney/Legal		
6.	Clerical		
7.	Signatory		
8.			

Final letter (prepared on letterhead & ready for mailing) to be submitted to the following:

1.	Preparer (I have re-read this letter for content & quality)	AB	10/31/2011
2.	Data Entry (if applicable)		
3.	Clerical Linda		
4.	Preparer's Supervisor Rita	RK	11/1/11
5.	Signature	AB	10/31/2011

Letter will be returned to clerical person for copying and mailing. ~~RK CD being prepared by Todd~~ AB 10/31/2011

Date letter mailed/Initial: _____

Certified Mail # _____

(This control sheet is to be attached to file copy of **final letter** and placed in facility file.)

Revised 4/29/03