

BP America Production Company North America Gas SPU 200 Energy Court Farmington, NM 87401

February 1, 2010

RCWD FEB 12'10

United States Department of the Interior Bureau of Land Management 1235 La Plata Highway Farmington, NM 87401

OIL CONS. DIV.

Attn: Jim Lovato

30-045-24735

RE: Gallegos Canyon Unit #328 Water Disposal and Oil Recovery Facility Surface. 3 Commingling and Off-Lease Sales and Measurement Request (01/10-06/10)

In accordance with your approval letter dated November 1, 2007 for surface commingling, off-lease sales, storage, usage & measurement and the allocation of oil sold from the Gallegos Canyon Unit #328 Oil Recovery and Water Disposal Facility, herein submitted for your records is the semi-annual re-determination of wells to be included in the allocation during the upcoming period covering **January 1, 2010 to June 30, 2010**. Normally ... in accordance with the original approval, the re-determination would have been performed by identifying those wells delivering water to the facility during the period **July 2009 through December 2009**. Wells not producing condensate would have been eliminated from the calculation of the allocation factors. The total water delivered to the facility, from oil producing wells and leases would have been totalled and then each well would have been allocated a percent of the oil sold from the facility based upon its' portion of this total. This facility has been shut down for major maintenance and repairs from early February 09 through now, we have not removed any wells from the previous period. Instead, we have continued them on through this upcoming period.

Produced water from various wells/leases operated by BP America Production Company, will be picked up at the well location from pits and or water storage tanks and hauled via truck to the Oil Recovery Facility (ORF) where it will be offloaded into two 500 bbl tanks which are equalized. Through separation, incidental volumes of condensate entrained in the water delivered to the facility will be recovered into the 400 bbl sales tank, no. 8358 or the 300 bbl sales tank, no. 8100. Sales of condensate will be made periodically from these tanks in accordance with Onshore Orders No. 3, Site Security, and No. 4, Oil Measurement.

Exhibit No. 1 is a listing of wells to be included in the allocation during the period **January 1, 2010 to June 30, 2010**. Exhibit No. 2 is a listing of those wells added to the allocation from the previous period. Exhibit No. 3 is a listing of those wells deleted from the allocation from the previous period.

ACCEPTED FOR RECORD

FEB 1 0 2010

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All volumes will be properly allocated to the appropriate Federal Lease or CA and reported on the OGOR Form 4045. Allocated sales volumes of condensate from the ORF are combined with sales at the lease, and recorded as sales and production on the OGOR, and royalties and taxes are paid on the total sales volume. Volumes reported for royalty determination and Federal royalties paid are not reduced in any way by this allocation process.

If there are any questions regarding this proposed allocation, please call me at (505) 326-9260.

Respectfully,

Sheri Bradshaw

Production Systems Operator

Attachments

Exhibit I Proposed Allocation, GCU #328 ORF Exhibit II Wells Added, GCU #328 ORF

Exhibit III Wells Deleted, GCU #328 ORF

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