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Amoco Production Company

A Part of the BP 501 WestLake Park Blvd. Houston, TX 77079-3092

Phone: 281-366-2000

February 9, 2005

Bureau of Land Management Farmington District Office 1235 La Plata Highway, Suite A Farmington, New Mexico 87401 Attn: Lucy Bee

State of New Mexico Commissioner of Public Lands P.O. Box 1148 Santa Fe, New Mexico 87504-1148

State of New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, New Mexico 87505 Attn: Ms. Lori Wrotenbery, Director MR MOUR E FESMIRE

Re:

2004 Review of Operations 2005 Plan of Development San Juan County, New Mexico

Gallegos Canyon Unit

Gentlemen:

BP America Production Company, as Unit Operator for the Gallegos Canyon Unit, submits for your approval the attached Review of 2004 Operations and 2005 Plan of Development.

Please signify your approval of this Plan of Development by signing in the space provided on the attached sheet and returning to me at the letterhead address. If you have any questions, please feel free to call me at (281) 366-4691.

Very truly yours,

Brett Woody

Enclosures

Review of 2004 Operations

Shown in Table I are the cumulative volumes of gas and condensate produced from each reservoir in the Gallegos Canyon Unit. Table II summarizes the well status in each horizon. Because Gallegos Canyon Unit has many down hole commingled wells producing from more than one formation, Table II reflects active completions rather than wellbores. Historical production graphs for each horizon are attached.

TABLE I
Cumulative Production as of 7/31/2004

FORMATION	GAS (MMCF)	CONDENSATE (MBLS)				
Farmington Sands	366					
Fruitland Sands	13,935					
Fruitland Coal	46,808					
Pictured Cliffs	190,125	4				
Chacra	514	4				
Gallup	8,871	1,947				
Dakota	464,384	3,470				

TABLE II
Production Status by Formation as of 7/31/2004

FORMATION	ACTIVE	INACTIVE				
Farmington Sands	3	0				
Fruitland Sands	38	2				
Fruitland Coal	88	5				
Pictured Cliffs	146	10				
Chacra	6	0				
Gallup	5	14				
Dakota	197	7				

2004 GCU Development

Table III below shows the status of each of the proposed activities from the 2004 GCU Plan of Development. As of December 9, 2004, 1 new well has been drilled and xx wells have been recompleted.

TABLE III-A 2004 Work Status

		04 WUIK Status	20	•
STATUS	OBJECTIVE	TYPE	DEDICATION	WELL NO.
P&A		Recomplete and commingle with FC	W/2 24-T28N-R12W	GCU 003
Deferred		Recomplete and commingle with FC	NE/4 34-T28N-R12W	GCU 004
Deferred		Recomplete and commingle with FC	NE/4 29-T28N-R12W	GCU 040
Completed - Evaluating	FC & PC	Recomplete	S/2 & SE/4 36-T28N-R13W	GCU 137
Cancelled	PC	Recomplete	E/2 35-T29N-R12W	GCU 169
P&A	FC	Recomplete	E/2 24-T28N-R12W	GCU 243E
Deferred	PC	Drill	SE/4 19-T28N-R12W	GCU 572
Completed - Successful	FC	Drill	S/2 04-T27N-R12W	GCU 583
Deferred	PC	Drill	SW/4 29-T28N-R12W	GCU 585

TABLE III-B
2004 Plug and Abandon Candidates

WELL NO.	DEDICATION	CURRENT	STATUS
		HORIZON	
GCU 003	W/2 24-T28N-R12W	FC	Completed
GCU 012	NE/4 33-T28N-R12W	PC	Planned for 2005
GCU 018	E/2 21-T28N-R12W	FC/PC	Completed
GCU 022	E/2 18-T28N-R12W	FC	Completed
GCU 123	NW/4 25-T28N-R12W	FS	Completed
GCU 176E	N/2 25-T28N-R13W	FC/DK	Planned for 2005
GCU 209	W/2-15-T28N-R12W	, FC	Planned for December 2004
GCU 227	N/2 20-T28N-R12W	DK	Completed
GCU 242	W/2 24-T28N-R12W	DK	Completed
GCU 243E	E/2 24-T28N-R12W	DK	Completed
GCU 246	E/2 35-T28N-R12W	DK	Planned for December 2004
GCU 350	SE/4 33-T29N-R12W	PC	Planned for December 2004
GCU 400E	N/2 25-T28N-R12W	FC	Completed
GCU 578	N/2 27-T29N-R12W	FC	Completed
GCU GC D 160	S/2 27-T29N-R12W	DK	Completed

2005 Plan of Development

BP America will continue to develop the Fruitland Sand, Fruitland Coal, Pictured Cliffs and Chacra horizons within the Gallegos Canyon Unit through recompletions, commingling and selective drilling. However, as higher risk prospects have been carried out, the success rate has decreased dramatically. This is driving BP America to pause and assess the operating and reservoir characteristics that appear to be most controlling results. Recent 160 Acre Fruitland Coal completions have been particularly disappointing. Current 2005 plans include the no drilling and only 2 recompletions in existing wellbores from the list below. Some of the recompletions will involve commingling the recompleted horizon with the current producing horizon. We do have 2 drilling locations on Navajo land that we hope to permit in 2005 and drill in 2006.

Table IV

Development Projects

		Development Projects	S	
WELL NO.	DEDICATION	ТҮРЕ	OBJECTIVE	PERMIT STATUS
GCU 004	NE/4 34-T28N-R12W	Recomplete and commingle with FC		Evaluating
GCU 020	SW/4 17-T28N-R12W	Recomplete and commingle with FC		Preparing for Submission
GCU 028	NE/4 30-T29N-R12W	Recomplete and commingle with FS		Preparing for Submission
GCU 040	NE/4 29-T28N-R12W	Recomplete and commingle with FC		Evaluating
GCU GC 'D' 160E	SW/4 27-T29N-R12W	Recomplete	CK	Evaluating
GCU GC 'F' 162E	NE/4 36-T29N-R12W	Recomplete and commingle with DK		Evaluating
GCU 341	NW/4 16-T28N-R12W	Recomplete and commingle with FS		Evaluating
GCU 572	SE/4 19-T28N-R12W	Drill	PC	Preparing for Submission
GCU 585	SW/4 29-T28N-R12W	Drill	PC	Preparing for Submission
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TABLE V
2005 Plug and Abandon Candidates

WELL NO.	DEDICATION	CURRENT HORIZON	OTHER PRODUCED OR TESTED HORIZONS					
GCU 012	NE/4 33-T28N-R12W	PC	FC					
GCU 169	E/2 35-T29N-R12W	DK	None					
GCU 174	W/2 28-T28N-R12W	DK	None					
GCU 176E	N/2 25-T28N-R13W	FC/DK	None					
GCU 184	E/2 28-T28N-R12W	DK	None					

GALLEGOS CANYON UNIT AREA

2005 PLAN OF DEVELOPMENT

APPROVED:	:Dated:
	Bureau of Land Management (Subject to like approval by the Commissioner of Public Lands and the O Conservation Division)
APPROVED:	:Dated:
	Commissioner of Public Lands (Subject to like approval by the Bureau of Land Management and the Oil Conservation Division)
APPROVED:	:Dated:
	Oil Conservation Division (Subject to like approval by the Bureau of Land Management and the Commissioner of Public Lands)

The foregoing approvals are for the 2005 Plan of Development for the Gallegos Canyon Unit.

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!	Dakota	Gallup	Pictured Cliffs	Fruitland Coal	Talleand Canas	Emitland Sands	Farmington Sands	Z	Production Status by Formation		Dakota	Gallup		Pictured Cliffs	Fruitland Coal	Fruitiand Saires	Table Conds	Farmington Sands	F.		1999 Operations
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	Dakota	Gallup	Pictured Cliffs	Fruitland Coal		Fruitland Sands	Farmington Sands	FM	Production Status by Formation		Dakota		Gallin	Pictured Cliffs	Fruitland Coal	Trainagia Carico	Fruitland Sands	Farmington Sands	FM	:	2000 Operations
	200	о	120	\$	P	21		Active Inactive	s by Formation			AED 27E 3 373		163,357	35,608		11,861	91	MMCF MBO		
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	Dakota	Gallup	Pictured Cliffs	riuluanu coai	Hand Coal	Fruitland Sands	Farmington Sands		Production Status by Formation			Dakota .		Pictured Cliffs	Fruitland Coal		Fruitland Sands	Farmington Sands			2001 Operations
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Chacra	Dakota	Gallup	riculed Cilis	Distance Cliffe	Fruitland Coal	Fruitland Sands	Farmington Sands	-	Production Status by Formation	Chacra		Dakota	Gallup	Pictured Cliffs	Fruitano Coa	E STANK COL	Fruitland Sands	Farmington Sands	S		2003 Operations
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Chacra	Сакога	Gallup	Calling	Dictural Cliffs	Fruitland Coal	Fruitland Sands	Farmington Sands		Production Status by Form	Cnacra	?	Dakota	Gallup	Pictured Cims	To the state of th	Fruitland Coal	Fruitland Sands	Farmington Sands		Cumulative Production as	2004 Operations
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