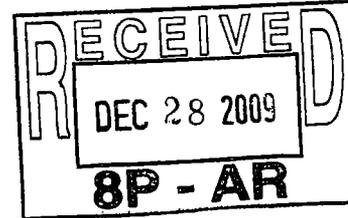


BP America Production Company
501 Westlake Park Boulevard
Houston, TX 77079

December 21, 2009

Ms. Claudia Young Smith
Air and Radiation Program
United States Environmental Protection Agency, Region 8
1595 Wynkoop Street
Mail Code: 8P-AR
Denver, CO 80202-1129



Re: Florida River Compression Facility
Proposed Title V Permit No. V-SU-0022-05.00
Clarification of December 17, 2009 Flow Description and Proximity Map

Dear Ms. Smith:

On December 17, 2009 BP America Production Company (BP) had the opportunity to meet with you and EPA's Ms. Kathleen Paser to discuss the direct and indirect gas flow from BP's owned and operated wells to the Florida River Compression Facility. At that time, BP submitted a description of the gas flow as Attachment A to the December 17, 2009 letter. BP wishes to clarify the description and is including an updated Attachment A.

Based on our conversation on December 17, 2009, BP understands that a proximity map may be helpful in determining which emissions sources will be included in the proposed Title V Permit for the Florida River Compression Facility.

The clarified flow description, the proximity map, and the Certification of Truth, Accuracy, and Completeness by Responsible Official, are attached.

If you have questions regarding this submittal or require additional information, please call me (281-366-3946) or Julie Best, BP's field environmental coordinator in Durango (970-375-7540).

Sincerely,

Rebecca Tanory

cc: K. Paser -EPA Region 8, Air and Radiation Program, Mail Code 8P-AR
J. Best, BP Durango



Federal Operating Permit Program (40 CFR Part 71)

CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS (CTAC)

BP America Production Company
Florida River Compression Facility
Proposed Title V Permit Number V-SU-0022-05.00
Clarified Description of Facility Gas Flow

This form must be completed, signed by the "Responsible Official" designated for the facility or emission unit, and sent with each submission of documents (i.e., application forms, updates to applications, reports, or any information required by a part 71 permit).

A. Responsible Official

Name: (Last) Braun (First) Jeffrey (MI) M.

Title San Juan Performance Unit Leader

Street or P.O. Box 501 Westlake Park Blvd.

City Houston State TX ZIP 77079

Telephone (281) 366 - 5987 Ext. Facsimile (281) 366 - 7981

B. Certification of Truth, Accuracy and Completeness(to be signed by the responsible official)

I certify under penalty of law, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

Name (signed) Jeffrey M. Braun

Name (typed) Jeffrey M. Braun Date: 12/21/2009

ATTACHMENT A (12/21/2009)

DESCRIPTION OF GAS FLOW FROM BP AMERICA PRODUCTION COMPANY WELLS TO BP AMERICA PRODUCTION COMPANY FLORIDA RIVER COMPRESSION FACILITY AND THIRD PARTY FACILITIES

The majority of the gas from BP America Production Company (BP) owned and operated wells located in BP's San Juan Performance Unit North Asset (SJNA) flows to the BP owned and operated Florida River Compression Facility (Florida Facility) for processing. Gas from BP owned and operated SJNA wells can flow to third party owned and operated gathering facilities (Plants) for processing if the Florida Facility is off line.

Specifically, gas from the BP owned and operated SJNA wells flows to Low Pressure Pipeline systems (LPP) (both BP and third party owned and operated), then to central points of delivery compressor stations (CDPs) (both BP and third party owned and operated)(the Florida Facility also performs the function of a CDP), then to medium pressure pipeline systems (MPPs) (both BP and third party owned and operated), and then to third party owned and operated Plants or to the Florida Facility.

Gas from BP owned and operated CDPs flows to MPPs, the Florida Facility or third-party owned and operated Plants.

Gas from third-party owned and operated CDPs flows to third-party owned and operated Plants.

The Florida Facility also handles gas from third party gas producers and third party owned and operated gathering systems.

BP routes gas from the Florida Facility to BP owned and operated sales pipelines that connect with third party owned and operated sales pipelines.

Gas from BP owned and operated wells located southwest of the Florida Facility and west of the BP owned and operated Wolf Point CDP (Wolf Point CDP) flows mostly through a BP owned and operated LPP to a third party owned and operated CDP, MPP, and Plant. In the event of a third party owned and operated Plant upset, the gas can flow to the Wolf Point CDP.

Gas from other BP owned and operated wells located southwest of the Florida Facility and near the Wolf Point CDP flows through a BP owned and operated LPP to the Wolf Point CDP or to the Florida Facility.

Gas from the Wolf Point CDP flows to a BP owned and operated MPP that flows to the Florida Facility. Very infrequently a portion of the Wolf Point CDP MPP gas can be routed to a third party owned and operated MPP and Plant.

Gas from the Florida direct connect (DC) pipelines (LPPs) flows to BP owned and operated CDPs and then to the Florida Facility, or to a third party owned and operated CDP and third party owned and operated Plants.

BP does not control third party owned and operated CDPs, pipeline systems, or Plants.

Florida River Compression Facility Proximity Map

