

**BEFORE THE OIL AND GAS CONSERVATION COMMISSION
STATE OF COLORADO**

IN THE MATTER OF CHANGES TO THE) RULES AND REGULATIONS OF THE OIL) AND GAS CONSERVATION COMMISSION) OF THE STATE OF COLORADO)	CAUSE NO. 1R DOCKET NO. 0803-RM-02
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**BP AMERICA PRODUCTION COMPANY'S
REBUTTAL STATEMENT
REGARDING DRAFT RULES PUBLISHED
APRIL 10, 2008 (31 Colo. Reg. 4)**

BP America Production Company ("BP") hereby incorporates and adopts the positions, witness testimonies, exhibits and legal authorities presented and/or cited by the Colorado Petroleum Association ("CPA") in its Rebuttal Statement as if fully set forth herein.

Respectfully submitted,

DUGAN & ASSOCIATES, P.C.

By: _____



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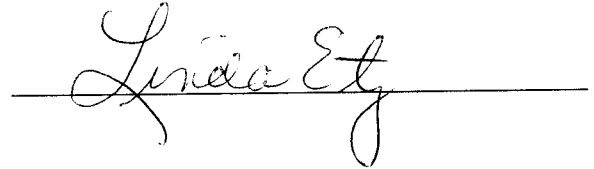
CERTIFICATE OF SERVICE

I, hereby certify that on this 16th day of June, 2008, I caused to be hand-delivered, one original with fifteen (15) true and correct copies, of the above and foregoing BP AMERICA PRODUCTION COMPANY'S REBUTTAL STATEMENT REGARDING DRAFT RULES PUBLISHED APRIL 10, 2008, addressed to the following:

Patricia Beaver, Hearing Manager
Docket No. 0803-RM-02
Oil and Gas Conservation Commission
1120 Lincoln Street, Suite 801
Denver, CO 80203

trisha.beaver@state.co.us

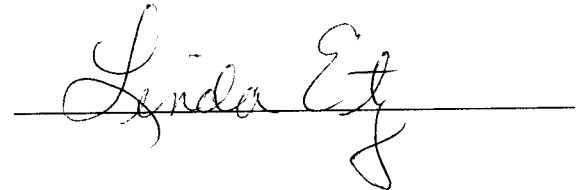
With electronic copies sent to:
Marc.fine@state.co.us and all of the Parties
listed on the Party List found at the OGCC
website.

A handwritten signature in cursive script, reading "Linda Ely", is written over a horizontal line.

I also hereby certify that on this 16th day of June, 2008, I caused to be hand-delivered, two (2) true and correct copies of the above and foregoing BP AMERICA PRODUCTION COMPANY'S REBUTTAL STATEMENT REGARDING DRAFT RULES PUBLISHED APRIL 10, 2008, addressed to the following:

Kelly Rees
Colorado Department of Law
1525 Sherman Street, 5th Floor
Denver, CO 80203

kelly.rees@state.co.us

A handwritten signature in cursive script, reading "Linda Ely", is written over a horizontal line.

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