

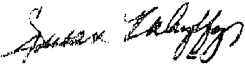
**BEFORE THE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

Before Commissioners: Brian J. Moline, Chair
Robert E. Krehbiel
Michael C. Moffet

STATE CORPORATION COMMISSION

NOV 04 2005

In the Matter of the General Investigation to)
Determine a Commission Policy Regarding)
Customers Served Directly or Indirectly by)
Gas Gathering Systems)

 Docket
Room

Docket No. 06-GIMG-400-GIG

MOTION TO INTERVENE BY BP AMERICA PRODUCTION COMPANY

BP America Production Company (“BP”) moves to intervene in the above-captioned matter under K.A.R. 82-1-225 because its legal interests may be substantially affected by this proceeding. In support of its Motion, BP states as follows:

1. The Order Initiating Investigation and Assessing Costs (“Order”) which was filed on October 19, 2005, identifies a number of issues involving: (1) the production of gas from the Hugoton Natural Gas Field into gathering systems; (2) the operation of gas gathering systems; (3) whether operators of gathering systems are required to provide “exit taps;” (4) whether operators of gathering systems should curtail existing “exit taps” based on safety considerations; (5) minimum gas quality requirements; (6) natural gas public utility issues; (7) the effect of negotiated contracts between royalty owners and producers, producers and gatherers, land owners and gatherers, and third-party transporters; and (8) various other issues identified in the Order.

2. BP’s legal interests may be substantially affected by this proceeding for the following reasons:

(a) As a producer, BP operates approximately 1,800 gas wells in the Kansas Hugoton Field and approximately 900 gas wells in the Panoma Council Grove natural gas field;

(b) BP operates the gathering system owned by WGP-KHC LLC which is one of the largest gathering systems in the Kansas Hugoton Field and the Panoma Council Grove Gas Field, which gathering system is connected to approximately 2,400 wells, consists of approximately 2,100 miles of gathering pipeline, and transports approximately 170 mmcf/d;

(c) BP owns Grant Gathering Company which in turn owns and operates a gathering system with 184 connected wells and transports approximately 17 mmcf/d in the Hugoton Field; and

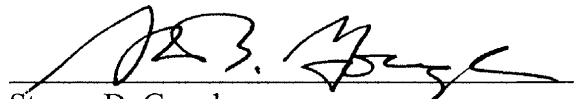
(d) BP owns and operates the Jayhawk Plant which is one of the major processing plants in the Hugoton Natural Gas Field with a 450 mmcf/d capacity (approximately 230 mmcf/d current inlet volumes).

3. The above facts demonstrate that BP's legal rights, privileges, immunities, and other legal interests both as a producer, operator of a gathering system, owner of a gathering system and as the owner of the Jayhawk Plant may be substantially affected by these proceedings. BP is entitled to intervene under K.A.R. 82-1-225(a)(2).

WHEREFORE, BP requests that its Motion to Intervene be granted.

Respectfully submitted,

BP AMERICA PRODUCTION COMPANY

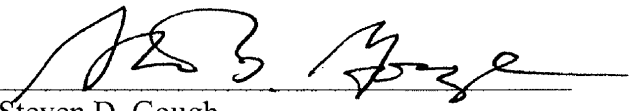


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STATE OF KANSAS }
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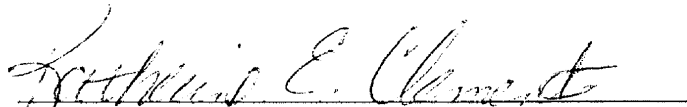
ss.

Steven D. Gough, of lawful age, and being first duly sworn upon oath, deposes and says:
He is an attorney for BP America Production Company; he has read the within and foregoing
Motion to Intervene by BP America Production Company; and the statements and contents
thereof are true to the best of his knowledge and belief.

By: 
Steven D. Gough

Subscribed and sworn to before me this 3rd day of November, 2005.




Katherine E. Clements, Notary Public

My Commission Expires:

June 30, 2006

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 3, 2005, the original and seven (7) copies of the above and foregoing *Motion to Intervene by BP America Production Company* was mailed, postage prepaid and properly addressed, to:

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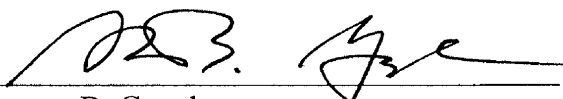
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