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August 13, 1996

Mr. David S. Guzy  
Chief, Rules and Procedures Staff  
Minerals Management Service  
Royalty Management Program  
P O Box 25165 MS3101  
Denver CO 80225-0165



**RE: Amendments to Gas Valuation Regulations for Federal Leases  
61 FED. REG. 25,421 (May 21, 1996)**

Dear Mr. Guzy:

Conoco Inc. (Conoco) appreciates this opportunity to resubmit comments to the Minerals Management Service (MMS) with respect to the above referenced notice of reopening of public comment period.

Conoco is a wholly-owned subsidiary of E. I. DuPont de Nemours and Company. In 1995, its worldwide production of crude oil, condensate, and natural gas liquids averaged 414,000 barrels per day; and its worldwide natural gas production averaged 1,242 million cubic feet per day. During the five year period ending December 31, 1995, Conoco remitted royalty payments to the MMS in excess of \$353 million.

Conoco and some of its employees are members of the American Petroleum Institute, the Natural Gas Supply Association, the Rocky Mountain Oil and Gas Association, and the Council of Petroleum Accountants Societies. All of these organizations are filing separate comments regarding this reopening of public comment period. Conoco supports the comments submitted by those organizations and we adopt, and incorporate by reference, those comments.

Due to the extensive nature of the comments submitted by those organizations, Conoco has no additional comments.

Should the MMS have any question of Conoco concerning these comments, please contact me at the above address or at 405/767-5044.

Respectfully,

John E. Clark

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