

**CHEVRON FACSIMILE MESSAGE**

**CHEVRON LAW DEPARTMENT  
1301 MCKINNEY STREET  
HOUSTON, TEXAS 77010**

**FACSIMILE NO. (713) 754-3366**

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**DATE:** May 13, 1999 **TIME:** 4:22 PM

**TO**

**Facsimile No.:** (303) 231-3700  
**Name:** BETH ANN DANFORD  
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**FROM**

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**Number of Pages (Including Cover) 3**

**Instruction/Comments:**

***If you do not receive all pages, please phone: Carol Hicks, (713) 754-3408.***



May 13, 1999

**VIA FACSIMILE - (303) 231-3700**

**VIA E-MAIL - RMP.comments@mms.gov**

Minerals Management Service  
Royalty Management Program  
Rules and Publications Staff  
P.O. Box 25165, MS 3021  
Denver, CO 80225-0165

**Notice of Information Collection Solicitation**  
**Forms: MMS-3160, MMS-4054, MMS-4055, MMS-4056, MMS-4058**  
**64 Fed. Reg. 8844 (February 23, 1999)**

Chevron U.S.A. Production Company  
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Ladies and Gentlemen:

Chevron U.S.A. Production Company, a Division of Chevron U.S.A. Inc. ("Chevron"), respectfully requests the opportunity to submit additional comments on the subject information collection solicitation. As one of the largest lessee/payors of royalties on oil and gas produced from federal leases, Chevron would be significantly affected by the proposed changes to the subject oil and gas production forms.

Chevron participated in the preparation of the comments submitted by the Council of Petroleum Accountants Societies. For the most part, Chevron endorses and incorporates by reference the comments submitted by COPAS.

However, we wish to clarify that we do not endorse the proposed elimination of the OGOR-C. We do not believe it is beneficial to combine Parts B and C of the Oil and Gas Operations Report into a single report. Inasmuch as there would no longer be individual columns for oil, gas and water, we believe the combined form will be far too crowded and difficult to read, resulting in confusion rather than enhancing the clarity of the reporting data. The current format provides product footing (totals) which can be tied to OGOR B & C. However, with the proposed change, there would be no footing (totals). Since the three disposition volume columns would be consolidated into a single column, the disposition volume totals for oil, gas and water would have to be added manually, which would place an added burden on individuals, primarily partners, who use hard copies of the reports for booking or analysis purposes. We therefore recommend continuing with separate OGOR B & C reports.

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Chevron appreciates the opportunity to comment on the proposed reporting changes.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "G. W. Butler, III".

George W. Butler, III