



James C Pruitt
Vice President
Government Relations
Department

Texaco

1050 17th Street NW
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June 19, 2000



Office of Information and Regulatory Affairs
Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

Attention: Desk Officer for the Interior Department
Ms. Tammy Croote
By facsimile 202-395-7285

Re: Form MMS-2014
OMB Control Number 1010-NEW, 65 FR 31598, May 18, 2000

Dear Sir or Madam:

Texaco Inc., on behalf of itself and its affiliates, including Texaco Exploration and Production Inc., ("Texaco"), appreciates the opportunity to file these comments in response to the Notice of Information Collection Request, published in the Federal Register on May 18, 2000 at 65 FR 31598.

Texaco hereby incorporates by reference and adopts as its own the comments filed by the Council of Petroleum Accountants Societies. Those comments articulate serious substantive problems with the proposed form. One example is the sales type codes required by the form. Although industry and the Minerals Management Service ("MMS") have met several times to discuss the problem, MMS has not agreed to all the changes necessary to relieve the significant new burdens on industry. Texaco also notes that the MMS submission to OMB was



36 USC 380

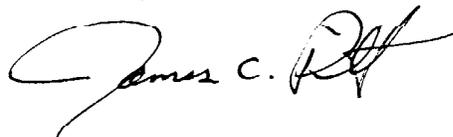
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incomplete as to all data elements and therefore industry has been deprived of the chance to fully comment on the proposed form. It is critical that industry be afforded this opportunity before the form is approved.

Texaco strongly urges the Office of Management and Budget not to approve Form MMS-2014 at this time. MMS should resubmit Form 2014 with all necessary information and with any revisions that were discussed with industry with which they may agree. Only at that time will industry be in a position to properly evaluate the new proposed form or its financial impact on lessees.

Sincerely,

A handwritten signature in black ink, appearing to read "James C. Pruitt". The signature is fluid and cursive, with the first name "James" being the most prominent.

James C. Pruitt

cc: David S. Guzy
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