



April 6, 1999

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



HUNT OIL COMPANY
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Re: Federal Register / Vol.64, No. 35/ Tuesday, February 23, 1999/ Notices
Under the Paperwork Reduction Act of 1995, the Minerals Management Service (MMS)
is soliciting comments on revising an existing information collection, Production Accounting
and Auditing Reports, the Office of Management and Budget (OMB) Control Number
1010-0040, which expires on July 31, 2001.
Forms: MMS-3160, MMS-4054, MMS-4055, MMS-4056, MMS-4058

Gentlemen:

Hunt Oil Company offers the following comments in response to the subject notice.

Federal Register/Vol. 64, No. 35/Tuesday, February 23, 1999/Notices:

FORM 3160

Eliminating Form 3160 and using the revised OGOR Form MMS-4054
A & B for both onshore and offshore wells.

RESPONSE: We agree with MMS plan to eliminate Form 3160.

FORM 4054

"many of these fields will either be system calculated (Column totals)
or will not be required for onshore reporters (metering points and
facility numbers)."

RESPONSE: Suggest a code be added to distinguish between on-
shore and offshore properties.

"we will provide templates or Internet interfaces with pull-down menus
to allow the small reporters to select the narrative response (for dis-
positions) they are accustomed to reporting on the Form MMS-3160."

RESPONSE: How will this be beneficial to those reporters not using
MMS software or Internet reporting?

"reduce well status code reported from 16 digits down to 4 digits."

RESPONSE: Suggest reducing down to 2 digits which would require
well status only.

"combine OGOR C data with OGOR B".

RESPONSE: We agree with this proposal.

"propose reengineered system be flexible enough to choose a modified report method that best meets each company's system capabilities."

RESPONSE: Agree with option to overlay method for modified reporting.

FORM 4058 (PASR)

"removing product code, delivered production volumes and beginning and ending inventories."

RESPONSE: We agree with proposed changes.

3160 to OGOR Comparison

Facility Number

RESPONSE: With regard to comment: "your internal tracking number or serial number on equipment" ; is not clear with regard to tank batteries.

Production Quantity

RESPONSE: With regard to comment "allows tracking of volumes into separate tanks" - PRODUCTION is on lease/well basis and not individual tank basis.

OGOR TO OGOR Comparison

Well Code

RESPONSE: Suggest that in addition to eliminating last production date/ action date/expected action date for shut in wells that the two digit reason code also be eliminated, leaving only two digits for status. BLM already would have this information through filing of Sundry Notice by the Operator.

Thank you for allowing us the opportunity to offer our comments. Questions concerning specific areas should be directed to the undersigned at (214)978-8145 or at the letterhead address.

Sincerely,

HUNT OIL COMPANY



Sue Moorman
Supervisor Production Accounting

CC: Vernon Crumrine
 Manager Revenue Accounting - Oil