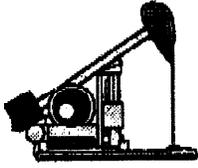


# NATIONAL STRIPPER WELL ASSOCIATION

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August 4, 1997

**Mr. David S. Guzy**  
Chief, Rules and Procedures Staff  
Minerals Management Service  
Royalty Management Program  
Building 85  
Denver Federal Center  
Denver, CO 80225

Re: Supplementary Proposed Rule on Crude Oil Valuation, 62 Fed.  
Reg. 36030 (July 3, 1997)

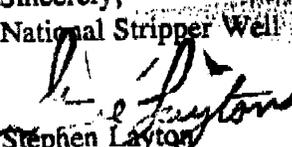
Dear Mr. Guzy:

The National Stripper Well Association ("NSWA") is a trade association representing producers and operators of marginally economic wells in the United States. America's marginal wells produce 14% of domestic oil production and 4.7% of U.S. gas production. Our members have production throughout the United States.

NSWA has reviewed the joint Independent Petroleum Association of America ("IPAA") and Domestic Petroleum Council ("DPC") letter to Mr. David S. Guzy of the Minerals Management Service ("MMS") regarding the Proposed Regulation as referenced above. We fully endorse IPAA & DPC's position as set forth in its response. If implemented the proposed rulemaking will have a detrimental impact on small independent producers and our ability to produce oil and gas from marginal wells.

We appreciate the efforts of IPAA and DPC, their members and personal commitment to preparing this comprehensive response to MMS.

Sincerely,  
National Stripper Well Association

  
Stephen Layton  
President