



James C. Pruitt  
Vice President  
Government Relations  
Department

Texaco Inc.  
1050 17th Street NW  
Suite 500  
Washington, DC 20036

October 30, 2000

David S. Guzy  
Chief, Rules and Publications Staff  
Royalty Management Program  
Minerals Management Service  
U.S. Department of the Interior  
P.O. Box 25165  
MS 3021  
Denver, CO 80225-0165

**Comments of the American Petroleum Institute on  
Minerals Management Service Proposal on Valuation of  
Crude Oil Produced on Indian Leases  
30 CFR 206, 65 FR 58237 (September 28, 2000)**

Dear Mr. Guzy:

Texaco Exploration and Production Inc. ("Texaco") appreciates the opportunity to provide comments on the above referenced Minerals Management Service's ("MMS") proposed rule. Texaco has actively participated in leasing of and payment of royalty on Indian leases. Texaco has a substantial interest in the proposed rulemaking. Under separate letter, the American Petroleum Institute ("API") submitted comments to the above referenced proposed rule. Texaco concurs with the comments and recommendations provided in the API comments. In addition, Texaco incorporates all prior industry and company comments relating to the "major portion" analysis of the proposed rule for valuation of Indian oil royalty.

If I can provide you with additional information on this important rulemaking, please contact us.

Sincerely,

James C. Pruitt

