



James C Pruitt
Vice President
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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: OMB Control Number 1010-NEW, 65 FR 31600, May 18, 2000
Forms MMS-4054, MMS-4055, MMS 4056, and MMS 4058

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 31600.

Texaco hereby incorporates by reference and adopts as its own the comments filed by the Council of Petroleum Accountants Societies. By way of emphasis though, Texaco notes the following regarding the proposed changes to Form 4054, the Oil and Gas Operations Report (OGOR):

- The changes to the disposition codes is unnecessary and will lead to confusion and an increase in inadvertent errors in reporting;
- Also unnecessary and unduly burdensome to the lessee is the addition of product codes to the OGOR. MMS has grossly underestimated the time and effort lessees will be forced to expend in order to implement this change on an ongoing basis.



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Texaco has no specific comments on Forms 4055, 4056 and 4058.

Texaco urges the Office of Management and Budget to disapprove Form MMS-4054 as submitted, and has no objections to the approval of Forms MMS-4055, MMS-4056, and MMS-4058.

Sincerely,

A handwritten signature in black ink, appearing to read "James C. Pruitt". The signature is fluid and cursive, with a large initial "J" and "P".

James C. Pruitt

cc: David S. Guzy
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