

BP Amoco



BP Amoco Corporation

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Robert G. Leo, Jr.
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April 19, 1999

Minerals Management Service
Royalty Management Program
Rules and Publications Staff
P.O. Box 25165, MS 3021
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RE: Request for Comment
Federal Register: February 23, 1999
Volume 64, Number 35
MMS Forms 3160/4054/4056/4058

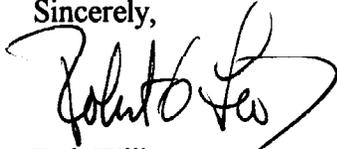
We appreciate the opportunity to offer comments concerning proposed reporting changes to the MMS Forms 3160/4054/4056/4058 as reported in the Federal Register on February 23, 1999. Generally speaking, we find the proposed changes to be favorable. If not covered in these comments, BP Amoco considers the change to be either positive (e.g. a single form for both onshore and offshore, and maintaining a delete/add method for modifications) or not a significant change to current requirements. As identified below, we also have a few concerns and recommendations that we would appreciate be addressed before any final reporting changes are adopted:

1. **GPM and Methane Mol** - These data elements are not available electronically, and in some cases are not available at all. Although this data is optional, we recommend that this information be requested on an "as needed" basis, and not on this form.
2. **OGOR A & B** - Although we encourage the move from OGOR A, B, and C, to just OGOR A & B, it appears that much of the same information is being requested, it is simply being forced onto fewer pages. Consideration should be given whether to go back to the 3 pages versus the more condensed 2 pages..

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Once again, we appreciate the opportunity to offer comments concerning proposed reporting changes to the MMS Forms 3160/4054/4056/4058. Should you have any questions concerning these comments, please feel free to call Bob Wilkinson at (918) 581-1127.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert G. Leo, Jr.", written in a cursive style.

Bob Wilkerson
Robert G. Leo, Jr.
BP Amoco

cc: John L. Sager
William Colbert