

Acadiana
Anchorage
Canada
Colorado
Corpus Christi
Dallas
Fort Worth
Houston
Kansas
Los Angeles
Michigan
Mississippi



New Mexico
New Orleans
Ohio
Oklahoma City
Oklahoma-Tulsa
Permian Basin
Rocky Mountains
San Antonio
San Francisco
San Joaquin
West Central Texas
Wichita Falls

May 29, 1997

Mr. David S. Guzy
Chief, Rules and Procedures Staff
Minerals Management Service
Royalty Management Program
P O Box 25165 MS3101
Denver CO 80225-0165

RE: Policy for Release of Third-Party Proprietary Information for the Administrative Appeals Process and for Alternative Dispute Resolution - 62 Fed. Req. 16116 (April 4, 1997)

Dear Mr. Guzy:

The Council of Petroleum Accountant's Societies (COPAS) appreciates the opportunity to comment on the MMS' proposed rulemaking governing release of third-party proprietary information for the administrative appeals process. COPAS members have extensive experience with Royalty Management Program (RMP) rules and handle royalty valuation, allowances, adjustments, bills, audits, and other royalty matters on a regular basis.

COPAS believes that the issues raised in this proposed rulemaking are primarily legal instead of accounting, therefore, we will defer comment on this proposed rule.

Again, COPAS appreciates the opportunity to comment to MMS' proposed rules.

Sincerely,

John E. Clark
Chairman, COPAS Federal Affairs Subcommittee

It
cc:
Larry Monzingo
Bill Stone
Mary Stonecipher
COPAS Federal Affairs Subcommittee