

MEMORANDUM

TO : File No. S7-25-15

FROM: Elliot Staffin
Special Counsel
Office of Rulemaking
Division of Corporation Finance
U.S. Securities and Exchange Commission

DATE : October 10, 2017

RE : Meeting with representatives from the American Petroleum Institute

On October 10, 2017, William Shirey and Bryant Morris of the Office of the General Counsel, Elizabeth Murphy, Michael Seaman and Elliot Staffin of the Division of Corporation Finance, and Adam Yonce and Vladimir Ivanov of the Division of Economic and Risk Analysis met with representatives of the American Petroleum Institute, as noted below, to discuss issues related to the rulemaking regarding the disclosure of payments by resource extraction issuers.

Representing the American Petroleum Institute were: Peter Tolsdorf, Senior Counsel, Office of General Counsel; Michael Flickinger, Advisor, Tax and Accounting Policy; and Chris Kelley, Director, Federal Relations.