

MEMORANDUM

TO: File (S7-42-10)

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

RE: Meeting with representatives of BHP Billiton Ltd.

DATE: November 9, 2015

On November 9, 2015, Barry Summer and Elliot Staffin of the Division of Corporation Finance, William Shirey of the Office of General Counsel, and Vladimir Ivanov and Igor Kozhanov of the Division of Economic and Risk Analysis met with Frank Fannon and Jane Michie of BHP Billiton to discuss issues relating to the rulemaking on payment disclosures by resource extraction issuers required by Section 1504 of the Dodd Frank Wall Street Reform and Consumer Protection Act.