

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: September 9, 2015

On September 9, 2015, Barry Summer, Elliot Staffin, and Shehzad Niazi of the Division of Corporation Finance, Daniel Morris and Theodore Weiman of the Office of General Counsel, and Igor Kozhanov of the Division of Economic and Risk Analysis met with Ian Wood, Vice President Community Relations and Sustainability, and Frank Fannon, Managing Director, BHP Billiton Ltd. to discuss issues relating to the rulemaking regarding payment disclosures by resource extraction issuers required by Section 1504 of the Dodd Frank Wall Street Reform and Consumer Protection Act.