

MEMORANDUM

TO: File

FROM: Barry Summer
Division of Corporation Finance
U.S. Securities and Exchange Commission

RE: Meeting with representatives from BHP Billiton Ryan Bowley and Leslie Arnold.

DATE: June 19, 2019

On June 19, 2019, Division of Corporation staff Barry Summer and Betsy Murphy met with Ryan Bowley and Leslie Arnold from BHP Billiton. Among the topics discussed were Exchange Act Section 13(q) and Congressional disapproval of the related 2016 rules.