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December 14, 2020

Chairman Clayton, chairmanoffice@sec.gov

Subject: Proposed Rule: Disclosure of Payments by Resource Extraction Issuer,
Release No. 34- 87783; File No. S7-24-19

Dear Chairman Clayton,

I understand the SEC will be holding an Open Meeting on Wednesday, December 16th to consider, among other matters, whether to adopt rules requiring extractive issuers to disclose payments to governments for the development of oil, gas and minerals.

In light of this, I would like to draw your attention to the attached letter submitted to the SEC on February 19th, 2020, recalling Kosmos Energy's long-held position in support of project-level transparency around payments to governments in the extractive industries.

We would like to reiterate in advance of Wednesday's meeting that – as a US-headquartered oil and gas company, listed on both the London and New York Stock Exchanges – Kosmos supports a strong rule for implementation of Section 1504 of the Dodd-Frank Act. In particular, we support the Extractive Industry Transparency Initiative's definition of "project-level" reporting and, with our dual listing, it would be helpful and cost-efficient if there was substantial international alignment on this definition and on payments-to-government reporting requirements more broadly.

Kosmos has reported payments to government at this level since 2014 and seen no competitive harm from this approach. In addition, the cost of compliance has been negligible, particularly when compared to the benefits that we believe a strong approach to transparency brings to our business.

We therefore recommend that the SEC take more time to review the evidence generated by existing project-level reporting requirements such as in the EITI, Europe and the UK, and develop a strong rule on that basis.

Should you have time, we would welcome the opportunity to have a virtual meeting with you in advance of Wednesday to provide more detail on our thoughts on this matter.

Thank you and best regards,

A handwritten signature in black ink, appearing to be "JK" or similar initials, written in a cursive style.

Jeffrey Krilla

cc:

