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LOBBYING REPORT

Lobbying Disclosure Act of 1995 (Section 5) - All Filers Are Required To Complete This Page

1. Registrant Name Covington & Burling			
2. Address <input type="checkbox"/> Check if different than previously reported 1201 Pennsylvania Avenue, NW			
3. Principal Place of Business (if different from line 2) City: Washington State/Zip (or Country) DC 20004			
4. Contact Name Stuart E. Eizenstat	Telephone (202) 662-5519	E-mail (optional) seizenstat@cov.com	5. Senate ID #
7. Client Name <input type="checkbox"/> Self BP America, Inc.			6. House ID #

TYPE OF REPORT 8. Year 2002 Midyear (January 1-June 30) ☒ OR Year End (July 1-December 31) ☐

9. Check if this filing amends a previously filed version of this report ☐

10. Check if this is a Termination Report ☐ ⇨ Termination Date _____

11. No Lobbying Activities ☐

INCOME OR EXPENSES - Complete Either Line 12 OR Line 13

12. Lobbying Firms

INCOME relating to lobbying activities for this reporting period was:

Less than \$10,000 ☐

\$10,000 or more ☒ ⇨ \$ 40,000.00
Income (nearest \$20,000)

Provide a good faith estimate, rounded to the nearest \$20,000, of all lobbying related income from the client (including all payments to the registrant by any other entity for lobbying activities on behalf of the client).

13. Organizations

EXPENSES relating to lobbying activities for this reporting period were:

Less than \$10,000 ☐

\$10,000 or more ☐ ⇨ \$ _____
Expenses (nearest \$20,000)

14. REPORTING METHOD. Check box to indicate accounting method. See instructions for description

☐ Method A. Reporting amounts using LDA definition

☐ Method B. Reporting amounts under section 6 Internal Revenue Code

☐ Method C. Reporting amounts under section 1 Internal Revenue Code

Signature _____

Printed Name and Title _____

Stuart E. Eizenstat, Partner

Registrant Name Covington & Burling Client Name BP America, Inc.

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code information as requested. Attach additional page(s) as needed.

15. General issue area code TRD (one per page)

16. Specific lobbying issues

Opposition to capital market sanctions in House-passed Sudan Peace Act, H.R. 2052.

17. House(s) of Congress and Federal agencies contacted

☐ Check if None

U.S. Senate
U.S. House of Representatives
U.S. Department of State
U.S. Department of the Treasury

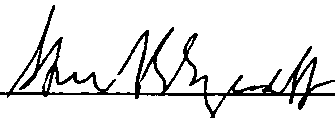
18. Name of each individual who acted as a lobbyist in this issue area

Name	Covered Official Position (if applicable)
Stuart E. Eizenstat	1999-2001 - Deputy Secretary of Treasury
	1997-1999 - Undersecretary for Economic, Business and Agricultural Affairs, U.S. Dept. of State
Peter L. Flanagan	
Roderick De Arment	
David M. Marchick	

19. Interest of each foreign entity in the specific issues listed on line 16 above

☒ Check if None

Signature



Date

Aug 15, 2002

Printed Name and Title

Stuart E. Eizenstat, Partner

