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SECRETARY OF THE SENATE

Lobbying Disclosure Act of 1995 (Section 5) - All Filers	Are Required To Complete Tink Page.			
Registrant Name COVINGTON & BURLING	#31827644			
2. Address Check if different than previously reported. 1201 Pennsylvania Avc., NW., Washington, D.	: C. 29044			
3. Principal Place of Business (if different from line 2)				
City: Washington,	State/Zip (or Country) D.C. 20044			
	nail (optional) 5. Senate ID # 31827044			
7. Client Name Self ASARCO Incorporated	6. House ID # 31827044			
TYPE OF REPORT 8, Year 1999 Midyear (January	1-June 30) CR Year End (July1-December 31) X			
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 Activity □				
INCOME OR EXPENSES - Complete Either Line 12 OR Line 13				
12. Lobbying Firms	13. Organizations			
INCOME relating to lobbying activities for this reporting period was:	EXPENSES relating to lobbying activities for this reporting period were:			
Less than \$10,000 🔀	Less than \$10,000 [
\$10,000 or more	\$10,000 or more			
Provide a good faith estimate, rounded to the nearest \$20,000, of all lobbying related income for the client (including all payments to the registrant by any other entity for lobbying activities on behalf of the client.)	 REPORTING METHOD. Check box to indicate expense accounting method. See instructions for description of options. 			
	Method A. Reporting amounts using LDA definitions only			
	Method B. Reporting amounts under section 6033(b)(8) of the Internal Revenue Code			
	Method C. Reporting amounts under 162(e) of the Internal Revenue Code			
Signature Printed Name and Tiple John T. Smith II	Date <u>January 31, 2000</u>			
4900 1, 5004 II	······································			

Registrant Name COVINGTON & Client Name ASARCO INCORPORATED BURLING #31827044 LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the registrant engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code, provide information as requested. Attach additional page(s) as needed. 15. General issue area code <u>ENV</u> (one per page) 16. Specific lobbying issues Superfund Reform Legislation RCRA Corrective Action Legislation Check if None 17. House(s) of Congress and Federal agencies contacted U.S. House of Representatives and U.S. Senate 18. Name of each individual who acted as a lobbyist in this issue area Name Covered Official Position (if applicable) New John T. Smith II 19. Interest of each foreign entity in the specific issues listed on line 16 above Check if None January 31, 2000 Signature Date Printed Name and Title

Registrant Name

COVINGTON & BURLING #31827044

Client Name ASARCO INCORPORATED

Information Update	e Page - Complete ()NLY where registration i	information has chung	ed.
20. Client new address			***************************************	
21. Client new principal p	place of business (if di	fferent from line 20)		////
City		State/Zip (or Country)	
22. New general descripti	on of client's business	or activities	11. 11.1.711.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1	SUSSIERESSEESSEER III HEES
LOBBYIST UPDA 23. Name of each previou		l who is no longer expected	to act as a lobbyist for	the client
ISSUE UPDATE 24. General lobbying issue	es previously reported	that no longer pertain		
AFFILIATED ORG 25. Add the following aff		Address	Principal Place o	f Business
d tedestates en		H 11/11/141-11-11/1-/1-d1-d1-d1-d1-d1-d1-d1-d1-d1-d1-d1-d1-d1	(city and state or country)	
26. Name of each previous FOREIGN ENTITIE 27. Add the following for	s	on that is no longer affiliat	I ed with the registrant or	client
· Name	Address	Principal place of Ausiness (city and state or country)	Amount of contribution for lobbying activities	Ownership percentage in client
 Name of each previous registrant, client or af 	isly reported foreign e filiated organization	ntity that no longer owns, g	<u>r</u> controls, <u>or</u> is affiliate	ed with the
Signature	They o	Date		
Printed Name and Title	John T. Smith 1]		