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Washington, DC 20515

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232 Hart Building
Washington, DC 20510

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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, N.W.			
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 _____ 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 ☐

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: Less than \$10,000 <input type="checkbox"/> \$10,000 or more <input checked="" type="checkbox"/> ⇨ \$ 40,000.00* *Part of general retainer for other issues. 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). Income (nearest \$20,000)	EXPENSES relating to lobbying activities for this reporting period were: Less than \$10,000 <input type="checkbox"/> \$10,000 or more <input type="checkbox"/> ⇨ \$ _____ Expenses (nearest \$20,000) 14. REPORTING METHOD. Check box to indicate accounting method. See instructions for description of: <input type="checkbox"/> Method A. Reporting amounts using LDA definition <input type="checkbox"/> Method B. Reporting amounts under section 6033 Internal Revenue Code <input type="checkbox"/> Method C. Reporting amounts under section 162(c) Internal Revenue Code

Signature _____

Printed Name and Title _____

Stuart E. Eizenstat, Partner

[REDACTED]

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 registrant was 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
NFTC
Federal Reserve Board
House International Relations Committee

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, U.S. Treasury Dept.
	1997-1999 - Under Sec., U.S. Dept. of State
Peter L. Flanagan	
Roderick DeArment	

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

☒ Check if None

Signature  Date 02/14/2002

Printed Name and Title Stuart E. Eizenstat, Partner

[REDACTED]