Clerk of the House of Representatives	Secretary of the Senate
Legislative Resource Center	Office of Public Records
B-106 Cannon Building	232 Hart Building
Washington, DC 20515	Washington, DC 20510

SECRETARY OF THE SENATE

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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   #31827044

2. Address   ☐ 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)   **D.C. 20004-2401**

4. Contact Name   Telephone   Email (optional)   5. Senate ID #
   John T. Smith II   **202-662-5555**   **JTSMITH@cov.com**   **31827044**

7. Client Name   ☐ Self   6. House ID #
   ASARCO Incorporated   **31872044**
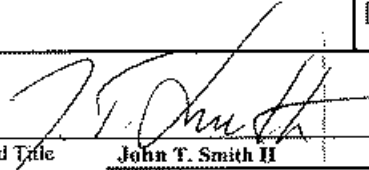
TYPE OF REPORT 8. Year **2000** Midyear (January 1-June 30) ☒ OR Year End (July 1-December 31) ☐

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

10. Check if this is a Termination Report ☒ ⇨ Termination Date **9/7/2000**   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 ☐ ⇨ $_____ Income (nearest $20,000)	$10,000 or more ☐ ⇨ $_____ Expenses (nearest $20,000)
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.)	**14. 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 _____   Date   **September 7, 2000**

Printed Name and Title   **John T. Smith 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 ___**ENV**___   (one per page)

16.   Specific lobbying issues

Superfund Reform Legislation
RCRA Corrective Action Legislation

17.   House(s) of Congress and Federal agencies contacted   ☐ Check if None

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

Signature _____   Date ___**September 7, 2000**___
Printed Name and Title   **John T. Smith II**

Registrant Name **COVINGTON & BURLING #31827044** Client Name ASARCO Incorporated

Information Update Page – Complete ONLY where registration information has changed.

20. Client new address

21. Client new principal place of business (if different from line 20)

City   State/Zip (or Country)

22. New general description of client's business or activities

LOBBYIST UPDATE

23. Name of each previously reported individual who is **no longer** expected to act as a lobbyist for the client

ISSUE UPDATE

24. General lobbying issues previously reported that **no longer** pertain

AFFILIATED ORGANIZATIONS

25. Add the following affiliated organization(s)

Name	Address	Principal Place of Business (city and state or country)

26. Name of each previously reported organization that is **no longer** affiliated with the registrant or client

FOREIGN ENTITIES

27. Add the following foreign entities

Name	Address	Principal place of business (city and state or country)	Amount of contribution for lobbying activities	Ownership percentage in client

28. Name of each previously reported foreign entity that no longer owns, **or** controls, **or** is affiliated with the registrant, client or affiliated organization

Signature _____   Date **September 7, 2000**

Printed Name and Title   **John T. Smith II**