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COMMISSION MAIL ROOM

June 30, 1997

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713•296•6150
FAX: 713•296•6471

Mr. Scott Francis
Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N. W.
Washington, D. C. 20463

Identification Number: C 00279224

Reference: February Monthly (01/01 - 01/31/96); 12 Day Pre-Primary Report (02/01 - 02/29/96); April Monthly (03/01 - 03/31/96); July Monthly (06/01 - 06/30/96); August Monthly (07/01 - 07/31/96); September Monthly (08/01 - 08/31/96); October Monthly (09/01 - 09/30/96); 30 Day Post-General (10/17 - 11/25/96); Year End (11/2- 12/31/96)

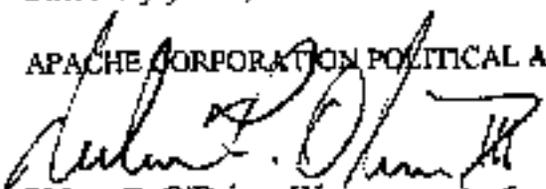
Dear Mr. Francis:

In response to your letter dated June 20, 1997, please be advised that effective with our next report (for period June 1 - 30, 1997), Apache Corporation Political Action Committee's reports will reflect only contributors who have achieved or exceeded an annual aggregate of \$200 on Line 11.(a)(i) of the Detailed Summary Page. Contributors who have not achieved the \$200 aggregate amount will be reported in total on Line 11(a)(ii) as "unitemized contributions," in accordance with 11 CFR §104.3(a)(2)(i)(B).

Furthermore, we understand that should ApachePAC elect to continue disclosure of contributors who have not achieved the \$200 annual aggregate, those contributions will appear on separate receipt schedules in accordance with 11 CFR §104.3(a)(4)(i).

Sincerely yours,

APACHE CORPORATION POLITICAL ACTION COMMITTEE


Urban F. O'Brien, III
Administrator & Treasurer

UFO:mh

cc: Ann Ward, Jackson & Walker

APACHE CORPORATION POLITICAL ACTION COMMITTEE
2000 Post Oak Boulevard • Suite 100 • Houston, Texas 77056-4400



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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JUN 20 1997

Urban O'Brien III, Treasurer
Apache Corporation PAC (APACHE PAC)
2000 Post Oak Boulevard
Houston, TX 77056

Identification Number: C00279224

Reference: February Monthly (1/1/96-1/31/96), 12 Day Pre-Primary (2/1/96-2/29/96), April Monthly (3/1/96-3/31/96), July Monthly (6/1/96-6/30/96), August Monthly (7/1/96-7/31/96), September Monthly (8/1/96-8/31/96), October Monthly (9/1/96-9/30/96), 30 Day Post-General (10/17/96-11/25/96) and Year End (11/26/96-12/31/96)

Dear Mr. O'Brien:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-2 U.S.C. §434(b)(3) requires itemization of contributions from individuals and persons other than political committees, where the aggregate total from the contributor exceeds \$200 in a calendar year. In addition, 11 CFR §104.3(a)(2)(i)(B) requires a committee to report the total amount of unitemized contributions (see Line 11(a)(ii) of the Detailed Summary Page). If a committee wishes to disclose contributions regardless of the amount contributed, the committee must separate (on separate receipt schedules) those contributors requiring itemization from those who are not required to be itemized. 11 CFR §104.3(a)(4)(i) For future filings, please submit your reports in this order.

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

A handwritten signature in cursive script, appearing to read "Scott Francis".

Scott Francis
Reports Analyst
Reports Analysis Division

