

**TORCH ENERGY ADVISORS INCORPORATED /
BLACK HAWK OIL COMPANY POLITICAL ACTION COMMITTEE
1221 LAMAR, SUITE 1600
HOUSTON, TEXAS 77010-3039**

January 18, 1995

Jordan Frame
Federal Election Commission
Washington, D.C. 20463

Identification Number: C00300137

Dear Mr. Frame:

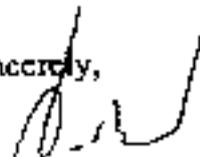
This responds to your letter dated December 28, 1994 requesting further clarification on the name of the connected organization for the Political Action Committee which was named on the Statement of Organization FEC Form 1 dated November 22, 1994. The name is the registered State of Texas Political Action Committee. The State PAC was organized on February 7, 1990. Both companies have the same parent company, Torchmark Corporation. The initial purpose of the PAC was to offer support to State level political candidates. However, in the future it would like the opportunity to support Federal candidates.

Torch Energy Advisors Incorporated / Black Hawk Oil Company Political Action Committee requests that it operate as a combined fund rather than establishing two distinct funds (State & Federal). A request is also made to use both organizations in the name, since we are currently operating as such. I further understand the Commission permits political committees to have cash on hand at the time of their registration and understand the procedure to ascertain the composition of the cash balance. This balance being those most recently received prior to its date of registration.

I also understand in order to come into compliance, the donors must be given notice of the proposed change in the use of funds and an opportunity to object to such use and request a refund. I have composed a letter stating the facts above and will issue to donors upon approval of the FEC on the PAC.

I further request the quarterly filing schedule as opposed to monthly.

If you need additional information, please feel free to contact Marla LeLeux at our toll-free number, (800) 324-8672 or the direct number is (713) 756-1461.

Sincerely,


James M. Vanderhider, Treasurer



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

RQ-1

James M. Vanderhider, Treasurer
Torch Energy Advisors Incorporated/
Black Hawk Oil Company Political
Action Committee
1221 Lamar, Ste. 1600
Houston, TX 77010-3039

DEC 25 1994

Identification Number: CDD300137

Reference: Statement of Organization

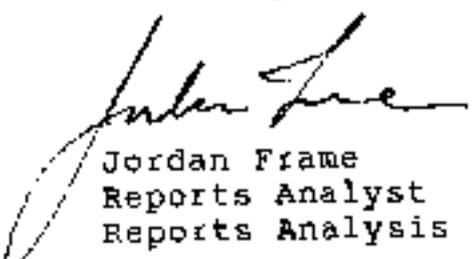
Dear Mr. Vanderhider:

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:

-Line 6 of your Statement of Organization indicates that both Torch Energy Advisors Incorporated and Black Hawk Oil Company are the connected organization for your Committee. Under normal circumstances, only one company may act as the connected organization for a separate segregated fund. Please provide further clarifying information concerning the relationship between these two connected organizations, with regard to your separate segregated fund.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. 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,


Jordan Frame
Reports Analyst
Reports Analysis Division

Federal Election Commission
**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

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PREPARER

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