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December 21, 2012

Via email to director@fasb.org

Technical Director
Financial Accounting Standards Board
401 Merritt 7
P. O. Box 5116
Norwalk, CT 06856-5116

Re: File Reference No. 2012-250, Exposure Draft: *Balance Sheet (Topic 210), Clarifying the Scope of Disclosures about Offsetting Assets and Liabilities*

Chevron Corporation (Chevron) appreciates the opportunity to provide comments to the Financial Accounting Standards Board (the "Board") regarding the Exposure Draft, "*Balance Sheet (Topic 210), Clarifying the Scope of Disclosures about Offsetting Assets and Liabilities*" (the "ED").

We appreciate the Board's consideration of the feedback it received from stakeholders and its timely response in providing scope clarification on disclosures involving offsetting assets and liabilities. We strongly support the Board's proposed clarification to limit the scope of this Accounting Standards Update (ASU) to derivatives, repurchase agreements and reverse repurchase agreements, and securities borrowing and securities lending transactions.

Our responses to the questions posed by the Board in the ED are included in the attached Appendix.

We trust our comments are helpful to the Board in determining the next steps for the proposed accounting standards update. If you have any questions on the content of this letter, please contact Al Ziarnik, Assistant Comptroller, at (925) 842-5031.

Very truly yours,

A handwritten signature in black ink, appearing to be the initials "MF" or similar, written in a cursive style.

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Appendix – Responses to Questions

***Question 1:** The proposed amendments would require an entity to provide the disclosures required by Section 210-20-50 for derivatives, repurchase agreements and reverse repurchase agreements, and securities borrowing and securities lending transactions that are either offset in accordance with Section 210-20-45 or Section 815-10-45 or subject to an enforceable master netting arrangement or similar agreements. Do you believe that there are other instruments that should be included in the proposed scope that would provide useful information to users of financial statements as it relates to reconciling differences as a result of offsetting between financial statements prepared in accordance with U.S. GAAP and those financial statements prepared in accordance with IFRS?*

No. We strongly support the Board's proposed clarification to limit the scope to derivatives, repurchase agreements and reverse repurchase agreements, and securities borrowing and securities lending transactions that are either offset in accordance with Section 210-20-45 or Section 815-10-45 or subject to an enforceable master netting arrangement or similar agreements. We believe the proposed update narrows the scope to transactions that are most impacted by master netting arrangements and consistent with the objective of the proposed ASU. It also addresses our concerns about the unintended inclusion of other financial instruments such as trade receivables and trade payables subject to a standard commercial provision allowing either party to net in the event of default.

***Question 2:** Do you foresee any significant operability or auditing concerns or constraints in implementing the revised scope of the disclosures based on the proposed amendments in Question 1?*

No. We believe the scope clarification will minimize the burden and costs associated with the initial implementation and ongoing reporting under this ASU.