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OVERNIGHT MAIL

March 18, 1996

David S. Guzy, Chief
Rules and Procedures Staff
Minerals Management Service
Royalty Management Program
Denver Federal Center, Building 85
P.O. Box 25165, Mail Stop 3101
Denver, CO 80225-0165

**RE: Advance Notice of Proposed Rulemaking
Valuation of Oil from Federal and Indian Leases
30 CFR Part 206
60 FR 65610 (December 20, 1995)**

Dear Mr. Guzy:

Marathon appreciates the opportunity to comment on the Advance Notice of Proposed Rulemaking for Valuation of Oil from Federal and Indian Leases (ANOPR). However, Marathon's ability to offer substantive comments at this time on the specific issues raised by MMS is severely limited due to the current litigation over many of these same issues in the state courts of Texas, Oklahoma, New Mexico and Louisiana. These lawsuits are either in the pleadings stage or early stages of discovery, and resolution may not take place in the near future.

Marathon is further constrained in its ability to participate in a negotiated rulemaking due to this litigation. Accordingly, Marathon urges the MMS to withdraw this pending ANOPR and suspend rulemaking to a later and more appropriate time.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Richard J. Kolencik', written over a white background.

Richard J. Kolencik

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