

**DUNCAN OIL, INC.**

PENTHOUSE ONE  
1777 SOUTH HARRISON STREET  
DENVER, COLORADO 80210  
TELEPHONE (303) 759-3303

April 7, 1999



Minerals Management Service  
Royalty Management Program  
Rules and Publications Staff  
P O Box 25165, MS 3021  
Denver, CO 80225-0165

RE: Proposed changes to forms  
MMS 3160 and MMS 4054

Dear Sir or Madam:

This is to offer Duncan Oil's concerns/comments about the proposed changes to the subject forms as outlined in the February 23, 1999 (Volume 64, Number 35, pages 8844-8852) publication of the Federal Register.

As a small, independent operator, Duncan's first concern is cost. In this time of declining oil prices, Duncan Oil does not have additional revenue required to redesign our software. Making this change as you propose will require many hours of someone's time to design the new forms.

Your notice mentions the use of a RMP template/Internet interface. My concern in reference to the template is whether it will integrate with Duncan's software. If your template is used, will information have to be entered twice to also accommodate state reporting requirements? Using the Internet is a viable idea; however, I do not have Internet access.

Duncan Oil realizes the MMS desires to improve its productivity, efficiency and effectiveness. At this point, it is difficult to judge whether these items will also improve for the operator. A hard copy of the MMS report is still needed for company purposes; therefore, the amount of paper in my file will be doubled if forms 4054A and 4054B go into effect.

Duncan Oil appreciates the opportunity to submit comments on this proposed change.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brenda Kelsch'. The signature is fluid and cursive.

Brenda Kelsch  
Production Clerk

BK