

Dow L. Campbell  
Attorney

ORIGINAL



539 South Main Street  
Findlay, OH 45840-3295  
Direct No. 419/421-4121  
Main No. 418/422-2121  
Facsimile 419/427-3681  
E-mail: DLCampbell@MarathonOil.com

March 15, 1999

**VIA FACSIMILE (303) 231-3385  
& OVERNIGHT MAIL**

Mr. David S. Guzy, Chief  
Rules and Publications Staff  
Minerals Management Service  
Royalty Management Program  
Building 85, Room A-613  
Denver Federal Center  
Denver, Colorado 80225

**Re: Comments on Proposed Rules  
Appeals of MMS Orders  
64 Federal Register 1930, dated January 12, 1999**

Dear Mr. Guzy:

Marathon Oil Company (Marathon) appreciates the opportunity to offer its comments regarding the proposed rules for Appeals of MMS Orders (30 CFR Parts 208, 241, 242, 243, 250, and 290; and 43 CFR Part 4) published in the Federal Register, Tuesday, January 12, 1999. Marathon offers the following comments:

In addition to the comments which Patricia Dunmire Bragg, of Gardere & Wynne, L.L.P., has submitted on behalf of Marathon Oil Company, Marathon fully supports and endorses the comments submitted by the American Petroleum Institute.

Once again, Marathon appreciates the opportunity to provide its comments to this proposed rule. Marathon urges the MMS to carefully consider these comments and to modify its proposal accordingly. If you have any questions regarding our comments, please call me at (419) 421-4121.

Sincerely,

A handwritten signature in cursive script that reads 'Dow L. Campbell'.

Dow L. Campbell

cc: G. C. Haines

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