

Dow L. Campbell
Attorney



539 South Main Street
Findlay, OH 45840-3295
Telephone: 419/421-4121
FAX: 419/427-3681
E-Mail: DLCampbell@MarathonOil.com

March 27, 2003

*Via Facsimile: (303) 231-3385
& Overnight Mail*

Ms. Sharron L. Gebhardt, Regulatory Specialist
Minerals Management Service
Minerals Revenue Management
Building 85, Room A-614
Denver Federal Center
Denver, Colorado 80225

**Re: 30 CFR part 206, subpart B
Indian Oil (Form MMS-4416, Indian Crude Oil Valuation Report)
OMB Control No. 1010-0113
(68 FR 8781, February 25, 2003)**

Dear Ms. Gebhardt:

Marathon Oil Company appreciates the opportunity to submit comments on MMS' recently published notice of an extension of currently approved information collection for OMB Control Number 1010-0113 [30 CFR 206(B) Form MMS-4416, Indian Crude Oil Valuation Report].

Marathon reaffirms and incorporates by reference its comments filed on May 13, 1998, submitted in response to the MMS proposal in the Federal Register on February 12, 1998 (63 FR 7089), and its comments filed on March 20, 2000, submitted in response to the MMS proposal in the Federal Register on January 3, 2000 (65 FR 403). Particularly in regard to the proposed Form MMS-4416 as follows:

The proposed Form MMS-4416 requires all purchasers, not just lessees, of Indian oil to report the required data. This will create two major problems. First, not all purchasers will necessarily know if they purchased oil produced from Indian leases. Second, those purchasers who are aware that they are purchasing oil produced from Indian leases would then be subjected to additional record-keeping and administrative burdens. Anything which adds to transactions costs can have only one result: the buyer will offer a lower price to the seller in order to compensate for the additional burdens imposed upon the buyer. Does the MMS really want to make Indian production disfavored in the marketplace?

Additionally, the MMS must take every precaution to prevent the sharing of marketing data garnered from the MMS-4416 forms with tribes that have taken any portion of their royalties in-kind and marketed their production themselves. Otherwise, having access to this type of competitor's data would present those tribes with a unfair and illegal marketing advantage.

If you have any questions, please contact me.

Sincerely,

A handwritten signature in black ink that reads 'Dow L. Campbell'.
Dow L. Campbell