

Dow L. Campbell  
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June 19, 2000

*Via Overnight Mail*

The Office of Information and Regulatory Affairs  
Office of Management and Budget  
Attention: Desk Officer for the Interior Department  
(OMB Control Number 1010-NEW)  
725 17th Street, NW  
Washington, D.C. 20503

**Re: Notice of Information Collection Request  
OMB Control Number 1010-NEW  
65 FR 31598 (May 18, 2000)**



Dear Sir or Madam:

Marathon appreciates the opportunity to submit the following comments on MMS' revised Report of Sales and Royalty Remittance (Form MMS-2014).

Marathon wishes to renew its endorsement of the comments made by the Council of Petroleum Accountants Societies (COPAS) to the MMS.

In addition, we wish to reiterate our concerns with the "Sales Type Code". Unduly burdensome reporting problems will be encountered when lessees aggregate their volumes in pools and then sell or exchange their product under multiple contracts that fit into many different categories of contracts listed by the MMS. Additional burdensome reporting problems will be encountered when lessees will be required to report multiple sales types occurring during a month for a single lease.

If you have any questions, please contact me.

Sincerely,

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

Dow L. Campbell

{122303}

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

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