

To:

Dave Guzy

Fax #:

303-231-3385

Subject:

Marginal Properties Rule

Date:

May 7, 1999

Pages:

2, including this cover sheet.

COMMENTS:

Attached is the State and Tribal Royalty Audit Committee's comments on the proposed marginal properties rule.

From the desk of

Rowena Cheromiah

Audit Manager Minerals Audit Program P.O. Box 3750 Window Rock, Arizona 86515

> (520) 871-6057 Fax: (520) 871-7832

STATE and TRIBAL ROYALTY AUDIT COMMITTEE

State of Alaska • Blackfeet Nation • State of California • State of Colorado • Fort Peck Tribes

Ticarilla Apache Tribe • State of Louisiana • State of Montana • Navajo Nation • State of New Mexico

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Rowena Uneromiah. Chair (520) 871-6057 1. David Loomis. Ist Vice Chair (303) 355-0400 Ext. 777 Larev Love, 2nd theo Chair (970) 565-4851 Former Chair, Ex Officio. George Staigle, (701) 250-4682

May 6, 1000

David Guzy, Chief Rules and Procedures Staff Minerals Management Service P.O. Box 25165, MS 3021 Denver, Colorado 80225-0165

Re:

Advanced Notice of Proposed Rule

Accounting Relief for Marginal Properties

Dear Mr. Guzy:

The State and Tribal Royalty Audit Committee (STRAC) appreciates you granting a 15 day extension for STRAC to respond to the proposed Accounting Relief for Marginal Properties. As you know, STRAC meets on a quarterly basis and the extension required a hurried effort to provide input from our perspective to the proposed rules. Since STRAC was unable to schedule a meeting of the States affected by the Relief for Marginal Properties to prepare a full response, we concur in general with the comments submitted by Wyoning and California.

If you have any questions, please call David Loomis, 303-355-0400, extension 777.

Sincerely,

Rowena Cheromiah

Rowena Cresomiah

Chair