

Before the
FEDERAL TRADE COMMISSION
Washington, D.C.

In the Matter of

Marketing Manipulation Rulemaking Workshop – Request to Participate, P082900

Pursuant to the Notice Announcing Public Workshop Concerning Petroleum Market Manipulation Rulemaking (“NAPW”), 73 Fed. Reg. 53394 (Sept. 16, 2008), the undersigned, on behalf of the Navajo Nation, Resolute Natural Resources Company, and Navajo Nation Oil and Gas Company (together, the “Navajo Requesters”), respectfully requests to participate as a panelist at the Public Workshop scheduled for November 6, 2008.

The Navajo Requesters provided a detailed statement concerning the Advance Notice of Proposed Rulemaking on June 23, 2008, which explains their familiarity with the issues that are the focus of the workshop. The Commission’s Notice of Proposed Rulemaking (“NPRM”), 73 Fed. Reg. 48317 (Aug. 13, 2008), cites this statement in several places. The Navajo Requesters’ statement urged the Commission to exercise its authority under Section 811 of the Energy Independence and Security Act of 2007 to prevent manipulative conduct by an entity controlling the only refineries and crude oil pipeline in the Four Corners area. The owner has denied access to the pipeline, thereby obstructing and impairing the flow of crude oil and undermining market incentives to explore for and develop reserves of domestic crude oil in the area. The Navajo Requesters’ statement is one of the minority of statements submitted by industry participants that supports vigorous implementation of Section 811, and therefore their participation would promote a balance of interests represented at the workshop. The

Navajo Requesters will submit written comments in response to the NPRM by no later than October 17, 2008.

The Navajo Requesters have considered and analyzed the issues outlined in Section II of NAPW and will present their views on those issues in the written comments. They would also like the opportunity to share those views at the public workshop.

We appreciate your consideration of this request and urge that it be granted. I would be happy to respond to any questions that may arise.

Dated October 6, 2008.

Respectfully submitted,

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