



December 31, 2014

Mr. Christopher J. Kirkpatrick
Secretary of the Commission
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street NW
Washington, DC 20581

VIA ONLINE SUBMISSION

Re: Notice of Intent To Renew Collection 3038-0066, Financial Resource Requirements
for Derivatives Clearing Organizations

Dear Secretary Kirkpatrick:

The Minneapolis Grain Exchange, Inc. ("MGEX") would like to thank the Commodity Futures Trading Commission ("CFTC") for the opportunity to respond to the CFTC's request for public comment on the above referenced matter published in the November 5, 2014 Federal Register Vol. 79, No. 214. MGEX is both a Subpart C Derivatives Clearing Organization and a Designated Contract Market, and is subject to the financial reporting requirements found in Part 39 of the CFTC Regulations.

MGEX believes that the financial information currently reported pursuant to Part 39 of the CFTC Regulations is more than sufficient for the CFTC's oversight. As the CFTC considers potential changes to the financial reporting requirements or to the method by which such information is collected, MGEX respectfully requests that the CFTC avoid a standardized "one size fits all" approach to financial reporting. Particularly given the varying size and market share of existing derivatives clearing organizations, MGEX believes it is important for the CFTC to be flexible with regard to the format and method of collection of financial information, so long as all pertinent information is obtained. In addition, when considering follow up matters to submitted financial information, MGEX urges the CFTC to carefully consider the materiality of any requests.

Thank you again for the opportunity to comment, and please feel free to contact MGEX with any further questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Aaron Nyquist".

Aaron C. Nyquist
Assistant Corporate Counsel