

Mail Stop 4561

November 21, 2007

VIA U.S. MAIL AND FAX (312) 264-4401

Allen Goodman
Principal Financial and Accounting Officer
Rogers International Raw Materials Fund, L.P.
c/o Beeland Management Company, L.L.C
141 West Jackson Boulevard
Suite 1340A
Chicago, IL 60604

**Re: Rogers International Raw Materials Fund, L.P.
Form 10-K for Fiscal Year Ended
December 31, 2006
Filed April 6, 2007
Form 10-Q for Quarterly Period Ended
June 30, 2007
Filed August 14, 2007
File No. 000-51836**

Dear Mr. Goodman:

We have completed our review of your Form 10-K and related filings and do not, at this time, have any further comments.

Sincerely,

Kevin Woody
Branch Chief