



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549-7010

May 11, 2009

Mr. S. R. Mills  
Chief Financial Officer  
Archer Daniels Midland Company  
4666 Faries Parkway Box 1470  
Decatur, Illinois 62525

**Re: Archer Daniels Midland Company**  
**Form 10-K for Fiscal Year Ended June 30, 2008**  
**Filed August 29, 2008**  
**File No. 001-00044**

Dear Mr. Mills:

We have completed our review of your Form 10-K and related filings and have no further comments at this time.

Sincerely,

Karl Hiller  
Branch Chief