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October 15, 1997

Mr. William J. LeMay
Oil Conservation Commission
2040 South Pacheco
Santa Fe, New Mexico 87502

Re: Application for Amendment of Rule #1105.C
State of New Mexico
Burlington Resources Oil and Gas Company, Applicant

Dear Chairman LeMay:

It has come to our attention about Burlington Resources application for amendment of Division Rule #1105.C. This amendment would allow an Operator to request and the NMOCD to grant, up to three consecutive ninety-day extensions of confidential data produced from the drilling of a well within the State of New Mexico.

Bettis, Boyle and Stovall, Inc. believes that such an amendment is necessary and strongly supports Burlington Resources in their application. The current ninety day confidentiality period is not long enough for an operator to recoup his significant risk and investment in costly exploration ventures. To allow an operator the ability to receive additional extensions to confidentiality is to recognize that operator's effort in developing the resources within the State of New Mexico and to allow him a competitive edge in developing those resources in innovative and, most of the time, costly avenues.

Most of the oil and gas producing states, along with the BLM, have established measures to maintain confidentiality for their domestic production for at least one year to protect the investment of those parties willing to explore within their state boundaries and upon their lands.

Bettis, Boyle and Stovall strongly supports Burlington Resources Oil and Gas Company's application and recommends that the NMOCD grant approval of said amendment.

Sincerely,
Bettis, Boyle and Stovall, Inc.



Robert B. Daws, CPL
Land Manager