

BASS ENTERPRISES PRODUCTION CO.

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NOV - 3 1997

October 31, 1997

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

Mrs. Jami Bailey
Office of Commissioner of Public Lands
State Land Office Building
310 Old Santa Trail
Santa Fe, New Mexico 87501

Mr. William Weiss
New Mexico Petroleum Recovery
Research Center, Kelly Building
New Mexico Tech Campus
Socorro, New Mexico 87801

Re: Amendment of Rule No. 1105.C
Burlington Resources Oil & Gas Company, Applicant

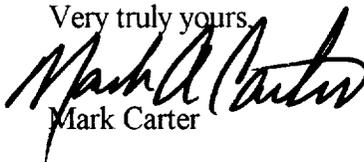
Ladies and Gentlemen:

A hearing before the New Mexico Oil Conservation Commission was held on September 24, 1997, to consider the application of Burlington Resources Oil and Gas Company regarding an amendment to Division Rule 1105.C. The proposed amendment would allow parties to administratively request, and the Director to grant, up to three (3) consecutive ninety (90) day extensions of the confidentiality period associated with data and information submitted by parties appearing before the Division. Bass Enterprises Production Co. opposes this application for the following reasons:

1. This amendment is overly general in that it applies to all information submitted to the Division in any manner. The amendment does not apply only to information derived from new wells.
2. This amendment will facilitate the possible drainage of tracts adjoining new wells, units, recompletions, etc. by delaying the availability of information necessary for offsetting owners to protect their correlative rights.
3. Rule 1105.C, as written, promotes oil and gas drilling activity in New Mexico by increasing the availability of data and technology to the industry. Any delay in access to said information will discourage drilling and production.

For these reasons stated above, Bass Enterprises Production Co. opposes the subject application of Burlington Resources Oil & Gas Company. Bass would be more inclined to support the amendment if the extended confidentiality period was limited to new well information only. Thank you for your consideration in this regard.

Very truly yours,



Mark Carter

MAC:ca

cc: Tom Kellahin
117 North Guadalupe
Santa Fe, New Mexico 87504

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