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**To: Florence E. Harmon,
Acting Secretary,
Securities and Exchange Commission**

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COMMENTS ON PROPOSED RULE CHANGES:

Modernisation the Oil & Gas Reporting Requirements

I have some 40 years of experience in the Oil & Gas Industry, 10 of which were for major oil companies and 27 years working for the UK Civil Service where I was Director of Exploration & Licensing at the Department of Trade & Industry. Since retiring from DTI I have formed my own company to advise governments on licensing and licensing strategy.

I am thus particularly aware of the need of a regulator to be transparent and professionally competent

I am a certified Petroleum Geologist of AAPG and a Chartered Geologist of the Geological Society of London. I am also a member of the UN ECE Ad Hoc Committee on Reserves and Reserves Reporting.

The SEC should be congratulated for its concept document and for putting out the recent proposals on rules changes to oil and gas reporting requirements.

These seem to me to be very important in that they should permit the use of both data and practices which are as close as possible to those adopted in-house for the calculation and presentation of reserve numbers. Technology improves all of the time and to set down a list of "accepted" practices now might very well mean that they will become obsolete and the SEC will need to issue further concept documents in the future. The SEC needs to be aware of change and to be able to cope with it seamlessly as a competent regulatory body.

What is not mentioned in the document is how the SEC is to cope with the new regime in terms of evaluating the filings that it receives.

There needs to be a professional staff as qualified as those who put together the reserves filings for oil companies in the first place, and who can hold their own with industry geologists, reservoir engineers and geophysicists

I would advocate a minimum technical staff of twelve to begin with, all qualified reservoir evaluators with experience in all three major categories

One might also have an advisory board comprising experience from not only the USA but around the world to ensure that the SEC keeps a focus on change and competence.

The above observations will I trust be received in the spirit of constructiveness in which they are offered. I would be happy to expand on these.

John R. V. Brooks CBE

Director,

Past President, AAPG European Region