



**Southwestern Energy
Production Company**

A subsidiary of Southwestern Energy Company

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September 8, 2008

Ms. Florence Harmon
Acting Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-0609

Subject: File Number S7-15-08; Release Nos. 33-8935; Modernization of the Oil and Gas Reporting Requirements

Dear Ms. Harmon:

I am the Vice President, Economic Planning and Acquisitions, of Southwestern Energy Production Company, a wholly owned subsidiary of Southwestern Energy Company ("Southwestern" or the "Company"), and on behalf of Southwestern, I am writing to comment on the U.S. Securities and Exchange Commission ("SEC") Proposed Release on the Modernization of the Oil and Gas Reporting Requirements published in the Federal Register on July 9, 2008 (the "Release").

Southwestern would like to express its overall support for, and offer a few limited comments on the SEC's proposals to modernize the oil and gas reserves disclosure requirements under Regulation S-K and Regulation S-X under the Securities Act of 1933 and the Securities Exchange Act of 1934.

Southwestern agrees with the SEC's proposal to revise the definitions in Rule 4-10 of Regulation S-X to change the price used in calculating reserves from a single-day closing price measured on the last day of a company's fiscal year to an average price for the 12 months prior to the end of the company's fiscal year. We also encourage the SEC to urge the Financial Accounting Standards Board ("FASB") to adopt conforming changes to the prices that are used for accounting purposes under either the successful efforts accounting method described in Statement of Financial Accounting Standard No. 19 (SFAS 19) prescribed by the Financial Accounting Standards Board (FASB) or the full cost accounting method, set forth in Rule 4-10(c) of Regulation S-X.

Southwestern agrees with the SEC's proposed change to the definition of "proved oil and gas reserves" that would permit a company to claim proved reserves beyond drilling units that immediately offset developed drilling locations if the company can establish with reasonable certainty that these reserves are economically producible. The proposed open-ended definition of "reliable technology" as "technology (including computational

methods) that, when applied using high quality geoscience and engineering data, is widely accepted within the oil and gas industry, has been field tested and has demonstrated consistency and repeatability in the formation being evaluated or in an analogous formation” is appropriate. Southwestern does not believe that requiring the disclosure of the technology used to establish the appropriate level of certainty would enhance an investor’s understanding, but if the proposal to provide such disclosure is adopted, the information should only be provided for material properties in a company’s first filing with the SEC and for material additions to reserves estimates in subsequent filings.

Southwestern believes that the proposed definitions of “deterministic estimate” and “probabilistic estimate” are appropriate as they reflect the current industry standard. With respect to the proposed treatment of “unproved reserves,” “probable reserves” and “possible reserves,” Southwestern does not believe that the voluntary reporting of “probable reserves” and “possible reserves” should be permitted. We believe that disclosure of “probable reserves” and “possible reserves”, given the higher levels of uncertainty that are inherent in such estimates, may lead to greater investor misunderstanding of a company’s value. In addition, because various technology based methodologies may be utilized in estimating such reserves, it will not be possible to ensure adequate consistency within the industry as to what constitutes “probable reserves” or “possible reserves”.

With respect to the new disclosure requirements that will be included in Subpart 1200 to Regulation S-K, although Southwestern generally agrees with the proposed new disclosures, Southwestern believes that certain information will be of minimal use in enhancing investors’ understanding relative to the burden placed upon the reporting company in order to provide the requested information. Specifically, Southwestern believes that the breakout between continuous and conventional accumulations is not particularly significant, while the reporting of the aging of proved undeveloped reserves and the history of the conversion of those reserves to proved reserves for a prior five year period may be overly burdensome. Breaking out oil and gas production, costs, revenues, etc. by area for the prior three year period and the introduction of the “extension” and “suspended” well categories will also create a burden on companies that is not justifiable when weighed against the benefits of such information for investors.

Southwestern agrees with the SEC’s proposal not to require that reserve estimates be prepared or audited by an independent third party. Southwestern also agrees with the proposed disclosures as to whether the person primarily responsible for preparing reserves estimates or conducting reserves audits meets the specified qualification standards.

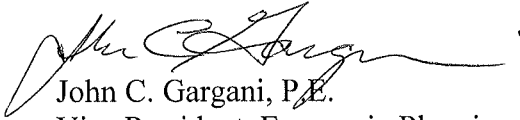
Finally, Southwestern agrees with the SEC's proposal to implement the new disclosure requirements for registration statements filed on or after January 1, 2010, and for annual reports on Forms 10-K and 20-F for fiscal years ending on and after December 31, 2009 as such timing will enable companies to establish the internal procedures and gather the information required to ensure compliance with the new rules.

Ms. Florence Harmon, Acting Secretary
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Southwestern appreciates the SEC's efforts to revise the current disclosure rules and the opportunity that we have been afforded to comment upon the SEC's proposals. Please feel free to contact the undersigned if you have any questions regarding these comments or if additional information is required.

Sincerely,



John C. Gargani, P.E.

Vice President, Economic Planning & Acquisitions, Southwestern Energy Production Company

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Member of Society of Petroleum Evaluation Engineers

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