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[Sent via e-mail attachment to: rule-comments@sec.gov]

Secretary  
Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549-1090

Re: Comment on “Modernization of the Oil and Gas Reporting Requirements”; Your File No. S7-15-08

Ladies and Gentlemen:

I am submitting comments on the Commission’s proposed amendments to Rule 4-10 of Regulation S-X and related proposals described in the Commission’s RIN 3235-AK00.

By way of background, I have practiced either as an accountant/ CPA or as an attorney for more than 30 years. In recent years, I have spent considerable time analyzing financial statements of both government and publicly traded entities. My particular focus in the public entity area has been entities in the oil and gas industry for the purpose of investment analysis. As a result, I have actively utilized oil and gas data included in public filings made by businesses in the oil and gas industry. My personal experience in analyzing businesses in the oil and gas industry has led me to conclude that more and better information needs to be included in financial statements of that industry; in particular, data that can be used for comparative analysis is sorely needed.

I restrict my comments to those pertinent to financial analysis inasmuch as I do not have the petroleum engineering or geotechnical background necessary to respond to matters relating primarily to those fields.

My comments follow, keyed to the Table of Contents of the Commission’s request for comments:

**Section II.C. Extraction of Bitumen and other Non-Traditional Resources.**







