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August 16, 2007

Department of Interior
Minerals Management Service
381 Elden Street, MS-4024
Herndon, Virginia 20170-4817

Attention: Regulations and Standards Branch

**Re: *Changing Proprietary Term of Certain Geophysical Information,
RIN 1010-AD41
Comments on Proposed Regulation Changes***

Dear Sir or Ma'am:

ConocoPhillips Alaska, Inc. ("CPAI") appreciates the opportunity to submit these comments regarding the proposed option to apply for a five year extension of the proprietary term for geophysical information reprocessed 20 or more years after issuance of the underlying permit. CPAI is one of the most active oil and gas exploration/production companies -- both onshore and offshore -- in Alaska and will be significantly impacted by the regulatory changes promulgated in 2006. Hence, CPAI has a significant interest in this proposed change as well.

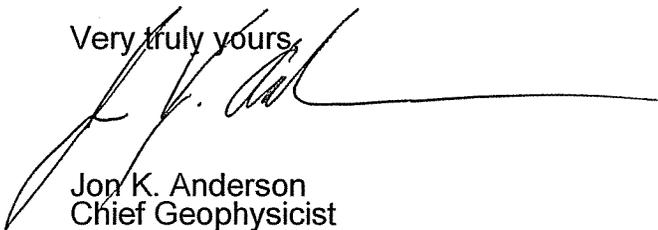
CPAI believes that the concept of an extension to the proprietary period for geophysical information is a much needed addition to the regulations as they currently exist after the changes enacted in 2006 (71 FR 16033, March 30, 2006, effective date May 1, 2006). CPAI, however, contends that the proposed extension should be increased to ten years. It is our view that the proposed five year extension is too short and will result in unintended consequences. A longer ten year term would preserve both the value of existing information sets and maintain interest in applying newer technologies to older information sets.

The time involved (typically about one year) and the substantial costs that can be incurred in reprocessing existing geophysical information sets warrant, in CPAI's view, a minimum ten year proprietary term extension. The proposed five year extension would significantly limit the value of reprocessing projects conducted by geophysical contractors and processing firms, and as a result would degrade the value of pre-existing information and lessen interest in applying new reprocessing technologies to older information sets.

The impacts of the application of the shorter proposed five year extension option (decreased interest and lower values on existing information sets) will tend to encourage acquisition of new geophysical data because the newly acquired data will remain confidential for a longer period of time. Data and information with a longer proprietary period are intrinsically more valuable in the market place due to the longer confidential status. Encouraging acquisition of new data and discouraging reprocessing of older information in a world of increasingly more stringent and controversial permitting processes will result in the inefficient use of capital and delay new exploration and development activities.

CPAI strongly supports the concept of an extension to the proprietary period for geophysical data reprocessed 20 or more years after the issuance of the MMS permit for acquisition, but believes that a longer extension period is necessary for the extension to be of value to existing information sets and to avoid the unintended results described above. Thank you for considering CPAI's comments on this proposed extension.

Very truly yours,



Jon K. Anderson
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