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August 18, 2004

Mr. Lawrence Smith
Director TA&I--FSP
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, CT 06856-5116

Letter of Comment No: A
File Reference: FSPFAS142B
Date Received: \$\(\chi_{10}\)

Dear Mr. Smith:

BDO Seidman, LLP is pleased to offer comments on the Proposed FASB Staff Position (FSP) FAS 142-b.

We agree with the guidance in the Proposed FSP and support its issuance. The proposed FSP appropriately confirms that FASB Statement No. 142 does not change the balance sheet classification or disclosures of drilling and mineral rights for oil and gas producing enterprises that follow the provisions of FASB Statement No. 19. In addition, we believe that the stated rationale will help the SEC staff reach the same conclusion for oil and gas producing enterprises that follow the full cost method in accordance with Article 4-10 of Regulation S-X.

We would be pleased to discuss our comments with the FASB staff. Please direct questions to Ben Neuhausen at 312-616-4661.

Very truly yours,

s/ BDO Seidman, LLP