



OFFSHORE OPERATORS COMMITTEE

April 24, 2015

U.S. Department of the Interior,
Bureau of Safety & Environmental Enforcement
Office of the Director
1849 C Street NW, Mail Stop DE5438
Washington, DC 20240

Re: Docket No. BSEE-2015-0002: *Oil and Gas and Sulphur Operations in the Outer Continental Shelf—Blowout Preventer Systems and Well Control* - Request for Extension of Comment Period

Via electronic submission to: <http://www.regulations.gov/>

Director Salerno:

Offshore Operators Committee (OOC) requests an extension of an additional 120 days to the comment period associated with the Notice of Proposed Rulemaking referenced above. OOC is an organization of some 138 producing and service companies who conduct essentially all of the OCS oil and gas exploration and production activities in the Gulf of Mexico (GOM). Comments made on behalf of OOC are submitted without prejudice to any member's right to have or express different or opposing views. At this time our members are actively reviewing the proposed rule and engaging in Industry discussions to inform the comments to be submitted by OOC. Based upon our members' preliminary review, we concur with the agency's assessment of its significance that this rule "*represents one of the most substantial rulemakings in the history of the BSEE and its predecessor organizations.*"¹ The breadth and complexity of the rule is also reflected in the fact that the rule took four years for BSEE to write and another four plus months for the Office of Management and Budget to complete its procedural review required prior to its publication in the Federal Register.

An extension is necessary to allow the affected Industry the sufficient time needed to review the vast number of new and comprehensive requirements affecting multiple systems critical to well control operations proposed in this rulemaking so that informed and thoughtful input can be provided. It is therefore critical for a rule of this nature to undergo robust assessment of the potential impacts and feasibility of implementation. Unintended consequences of this proposed rulemaking could be significant, thus thoughtful consideration of each element is required to help ensure the intent of the regulation is achieved. In addition to reviewing the proposed regulatory action, BSEE has posed over 50 questions to Industry, seeking input on critical matters under consideration, including technology requirements that currently do not exist (e.g., requirement for "*technology capable of severing any components of the drill string (excluding drill bits)*"² as well as input on expanding of the proposed rule to cover operations beyond that currently being considered (e.g., RTM being "*required for all well operations, including shallow water shelf operations,*"³ and, applying "*source control and containment requirements...to wells drilled in shallow water*"⁴). While the preamble of the rule may be viewed in its intent to serve as explanatory in nature, considerations posed in the preamble may in fact become requirements in the final rule if the Agency determines it receives substantial comments in support. The Agency noted in its comments issued with the release of the proposed rule its desire to implement the rule with severing capability

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of the BOP as a requirement. It is therefore critical that adequate time be afforded Industry to thoughtfully respond to the Agency's request for information and feedback.

It is the OOC's intent to undertake a thorough and comprehensive technical review and submit comments that will significantly aid in the creation of a robust and effective well control rule. The industry is committed to safe operations and supports effective regulations that will improve the performance of blowout preventer systems and well control operations. The OOC believes these comments will be of significant value to BSEE if we are allowed adequate time to conduct a review that leverages Industry's expertise in each of the many areas touched by this proposed rule.

We therefore, respectfully request a response to our extension request of 120 days on or before May 8, 2015. If faced with insufficient time, we will have no choice but to prioritize our focus to those items that we can timely address and are deemed most critical to our members. Limiting the time required for a complete and thorough review will likely lead to a rule that has unintended consequences and compromise the Agency's efforts to achieve its stated objectives.

Should you wish to discuss further or have questions, please feel free to contact me at 713-589-6710.

Respectfully submitted,



Evan H. Zimmerman
Executive Director
Offshore Operators Committee

c.c.: Sec Jewell, Department of the Interior
Mr. Lars Herbst, BSEE GOMR
Mr. Doug Morris, BSEE

¹ Federal Register / Vol. 80, No. 74 / Friday, April 17, 2015 / Proposed Rules, page 21506

² Ibid, page 21529

³ Ibid, page 21520

⁴ Ibid, page 21516