



Comment on BSEE-2015-0002-0001

This is a Comment on the **Bureau of Safety and Environmental Enforcement (BSEE) Proposed Rule: Oil and Gas and Sulphur Operations in the Outer Continental Shelf; Blowout Preventer Systems and Well Control**

For related information, [Open Docket Folder](#)

[Comment Now!](#)

Due Jun 16 2015, at 11:59 PM ET

ID: BSEE-2015-0002-0008

Tracking Number: 1jz-8ij6-87sk

Comment

April 27, 2015

Department of the Interior
Bureau of Safety and Environmental Enforcement
Attention: Regulations and Standards Branch
45600 Woodland Road
Sterling, VA 20166

Re: Blowout Preventer Systems and Well Control, 1014AA11;
Request for extension of comment period

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

To whom it may concern:

We ask that the Department grant a 120-day extension of the comment period to the notice of proposed rulemaking (80 FR 21504) published on April 17, 2015, by the Bureau of Safety and Environmental Enforcement (BSEE) regarding the requirements for Blowout Preventer Systems and Well Control.

The US Oil & Gas Association (USOGA) is a national trade association with divisions in Texas, Louisiana, Oklahoma and Mississippi/Alabama. The Association represents over 5,000 members and a good number of our Members explore for, lease, or produce oil and natural gas resources in the federal and state waters of the Gulf of Mexico.

With the publication of this proposed rulemaking, many questions are raised, indeed as pointed out by its authors this represents one of the most substantial rulemakings in the history of the BSEE and its predecessor organizations.

Please recognize that it will take a lot of time, effort and resources to evaluate and draft helpful, meaningful comments on the technological,

Document Information

Date Posted:

Apr 27, 2015

RIN:

1014-AA11

[Show More Details](#)

Submitter Information

Submitter Name:

Albert Modiano

Organization Name:

US Oil & Gas Association

scientific and commercial issues relating to exploratory drilling and production operations on the OCS and the efforts proposed by the draft rule.

The Agency expects and benefits from an in-depth review that answers its proposal especially since this rulemaking has significant potential impacts for operational safety and efficiency on the OCS. The proposed rule also brings, with its implementation and adoption, additional costs of doing business for not only those companies operating on the OCS, but also will engender economic impacts on the community at large. Recognizing that adequate time and attention to consider potentially significant unintended consequences of the proposed rule, any additional time to the comment period will help ensure a more meaningful response.

The comment period proposed does not help achieve these ends and is at odds with the need to provide adequate or lawful public participation.

And importantly this rule is not the only regulatory proposal industry resources and expertise must focus on simultaneously over the coming weeks. In addition to this rulemaking the DOI is also soliciting comments on the following proposals:

Oil and Gas and Sulphur Operations on the Outer Continental Shelf Requirements for Exploratory Drilling on the Arctic Outer Continental Shelf, RIN: 1082-AA00 (BSEE/BOEM);
Oil and Gas Leasing; Royalty on Production, Rental Payments, Minimum Acceptable Bids, Bonding Requirements, and Civil Penalty Assessments, RIN 1004-AE41 (BLM); and
Consolidated Federal Oil & Gas and Federal & Indian Coal Valuation Reform, RIN 1012AA13 (ONRR).

The need, and burden, to have our Members comment simultaneously on all of these proposals, strains industry expertise to craft valuable comments for the Departments consideration. Extending the public comment period for 120 days, serves both industries and the governments interest in getting the best comments back for consideration and more importantly would help to advance the goal of safe, responsible offshore oil and natural gas operations.

The US Oil & Gas Association thanks you for your consideration of this request for an extension of the comment period.

If you have any questions, please contact me by telephone (202) 638-4400, or e-mail amodiano@usoga.org.

Sincerely,

Albert Modiano
President

cc: Secretary of the Interior Sally Jewell
Assistant Secretary Land and Minerals Management, Janice Schneider
Director, Bureau of Safety and Environmental Enforcement Brian Salerno

