



International Association
of Drilling Contractors
10370 Richmond Ave., Suite 760
Houston, Texas 77042
P.O. Box 4287
Houston, Texas 77210

P +1.713.292.1945
F +1.713.292.1946
www.iadc.org

28 April 2015

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

Via – Regulations.gov

Re: Oil and Gas and Sulphur Operations in the Outer Continental Shelf – Blowout Preventer Systems and Well Control [RIN 1014–AA11; Docket No. BSEE-2015-0002]
Request for extension of comment period

To whom it may concern:

The purpose of this letter is to request an extension of the comment period provided for reviewing and responding to the notice of proposed rulemaking regarding the requirements for Blowout Preventer Systems and Well Control which was published on 17 April 2015 (80 FR 21504 et seq).

The International Association of Drilling Contractors is a not for profit organization with around 2,000 member companies representing the worldwide drilling industry. Pertinent to this rulemaking, IADC's membership includes all drilling contractors currently operating mobile offshore drilling units in the areas subject to the jurisdiction of the United States, and the vast majority of drilling contractors offering MODUs in the competitive market, worldwide.

IADC asks that the comment period be extended by at least 120 days, *i.e.*, until at least 14 October 2015. Further, to facilitate orderly consultation with our members and other affected trade associations, we ask that a timely response to this request be provided.

In the preamble to the proposed rule BSEE acknowledges that the proposed rulemaking “represents one of the most substantial rulemakings in the history of the BSEE and its predecessor organizations.” IADC views the extension of the comment period as necessary to provide industry with the time to develop a considered response to the complex technological, scientific and commercial issues raised by this substantial proposal. IADC believes that the presently-provided 60-day comment period will not allow sufficient time to fully consider:

- The technical feasibility of implementing proposed modifications to contractor-owned equipment and the time allocated for doing so, particularly in consideration of possible downtime outside of the equipment's planned maintenance and repair cycle;
- Possible overlapping demands for unplanned downtime which could be imposed by the U.S. Coast Guard through the implementation of its proposed Requirements for MODUs and Other Vessels Conducting OCS Activities with DP Systems [RIN 1625-AC16; USCG-2014-0063]; and

Oil and Gas and Sulphur Operations in the Outer Continental Shelf – Blowout Preventer Systems and Well Control [RIN 1014-AA11; Docket No. BSEE-2015-0002]

- New and/or unanticipated regulatory obligations and liabilities for contractors which the rule might create, in consideration of BSEE's post-Macondo re-interpretation of 30 CFR 146(c)(3) and Interim Policy Document No. 12-17.

IADC and its drilling contractor members are working cooperatively with other trade associations in order to consolidate industry comments and provide BSEE with comments in response to the proposed rule that can lead to a robust and cost-effective rule. However, IADC is mindful of the need to also develop a differentiated submission to the rulemaking docket to address, *inter alia*, the above concerns on behalf of our drilling contractor members. The requested extension of the comment period is necessary for this purpose.

IADC appreciates your consideration of this request. If you have any questions about any portion of this request, please contact me by phone at (713) 292-1964, or by e-mail at alan.spackman@iadc.org.

Sincerely,



Alan Spackman
Vice President, Policy, Government and
Regulatory Affairs