



April 28, 2015

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

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

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

To whom it may concern:

As you know on, April 17, 2015, the Bureau of Safety and Environmental Enforcement (BSEE) published a notice of proposed rulemaking (80 FR 21504) regarding the requirements for Blowout Preventer Systems and Well Control. Due to the intricacy of this rulemaking, this letter is to request a 120-day extension in the comment period.

IPAA is a national trade association representing the thousands of independent oil and natural gas explorers and producers, as well as the service and supply industries that support their efforts. Independent producers drill about 95 percent of American oil and natural gas wells, produce more than 50 percent of American oil, and more than 85 percent of American natural gas. IPAA is dedicated to ensuring a strong, viable domestic oil and natural gas industry, recognizing that an adequate and secure supply of energy developed in an environmentally responsible manner is essential to the national economy.

IPAA values safety as one its top priorities and appreciates BSEE continuing to examine this issue. Further, IPAA is grateful for the opportunity to comment on all aspects of the technical rulemaking. But given the complexity and length of the rulemaking, IPAA would respectfully like to have more time to consult with our member companies to examine the consequences of this rulemaking to equip the agency with the adequate feedback it seeks.

IPAA appreciates your consideration of this request. If you have any questions, please contact me by phone at (202)857-4722 or at dnaatz@ipaa.org.

Sincerely,

Dan Naatz
Senior Vice President
Federal Resources & Political Affairs