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April 28, 2015

Department of the Interior
Bureau of Safety and 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

Director Salerno:

The Louisiana Mid-Continent Oil & Gas Association (LMOGA) has reviewed the April 17, 2015 Bureau of Safety and Environmental Enforcement (BSEE) published notice of proposed rulemaking (80FR 21504) regarding the requirements for Blow Out Preventer and Well Control. We recognize the significance of this new proposed rule and we appreciate that an in-depth industry analysis is needed in order to provide BSEE with comprehensive comments to cover the wide-range of topics included in the proposed rule. As such, LMOGA respectfully requests that BSEE issue an extension of an additional 120 days to the public comment period associated with the Notice of Proposed Rulemaking referenced above.

LMOGA is Louisiana's longest standing trade association, exclusively representing all aspects of the oil and gas industry onshore and offshore, including exploration, production, mid-stream activities, pipeline, refining and marketing. Louisiana is a significant supporter of OCS activity in the Gulf of Mexico, which currently accounts for more than 16 percent of the Nation's oil production and about five percent of domestic natural gas production, resulting in annual federal revenues of over \$7.4 billion in 2014. Louisiana's oil and gas industry has a total annual economic impact to the state of over \$70 billion annually.

LMOGA members are currently reviewing the proposed rule and collaborating with other trade associations to ensure that our comments cover the wide range of topics in the areas of safety, efficiency and economics. Our members wholeheartedly agree with the Agency's assessment that this rule *"represents one of the most substantial rulemakings in the history of the BSEE and its predecessor organizations."* This is also validated by the fact that this rule took the Agency over four years to develop and another four months for the Office of Management and Budget to complete its procedural review required prior to its publication in the Federal Register.

The proposed rule includes many new requirements, some of which requires the development of new and advanced technology. Also, our initial review indicates that additional resources that do not yet exist may also be needed to implement this rule. Upon further review of the rule, industry will need to take into consideration that new technology, new systems and new resources will need to be developed and implemented.

Furthermore, an extension to the public comment period will benefit industry and the Agency alike. By granting an extension, industry will have the opportunity to provide the Agency with more thorough and well thought-out comments covering the vast number of new and comprehensive requirements affecting multiple systems critical to well control operations. It is our goal to collaborate with the Agency to develop a well control rule that further improves safe drilling in the Gulf of Mexico.

The offshore oil and gas industry in the Gulf of Mexico has proven to provide long-lasting and indisputable economic and energy security benefits not only to Louisiana, but also to the entire nation. LMOGA and its members are committed to safe operations and environmental protection in the Gulf of Mexico.

Thank you for your consideration of our request for an extension of 120 days. In order to further plan our comments, we request your response on or before May 8, 2015. As always, LMOGA looks forward to further collaboration with you and the Agency as we continue offshore oil and gas development in our federal waters.

Thank you again and I look forward to hearing from you. If you have any questions or would like to discuss further, please contact me at 225-387-3205 or at lori@lorileblancllc.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lori LeBlanc', with a stylized flourish at the end.

Lori LeBlanc
Louisiana Mid-Continent Oil & Gas Association
Director, Offshore Committee

cc: Secretary of the Interior Sally Jewell
Assistant Secretary Land and Minerals Management, Janice Schneider
Mr. Lars Herbst, BSEE, GOMR