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April 29, 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, 1014-AA11*; Request for extension of comment period

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

To whom it may concern:

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. The purpose of this letter is to request an extension of the comment period. We request that the comment period be extended by at least 120 days, until October 14, 2015. Additionally, to facilitate orderly consultation with our members and other affected trade associations, we ask for a timely response to this request by May 8, 2015.

The API is a national trade association that represents over 625 members involved in all aspects of the oil and natural gas industry, including exploring for and developing oil and natural gas resources in the OCS, a vital part of our nation's economy. The oil and natural gas industry supports 9.8 million U.S. jobs and 8 percent of the U.S. economy.

The agency states in the rule text, "this represents one of the most substantial rulemakings in the history of the BSEE and its predecessor organizations," we couldn't agree more. The agencies' proposed rule evaluates and solicits comments on a variety of complex technological, scientific and commercial issues relating to exploratory drilling and production operations on the OCS. It is critical for a rule of this nature to undergo robust assessment of the potential impacts in the areas of safety, efficiency and economics. 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. Development of thoughtful comments in the time provided is clearly unachievable and is therefore inconsistent with providing adequate or lawful public participation.

An additional confounding factor beyond this proposed agency action is additional rulemaking by this agency and this agencies' sister bureaus at the US Department of the Interior (DOI). In addition to this proposed rulemaking the DOI is also soliciting comments on the following proposals:

1. 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);
2. Oil and Gas Leasing; Royalty on Production, Rental Payments, Minimum Acceptable Bids, Bonding Requirements, and Civil Penalty Assessments, RIN 1004-AE41 (BLM); and
3. Consolidated Federal Oil & Gas and Federal & Indian Coal Valuation Reform, RIN 1012-AA13 (ONRR).

Soliciting comments simultaneously on all of these proposals has created an increased burden on industry resources to provide valuable feedback.

Outside of the DOI there are additional proposals by other federal regulators also soliciting comments simultaneously which adds to the strain on resources to provide valuable feedback. Some of these include:

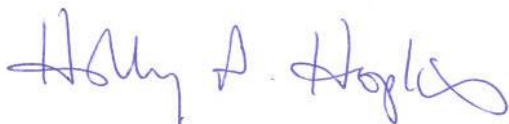
- Requirements for MODUs and Other Vessels Conducting OCS Activities with DP Systems, RIN 1625-AC16 (USCG);
- Guidelines for Implementing Executive Order 11988, Floodplain Management, as Revised, Docket ID FEMA-2015-0006; and
- Effluent Limitations Guidelines and Standards for the Oil and Gas Extraction Point Source Category, RIN 2040-AF35 (EPA)

Extending the public comment period for this proposed rule would allow sufficient time for the industry to provide a well thought-out response and will serve the government's interest in receiving comments that will identify issues and offer recommendations to ensure safe and responsible offshore oil and natural gas development.

It is the API's intent to provide BSEE with a high quality set of technically based comments that will significantly aid in creation of a robust and effective well control rule. The industry is committed to safe operations and supports effective regulations in the area of blowout preventer systems and well control. The API believes these comments will be of significant value to BSEE if we are allowed adequate time to coordinate the industry's expertise in each of the many areas touched by this proposed rule.

API appreciates your consideration of this request. If you have any questions, please contact me by phone at (202)682-8439, or by e-mail at hopkinsh@api.org.

Sincerely,

A handwritten signature in blue ink that reads "Holly A. Hopkins". The signature is fluid and cursive, with the first name "Holly" being the most prominent.

Holly A. Hopkins

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