



**NOBLE DRILLING SERVICES INC.**

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April 29, 2015

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

Re: Oil and Gas and Sulphur Operations in the Outer Continental Shelf – Blowout  
Preventer Systems and Well Control, RIN 1014-AA11, Docket BSEE-2015-002  
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.

This proposed rule has significant scope and “represents one of the most substantial rulemakings in the history of the BSEE and its predecessor organizations.” The current 60-day comment period is insufficient for the industry to develop a considered response to the complex technological, scientific and commercial issues raised by this substantial proposal. Therefore, Noble Drilling Services, Inc. respectfully requests an extension for 120 days, until 14 October, 2015 in order to give the thoughtful well-researched response a rulemaking this significant merits.

Noble is a leading offshore drilling contractor for the oil and gas industry. The Company owns and operates an offshore drilling fleet, consisting of 20 semisubmersibles and drillships and 15 jackups, that focus largely on ultra-deepwater and high-specification jack-up drilling opportunities in the United States and worldwide. For more information on Noble, please visit [www.noblecorp.com](http://www.noblecorp.com).

If you have any questions, please contact me at [olyle@noblecorp.com](mailto:olyle@noblecorp.com).

Respectfully,

A handwritten signature in blue ink, appearing to read "Orlan Lyle", is written over a light blue grid background.

Orlan Lyle  
Manager Subsea Engineering