

**Department of the Interior
Bureau of Safety and Environmental Enforcement**

Attention: Regulations and Standards Branch
45600 Woodland Road
Sterling, VA 20166
USA

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Your Ref: BSEE-2015-0002

Oil and Gas and Sulphur Operations in the Outer Continental Shelf – Blowout
Preventer Systems and Well Control

To whom it may concern,

Maersk Drilling is a member of the A.P. Moller - Maersk Group with a global operating fleet of 23 drilling rigs. Maersk Drilling operates one deepwater semi-submersible and two ultra-deepwater drill ships in the US Gulf of Mexico. Maersk Drilling is a member of IADC and API and is an active participant in the BOP reliability initiatives that are presently being run across the industry.

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 Blow-Out Preventer Systems and Well Control which was published on 17 April 2015.

To allow for a detailed review of the proposed new ruling, Maersk Drilling kindly requests that the comment period be extended by at least 120 days, i.e., until at least 14 October 2015.

Maersk Drilling views the extension of the comment period as necessary to provide considered responses to the complex technological, scientific and commercial issues raised by this substantial proposal. Maersk Drilling believes that the presently provided 60-day comment period will not allow sufficient time to fully consider these issues.

Maersk Drilling is performing both an internal review of the proposed rule and is involved in the industry initiative to consolidate industry comments. The aim of this comprehensive review is to provide BSEE with constructive feedback on the proposed rule that will lead to the shared goal of safe and efficient deepwater drilling operations in the US Gulf of Mexico.

Maersk Drilling appreciates your consideration of this request.

Yours sincerely,



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