



April 30, 2015

**Docket No BSEE-2015-0002**

U.S. Department of the Interior,  
Bureau of Safety & Environmental Enforcement  
Office of the Director  
1849 C Street NW, Mail Stop DE5438  
Washington, DC 20240

Director Salerno:

Thank you for the opportunity to submit this extension request on the Oil and Gas and Sulphur Operations in the Outer Continental Shelf—Blowout Preventer Systems and Well Control proposed rule, **Docket No. BSEE-2015-0002**.

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. Murphy respectfully requests that the comment period be extended by at least 120 days, until October 14, 2015. Additionally, we ask for a timely response to this request by May 8, 2015.

Murphy is an independent exploration and production company with both onshore and deepwater offshore assets operating in the Gulf of Mexico and numerous drilling and production operations around the world. Based upon our preliminary review, we concur with the agency's assessment of its significance that this rule "*represents one of the most substantial rulemakings in the history of the BSEE and its predecessor organizations.*"<sup>i</sup>

An extension is necessary to allow Murphy and the affected Industry sufficient time needed to review the vast number of new and comprehensive requirements affecting multiple systems critical to well control operations proposed in this rulemaking. Murphy requests this extension be granted to allow sufficient time for informed and thoughtful input be provided to your office. It is therefore critical for a rule of this nature to undergo a robust assessment of the potential impacts and feasibility of implementation. 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.

In addition to reviewing the proposed regulatory action, BSEE has posed over 50 questions to Industry, seeking input on critical matters under consideration, including technology requirements that currently do not exist (e.g., requirement for "*technology capable of severing any components of the drill string (excluding drill bits)*"<sup>ii</sup>) as well as input on expanding of the proposed rule to cover operations beyond that currently being considered (e.g., Real Time Monitoring (RTM) being "*required for all well operations*"). While the preamble of the rule may be viewed as explanatory in nature, considerations

posed in the preamble may in fact become requirements in the final rule if the Agency determines it receives substantial supportive comments.

The Agency noted in its comments issued with the release of the proposed rule its desire to implement the rule with severing capability of the BOP as a requirement. It is therefore critical that adequate time be afforded Industry to thoughtfully respond to the Agency's request for information and feedback.

It is Murphy's intent to undertake a comprehensive technical review, participate in Industry work groups and submit comments that will significantly aid in the creation of a robust and effective well control rule. Murphy is committed to safe operations and supports effective regulations that will improve the performance of blowout preventer systems and well control operations that are practical as well. Murphy believes these comments will be of significant value to BSEE if we are allowed adequate time to conduct a review that leverages expertise in each of the many areas touched by this proposed rule.

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

Murphy would be open and receptive to a meeting, or telephone conference, to discuss any of these issues. If you or your staff have any questions or to arrange a meeting, please call Charles Dudek at (281) 717-5152 or email at [charles\\_dudek@murphyoilcorp.com](mailto:charles_dudek@murphyoilcorp.com).

Regards,



Kenneth Hampshire  
General Manager, GOM Drilling & Completions

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<sup>i</sup> Federal Register / Vol. 80, No. 74 / Friday, April 17, 2015 / Proposed Rules, page 21506

<sup>ii</sup> Ibid, page 21529