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Bureau of Safety and
Environmental Enforcement
45600 Woodland Road
Sterling
Virginia 20166

Date 01.05.2015

TO: Whom it May Concern- BSEE

Subject: **(RIN) 1014-AA11**

BSEE-2015-0002 Oil and Gas and Sulphur Operations in the Outer Continental Shelf—Blowout Preventer Systems and Well Control

Seadrill has reviewed the proposed rule referenced above and requests additional time to respond beyond the proposed 60 days such that those subjects and rules, that BSEE has requested feedback on, can be analysed to accurately reflect the feasibility and impacts in terms of financial, organizational, contractual, installation, implementation, and continual maintenance costs.

We understand the intent of the new rules to close gaps in expectations and oversight of the offshore drilling processes and are sincerely interested in participating in constructive feedback that will improve the communication of the timeline and intent of the rules such that current or future compliance feasibility is less questionable.

We have, as example to date, incurred 30 man-hours to study the effects of the proposed accumulator sizing in the above referenced rule at a top level without in-depth consideration of structural feasibility and costs that would come with an additional estimated 120 man-hours to study.

Seadrill respectfully requests an additional 120 days to complement our comments with supporting documentation, references, and examples and allow adequate time to confer with our vendors concerning market capacity to provide service and products required to comply.

Yours sincerely,

Erin Welsh-
Subsea Superintendent
Representing Seadrill Technical Services - Corporate