

April 30, 2015

**VIA FEDEX**

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

*Re: Docket No. BSEE-2015-0002: Oil and Gas and Sulphur Operations in the Outer Continental Shelf – Blowout Preventer Systems and Well Control – Request for Extension of Comment Period*

Director Salerno:

Fieldwood Energy LLC, (“Fieldwood”), has reviewed the April 17, 2015 Bureau of Safety and Environmental Enforcement (BSEE) published notice of proposed rulemaking (80FR 21504) regarding the requirements for Blowout Preventer and Well Control. We recognize the significance of this new proposed rule and we appreciate that an in-depth industry analysis is needed in order to provide BSEE with comprehensive comments to cover the wide-range of topics included in the proposed rule. As such, Fieldwood respectfully requests that BSEE issue an extension of an additional 120 days to the public comment period associated with the Notice of Proposed Rulemaking referenced above. Fieldwood is currently reviewing the proposed rule and collaborating with Louisiana Mid-Continent Oil and Gas Association, the Offshore Operators Committee and other trade associations to consolidate our comments.

By way of introduction, Fieldwood is the largest producer and platform owner in the Gulf of Mexico-Shelf. Currently, Fieldwood produces more than 100,000 boepd, owns an interest in approximately 650 OCS blocks covering approximately 2 million net acres, and operates over 600 platforms. Fieldwood’s daily operations are enormous, with approximately 700 employees, 3,100 offshore personnel, and hundreds of separate vendor/contractors supporting daily operations. Fieldwood’s impact to the Gulf Coast regional economy is huge, with thousands, if not tens of thousands, of workers either directly or indirectly contributing to Fieldwood’s operations by way of equipment, supplies, and logistical support.

Fieldwood believes an extension to the public comment period will benefit the industry and the Agency alike. By granting an extension, the industry will have the opportunity to provide the Agency with more thorough and well thought-out comments covering the vast number of new and comprehensive requirements affecting multiple systems that are critical to well control



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operations. It is our goal to collaborate with the Agency to develop a well control rule that further improves safe drilling in the Gulf of Mexico.

Thank you for your consideration of our request for an extension of 120 days. As always, Fieldwood looks forwards to further collaboration with you and the Agency as we continue offshore oil and gas development in our federal waters.

If you have any questions or would like to discuss further, please contact me at 713-969-1015 or at [mattm@fwelc.com](mailto:mattm@fwelc.com).

Sincerely,

Fieldwood Energy LLC

A handwritten signature in blue ink, reading 'G. M. McCarroll'.

G. M. McCarroll  
President and Chief Executive Officer

Cc: Sally Jewell, Secretary of the Interior  
Janice Schneider, Assistant Secretary Land and Minerals Management  
Lars Herbst, BSEE, GOMR  
Lori LeBlanc, Director, Offshore Committee – Louisiana Mid-Continent Oil and Gas Association  
Randall Luthi, President – National Ocean Industries Association  
Evan Zimmerman, Director – Offshore Operators Committee