



**Pacific Drilling Services, Inc.**

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1 May 2015

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

Via – Regulations.gov

Re: Oil and Gas and Sulphur Operations in the Outer Continental Shelf – Blowout Preventer Systems and Well Control [RIN 1014-AA11; Docket No. BSEE-2015-0002]  
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 (80 FR 21504 et seq).

Pacific Drilling is a specialist deepwater drilling contractor with operations in the GoM as well as other international locations.

We ask that the comment period be extended by at least 120 days, *i.e.*, until at least 14 October 2015 to give us time to properly consider and respond accordingly to what the BSEE acknowledges “represents one of the most substantial rulemakings in the history of the BSEE and its predecessor organizations.”

Pacific Drilling views the extension of the comment period as necessary to provide us with the time to develop a considered response to the complex technological, scientific and commercial issues raised by this substantial proposal.

Pacific Drilling believes that the presently-provided 60-day comment period will not allow sufficient time to fully consider the technical and logistical feasibility of implementing the proposed modifications to our equipment and procedures, and the time requirements for doing so, particularly in consideration of possible downtime outside of the equipment’s planned maintenance and repair cycle.

Pacific Drilling is working with the trade associations but we also have comments of our own to provide to the BSEE in response to the proposed rule that, we believe, can lead to a safer way of carrying out our business.

The requested extension of the comment period is necessary for this purpose.

Pacific Drilling appreciates your consideration of this request. If you have any questions about any portion of this request, please contact me by phone at 832-255-0456, or by e-mail at [c.vandiemer@pacificdrilling.com](mailto:c.vandiemer@pacificdrilling.com).

Sincerely

Cees van Diemen

A handwritten signature in black ink, appearing to read 'Cees van Diemen', is written over a light blue horizontal line.

Executive VP and Chief Operations Officer