



W&T OFFSHORE

May 7, 2015

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

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:

W&T Offshore, Inc. (W&T) respectfully requests an extension of an additional 120 days to the comment period associated with the Notice of Proposed Rulemaking referenced above. At this time our staff is actively reviewing the proposed rule and collaborating with Industry associations in order to consolidate our comments. Based upon our preliminary review, we need the additional time to prepare comments on what is a very complex and substantial set of proposed rules.

W&T believes an extension is necessary in order to allow the affected Industry the time needed to review the vast number of proposed new and comprehensive requirements affecting multiple systems critical to well control operations. It is critical for a rule of this nature to undergo 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. An extension will benefit both the Agency and Industry by allowing adequate time to formulate informed and well-thought out comments.

W&T is committed to safe operations and supports effective regulations that will improve the performance of blowout preventer systems and well control operations. W&T believes the comments provided will be of significant value to BSEE if we are allowed adequate time to conduct a thorough review of the many areas impacted by this proposed rule.

Respectfully submitted,

David M. Bump
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W&T Offshore, Inc