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07 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).

Ensco brings energy to the world as a global provider of offshore drilling services to the petroleum industry. For more than 25 years, we have focused on operating safely and exceeding customer expectations. Ensco is the second largest offshore drilling contractor in the world. Pertinent to this rulemaking, Ensco currently operates 18 mobile offshore drilling units in the areas subject to the jurisdiction of the United States.

Ensco asks that the comment period be extended by at least 120 days, i.e., until at least 14 October 2015. Further, to facilitate orderly consultation with the trade associations of which we are members, our business partners, and others in the industry, we ask that a timely response to this request be provided.

In the preamble to the proposed rule BSEE acknowledges that the proposed rulemaking “represents one of the most substantial rulemakings in the history of the BSEE and its predecessor organizations.” Ensco 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. Ensco believes that the presently-provided 60-day comment period will not allow sufficient time to fully consider, among other things:

- The technical feasibility of implementing proposed modifications to contractor-owned equipment and the time allocated for doing so, particularly in consideration of possible equipment downtime outside of the equipment’s planned maintenance and repair cycle;
- Possible overlapping demands for unplanned equipment downtime which could be imposed by the U.S. Coast Guard through the implementation of its proposed Requirements for MODUs and Other Vessels Conducting OCS Activities with DP Systems [RIN 1625-AC16; USCG-2014-0063]; and
- New and/or unanticipated regulatory obligations and liabilities for contractors which the rule might purport to create, in light of BSEE’s post-Macondo re-interpretation of 30 CFR 250.146(c)(3) and Interim Policy Document No. 12-17.





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EnSCO appreciates your consideration of this request. If you have any questions about any portion of this request, please contact me by phone at (713) 430-4579, or by e-mail at cstewart@enscoplc.com.

Sincerely,

C. Stewart

Chris Stewart
Director – Subsea Engineering & Analysis

