

7 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).

I am Director of Subsea Support for Pacific Drilling. The company is a specialist deepwater drilling contractor with operations in the GoM as well as other international locations.

I respectfully 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.”

I view 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.

I believe 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 and I also have comments of my own to provide to the BSEE in response to the proposed rule that, I believe, can lead to a safer way of carrying out our business without the impracticalities the proposed rule creates.

The requested extension of the comment period is necessary for the purpose of providing accurate information and verbiage to the BSEE.

I sincerely appreciate your consideration of this request. If you have any questions about any portion of this request, please contact me by phone at 832-255-0528 or by e-mail at p.bennett@pacificdrilling.com.

Sincerely



Pete Bennett - DIRECTOR-SUBSEA SUPPORT

PACIFIC DRILLING

11700 Katy Freeway, Suite 175 , Houston, Texas 77079