

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

Via electronic submission to: <http://www.regulations.gov/>

Dear Director Salerno:

I am writing to request an extension of an additional 120 days to the comment period associated with the Notice of Proposed Rulemaking referenced above. Based upon a preliminary review of this rule, I agree with the agency's assessment of that this rule "*represents one of the most substantial rulemakings in the history of the BSEE and its predecessor organizations.*"ⁱ The breadth and complexity of the rule is also reflected in the fact that the rule took four years for BSEE to write and another four plus months for the Office of Management and Budget to complete its procedural review required prior to its publication in the Federal Register.

An extension is necessary to allow the offshore industry the sufficient time needed to review the vast number of new and comprehensive requirements affecting multiple systems critical to well control operations proposed in this rulemaking so that informed and thoughtful input can be provided. It is therefore 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.

I therefore, respectfully request a response to this extension request of 120 days on or before May 15, 2015.

Thank you for your consideration in this important matter.

Respectfully,



Lynne Hackedorn