

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 requesting that the comment period be extended by at least 120 days, *i.e.*, until at least 14 October 2015 to give me 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 me 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.

Thank you for your consideration of this request. If you have any questions about any portion of this request, please contact me by phone at 832-255-0643, or by e-mail at t.hogg@pacificdrilling.com

Sincerely

Tony Hogg

