



PARAGON
OFFSHORE

May 12, 2015

Department of the Interior
Bureau of Safety and Environmental Enforcement
Attn: Regulations and Standards Branch
45600 Woodland Road
Sterling, VA 20166

RE: Oil and Gas Re: Oil and Gas and Sulphur Operations in the Outer Continental Shelf Blowout
Preventer Systems and Well Control, RIN 1014-AA11, Docket BSEE-2015-002
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.

This proposed rule has significant scope and represents one of the most substantial rulemakings in the history of the BSEE and its predecessor organizations. The current 60-day comment period is insufficient for the industry to develop a considered response to the complex technological, scientific and commercial issues raised by this substantial proposal. Therefore, Paragon Offshore respectfully requests an extension for 120 days, until 14 October, 2015 in order to give the thoughtful well-researched response a rulemaking this significant merits.

Respectfully,

Ian Barker
Director – Well Control Operations