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May 12, 2015

Department of the Interior
Bureau of Safety and 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* – Follow Up Request for Extension of Comment Period

Director Salerno:

The Louisiana Mid-Continent Oil & Gas Association (LMOGA) is following up to our letter dated April 25, 2015 regarding our request for an extension of an additional 120 days to the public comment period associated with the Notice of Proposed Rulemaking referenced above. Our initial letter requested a response from the Agency by May 8, 2015 so that we can plan the scope of our comments appropriately based on the amount of time the Agency provides. Since we have not yet received a response from the Agency we are following up to provide you with a summary of the comments submitted to the Federal Register Docket thus far that reflect similar concerns regarding the public comment period for reviewing such a significant and complex rule.

As of May 10, 2015 there have been 35 comments submitted to the Docket wherein 31 of the comments specifically request an extension of an additional 120 days to the public comment period. A list of the organizations that have submitted comments thus far is attached for your reference. Of those organizations and individuals who have already provided comments, seven (7) of the comments are from industry trade associations, including API, LMOGA, NOIA, IADC, IPAA, OOC, and the US Oil & Gas Association, who collectively represent thousands of industry companies. It cannot be ignored that these state and national trade associations include a wide-range of industry companies including oil and gas operators, drilling companies, marine service companies and various other oil and gas service companies. For example, trade associations such as API, IADC and NOIA represent a wide-range of companies including Cameron, Baker Hughes, and Transocean.

We cannot emphasize enough the significance of the proposed Well Control Rule as the Rule's preamble also the rule, "represents one of the most substantial rulemakings in the history of the BSEE and its predecessor organizations." In addition, It has taken BSEE over four years to draft the proposed rule and it took OMB over four months to review the rule. It is critical that the industry have adequate time to review the proposed rule in order to submit well thought and comprehensive comments which include answering the over 50 questions to Industry, seeking input on critical matters under consideration, including technology requirements that currently do not exist as well as input on expanding of the

proposed rule to cover operations beyond that currently being considered. An extension is necessary to allow adequate time to conduct a review that leverages Industry's expertise in each of the many areas touched by this proposed rule.

As always, LMOGA looks forward to further collaboration with you and the Agency as we continue offshore oil and gas development in our federal waters.

Thank you again and I look forward to hearing from you. If you have any questions or would like to discuss further, please contact me at 225-387-3205 or at lori@lorileblancllc.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Lori LeBlanc". The signature is fluid and cursive, with a long horizontal stroke at the end.

Lori LeBlanc
Louisiana Mid-Continent Oil & Gas Association
Director, Offshore Committee

cc: Secretary of the Interior Sally Jewell
Assistant Secretary Land and Minerals Management, Janice Schneider
Mr. Lars Herbst, BSEE, GOMR

BSEE - Proposed Well Control Rule

Public Comments Submitted as of May 10, 2015

Docket No. BSEE-2015-0002: *Oil and Gas and Sulphur Operations in the Outer Continental Shelf – Blowout Preventer Systems and Well Control*

Organization	Submitter Name	Date Posted
American Petroleum Institute	Hopkins, Holly	4/30/15
Apache Corporation	Daigle, Steve	5/1/15
Chevron North America Exploration and Production Company	Fury, Sandi	5/1/15
Cobalt International Energy, Inc	Hackedorn, Lynne	5/11/15
Diamond Offshore Drilling, Inc.	Le, Tri C.	5/1/15
*ECS	Mullins, Carson	4/22/15
Ensco Plc	Stewart, Chris	5/11/15
Fieldwood Energy	McCarroll, G.M.	5/5/15
HWCG LLC	Frazer, Ross	5/11/15
International Association of Drilling Contractors	Spackman, Alan	4/29/15
IPAA	Naatz, Dan	4/29/15
Louisiana Mid-Continent Oil & Gas Association	LeBlanc, Lori	4/29/15
Maersk Drilling	Law, Jake	5/1/15
Marathon Oil Corporation	Kelley, Toni	4/29/15
Murphy Exploration & Production	Dudek, Charles	5/5/15
NA	Bennett, Peter	5/11/15
NA	Broussard, Alan	4/28/15
NA	Castille, Craig	4/27/15
NA	Hackedorn, Lynne	5/11/15
NA	Hogg, Tony	5/11/15
*NA	Miller, Keith	4/20/15
NA	Moras, Ralph Jr.	4/28/15
National Ocean Industries Association	Nye, Nicolette	4/30/15
*National Society of Professional Engineers	Eiser, Arielle	5/1/15
Noble Drilling	Lyle, Orlan	4/30/15
Offshore Operators Committee	Zimmerman, Evan	4/27/15
Pacific Drilling	Hogg, Tony	5/11/15
Petrobras America Inc	Roland, Gregory	5/1/15
Petrobras America Inc	Roland, Gregory	5/1/15
Seadrill	Welsh, Erin	5/5/15
Stone Energy Corporation	Eiland, Patrick	5/1/15
Pacific Drilling	van Diemen, Cees	5/11/15
*University of Miami	Nusbaum, Noah	4/29/15
US Oil & Gas Association	Modiano, Albert	4/27/15
W&T Offshore, Inc	Bump, David	5/11/15

* Extension not requested