

May 5, 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

Director Salerno:

Anadarko Petroleum Corporation (Anadarko) requests an extension of an additional 120 days to the comment period associated with the Notice of Proposed Rulemaking referenced above. We recognize the significance of this new proposed rule and we believe an in-depth industry analysis is needed in order to cover the wide-range of topics included in the proposed rule. At this time Anadarko is actively reviewing the proposed rule and engaging in Industry discussions in order to provide BSEE with comprehensive comments. 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 affected 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.

In addition to reviewing the proposed regulatory action, BSEE has posed over 50 questions to Industry, seeking input on critical matters under consideration, including technology requirements that currently do not exist (e.g., requirement for "*technology capable of severing any components of the drill string (excluding drill bits)*") as well as input on expanding of the proposed rule to cover operations beyond that currently being considered (e.g., RTM being "*required for all well operations, including shallow water shelf operations;*" and, applying "*source control and containment requirements...to wells drilled in shallow water*"). It is therefore critical that adequate time be afforded Industry to thoughtfully respond to the Agency's request for information and feedback.

It is Anadarko's intent to undertake a thorough and comprehensive technical review and submit comments that will significantly aid in the creation of a robust and effective well control rule. The industry is committed to safe operations and supports effective regulations that will improve the performance of blowout preventer systems and well control operations. Anadarko believes these comments will be of significant value to BSEE if we are allowed adequate time to conduct a review that leverages Industry's expertise in each of the many areas touched by this proposed rule.

Anadarko respectfully requests a response to our extension request of 120 days on or before May 8, 2015. If faced with insufficient time, we will have no choice but to prioritize our focus to those items that we can timely address and are deemed most critical to our operations. Limiting the time required for a complete and thorough review will likely lead to a rule that has unintended consequences and compromises the Agency's efforts to achieve its stated objectives.

Thank you for your consideration of this request. Should you wish to discuss further or have questions, please feel free to contact me at 832-636-1000.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "R.D. abel".

Robert D. Abendschein
VP, Deepwater Americas Operations

c.c.: Sec Jewell, Department of the Interior
Mr. Lars Herbst, BSEE GOMR
Mr. Doug Morris, BSEE