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May 7, 2015

Brian Salerno, Director
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 –*

Request for Extension of Comment Period

Director Salerno:

South Central Industrial Association (SCIA) represents more than 250 member companies with over 100,000 employees, many of whom are engaged in servicing the oil and gas operations in the U.S. Gulf of Mexico and around the world. We serve as the economic engine for the region, which is the hub for the offshore oil and gas industry in Louisiana.

We have reviewed the current published notice dated April 17, 2015 by the Bureau of Safety and Environmental Enforcement (BSEE) regarding proposed rulemaking (80FR 21504) including the requirements for Blow Out Preventer and Well Control. The significance of this new proposed rule is critically important to the well-being of industry. We understand that an in-depth industry analysis is needed in order to provide BSEE with comprehensive comments that will cover the wide-range of topics included in the proposed rule.

This important issue affects various entities of the oil and gas industry. Therefore, SCIA respectfully requests that BSEE issue an extension of an additional 120 days to the public comment period associated with the Notice of Proposed Rulemaking referenced above.

The State of Louisiana, our region and our organization are significant supporters of OCS activity in the Gulf of Mexico, which currently accounts for more than 16 percent of the Nation's oil production and about five percent of domestic natural gas production, resulting in annual federal revenues of over \$7.4 billion in 2014. Louisiana's oil and gas industry has a total annual economic impact to the state of over \$70 billion annually.

Our organization partners with organizations such as Louisiana Mid Continent Oil and Gas Association (LMOGA), Louisiana's longest standing trade association, exclusively representing all aspects of the oil and gas industry.

As you have been informed, LMOGA members are currently reviewing the proposed rule and collaborating with other trade associations such as ours to ensure that comments cover the wide range of topics in the areas of safety, efficiency and

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economics. We agree with the Agency's assessment that this rule "*represents one of the most substantial rulemakings in the history of the BSEE and its predecessor organizations.*" This is also validated by the fact that this rule took the Agency over four years to develop and another four months for the Office of Management and Budget to complete its procedural review required prior to its publication in the Federal Register.

Once again, we concur and reiterate the comments made by LMOGA. The proposed rule includes many new requirements, some of which require the development of new and advanced technology. Also, our initial review indicates that additional resources that do not yet exist may also be needed to implement this rule. Upon further review of the rule, industry will need to take into consideration that new technology, new systems and new resources will need to be developed and implemented.

Furthermore, an extension to the public comment period will benefit industry and the Agency alike. By granting an extension, industry will have the opportunity to provide the Agency with more thorough and well thought-out comments covering the vast number of new and comprehensive requirements affecting multiple systems critical to well control operations. It is our goal to collaborate with the Agency to develop a well control rule that further improves safe drilling in the Gulf of Mexico.

The offshore oil and gas industry in the Gulf of Mexico has proven to provide long-lasting and indisputable economic and energy security benefits not only to Louisiana, but also to the entire nation. It is to our advantage to remain committed to safe operations and environmental protection in the Gulf of Mexico.

We appreciate your consideration of our request for an extension of 120 days. In order to further plan our comments, we request your response. We look forward to hearing from you.

Sincerely,



Jane L. Arnette
SCIA Executive Director

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