

ROWAN COMPANIES PLC
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Thomas Burke
President and Chief Executive Officer

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4 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:

As Vice Chairman of the International Association of Drilling Contractors (IADC) and President and CEO of Rowan Companies, I support the IADC's request to extend 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.).

Rowan Companies plc ("Rowan") is a provider of global contract drilling services with a fleet of 34 offshore drilling units located around the world. We specialize in drilling high-pressure high-temperature (HPHT) and demanding wells, and currently have nine jack-ups and two recently constructed ultra-deepwater drillships in the U.S. Gulf of Mexico. Over the past four years, Rowan has invested \$3 billion in the construction of our four new drillships, all of which will be operating on the Outer Continental Shelf by year-end.

BSEE has acknowledged that the proposed rulemaking "represents one of the most substantial rulemakings in the history of the BSEE and its predecessor organizations." The standing 60-day comment period will not allow sufficient time for all members of the IADC, nor Rowan, to develop a considered response to the complex technological, scientific and commercial issues raised by this substantial proposal. Rowan stands with the IADC in requesting the comment period be extended by at least 120 days, *i.e.*, until at least 14 October 2015.

Rowan is working cooperatively with the IADC to consolidate industry comments and provide BSEE with comments in response to the proposed rule that can lead to a robust and cost-effective rule. For your reference, the attached letter from the IADC Vice President of Policy, Government and Regulatory Affairs describes the specific items our industry must consider and why we need an extension of the comment period.

I appreciate your consideration of this request. If you have any questions about this request, please contact me by phone at 713-960-5332 or by e-mail at tombur@rowancompanies.com.

I look forward to your favorable response to our request.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Burke', enclosed within a hand-drawn circular scribble.

Thomas Burke