



Alan Quintaro
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TRANSOCEAN OFFSHORE DEEPWATER DRILLING Inc
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Houston – May 1st 2015

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

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,

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 (80 FR 21504 et seq).

Transocean is a major international offshore drilling contractor and currently operates around 12 Deepwater mobile offshore drilling units in the areas subject to the jurisdiction of the United States. As such Transocean is the largest Deepwater MODU operator in the United States.

In the preamble to the proposed rule BSEE acknowledges that the proposed rulemaking “represents one of the most substantial rulemakings in the history of the BSEE and its predecessor organizations.” Transocean views the extension of the comment period as necessary to provide industry with the time to develop a considered response to the complex technological and commercial issues raised by this substantial proposal.

Transocean kindly requests an extension of at least 120 days of the comment period, i.e. allowing comments until at least the 14th of October 2015. The presently-provided 60-day comment period will not allow sufficient time to fully consider:

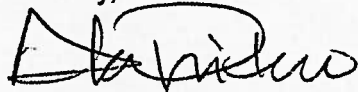
- The technical feasibility of implementing proposed modifications to the rig equipment and the time allocated for doing so, particularly in consideration of possible downtime outside of the equipment’s planned maintenance and repair cycle;

- Ascertain the merit of the proposed modification toward improving the safety of operations and protection of the environment, and propose potentially more effective and easier to implement solutions
- Possible overlapping demands for unplanned downtime which could be imposed by the U.S. Coast Guard through the implementation of its proposed Requirements for MODUs and Other Vessels Conducting OCS Activities with DP Systems [RIN 1625-AC16; USCG-2014-0063]; and 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]
- New and/or unanticipated regulatory obligations and liabilities for contractors which the rule might create, in consideration of BSEE's post-Macondo re-interpretation of 30 CFR 146(c)(3) and Interim Policy Document No. 12-17.

Transocean is working cooperatively with the trade associations in order 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. However, Transocean is mindful of the need to also develop a differentiated submission to the rulemaking docket to address Transocean's specific concerns.

Transocean appreciates your consideration of this request. If you have any questions, please contact me by phone at (832) 587-8596, or by e-mail at alan.quintero@deepwater.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan Quintero", written over a horizontal line.

Alan Quintero
Senior Vice President, Operations West