

From:
Chris D. Johnson
Director of Engineering
Drill Through Equipment

5/11/15

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

Subject: Well Control Rule Extension Request

To Whom it May Concern,

On April 17th, 2015, a proposed requirement for Blowout Preventer Systems and Well Control [RIN 1014-AA11; Docket No. BSEE-2015-0002] was published in the federal register with a 60 day comment period. The purpose of this letter is to request an extension of the comment period.

Given the complexity and somewhat ambiguous wording within this proposed rule, it will take much longer than 60 days to fully digest and develop reasonable alternative suggestions to wording within this rule. While the impact of the rule as it is currently written has yet to be fully evaluated, NOV believes it is fairly evident that several aspects of the rule may have significant economic and scheduling impacts on the industry without increasing overall safety.

In order to allow NOV and others in the industry to gain further understanding of the rule and its implications and to develop workable solutions to the proposed text, an extension of at least 120 days is requested. We believe this extended time period should allow adequate time for the industry to propose text that meets the rule's overall objectives without creating insurmountable problems for the industry as well as the overall economy.

Sincerely,



Chris D. Johnson