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May 14, 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

Via electronic submission to: <http://www.regulations.gov/>

Director Salerno:

ConocoPhillips Company (COP) requests an extension of an additional 120 days to the comment period associated with the Notice of Proposed Rulemaking referenced above. COP have conducted an initial review of the proposed rule change and are actively engaged in industry forums to respond to this rule making.

COP believe an extension is necessary to allow itself and the industry the necessary time needed to review, clarify and fully understand the technical complexity and time lines associated with some of the proposed rule changes. This will also provide the necessary time to respond on the additional queries BSEE have requested of the industry.

I am very encouraged to see how the industry has come together to review these proposed changes and therefore confident we can ensure the changes are sufficiently reviewed and the proposed intent to make the industry safer shall be met. However, with an integrated review, and the time line to complete such, we believe it shall require more than the initial 60 days comment period provided.

We therefore, respectfully request a response to our extension request of 120. In the meantime, COP are reviewing internally and with the industry to try and provide comments back within the initial 60day period, however, concerns exist that it may be insufficient to be an exhaustive review to fully comprehend some of the consequences of such rule changes.

Should you wish to discuss further or have questions, please feel free to contact me at 281-293-1756.


Yours Faithfully,

Glenn D Schaaf
Vice President of Global Wells and Marine
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