



## International Marine Contractors Association

*Improving performance in the marine contracting industry*  
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22 May 2015

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

Submitted electronically via <http://www.regulations.gov>

To whom it may concern,

### **Blowout Preventer Systems and Well Control, 1014-AA11 - Request for extension of comment period**

We are writing in support of the requests already submitted to BSEE for an extension of the comment period provided for the proposed rulemaking for Blowout Preventer Systems and Well Control, published on 17 April 2015 (80 FR 21504).

The International Marine Contractors Association (IMCA) is the international association representing offshore, marine and underwater engineering companies, with over a thousand members worldwide. IMCA members carry out the marine construction operations that support offshore exploration and production activities all over the world, including in the Gulf of Mexico. Our members own and operate primarily offshore construction support vessels, such as dive support, pipelaying and well intervention vessels, but also mobile offshore drilling units (MODUs) and offshore supply vessels.

While we expect that any IMCA comments on the proposed rule will focus on the specific provisions for remotely operated vehicles (ROVs), this is a significant rule making for the offshore exploration and production industry, and it is important that all the main stakeholders have sufficient time to complete a thorough review of these far reaching proposals.

IMCA therefore supports the requests made by other affected trade associations for the comment period to be extended by at least 120 days. To assist the consultation process, it would be greatly appreciated if BSEE could provide a timely response to this request.

Yours sincerely,

Emily Comyn  
Technical Adviser (Regulatory Affairs)