



INSTITUTE FOR 21ST CENTURY ENERGY
U.S. CHAMBER OF COMMERCE



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March 6, 2015

Via regulations.gov

BSEE
Attention: Regulations and Standards Branch
381 Elden Street, HE3314
Herndon, Virginia 20170-4817

Re: [Docket ID: BSEE-2013-0011]

Request for Extension of Comment Period on Bureau of Safety and Environmental Enforcement, 30 CFR Parts 250 and 254; Bureau of Ocean Energy Management, 30 CFR Part 550

Oil and Gas and Sulphur Operations on the Outer Continental Shelf—Requirements for Exploratory Drilling on the Arctic Outer Continental Shelf, RIN: 1082-AA00

API, the U.S. Chamber of Commerce's Institute for 21st Century Energy, and National Ocean Industries Association (NOIA) respectfully request that the Bureau of Safety and Environmental Enforcement (BSEE), and the Bureau of Ocean Energy Management (BOEM) extend the public comment period on the above-referenced proposed rules by a minimum of sixty (60) days beyond the currently scheduled public comment deadline.

API is a national trade association representing over 625 member companies involved in all aspects of the oil and natural gas industry. API's members include producers, refiners, suppliers, pipeline operators, and marine transporters, as well as service and supply companies that support all segments of the industry. API and its members are dedicated to meeting environmental requirements, while economically developing and supplying energy resources for consumers. API member companies are engaged in exploration and production for crude oil and natural gas in the Outer Continental Shelf (OCS) portions of the Beaufort and Chukchi Seas, and hold leases issued by BOEM in these areas.

The mission of the U.S. Chamber of Commerce's Institute for 21st Century Energy is to unify policymakers, regulators, business leaders, and the American public behind a common sense energy strategy to help keep America secure, prosperous, and clean. Through policy development, education, and advocacy, the Institute is building support for meaningful action at the local, state, national, and international levels. The U.S. Chamber of Commerce is the world's largest business federation

representing the interests of more than 3 million businesses of all sizes, sectors, and regions, as well as state and local chambers and industry associations.

NOIA represents more than 320 companies among all segments of the offshore industry with an interest in the exploration and production of both traditional and renewable energy resources on the nation's outer continental shelf (OCS). NOIA's mission is to secure reliable access and a fair regulatory and economic environment for the companies that develop the nation's valuable offshore energy resources in an environmentally responsible manner.

On February 24, 2015, BSEE and BOEM published notice in the Federal Register of a proposal to revise and add new requirements to regulations for exploratory drilling and related operations on the OCS seaward of the State of Alaska (Alaska OCS). 80 Fed. Reg. 9915 (February 24, 2015). The notice provides a 60-day public comment period, which currently closes on April 27, 2015.

The agencies' proposed rule evaluates and solicits comments on a variety of complex technological, scientific and commercial issues relating to exploratory drilling conducted by floating drilling vessels and jackup rigs and potential oil and gas operations on the Arctic OCS. Development of thoughtful comments in the time provided is clearly unachievable and is therefore inconsistent with the providing adequate or lawful public participation.

An additional confounding factor beyond the proposed agency action is that of the plans of the Secretary of Energy to release to the public March 27, 2015 a detailed technical and research study on oil and gas operations in the Arctic OCS. This study, prepared by the National Petroleum Council (NPC) at the request of the Secretary of Energy, is expressly intended to provide broad context on prudent development of energy resources in the Arctic OCS, and to provide information to inform government and industry planning for such operations. It is in the interest of the government and all who share an interest in safe and responsible oil and gas activities in the Arctic OCS to allow the public additional time to review the proposed rule, the NPC Arctic research study, and other relevant technical, scientific and policy information. Extending the public comment period for this proposed rule will serve the government's interest in receiving comments that will identify issues and offer recommendations to support the objective that Arctic OCS exploratory drilling operations are conducted in a safe and responsible manner that considers the unique conditions of the region.

API, the U.S. Chamber of Commerce's Institute for 21st Century Energy, and NOIA respectfully request that BSEE and BOEM extend the public comment period for at least an additional 60 days, or until no earlier than June 27, 2015. Thank you for considering this request.



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cc: Secretary of the Interior Sally Jewell

Director, Bureau of Safety and Environmental Enforcement Brian Salerno

Director, Bureau of Ocean Energy Management Abigail Ross Hopper