



April 29, 2015

**NATIONAL
OCEAN
INDUSTRIES
ASSOCIATION**

1120 G Street, NW
Suite 900
Washington, DC 20005
Tel 202-347-6900
Fax 202-347-8650
www.noia.org

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

Re: Blowout Preventer Systems and Well Control, 1014AA11; Request for extension of comment period

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

To whom it may concern:

The National Ocean Industries Association (NOIA) requests an extension of the comment period for the notice of proposed rulemaking (80 FR 21504) regarding the requirements for Blowout Preventer Systems and Well Control published by BSEE on April 17, 2015. NOIA believes a rule of such magnitude and importance warrants a more thorough review and more thoughtful evaluation than can be accomplished in the 60-day comment period currently allotted. We request that the comment period be extended by 120 days, until October 14, 2015.

NOIA is the only national trade association representing all segments of the offshore industry and more than 300 member companies with an interest in the exploration and production of both traditional and renewable offshore energy resources. 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.

As BSEE itself asserts, the proposed action represents one of the most substantial rulemakings in the history of the agency and its predecessors. The proposed rule solicits input on a variety of complex technological, scientific and commercial issues relating to exploratory oil and gas drilling and production operations on the OCS. Additionally, the proposed rule poses over 50 questions to industry on critical matters under consideration.

Sufficient time is required for a robust assessment of the potential safety, efficiency and economic impacts of the proposed rule as well as the impact and feasibility of implementation. Unintended consequences of this proposed rulemaking could be significant, thus thoughtful consideration of each element is required to help ensure the intent of the regulation is achieved. An extension is necessary to allow adequate time to conduct a review that leverages industry's expertise in each of the many areas touched by this proposed rule.

In addition to this proposed rulemaking, the Department of the Interior is also soliciting comments on the following proposals:

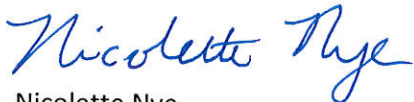
- Oil and Gas and Sulphur Operations on the Outer Continental Shelf—Requirements for Exploratory Drilling on the Arctic Outer Continental Shelf, RIN: 1082-AA00 (BSEE/BOEM)
- Oil and Gas Leasing; Royalty on Production, Rental Payments, Minimum Acceptable Bids, Bonding Requirements, and Civil Penalty Assessments, RIN 1004-AE41 (BLM)
- Consolidated Federal Oil & Gas and Federal & Indian Coal Valuation Reform, RIN 1012-AA13 (ONRR)

Soliciting comments simultaneously on all of these proposals has created an increased burden on industry resources to provide valuable feedback.

The industry is committed to safe operations and supports effective regulations that will improve the performance of blowout preventer systems and well control operations. NOIA intends to provide BSEE with highly meaningful and relevant comments that will significantly aid in creation of a robust and effective well control rule. We believe extending the public comment period for this proposed rule by 120 days will allow sufficient time for the industry to provide a well thought-out response and will serve the government's interest in receiving comments that will identify issues and offer recommendations to ensure safe and responsible offshore oil and natural gas development.

NOIA appreciates your consideration of this request. If you have any questions, please contact me at (202) 465-8464 or at nnye@noia.org.

Sincerely,



Nicolette Nye
Vice President Communications and Industry Affairs