



December 13, 2016

Submitted via www.regulations.gov

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

RE: Adjustment of Service Fees Relating to the Regulation of Oil, Gas, and Sulfur Activities on the Outer Continental Shelf, AA31

Docket ID: BSEE-2016-0003

RIN 1014-AA31

The National Ocean Industries Association (NOIA) joins the Offshore Operators Committee in respectfully requesting that the Bureau of Safety and Environmental Enforcement (BSEE) extend the 60-day comment period on the proposed Adjustments to Cost Recovery Fees Relating to the Regulation of Oil, Gas, and Sulfur Activities on the Outer Continental Shelf to 90 days.

NOIA is the only national trade association representing all segments of the offshore industry and roughly 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.

NOIA recognizes the Bureau's need to update its regulations as well as to regularly review its user charges in order to provide business critical services supporting oil and natural gas development; however, we would appreciate more time to review these proposed changes in order to provide informed, substantive feedback.

An extension of the comment period is justified given that in addition to the increases, some new fees are being proposed that did not previously exist. Further, BSEE indicated that "...cost recovery fees have not been adjusted since the 2006 and 2006 rulemakings establishing the fees..." which should also suggest that industry also be afforded an appropriate amount of time to review and comment on this revised fee structure. An additional 30 days is necessary to allow Industry to fully analyze the implications of the proposed changes and provide thorough and constructive feedback.

As you are aware, the Christmas and New Year holidays fall within the comment period for this rulemaking. This is traditionally a time when many of our members will be out of the office and away from their normal duties, which effectively shortens the time for thorough analysis and the development and vetting of meaningful comments.

We appreciate your consideration of this request for an extension. If you have any questions or if additional information is needed, please contact me at 202-347-6900 or rluthi@noia.org .

Sincerely,

A handwritten signature in cursive script that reads "Randall Luthi". The signature is written in black ink and is positioned above the printed name and title.

Randall Luthi
President