



September 2, 2014

Mr. Peter Meffert  
Office of Policy, Regulations and Analysis  
Bureau of Ocean Energy Management (BOEM)  
The U.S. Department of Interior  
381 Elden St.  
Herndon, VA. 20170-4817

RE: ANPR on Risk Management, Financial Assurance and Loss Prevention, BOEM-2013-0058

Dear Mr. Meffert:

The Independent Petroleum Association of America (IPAA) represents 9,000 independent oil and gas companies across the United States. Independent producers drill about 95 percent of American oil and natural gas wells, produce about 54 percent of American oil, and more than 85 percent of American natural gas. The National Ocean Industries Association (NOIA) is the only national trade association representing all segments of the offshore industry with an interest in the exploration and production of both traditional and renewable energy resources on the U.S. Outer Continental Shelf ("OCS"). The NOIA membership comprises more than 320 companies engaged in a variety of business activities, including production, drilling, engineering, marine and air transport, offshore construction, equipment manufacture and supply, telecommunications, finance and insurance, and renewable energy.

We reviewed BOEM's advance notice of proposed rulemaking seeking comments and information regarding the agency's effort to update its regulations and program oversight for the OCS financial assurance requirements. We would like to respond in a manner which takes into account the suggestions and concerns of the variety of our member companies affected by offshore activities. The suggested comment period posted on this rule only affords the public 60 days to make recommendations on this proposal. We are concerned that this abbreviated time period does not provide our members operating in the offshore enough time to fully analyze the 54 questions and provide feedback that may be of benefit to the agency.

As such, IPAA and NOIA respectfully request that the comment period for the supplemental notice be no less than an additional 90 days beyond the initial deadline. Further, we respectfully request a response to this request within 14 days of the publication in the Federal Register to ensure we are able to meet the comment deadline.

Thank you,

Dan Naatz  
Vice President, Federal Resources  
Independent Petroleum Association of America

Jeff Vorberger  
Vice President, Policy & Government Affairs  
National Ocean Industries Association