



October 20, 2015

Abigail R. Hopper, Director  
U.S. Department of the Interior  
Bureau of Ocean Energy Management  
1849 C Street  
Washington, DC 20240

Sent by email: [Abigail.hopper@boem.gov](mailto:Abigail.hopper@boem.gov)

Re: Request for Extension of Comment Period for BOEM's Risk Management/Financial Assurance Guidelines

Dear Ms. Hopper:

The American Petroleum Institute (API), the National Ocean Industries Association (NOIA), the Offshore Operators' Committee (OOC) and the Independent Petroleum Association of America (IPAA) respectfully request that the Bureau of Ocean Energy Management (BOEM) extend the 45 day period for comments on the proposed guidance that BOEM will use to determine a lessee's financial ability to carry out its obligations, primarily the decommissioning of OCS facilities, and the potential need for additional security posted on BOEM's website on September 22, 2015. We appreciate the opportunity to review the draft guidance and the workshop that BOEM held on October 9. After reviewing the proposal and hearing BOEM's presentation at the workshop, industry feels that 30 additional days are needed to fully analyze the potential impacts of the changes and to provide constructive feedback. Accordingly, we respectfully request that the deadline for comments on this proposed guidance be extended to December 6, 2016.

Our trade associations represent nearly all the companies operating in the Gulf of Mexico and the financial assurance criteria discussed in the proposed guidance documents have the potential to impact existing and future exploration and development opportunities. An extension of the comment period is justified given the complexity of the proposed guidance, the lack of finalized criteria for assessing a company's financial strength, the need to clarify of some of the provisions in the draft guidance, and the desire expressed at the workshop and subsequent discussions for BOEM to develop some example scenarios.

Continued discussion with BOEM, finalized financial criteria, and seeing some example scenarios will significantly enhance our efforts to review and comment on the proposed guidance. We therefore also request that the agency promptly provide finalized criteria and

example scenarios and decide on our request to grant an extension. Should you have any questions on this extension request please contact Andy Radford at (202) 682-8584 or by email at [radforda@api.org](mailto:radforda@api.org) or Dan Naatz at (202) 857- 4722 or by email at [dnaatz@ipaa.org](mailto:dnaatz@ipaa.org).

Sincerely,



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Andy Radford  
American Petroleum Institute



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Dan Naatz  
Independent Petroleum Association of America



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Jeff Vorberger  
National Ocean Industries Association



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Evan Zimmerman  
Offshore Operators Committee