



February 24, 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: Consumer Price Index Adjustments of the Oil Pollution Act of 1990 Limit of Liability for Offshore Facilities

Dear Mr. Meffert:

The Independent Petroleum Association of America (IPAA) represents 9,000 independent oil and gas companies across the United States. The National Ocean Industries Association (NOIA) represents 300 companies, which cover all facets of the domestic offshore energy and related industries. We have reviewed BOEM's proposal to administratively increase the limit of liability for damages applicable to offshore facilities under the Oil Pollution Act of 1990 from \$75 million to \$133.65 million, published in the Federal Register on February 21, 2014. The suggested comment period posted on this rule only affords the public 30 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 proposed change and provide comment on the impacts that the 78 percent increase will have on the insurance marketplace and their operations.

As you know, offshore oil and natural gas producers seek to ensure that development on the Outer Continental Shelf is conducted in a safe manner that protects the environment. The agency is attempting to nearly double the limit of the current cap, and we believe any such substantive changes demand thorough review.

As a result, 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. Thank you for your consideration, and we look forward to your expeditious response to this request within 14 days of the publication in the Federal Register to ensure we are able to meet the comment deadline.

Sincerely,

Dan Naatz  
Vice President, Federal Resources  
IPAA

Jeff Vorberger  
Vice President, Policy & Government Affairs  
NOIA