



August 29, 2013

Mr. Doug Morris
Chief of Offshore Regulatory Programs
Bureau of Safety and Environmental Enforcement
381 Elden St.
Herndon, Va. 20170

RE: 30CFR250, RIN 1014-AA10: Oil and Gas and Sulphur Operations on the Outer Continental Shelf — Oil and Gas Production Safety Systems

Dear Mr. Morris:

The Independent Petroleum Association of America (IPAA) represents 9,000 independent oil and gas companies across the United States. We have reviewed the Bureau of Safety and Environmental Enforcement's (BSEE) proposed amendments to BSEE's oil and gas production safety system regulations that were published in the Federal Register on August 22, 2013. 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 short time period does not provide independent offshore producers enough time to fully analyze the rule and provide comment on the impacts it will have on their operations.

As you know, safety is a primary goal of offshore energy production. Independent offshore oil and natural gas producers seek to ensure that development on the Outer Continental Shelf is conducted in a manner that protects the environment. While we realize that the agency is attempting to regulate advances in new technology, the proposed changes are both lengthy and complex. The new regulations impose requirements for safety pollution prevention equipment (SPPE) life cycle and reporting; foam firefighting systems; electronic based emergency shutdown systems (ESDs); valve closure timing valve leakage rates; boarding shutdown valves (BSDV); and equipment used for high temperature and high pressure wells. These revisions are not insignificant and will certainly have implications to both producing operations, as well as operations which may be planned or under construction and demand thorough review.

As a result, IPAA respectfully requests that the comment period for the supplemental notice be no less than an additional 120 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. If you have any questions, please contact me at IPAA at (202)857-4722.

Thank you,

Dan Naatz
Vice President, Federal Resources
IPAA