



International Association of  
Drilling Contractors  
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Department of the Interior  
Bureau of Safety and Environmental Enforcement  
Attention: Regulations and Standards Branch  
45600 Woodland Road  
Sterling, VA 20166

Via: <http://www.regulations.gov>

RE: Docket ID: BSEE–2016–0003; RIN 1014-AA31  
Adjustment of Service Fees Relating to the Regulation of Oil, Gas, and Sulfur Activities on the  
Outer Continental Shelf

To whom it may concern:

The International Association of Drilling Contractors (IADC) is a trade association representing the interests of drilling contractors, onshore and offshore, operating worldwide. Our membership includes all drilling contractors currently operating mobile offshore drilling units (MODUs) in the areas subject to the jurisdiction of the United States. Our comments are submitted without prejudice to any member's right to have or express different or opposing views.

On 17 November 2016, the Bureau of Safety and Environmental Enforcement (BSEE) published a notice of proposed rulemaking (81 FR 81033) proposing revisions to the the Cost Recovery regulations at 30 CFR 250.125(a) to create new fees for services and to adjustments to the existing fee schedule for BSEE-provided services relating to its regulation of oil, gas, and sulfur activities on the OCS.

We would express our support for the views presented jointly by the Offshore Operators Committee (OOC), the American Petroleum Institute (API), and the National Ocean Industries Association (NOIA) and concur with their suggestion that the proposed rule be withdrawn and reconsidered in its entirety. As contractors providing services to oil exploration and production companies, our members are not likely to be directly affected by the proposed revisions to the fee schedule; however, the additional costs will adversely impact investment in any already struggling sector of the industry.

Should you have any questions, please contact me by phone at (713) 292-1964, or by e-mail at [alan.spackman@iadc.org](mailto:alan.spackman@iadc.org).

Sincerely,

A handwritten signature in black ink that reads "Alan E. Spackman".

Alan E. Spackman  
Vice President, Policy, Government & Regulatory Affairs