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Director Michael Bromwich
Bureau of Ocean Energy Management, Regulation and Enforcement
US Department of Interior
Washington, DC 20240

Re: Commitments to Promote Safe Drilling Operations in the Deepwater Gulf of Mexico

Dear Director Bromwich:

In the aftermath of the *Deepwater Horizon* accident last year, BP Exploration & Production Inc. (BPXP) is committed to advancing and promoting safe and reliable deepwater drilling operations in the Gulf of Mexico.

As we have discussed with you and your colleagues at the Bureau of Ocean Energy Management, Regulation and Enforcement (BOEMRE or Bureau), BPXP intends to implement, on a voluntary basis, specific new performance standards applicable to its deepwater offshore drilling operations in the Gulf of Mexico. These new standards go beyond existing regulatory obligations.

BPXP will incorporate the voluntary performance standards in items 1 through 3 below, as applicable, in any future drilling permit application it submits, and BPXP will incorporate the voluntary performance standard in item 4 below, as applicable, in any proposed plan application it submits; otherwise, BOEMRE may determine that the application is incomplete and return it for resubmission by BPXP in order for BPXP to include the relevant performance standards. These voluntary performance standards, as applicable, will become conditions of operation, fully enforceable by BOEMRE, upon the approval by BOEMRE of any proposed plan or drilling permit application submitted by BPXP.

These voluntary performance standards will apply only to operations conducted on leases for which BPXP is the designated operator in the Gulf of Mexico. These voluntary performance standards will not apply to third parties to whom BPXP transfers operatorship for wells under normal commercial circumstances. It is not BPXP's intent to transfer operatorship for wells for the purpose of avoiding application of these voluntary performance standards.

Voluntary Performance Standards

1. BPXP will use, and will require its contractors involved in drilling operations to use, subsea blowout preventers (BOPs) equipped with no fewer than two blind shear rams and a casing shear ram on all drilling rigs under contract to BPXP for deepwater service operating in dynamic position mode. With respect to moored drilling rigs under contract to BPXP for deepwater drilling service using subsea BOPs, the subsea BOP will be equipped with two shear rams, which will include at least one blind shear ram and either an additional blind shear ram or a casing shear ram.
2. Each time a subsea BOP from a moored or dynamically positioned drilling rig is brought to the surface and testing and maintenance on the BOP are conducted, BPXP will require that a third party verify that the testing and maintenance of the BOP were performed in accordance with manufacturer recommendations and API RP 53.
3. BPXP will require that lab testing of cement slurries for primary cementing of casing and exposed hydrocarbon bearing zones relating to drilling operations of deepwater wells be conducted or witnessed by a BPXP engineer competent to evaluate such lab testing, or a competent third party independent of the cement provider. BPXP will provide lab results to the applicable BOEMRE field office within a reasonable period of time.
4. BPXP's Oil Spill Response Plan (OSRP) will include information about enhanced measures for responding to a spill in open water, near shore response and shoreline spill response based on lessons learned from the *Deepwater Horizon* oil spill. In complying with the requirements of 30 CFR 254 and related Notices to Lessees, BPXP's OSRP will include:
 - Provisions to maintain access to a supply of dispersant and fireproof boom for use in the event of an uncontrolled long-term blowout for the length of time required to drill a relief well.
 - Contingencies for maintaining an ongoing response for the length of time required to drill a relief well.
 - A description of the measures and equipment necessary to maximize the effectiveness and efficiency of the response equipment used to recover the discharge on the water's surface. The discussion must include methods to increase encounter rates, the use of vessel tracking, and the use of remote sensing technologies.
 - Information on remote sensing technology and equipment to be used to track oil slicks, including oil spill detection systems and remote thickness detection systems (such as X-band/infrared systems).
 - Information pertaining to the use of vessel tracking systems and communication systems between response vessels and spotter personnel.
 - A shoreline protection strategy that is consistent with applicable area contingency plans (ACP).
 - For operations using a subsea BOP or a surface BOP on a floating facility, a discussion regarding strategies and plans related to source abatement and control for blowouts from drilling.

If any of the voluntary performance standards identified in items 1 through 4 above is incorporated, in full or in part, in BOEMRE's regulations, or the regulations of BOEMRE's

successor agencies, that replace, supersede or modify the need for some or all of these standards, we will review the continued applicability of the performance standard with the Bureau.

Additional Voluntary Actions

In addition, BPXP will undertake the voluntary actions outlined in items A through F below in recognition of the significant resources available to BPXP in the Gulf of Mexico:

- A. BPXP has established a real-time drilling operations center in its Houston office. The center will be operational before BPXP begins drilling any new oil or gas wells in the Gulf of Mexico. BPXP will provide designated BOEMRE staff unlimited access to the center.
- B. BPXP will work to augment and improve industry response capabilities and technology in collaboration with groups such as Clean Gulf Associates (CGA) and Marine Spill Response Corporation (MSRC). As a member of MSRC, BP has committed to invest its proportionate share of funding, contributed BP-dedicated marine resources and encouraged other members of MSRC to invest in MSRC's capability expansion plan. BP also joined CGA and pushed for a coordinated plan to expand system capability with MSRC, both offshore and near shore. The approved MSRC and CGA expansion plans would create a three-fold increase in effective daily recovery capability by adding and upgrading skimming systems, relocating an additional MSRC responder to the Gulf Coast, converting five Platform Support Vessels to enable dual workboat/skimming service, converting five offshore barges to dual storage/skimming service, and adding three new fast response vessels and four shallow water skimming vessels to the inventories available to both MSRC and CGA. New technology, such as Xband/Infrared detection, is being used to enable nighttime skimming operations and improve encounter rate. In addition, substantial investments are being made to install fire boom systems and 7,000' of ocean boom on all MSRC responders to help contain and capture oil near the source. As a member of both organizations, BP will actively encourage and support additional investments in technology, training and people to continuously improve response capability and performance. BP also participated in a Joint Industry Task Force (JITF) led by API to assess the components of oil spill response, identify what worked and to address any deficiencies. BP supports and is actively involved in the API research and work program that has been developed to address the recommendations from the JITF assessment.
- C. BPXP has joined the Marine Well Containment Corporation (MWCC) and has made its relevant procedures, expertise and available equipment developed during the *Deepwater Horizon* accident available to industry through MWCC. BPXP has deployed approximately 50 staff to refurbish and transfer available equipment to MWCC. BPXP plans to complete the administrative transfer of the equipment to MWCC in the next few months, although the equipment is immediately ready if necessary to respond to an incident. In addition, BPXP will support the longer term staffing needs of MWCC by either seconding BPXP staff to MWCC or supporting MWCC's direct hiring efforts.
- D. BPXP will share its increased ROV and SIMOPS monitoring capabilities with industry and government through an industry workshop to be held by the end of this year. In addition, BPXP will make its SIMOPS monitoring site available upon request to the Unified Command and Responsible Parties in the event of a spill in the Gulf of Mexico. Longer term, BPXP will collaborate with the BOEMRE, the USCG and other agencies and industry work groups to share new learning regarding ROV and SIMOPS.

- E. BPXP will collaborate with BOEMRE, the Ocean Energy Safety Advisory Committee, the Center for Offshore Safety, and others in a joint technology development program to provide enhanced functionality, intervention, testing and activation of BOP systems, including acoustic and subsea communications capabilities.
- F. BPXP will increase its well control competencies through well control competency assessments of its employees and agents who have authority to act on BPXP's behalf in overseeing drilling operations on BPXP-operated facilities and drilling rigs. In addition, BPXP will use BPXP cement subject matter experts to review and approve cement designs for its operations. BPXP will develop and provide to BOEMRE a framework outlining BPXP's competency requirements for its cement subject matter experts.

BPXP will meet with the Bureau periodically to review the progress being made with respect to these additional voluntary actions and our ongoing commitments to promote safe drilling operations in the deepwater Gulf of Mexico.

Yours very truly,

A handwritten signature in black ink, appearing to be 'A. Salazar', written in a cursive style.

cc: Secretary Salazar
Deputy Secretary Hayes