

Peter Evans

VP Subsurface, Gulf of America & Canada



bp America Inc.
501 Westlake Park Boulevard
Houston, Texas 77079

September 12, 2025

Department of Interior
Bureau of Safety and Environmental Enforcement
Regulations and Standards Branch
45600 Woodland Road
Sterling, Virginia 20166

Subject: RIN 1014-AA68; Offshore Downhole Commingling Regulatory Updates; 90
Fed. Ref. 38935

Via Rulemaking Portal: <http://www.regulations.gov>; (Docket ID: BSEE-2025-0134)

bp America appreciates the opportunity to provide comments on the Bureau of Safety and Environmental Enforcement's (BSEE) direct final rule to revise the Outer Continental Shelf downhole commingling regulations consistent with Section 50102 of Public Law 119-21, the recently enacted tax law.

The US is at the heart of bp's strategy. We have roots in this country that go back more than 150 years. All bp's major businesses are active in the US, where we employ over 30,000 people and invested more than 40 percent of our global capital expenditures in 2024. bp aims to remain one of the US's top energy producers.

The Gulf of America will be a key part of this effort. Last year, bp produced 341,000 barrels of oil equivalent per day (net) and was the second-largest producer in the Gulf of America. bp currently has five operated platforms and has recently sanctioned a sixth hub, Kaskida, which will feature a new floating production platform with the capacity to produce 80,000 barrels of crude oil per day once in operation. Kaskida represents bp's first step of unlocking around 10 billion barrels of discovered resources in the Paleogene.

We're building capacity in the region to produce more than 400,000 barrels of oil equivalent per day by 2030. In support of growing production, we have also just brought online the Argos Southwest Extension project, adding 20,000 barrels of oil equivalent per day (gross peak annualized average production) and will bring online two additional expansion projects at our Atlantis platform by 2027.

The Gulf of America has been a cornerstone of US energy production for many years, and it remains a critical part of bp's global strategy, both today and tomorrow. As we

continue to innovate and invest in this region, we remain committed to enhancing energy security, driving technological advancements and contributing to the US economy.

bp supports the implementation of revisions to BSEE's downhole commingling regulations via direct final rule (DFR). The revisions included in the recently enacted tax law, and implemented through this DFR, reflect enhanced understanding of downhole commingling practices in the Gulf of America.

Downhole commingling facilitates optimal recovery from the reservoirs under our operation while reducing the number of wells necessary for asset development, thereby reducing safety risks and environmental impacts.

We believe implementation of these revisions to BSEE's downhole commingling regulations via DFR will be another important step forward for energy production in the Gulf of America. We look forward to working with BSEE to continue to improve and advance offshore safety and permitting for oil and gas production in the Gulf of America.

Sincerely,

/s/ Peter Evans

Peter Evans
Vice President of Subsurface
Gulf of America & Canada