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Director Brian Salerno
Bureau of Safety and Environmental Enforcement
Department of the Interior
1849 C Street, NW
Washington, DC 20240

Dear Director Salerno,

Thank you for your recent letter regarding industry equipment and safety and for providing me an opportunity to further update your office on our ongoing action on these issues since our last letter, on December 1, 2014 (attached).

Over the last year, API and industry have worked with your team, outside experts and stakeholders through our ANSI-accredited, standards-setting process to achieve the goals identified in BSEE's QC-FIT Report 2014-01. API hosted BSEE at a Technical Session at our January 2015 Winter Standards Meeting to foster the important dialogue between industry and the government. We formed a multi-segment task group to review your report, industry standards and practices, and relevant research and data associated with the use of connectors and bolts in subsea operations, and to identify the critical gaps for improving standards, practices and operations. We understand BSEE will issue an addendum to the above referenced report. This information will afford an opportunity to further validate our industry action plans. This past June, API published API Specification 20F, *Corrosion Resistant Bolting for Use in the Petroleum and Natural Gas Industries* (1st Edition), which is specifically designed to assist users in mitigating against risks associated with bolt use in operations, including subsea development. As with all our standards, API will continue to work with government regulators and others to monitor and evaluate additional action as appropriate.

Safety is a core value for our industry and our heightened awareness of subsea applications extends far beyond the activity of the past year. In addition to the technical standards work of API, the Center of Offshore Safety (COS), which was established in 2011 to promote the highest level of safety in offshore operations, has implemented a first-of-its-kind safety and environmental management system for our industry, using third-party auditors to certify operations against API Standard RP75, *Development of a Safety and Environmental Management Program for Offshore Operations and Facilities* (3rd Edition). Data Collection, Good Practices Sharing, Outreach and Education are additional key activities of the COS.

We appreciate your already confirmed participation at our semi-annual COS External Stakeholder Meeting on February 12, 2016, and I am ready to meet with you and your staff at your earliest convenience to discuss our shared objective of safe operations.

Best Regards,

Jack N. Gerard
President & CEO