



R. M. Johnnie Burton, Director
Minerals Management Service
Attention: Rules Processing Team (RPT)
381 Elden Street, MS-4024
Herndon, Virginia 20170-4817

Dear Ms. Burton:

We write to offer our comments on the proposed rulemaking for OCS Safety and environmental Systems (SEMS). For your reference, the Acadiana Safety Association was formed in Lafayette, LA in 1960 and has served as an occupational safety training source for the oil & gas industry since the 1970's. We have over 350 member companies. Ours is a non-profit association governed by a voluntary board of directors. Additional information can be found on our website at www.acadianasafety.org

As pointed out in the Regulatory Background of the Advanced Notice of Proposed Rulemaking, the operator conducting operations on the OCS is directly responsible for managing the performance of those operations safely and insuring they prevent damage to the environment. Many of our members are the contractors and subcontractors who then become subject to the directives and requirements of the several operators they may serve in the field. We note at least 120 different operators listed on the MMS website. One of the biggest burdens our members face, and a significant impediment to successful compliance in our opinion, is the variety of directives our members receive from these operators and the numerous formats for responding to them. While all of these operators aim at the same basic goals of safe and clean operations, each has a unique approach to achieving compliance, and the contractors, who we believe represent the greatest numbers in the workforce, have difficulty satisfying any more than one.

With this in mind, we suggest that the MMS not move away from prescriptive regulations, as that would allow for greater interpretation. We also ask that the MMS not segregate operators for different regulatory treatment, as we believe this would further vary the contractor requirements. If at all possible, we would ask the MMS to consider the possibility that it might find a way to standardize requirements for the contractors so that they may confidently support OCS operators in a safe, clean, and more efficient manner.

The Acadiana Safety Association is available to participate in a public workshop or any other forum as part of the rulemaking process. Please let us know how we can help.

Sincerely,

Andre' Comeaux, CPCU, CSP
Acadiana Safety Association Board President

Serving Our Community and Industry Since 1960