



# TECHNICAL RESOURCE SERVICES

September 1, 2009

Department of the Interior  
Minerals Management Service  
Att: Regulations & Standards Branch (RSB)  
381 Elden St.  
MS-4024  
Herndon, VA 20170-4817

RE: Safety & Environmental Management Systems for OCS Oil & Gas Operations 1010-AD15

The following represents comments regarding the Proposed Rules for 30 CFR Part 250; RIN 1010-AD15.

Background: I am an owner of a professional safety consulting & training corporation primarily serving the oil & gas exploration & production industry since 1992. I am a Certified Safety Professional # 14429 with 21 years directly in the field of safety (having been a safety director for a large oilfield service company prior to owning TRS). I have a BA degree from the University of Southwestern Louisiana. I started in the oilfield in 1972, working wireline, production operator jobs, lift boat & crane operator positions.

Overall, I am in support of the proposed rule concerning Subpart S- SEMS. I feel the burdens to industry are extremely insignificant when compared to the benefits that this regulation will create for the industry, individual workers and the Nation. I agree with the MMS assumptions that this rule will greatly improve safety of all personnel; minimize pollution to the environment; decrease operational & insurance costs on operators and ultimately lower energy costs.

When one reviews the 4 basic elements as required under this proposed rule many of the additional elements found in API RP 75 will be incorporated by compliance with the proposed regulation. Therefore I feel that the MMS should adopt into this regulation the entire API 75 standard as many operators are following that standard anyway.

The area of concern that I have with the proposed rule is that it does not incorporate per se the API RP 75 section on training which I feel is critical in helping to improve the safety & pollution prevention in the OCS and meeting the goals of the SEMS. In addition the MMS should consider ensuring OCS personnel are properly trained by requiring accredited training courses (ie. IADC; API Training Provider Certification Programs; SAFEGULF, etc) to be delivered. Prescriptive as well as performance based training must be utilized to ensure competency of OCS workers in performing their job safely as well as efficiently.

Safely Yours,

*Neil Collins*

Neil Collins, CSP #14429

President- TRS