



TECHNICAL RESOURCE SERVICES

October 17, 2008

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

RE: Technical Changes to Production Measurement and Training Requirements 1010-AD50

This is a comment submitted to the MMS regarding proposed rule RIN 1010-AD50 as referenced above.

Technical Resource Services Inc. (TRS) has been a professional safety training provider to the oil and gas industry since 1991. TRS was initially an approved MMS training provider when the MMS was involved in the T2 accreditation process. Whenever the MMS decided to relinquish the accreditation process TRS applied for & received accreditation under the API Training Provider Certification Program becoming one of the first in the industry to receive that distinction. TRS has trained thousands in Production Safety Systems training through the years.

Specifically TRS offers the following comments regarding 250.1500 Definitions:

Contractor- TRS recommends this inclusion into 30 CFR Part 250. This definition will require all personnel performing production field work to be competent in performing their duties. This will improve safety as well as provide for more efficient operations thus conserving the Nation's natural resources as well as lowering fuel costs which is the backbone of this Nation's economy.

Periodic- TRS feels it is important that personnel be periodically trained & assessed of their competency in performing their duties. Subpart O Plans written by TRS for clients always have included this periodic training & assessment requirement. This should be an MMS auditable item.

Production safety- TRS recognizes the importance of a worker understanding the overall production process as it has always been a course topic when providing PSST. TRS also understands the importance that personnel must be trained & assessed regarding specific duties in separation, dehydration, compression, sweetening and metering. TRS has

created specific training courses that will concentrate on providing training & assessment in those specific topics. This will greatly improve safety as well as efficiency in production operations. With a major problem in the industry being inexperienced personnel this will help meet America's needs for a trained effective work force providing energy for our nation needs.

TRS has always appreciated the services provided by the MMS and looks forward to continue working with the MMS and industry to improve safety and efficiency in meeting America's energy needs. TRS requests further emphasis by the MMS on the importance of the following training which should be required for appropriate personnel: Water Survival/Helicopter Underwater Escape Training; Incipient Fire Fighting; Fall Protection; Hazardous Waste Operations and Emergency Response; Crane Operator & Rigger; First Aid/CPR & Safety Orientation Training . Should you have any questions regarding these comments please contact me @ 337-837-4519 or trssafety@cs.com.

Safely Yours



Neil Collins, Certified Safety Professional
President- TRS