



To: Worksafe BC
May 21 2008

Proposed Amendments for Part 14: Cranes and Hoists in the Occupational Health and Safety Regulation
Equipment Operation

Operator's duties 14.37.1

"The operator of a crane, hoist or Boom truck must have full control of the equipment controls whenever the hoisting equipment is in use, and engaged in no other duties while operating the equipment."

This proposed regulatory change causes concerns in the use of cranes in some oilfield services:

- The operators of the boom truck have other duties that they complete during the operation while not operating the boom truck/crane controls
- Wireline services where a boom truck is used:
 - For equipment rig up
 - To support a shive (pulley) for to allow the wireline to be ran in to the wellbore
 - The well control and deployment equipment is affixed to and supported by the well head
- Coil Tubing services where a boom truck or crane is used to:
 - For equipment rig up and
 - To provide supplemental support and stabilization during operations.
 - The equipment is affixed to and supported by the well head
 - The equipment is secured from movement in all four directions by specialized chains
 - The crane is used to provide additional stabilizing by raising the crane blocks in to a position of tension (taking part of the weight of the equipment affixed to the wellhead).

The concerns with the changes in draft are:

1. The proposed change would require an operator to be in a potentially hazardous area continuously when only intermittent access is normally required. This includes being in close proximity to:
 - a. The wellhead
 - b. Potential H₂S area
 - c. High pressure lines during operations
 - d. Coil tubing services are performed in live well conditions.
2. This could create additional risks due to the operator sitting at the controls with no activities to be performed. The operator could unintentionally activate a control causing damage to operational and or well control equipment.
3. This would require an operator to be at the boom truck/crane controls when there is no reason to be there
4. It should be noted that the great majority of the operation where the operator is required to be at the controls of the boom truck/crane is carried out when the master valve is closed, thus the well is isolated resulting in a reduced hazard state.

Sincerely
Doug Smith
Field Safety Manager
BJ Services Company Canada
403 531 5210 cell 403 505 6952

Subject: FW: 14.2 BJ Services Company Canada - Doug Smith

-----Original Message-----

From: WorkSafeBC [mailto:prevweb@worksafebc.com]
Sent: Wednesday, May 21, 2008 1:30 PM
To: dosmith@bjsservices.ca
Subject: 14.2 BJ Services Company Canada - Doug Smith

Your submission has been received.

Submission ID: POB.WS6.CZ2.MK6

Part 14: Cranes and Hoists, relating to operators duties

1. Name: Doug Smith CRSP

- (a) Feedback is provided: on behalf of
Organization: BJ Services Company Canada
- (b) Feedback is provided: from an employer's perspective

2. E-mail: dosmith@bjsservices.ca

3. Feedback:

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Comments:

The change works during operations where components are being assembled or hoisted but is not suitable for some parts of Coil Tubing & Wire line operation in the Oil & Gas Industry

4. Please indicate your level of support of the proposed amendments:generally disagree

5. If you agree or disagree with the proposed amendments, please provide reason(s):

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