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June 13, 2008

Roberta Ellis  
Vice President  
Work Safe BC  
PO Box 5350 Stn Terminal  
Vancouver, BC  
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**Re: Proposed amendments to the Part 23 of OH&S Regulation**

This is a formal response to the Public Hearing held in Fort St. John on June 10, 2008 from Scott Ebert, president of Northern Snubbing Inc. I have been working with completions and workovers in the oil industry since 1984.

On behalf of Northern Snubbing Inc., I would like to bring to your attention the following:

We agree to put Snubbing Unit under the definition of "Rig".

We agree with adoption of IRP 15 and referencing this recommended practice in the BC OH&S Code as a universal standard for the snubbing industry.

We disagree with proposed Section 23.39 – Emergency Escape Systems, as it applies to Snubbing Units. We can not follow the rig's requirements on this policy. To follow the requirements of a rig means that at least one of our workers would have to cross a potentially dangerous area in order to reach safety. A few years back, rigs were required to change the escape line to the back of the raised working platform (monkey board and rod basket). This was a good change because the men didn't have to cross the area of the well blowing to get to the escape system.

Different services within the oil industry are highly specialized. In many cases, one policy can not be applied across the board.

At the meeting, one person proposed to phase out t-bars / Geronimos from rigs and slide poles from snubbing units. I believe that this person's opinion is not taking into account the safety of snubbing personnel.

On a snubbing unit, we have two slide poles, one on each side of the working platform. Therefore, both workers can get away from any hazard quickly and safely. This existing escape route is the safest and the most efficient way to get our workers away from hazards at their working level.

Our personnel are trained to use the slide pole not only through internal training and practicing, but also under the supervision of a qualified instructor at the Fort St. John's Fire Department. Northern Snubbing has been going for over 4 years and we have had no incidents in regards to using the slide pole. Our workers also agree to keep slide poles in effect as means of escape for their safety.

In Alberta, OH&S has allowed slide poles on snubbing units to remain the same. PSAC members, who have helped to develop IRP 15, all agree that the slide pole is the most efficient and safest means of escape from hazards on the snubbing work platform.

Sincerely,

Scott Ebert  
President  
Northern Snubbing Inc.

Copy: Anne Burch, BSc, MPA  
Director, Prevention Policy