



June 13, 2008

WorkSafe BC  
PO Box 5350 Stn Terminal  
VANCOUVER BC V6Y 3T6

**Attention: Anne Burch**

Dear Ms. Burch

### **Proposed Changes to BC OH & S Legislation**

I have been asked to write as a follow up to a presentation made by our member company BJ Services at the public hearings held by WorkSafe BC in Fort St. John on June 10, 2008

The presentation dealt with concerns our industry has with the changes being proposed for Section 14.37.1 and specifically the requirement for the operator of a crane or hoist or boom truck to "have full control of the equipment controls whenever the hoisting equipment is in use, and engaged in no other duties while operating the equipment".

We are concerned that this requirement could place the operators of this equipment at risk especially when they are operating in H<sub>2</sub>S environments. The hoisting equipment is used to lift equipment such as coil tubing into place and as a weight control and to steady the coil tubing and other equipment. By requiring the operator to remain at the controls of the hoisting equipment we could be exposing them to risk from hazards associated with high-pressure equipment, wireline equipment, etc.

We are asking WorkSafe to reconsider this proposal and if necessary to exempt our industry from the proposed requirement.

Please contact me if you have any questions.

Yours truly,

**PETROLEUM SERVICES ASSOCIATION OF CANADA**

A handwritten signature in black ink, appearing to read "Delaney", is written over a horizontal line.

Patrick J. Delaney, CRSP  
Vice President, Health, Safety and Government Relations