

***An independent voice for Wyoming people***



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September 26, 2012

Wyoming OSHA Commission  
Attn: Rule Changes  
1510 East Pershing Blvd., West Wing  
Cheyenne, WY 82002

Dear OSHA Commission members:

On behalf of the Equality State Policy Center and its member organizations, and the Wyoming State AFL-CIO, I write to support the proposals to amend and update the state Occupational Health and Safety Rules and Regulations for Oil and Gas Well Drilling. We congratulate you for advancing rules to protect oil and gas workers that go beyond federal OSHA standards. The state truly can set the pace nationally by taking these steps.

More specifically, we support language changes to Chapter 4 requiring employees to wear flame resistant clothing, while on a rig, that meets the requirements of the "current edition" of the NFPA 2112 and 2113 standards for flame-resistant clothing. This provision means our state OSHA standards will not "get stuck in time" and instead will reflect improvements whenever industry experts update the NFPA standard on flame-resistant clothing.

We likewise support the proposed rule change to Chapter 6 requiring emergency shut-down devices on all diesel engines operated on a drilling rig.

Thank you for this opportunity to comment. We agree that these improved standards will help employers better understand their obligations, follow industry best practices, and promote safety and health of their workers. Each step the state can take to improve these rules means Wyoming workers are more likely to return home safe and sound from their jobs.

Sincerely,

A handwritten signature in cursive script that reads "Dan Neal".

Dan Neal

Executive director