cc: AB/R 9/13/81 V.H.
KWC
R&B
JAW

DRILLING SPECIALTIES COMPANY
BARTLESVILLE, OKLAHOMA 74004

918 661-5400
918 661-6155
918 661-5333

TELEX 49-2455
TWX 910 841-2563

PLAINTIFF'S EXHIBIT

UC-3889

September 10, 1981

Asbestos-Const-Std
Sh-96-81

Mr. Thorne Auchter
Assistant Secretary for Occupational
Safety and Health
Department of Labor
200 Constitution Avenue, N.W.
Room S2315
Washington, D.C. 20210

Dear Mr. Auchter:

Since the early 1960's, asbestos fiber (chrysotile) has been used as an additive to oil well drilling muds. The major reason for its use in this application is that it allows wells to be drilled faster and more economically. Today, in light of our energy crisis, the increasing price of oil and the unfavorable balance of trade caused in part by large imports of foreign oil, the need for effective drilling mud additives has become even more important.

Yet, the continued use of asbestos in this important application is jeopardized by a single, overly-broad asbestos standard. The current OSHA asbestos standard (29 CFR 1910.1001) is apparently tailored to worker protection at the more traditional, enclosed and fixed worksites where potential exposures are greater than at drilling sites.

Drilling Specialties Company has been mindful of the health and safety of workers using drilling mud asbestos (DMA). Accordingly, and guided by OSHA Standard 1910.1001 (c)(2) (which recognizes wetting as an acceptable method of controlling asbestos dust), Drilling Specialties has previously developed a method of formulating its product (Flosal® DMA) with water, so that the release of any asbestos fibers is greatly reduced. The success of this method has been evaluated by on-site monitoring for asbestos fibers at numerous drilling sites where Flosal® DMA was being used. Filters from these tests were sent to an independent laboratory for counting. The results of this monitoring showed that exposures to airborne asbestos during the use of Flosal® DMA were consistently below the OSHA mandated PEL of 2 f/cc and, in fact, did not exceed 0.1 f/cc on an 8-hr time-weighted average (TWA).

Although there are no suitable substitutes for asbestos in many drilling mud formulations, many drilling contractors and operators are reluctant to use any asbestos fiber because they are afraid of being cited for not complying with the OSHA asbestos standard. Because of the transient nature of the work force, the relatively short time spent at each drilling location and the low potential exposures, the medical examinations, monitoring and record-keeping requirements in the OSHA asbestos standard are unnecessary and impractical, if not impossible.

A08594

UCC 013843