

# APPLICATION FOR LICENSE TO EXPORT NUCLEAR MATERIAL AND EQUIPMENT

(See Instructions on Reverse)

Estimated burden per response to comply with this mandatory collection request: 2.4 hours. This submittal is reviewed to ensure that the applicable statutory, regulatory, and policy considerations are satisfied. Send comments regarding burden estimate to the Records Management Branch (T-6 E6), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by Internet e-mail to [infocollect@nrc.gov](mailto:infocollect@nrc.gov), and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0027), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

1. APPLICANT'S USE		a. DATE OF APPLICATION 10/04/2005		b. APPLICANT'S REFERENCE MultiCountry License		2. NRC USE		a. DOCKET NUMBER		b. LICENSE NUMBER CBP0001	
3. APPLICANT'S NAME AND ADDRESS						4. SUPPLIER'S NAME AND ADDRESS (Complete if applicant is not supplier)					
a. NAME PRECISION ENERGY SERVICES, INC.(A Weatherford Co.)						a. NAME SAME					
b. STREET ADDRESS (Facility Site) 500 WINSOTT ROAD						b. STREET ADDRESS					
c. CITY FORT WORTH			d. STATE TX		e. ZIP CODE 76126		c. CITY jeff.pettigrew@precision-es.com			e. ZIP CODE	
f. TELEPHONE NUMBER (281) 260-5619		g. FAX (832) 615-3403		h. E-MAIL SEE RIGHT		c. CITY		d. STATE		e. ZIP CODE	
5. FIRST SHIPMENT SCHEDULED 12/29/2005		6. FINAL SHIPMENT SCHEDULED 12/31/2015		7. APPLICANT'S CONTRACTUAL DELIVERY DATE 01/02/2006		8. PROPOSED LICENSE EXPIRATION DATE 12/31/2015		9. CONTRACT NO. VARIOUS			
10. ULTIMATE FOREIGN CONSIGNEE						11. ULTIMATE END USE (Include plant or facility name) WELL LOGGING OF VARIOUS OIL & GAS WELLS WORLDWIDE. SEE ATTACHED LETTER WITH LIST OF COUNTRIES					
a. NAME PRECISION ENERGY SERVICES, INC. (AFFILIATES)						11a. DATE REQUIRED					
b. STREET ADDRESS (Facility Site) VARIOUS - SEE ATTACHED LETTER						12. INTERMEDIATE FOREIGN CONSIGNEE					
c. CITY VARIOUS						d. COUNTRY VARIOUS					
12. INTERMEDIATE FOREIGN CONSIGNEE						13. INTERMEDIATE END USE					
a. NAME						13a. DATE REQUIRED					
b. STREET ADDRESS (Facility Site)						14. INTERMEDIATE FOREIGN CONSIGNEE					
c. CITY						d. COUNTRY					
14. INTERMEDIATE FOREIGN CONSIGNEE						15. INTERMEDIATE END USE					
a. NAME						15a. DATE REQUIRED					
b. STREET ADDRESS (Facility Site)						16. COM CODE					
c. CITY						d. COUNTRY					
17. DESCRIPTION (Include chemical and physical form of nuclear material; give dollar value of nuclear equipment and components)						18. MAX. ELEMENT WEIGHT		19. MAX. WT. %		20. MAX. ISOTOPE WEIGHT	
Various radioactive material used in oil & gas well logging operations within 10 CFR 110, Appendix P, Category 2 limits requiring a specific import or export license.										21. SIGNATURE JIP	
22. FOREIGN OBLIGATIONS BY COUNTRY AND PERCENTAGE (Use separate sheet if necessary)											
23. ADDITIONAL INFORMATION ON CONSIGNEES, END USES, AND PRODUCT DESCRIPTION (Use separate sheet if necessary)											
24. The applicant certifies that this application is prepared in conformity with Title 10, Code of Federal Regulations; and that all information in this application is correct to the best of his/her knowledge.											
25. AUTHORIZED OFFICIAL						a. SIGNATURE Jeffrey S. Pettigrew					
						b. TITLE U.S. RADIATION SAFETY OFFICER					



October 4, 2005

Margaret M. Doane  
Deputy Director  
Office of International Programs  
U.S. Nuclear Regulatory Commission  
11555 Rockville Pike  
OWFN Mail Stop 4 E21  
Rockville, Maryland 20852-2738

Re: Import/Export License Application for Multiple Countries Pursuant to 10 CFR 110

Dear Ms. Doane,

Precision Energy Services, Inc. (Precision), a subsidiary of Weatherford International Ltd.<sup>1</sup>, wishes to apply for a multi-country export and import specific license in anticipation of the new requirements of 10 CFR Part 110, taking effect December 28, 2005, as specified in the July 1, 2005 Federal Register. This license is intended to include any radioactive material shipments listed in Appendix P to Part 110 that meet or exceed the import and export threshold limits, but typically Americium-241/Beryllium, in quantities exceeding [REDACTED] per shipment. Any such shipments will fall within Category 2 of Appendix P. The requested time interval for this license is 10 years.

Precision (formerly Computalog USA, Inc.) provides energy services, including well logging, around the world. Precision is licensed to use and possess radioactive materials by the NRC under Materials License 42-26891-01 and Texas DSHS Radiation Control Radioactive Material License L00747, and various other Agreement State licenses. In addition, Precision has been issued several export licenses by NRC OIP in the recent past, including XB001304, XB001305, and XB001306 for radioactive material to be exported to India and XB13011 for export to Libya. In all cases the byproduct material was exported to foreign affiliates of Precision for their specific use in performing well logging services.

In applying for this new broad specific license, Precision asserts the following:

- 1) All exports and imports of byproduct material requiring a specific license under the new requirements of 10 CFR Part 110 will only be made to or from foreign affiliates which are legal entities of the parent company. No sales to 3<sup>rd</sup> party persons that are non-affiliates with Precision (Weatherford) will be made under this license application.
- 2) All imports and exports will not be inimical to the common defense and security of the United States.

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<sup>1</sup> On September 1, 2005 Precision Energy Services, Inc. was acquired by Weatherford International Ltd. from Precision Drilling Corporation.

- 3) For all sealed sources containing Americium-241, quantities will not exceed [REDACTED] per year to or from any one country, except for the United Kingdom or Canada which may be up to [REDACTED] in a calendar year.
- 4) Precision will only export or import radioactive material if the applicable US license(s) that authorize the possession of said radioactive material are current or in timely renewal status.
- 5) Precision is currently in contact with the DOE NNSA and working towards implementing improved physical security measures, as warranted, at our international locations.
- 6) When exporting from the USA, written permission will be obtained from the Competent Authority of the destination country as listed in the IAEA National Competent Authority List (NCAL) in the form of a license, permit, or "No Objection Certificate" (NOC) as applicable as specified in 10 CFR 10.32(h). For countries, where no such Competent Authority is listed, assistance from NRC OIP will be requested in advance.
- 7) Notifications of imports and exports will be made to NRC as specified by 10 CFR 110 and any specified license conditions.
- 8) The annual report as specified in 10 CFR 110.23(b) will be filed for all Americium-241 exports.

It is essential that NRC OIP, the Executive Branch and the Commissioners understand that these exports of radioactive material are not sold to persons in the destination countries and are only used in conjunction with providing well logging services in these countries.

It is essential that this license application include import, as well as export, privileges not otherwise granted by general license, as the expeditious and unimpeded return of disused sources to the USA is paramount to their security. This is in keeping with NRC's own adoption (RIN 3150-AD36) of the previous IAEA recommendations regarding disused sources as stated in the Federal Register, Vol. 60, No. 140, published Friday, July 21, 1995, Page 37556-37565:

*"These types of transfers help to ensure that the materials are handled responsibly and not left in dispersed and perhaps unregulated locations around the world, and therefore they should not be subject to specific licensing if the radioactive material involved would not otherwise be subject to such licensing."*

We are enclosing a check in the amount of \$12,800, that being the amount specified for in 10 CFR 170.31, Category 15. A., if Executive Branch and Commission review is required. A check (No. 577684) dated September 29, 2005 for this amount is enclosed if review beyond staff level is required. We respectfully request that the licensing action approval process not be delayed, if attempting to approve all the requested countries at one time would prevent issuance of the license before December 28, 2005. We request that approval of as many countries as is possible, especially Canada, Mexico, UK and European countries, be granted and a license issued before December 28, 2005, the deadline of when the new rules take affect. Other countries can be added as the review process completes for each country.

Attached is a list of countries in which Precision either has a current business presence or plans to have a business presence in the foreseeable future. An address has been provided for those countries

in which we have a current business presence. The address shown within a particular country is not intended to be an exhaustive listing of all possible affiliate locations, as there may be multiple business locations within a particular country. Due to the dynamic nature of our industry, it should be noted that these addresses may change within the time period the license is active. The specific "ship to" addresses will be shown on the required advance notifications to NRC Operations Center as specified in 10 CFR 110.50.

If you have any questions related to this matter, please do not hesitate to contact me. My contact information can be found below.

Regards,



Jeffrey S. Pettigrew  
US Radiation Safety Officer  
Precision Energy Services, Inc.

Attachments:  
Import/Export Country List  
NRC Form 7

IMPORT/EXPORT COUNTRIES

Americas

Canada

Mexico

Venezuela

Columbia

Trinidad

Argentina

Paraguay

Europe/Africa

United Kingdom (England, Scotland, etc.)

Norway

Denmark

Netherlands

Poland

Bulgaria

Russia

France

Spain

Portugal

Germany

Greece

Ivory Coast

South Africa

Middle East

Libya\*

Algeria

United Arab Emirates (Dubai, Abu Dhabi)

Qatar

Oman

Saudi Arabia

Yemen

Asia Pacific

India\*

Bangladesh

Thailand

Indonesia

Malaysia

Brunei

Singapore

Australia

\* Have current NRC export licenses in these countries

Canada

Precision Energy Services Ltd.  
4200, 150 - 6th Avenue SW  
Calgary, Alberta, T2P 3Y7  
Canada

Mexico

PD Mexicana, S. de R.L. de C.V.  
Av. Ind. Rio San Juan Manzana 7, Lote 6 Parque Industrial del Norte  
Cd. Reynosa, Tamaulipas, 88730  
Mexico

Venezuela

Precision Drilling de Venezuela C.A.  
Avenida "L", Centro Empresarial Lorusso  
Ciudad Ojeda, Zulia, 4019  
Venezuela

Columbia

Precision Drilling Services Colombia  
World Trade Centre, Toore C Calle 1000, No. 8A-55 OFF. 503  
Bogota, Colombia

Trinidad

Currently no principal place of business. Various wellsites throughout the country

Argentina

Computalog S.A.  
Canadon Seco Base Ruta Provincial No. 12 9013 Canadon Seco Pcia. Santa Cruz  
Republica Argentina  
Canadon Seco, Argentina

Paraguay

Currently no principal place of business. Various wellsites throughout the country

United Kingdom

Reeves Wireline Services Inc  
Unit 11b Peterseat Drive, Peterseat Park, Altens Industrial Estate  
Aberdeen, AB12 3HT  
UK

Norway

Currently no principal place of business. Various wellsites throughout the country

Denmark

Currently no principal place of business. Various wellsites throughout the country

Netherlands

Currently no principal place of business. Various wellsites throughout the country

Poland

Currently no principal place of business. Various wellsites throughout the country

Bulgaria

Currently no principal place of business. Various wellsites throughout the country

Russia

Currently no principal place of business. Various wellsites throughout the country

France

Currently no principal place of business. Various wellsites throughout the country

Spain

Currently no principal place of business. Various wellsites throughout the country

Portugal

Currently no principal place of business. Various wellsites throughout the country

Germany

Precision Drilling Technology Services GmbH  
Eddesser Strasse 1  
31234 Edemissen, Germany

Greece

Currently no principal place of business. Various wellsites throughout the country

Ivory Coast

Currently no principal place of business. Various wellsites throughout the country

South Africa

Reeves Wireline Services Ltd  
PO Box 19307  
Pretoria West, 0117, South Africa

Precision Energy Services, Inc.      Multi-Country Import/Export License Application

Libya

Precision Drilling Services M.E. W.L.L  
Dhat El Emad Complex, Tower 4, Floor 15  
Tripoli, Libya

Algeria

Precision Drilling Services Algeria EURL  
c/o Euro Japan Motors Zone D'Activate'Route Nationale No. 3 BP 256 30500  
Hassi Messaoud, Ouargla, Algeria

United Arab Emirates

Precision Drilling Services M.E. W.L.L  
P.O. Box 2146 Bin Arrar Building Floor 2, Office No. 2 Al Najda Street  
Abu Dhabi, United Arab Emirates

Qatar

Currently no principal place of business. Various wellsites throughout the country

Oman

Precision Drilling Services (Oman) & Co LLC  
Amran Est LLC, PO Box 919, PC113  
Muscat, Oman

Saudi Arabia

Precision Drilling Services Saudi Arabia Ltd  
Refrigeration House Building, 28th Street, P.O. Box 30548  
Al-Krabiya, Al Khobar, Kingdom of Saudi Arabia

Yemen

Precision Drilling Services (BVI) Ltd.  
P.O. Box 16600, Haddah  
Sanaa, Republic of Yemen

India\*

Precision Drilling Technology Services Group Inc.  
401/402 Solitaire Corporate Park, 167 Guru Hargovindji Marg, Chakala, Andheri East  
Mumbai, 400093, India

Bangladesh

Currently no principal place of business. Various wellsites throughout the country

Thailand

Currently no principal place of business. Various wellsites throughout the country



Indonesia

PT Precision Drilling Services (Indonesia)  
4th Floor, Graha Elnusa Jl. T.B. Simatupang Kav. 1B  
Jakarta, 12560, Indonesia

Malaysia

Precision Oilfield Services, LLP (LeaseCo)  
a div of Accounting  
Precision Drilling Services (Malaysia) Sdn Bhd Level 40 PETRONAS Twin Towers  
Kuala Lumpur, 50088 , Malaysia

Brunei

Currently no principal place of business. Various wellsites throughout the country

Singapore

Currently no principal place of business. Various wellsites throughout the country

Australia

Reeves Wireline Services (Australia) Pty Ltd  
"Strathlink" Unit 11 & 12 27-29 South Pine Road  
Strathpine, Queensland, 4500 Australia