



5511 Greensburg Road  
Apollo, Pennsylvania 15613  
Telephone (724) 327 - 8119

**U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
Attn: Chief Financial Officer**

**August 10, 2019**

Re: Part 171 Invoice #LFB 19-2532

Gentlemen:

I was advised by Christian Leatherbury of your office to submit this appeal in writing to this address.

This invoice is for the time period October 1, 2018 through September 30, 2019. Appalachian Geophysical Surveys ceased business operations before the end of 2017 and I was compelled to accept employment with another firm. No business operations were conducted under this license within the referenced time frame. In September 2018 when this invoice became due I was working as a professional geologist on the Mariner II East pipeline project, observing horizontal directional drilling. The Pennsylvania DEP required that a registered professional geologist be on site continuously while this type of drilling was being conducted. These drills worked 12 hour shifts 6 days a week and were situated in rural areas of western Pennsylvania. We geologists observing these drills generally worked 60 hours per week and more and were always a considerable distance from home. This obligation to my new employer precluded my addressing the matter of this invoice in a timely fashion. Although I intended to surrender our license before the time frame expired I was unable to accomplish that task until the project slowed down at the beginning of December 2018.

I am requesting that the NRC consider this hardship and grant an extension to the time period required to surrender this license before the invoice came due.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Craig B. Clemmens', with a long horizontal flourish extending to the right.

Craig B. Clemmens P.G.  
Managing Partner – RSP

BTW The pipeline project fired up again in March and I currently traveling to eastern Pennsylvania on a weekly basis.