

From: [Associated Wire Line Services](#)
To: [Alldredge, Casey](#)
Subject: [External_Sender] Re: license renewal
Date: Friday, January 7, 2022 8:42:52 AM
Attachments: [img007.pdf](#)

Thank you Casey. Attached is the signed cover page that you requested.

On Thu, Jan 6, 2022 at 5:31 PM Alldredge, Casey <Casey.Alldredge@nrc.gov> wrote:

Hi Merle,

Thank you for this. I don't have any additional technical questions but I do have a request. The two emails with attachments that you sent me are going to be tied down on the license. Because of this, they need to be signed and dated. The attached pdf is both of your emails together with a cover page. Could you please sign and date the cover page and send it back? It can be a digital signature or handwritten; it just needs to be signed and dated.

Thanks very much,

Casey Alldredge

Health Physicist

Materials Licensing and Decommissioning Branch

Region IV, USNRC

License Renewal for Associated Wire Line Services, Inc.
NRC License No. 35-29278-02
Docket No. 030-37581
Control No. 627427
Requests for Information and Responses

Mark Callen

01/07/22

License Renewal for Associated Wire Line Services, Inc.
NRC License No. 35-29278-02
Docket No. 030-37581
Control No. 627427
Requests for Information and Responses

From: [Associated Wire Line Services](#)
To: [Alldredge, Casey](#)
Subject: [External_Sender] Re: Associated Wireline NRC license renewal; request for information
Date: Thursday, December 23, 2021 12:41:38 PM
Attachments: [img004.pdf](#)
[img005.pdf](#)
[img006.pdf](#)
[img007.pdf](#)
[img023.pdf](#)
[img040.pdf](#)
[img041.pdf](#)
[img045.pdf](#)
[img057.pdf](#)
[img058.pdf](#)
[img059.pdf](#)
[img060.pdf](#)
[img061.pdf](#)
[img062.pdf](#)

On Wed, Dec 22, 2021 at 1:50 PM Alldredge, Casey <Casey.Alldredge@nrc.gov> wrote:

Good afternoon Mr. Callis,

Please see the attached NUREG 1556 checklist which contains some statements for you to commit to. If you could please check the appropriate boxes that reflect your program and sign and date the first page and email it back, I would appreciate it.

If you have any questions, don't hesitate to reach out.

Thanks,

Casey Alldredge

Health Physicist

Materials Licensing and Decommissioning Branch

Region IV, USNRC

817-200-1546

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Thank you,

Associated Wire Line Services, Inc.
ph: 580.229.0731
fx: 580.229.0340

From: [Alldredge, Casey](#)
To: associatedwireline@gmail.com
Subject: Associated Wireline NRC license renewal; request for information
Date: Wednesday, December 22, 2021 1:50:00 PM
Attachments: [Blank NUREG-1556, Volume 14, Revision 1 Checklist.pdf](#)

Good afternoon Mr. Callis,

Please see the attached NUREG 1556 checklist which contains some statements for you to commit to. If you could please check the appropriate boxes that reflect your program and sign and date the first page and email it back, I would appreciate it.

If you have any questions, don't hesitate to reach out.

Thanks,

Casey Alldredge
Health Physicist
Materials Licensing and Decommissioning Branch
Region IV, USNRC
817-200-1546

Item No.	Title and Criteria	Yes	N/A	Description Attached
5.	RADIOACTIVE MATERIAL (Continued)			
5.3	Financial Assurance and Recordkeeping for Decommissioning <ul style="list-style-type: none"> Pursuant to 10 CFR 30.35(g) and 10 CFR 70.25(g) and 10 CFR 70.51(b)(3), as appropriate, we will maintain records important to decommissioning and will transfer these records to an NRC or Agreement State licensee before licensed activities are transferred or assigned, in accordance with 10 CFR 30.34(b) and 10 CFR 70.36, as appropriate. Furthermore, pursuant to 10 CFR 30.51(f) and 10 CFR 70.51(a)(3), as appropriate, we will forward the records required by 10 CFR 30.35(g) and 10 CFR 70.25(g), as appropriate, to the appropriate NRC regional office before the license is terminated. <p style="text-align: center;">AND</p> <ul style="list-style-type: none"> If financial assurance or a decommissioning funding plan is required, we will submit the required documents following the guidance described in NUREG-1757, Volume 3. 	✓		
			✓	[]
6.	PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED <ul style="list-style-type: none"> For each sealed source and radionuclide requested in the application, state the purpose for the licensed material using the following list: <ul style="list-style-type: none"> Oil and gas well logging Mineral well logging Geophysical well logging Tracer studies in single wells Field flood or enhanced recovery studies in multiple wells <p style="text-align: center;">OR</p> <ul style="list-style-type: none"> Specify the purposes for which the sources and device(s) will be used other than those included in the manufacturer's recommendations, and as specified on the SSD registration certificate. <p style="text-align: center;">AND</p> <ul style="list-style-type: none"> If applicable, provide a statement that, "We plan to perform the following activities in fresh water aquifers: <ul style="list-style-type: none"> Tracer studies Well logging using sealed sources Well logging using neutron generator" 			
		✓	[]	[]
		[]	✓	[]
		[]	✓	[]
		✓	[]	[]
		[]	✓	[]
			✓	[]
		[]	✓	
		[]	✓	
		[]	✓	

N/A
Previously
Provided

Item No.	Title and Criteria	Yes	N/A	Description Attached
7.	<p>INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE</p> <p>Radiation Safety Officer (RSO)</p> <ul style="list-style-type: none"> The name of the proposed RSO who will be responsible for ensuring that the licensee's radiation protection program is implemented in accordance with approved procedures. <p>Name: <u>MERLE CALLIS</u></p> <p>AND</p> <ul style="list-style-type: none"> Demonstrate that the RSO has sufficient independence and direct communication with responsible management officials by providing a copy of an organizational chart by position, demonstrating day-to-day oversight of the radiation safety activities. <p>AND</p> <ul style="list-style-type: none"> Provide documentation demonstrating that the proposed RSO is qualified by training and experience (e.g., certificate of completion of a well logging RSO or authorized user's course or an equivalent course that meets the logging supervisor criteria specified in Appendix F of this NUREG). <p>OR</p> <ul style="list-style-type: none"> Provide documentation demonstrating that the proposed RSO is qualified by training and experience (e.g., Board Certification by the American Board of Health Physicists; completion of a bachelor's or master's degree in the sciences with at least one year of experience in the conduct of a radiation safety program of comparable size and scope; or formal training in the establishment and maintenance of a radiation protection program) <p>OR</p> <ul style="list-style-type: none"> Provide alternative information demonstrating that the proposed RSO is qualified by training and experience (e.g., listed by name as an authorized user or the RSO on an NRC or Agreement State license that requires a radiation safety program of comparable size and scope). 	<input checked="" type="checkbox"/>		
8.	<p>TRAINING FOR LOGGING SUPERVISORS AND LOGGING ASSISTANTS</p> <ul style="list-style-type: none"> Submit the training program to be given to new logging supervisors and logging assistants. Provide a copy of a typical examination and the correct answers to the examination questions. Indicate the passing grade. 			<p>[]</p> <p>[]</p>

N/A
Previously
Provided

N/A
Previously
Provided

N/A
Previously
Provided

Item No.	Title and Criteria	Yes	N/A	Description Attached
8.	TRAINING FOR LOGGING SUPERVISORS AND LOGGING ASSISTANTS (Continued) <ul style="list-style-type: none"> Specify the qualifications of the instructors for radiation safety principles and describe their experience with well logging activities. If training will be conducted by someone outside the applicant's organization, identify the course by title, provide the name, address, and telephone number of the company providing the training, and provide a course outline (if available). Describe the field (practical) examination that will be given to prospective logging supervisors and logging assistants. Describe the annual refresher training program, including topics to be covered and how the training will be conducted. Submit a description of the program for annual safety reviews of the job performance of each well logging supervisor, as described in 10 CFR 39.13(d). 			<p>[]</p> <p>[]</p> <p>[]</p> <p>[]</p>
9.	FACILITIES AND EQUIPMENT <ul style="list-style-type: none"> Submit a diagram, drawing, or sketch of the proposed facility, identifying areas where radioactive materials, including radioactive wastes, will be used or stored. <ul style="list-style-type: none"> Drawings should show, where applicable, adjacent buildings, boundary lines, security fences, and lockable storage areas. Illustrate area(s) where explosive, flammable, or other hazardous materials may be stored. Drawings should also show the relationship and distance between restricted areas and adjacent unrestricted areas. Drawings should specify shielding materials (e.g., concrete, lead) and means for securing radioactive materials from unauthorized removal. Submit a drawing or sketch of the proposed tracer material storage facilities, including rooms, buildings, below ground bunker storage areas, or containers used for storage of both tracer and tracer waste materials, if appropriate. Specify the types and amount of shielding materials (e.g., concrete, lead) and means for securing tracer materials from unauthorized removal. Describe items such as protective clothing (e.g., rubber gloves, coveralls, respirators, and face shields), auxiliary shielding, absorbent materials, injection equipment, secondary containers for waste water storage for decontamination purposes, and plastic bags for storing contaminated items, which will be available at well sites when using tracer materials. 			<p>[]</p> <p>[]</p> <p>[]</p> <p>[]</p> <p>[]</p> <p>[]</p> <p>[]</p>

Item No.	Title and Criteria	Yes	N/A	Description Attached
9.	FACILITIES AND EQUIPMENT (Continued) <ul style="list-style-type: none"> Describe proposed laundry facilities, if applicable, used for contaminated protective clothing. Specify how the contaminated waste water from the laundry machines or sinks is disposed. Operating and emergency procedures should address decontamination of the laundry area and equipment. Describe proposed decontamination facilities for trucks, tracer injection tools, or other equipment contaminated by tracer materials, if applicable. Specify how the contaminated waste water for these decontamination facilities is disposed. Operating and emergency procedures should address decontamination of these types of equipment and facilities. Describe, if applicable, equipment for "repackaging" gaseous, volatile, or finely divided tracer material. Most tracer users do not repackage materials and acquire their injections in precalibrated amounts or "ready-to-use" forms. However, should an applicant request the ability to repackage tracer, volatile, or finely divided material, consider the following equipment when repackaging tracer materials: sinks, trays with absorbent material, glove boxes, fume hoods with charcoal filtration, filtered exhaust, special handling equipment including special tools, rubber gloves, etc. State the physical location(s) where the NRC regulatory required records will be stored and available for review during NRC inspections. 		<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
10.	RADIATION SAFETY PROGRAM <p>The applicant is required to establish and submit its radiation protection program. The format used for providing information should be developed by the applicant. No specific format is required by the NRC for submitting a radiation safety program.</p> <p>The radiation safety program should include each of the following items:</p> <ul style="list-style-type: none"> steps to keep radiation exposures ALARA description of equipment and facilities adequate to protect personnel, the public, and the environment commitment that licensed activities will be conducted by individuals qualified by training and experience written operating and emergency procedures program for the annual inspection of the job performance of well logging personnel description of organization structure and individuals responsible for ensuring implementation of radiation safety program records management 			<input type="checkbox"/>

Item No.	Title and Criteria	Yes	N/A	Description Attached
10.	RADIATION SAFETY PROGRAM (Continued) <ul style="list-style-type: none"> • methods or procedures for preventing the release of contaminated material, equipment, or vehicles to unrestricted use from tracer or field flood study operations • radiation safety procedures and the well logging supervisors' responsibilities unique to tracer and field flood study operations • tracer and field flood study equipment, techniques, and corresponding radiation safety procedures associated with the use of tracer materials • information on the appropriate handling, control/security, and disposal of any unused tracer materials • commitment that the licensee will implement a security, control, and accountability program for radioactive materials located at field stations and temporary job sites <p>Appendix D of this NUREG includes a description of procedures for using tracer materials in field flood study operations.</p>			
10.1	Well Owner or Operator Agreement <ul style="list-style-type: none"> • A statement that: "We will obtain a written agreement that meets the requirements specified in 10 CFR 39.15 prior to well logging: (i) with a sealed source; (ii) with a neutron generator exceeding 30 Ci; or (iii) with a neutron generator in a well without a surface casing, and will provide an example of the agreement to the NRC." • A statement that: "We will provide written instructions to the customer when conducting well logging using unsealed material that describes those subjects listed in the "Discussion" (unsealed material) portion of Section 8.10.1, "Well Owner or Operator Agreements" in NUREG-1556, Volume 14, Revision 1, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance About Well Logging, Tracer, and Field Flood Licenses."" 	<input type="checkbox"/> <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>
10.2	Radiation Safety Program Audit <p>The applicant is not required to, and should not, submit its audit program to the NRC for review during the licensing phase. The licensee's program for auditing its radiation safety and security programs may be reviewed during inspections.</p>	Need Not Be Submitted With Application		

[illegible]

Item No.	Title and Criteria	Yes	N/A	Description Attached
10.	RADIATION SAFETY PROGRAM (Continued)			
10.9.1	Maintenance Prior To Use (Continued) AND <ul style="list-style-type: none"> Submit the procedure(s) for conducting visual inspections. 			[]
10.9.2	Semiannual Visual Inspection and Routine Maintenance <ul style="list-style-type: none"> A statement that: "Semiannual visual inspections and routine maintenance will be conducted and records maintained in accordance with 10 CFR 39.43(b), to ensure that required labeling is legible and that no physical damage is visible." AND <ul style="list-style-type: none"> Submit the procedure(s) for conducting semiannual visual inspections and routine maintenance. 	<input checked="" type="checkbox"/>	[]	[]
10.9.3	Maintenance Requiring Special Authorization <ul style="list-style-type: none"> A statement that: "Activities described in 10 CFR 39.43(c) and (d) will not be conducted unless written detailed procedures have been approved by the NRC." OR <ul style="list-style-type: none"> Submit detailed procedures for any activities described in 10 CFR 39.43(c) and (d), including radiation safety precautions that individuals will be expected to follow when performing these tasks and the minimum qualifications of these individuals. Each different task must be described. Should a procedure require the removal of the sealed source from the holder before performing any maintenance on the holder, applicants should describe the removal procedures. 	<input checked="" type="checkbox"/>	[]	[]
10.10	Transportation <ul style="list-style-type: none"> Submit operating and emergency procedures for transporting well logging sealed sources containing radioactive material, and field flood and tracer radioactive materials. 			[]
10.11	Minimization of Contamination <ul style="list-style-type: none"> The applicant does not need to provide a response to this item if the applicant provides responses to the following sections of this NUREG that meet the "Response from Applicant" criteria from those sections: 8.5.1, "Radioactive Material—Sealed Radioactive Material;" 8.5.2, "Radioactive Material—Unsealed (Tracer) Radioactive Material;" 8.9, "Facilities and Equipment;" 8.10.8, "Radiation Safety Program—Leak Tests;" 8.10.7, "Radiation Safety Program—Operating and Emergency Procedures;" 8.10.13, "Radiation Safety Program—Subsurface Tracer Studies;" and 8.11, "Waste Management." 	No Response is Necessary for this Section		

N/A
Previously
Provided

Item No.	Title and Criteria	Yes	N/A	Description Attached
10.	RADIATION SAFETY PROGRAM (Continued)			
10.11	Minimization of Contamination (Continued) OR <ul style="list-style-type: none"> The applicant should submit its procedures to conduct decontamination of a facility contaminated by a leaking sealed source or contaminated by unsealed material with a half-life greater than 120 days. 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10.12.1	Use of Sealed Sources in Drill-to-Stop (DTS) (Wireline) Well Logging Operations <ul style="list-style-type: none"> Submit operating and emergency procedures for conducting DTS well logging operations. Procedures must address radiation safety aspects when conducting DTS well logging operations. 			<input type="checkbox"/>
10.12.2	Use of Sealed Sources in Measurement While Drilling (MWD) or Logging While Drilling (LWD) Well Logging Operations <ul style="list-style-type: none"> Submit operating and emergency procedures for conducting MWD and LWD well logging activities. Procedures must address radiation safety aspects when conducting MWD and LWD well logging operations. 			<input type="checkbox"/>
10.12.3	Energy Compensation Sources (ECS) <ul style="list-style-type: none"> Submit a statement that "We will test ECSs requiring leak tests at intervals not to exceed 3 years and we will conduct physical inventories of ECSs at least every 6 months. We will maintain physical inventory and material use records in accordance with 10 CFR 39.37, "Physical Inventory," and 10 CFR 39.39 "Records of Material Use." 			<input type="checkbox"/>
10.12.4	Use of Sealed Sources and/or Neutron Generators in Fresh water Aquifers <ul style="list-style-type: none"> A statement that: "We will not use sealed sources and/or neutron generators for conducting well logging operations in fresh water aquifers." OR <ul style="list-style-type: none"> Submit step-by-step operating and emergency procedures for conducting well logging activities using sealed sources and/or neutron generators in fresh water aquifers that meet the criteria in Section 8.10.12.4 of NUREG-1556, Volume 14, Revision 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Well Logging, Tracer, and Field Flood Licenses," 10 CFR 39.55, and 10 CFR 39.63." 	<input type="checkbox"/>	<input type="checkbox"/>	
		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10.13.1	Tracer Studies in Single Well Applications <ul style="list-style-type: none"> A statement that: "We will not perform tracer studies in single well applications." 		<input checked="" type="checkbox"/>	<input type="checkbox"/>

Item No.	Title and Criteria	Yes	N/A	Description Attached
10.	RADIATION SAFETY PROGRAM (Continued)			
10.13.1	Tracer Studies in Single Well Applications (Continued) OR <ul style="list-style-type: none"> A statement that: "We will perform tracer studies in single well applications and have submitted step-by-step operating and emergency procedures for conducting tracer studies in single well applications that meet the guidance in Section 8.10.13.1 of NUREG-1556, Volume 14, Revision 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Well Logging, Tracer, and Field Flood Licenses," 10 CFR 39.45, and 10 CFR 39.63." 		<input type="checkbox"/>	<input type="checkbox"/>
10.13.2	Field Flood and Secondary Recovery Applications (Tracer Studies in Multiple Wells) <ul style="list-style-type: none"> A statement that, "Field flood studies using tracer materials will not be conducted." OR <ul style="list-style-type: none"> A statement that, "Field flood studies using tracer materials will be conducted and we have submitted step-by-step procedures and information required in Section 8.10.13.2 and Appendix D, "Field Flood Studies/Enhanced Recovery of Oil and Gas Wells" of NUREG-1556, Volume 14, Revision 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Well Logging, Tracer, and Field Flood Licenses."" 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10.13.3	Tracer Studies in Fresh Water Aquifers <ul style="list-style-type: none"> A statement that: "We will not knowingly inject tracer material into a fresh water aquifer" OR <ul style="list-style-type: none"> A statement that: "We request authorization to inject tracer material into a fresh water aquifer involving secondary and tertiary oil and gas recovery and have submitted our reasons for performing the study and procedures to safeguard the public, licensee personnel, and the environment, and will provide an environmental report containing the information outlined in 10 CFR 51.45, "Environmental report." 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10.13.4	Frac-Tagging Operations <ul style="list-style-type: none"> A statement that: "We will not perform frac-tagging operations." OR <ul style="list-style-type: none"> A statement that: "We will perform frac-tagging operations and have submitted step-by-step operating and emergency procedures that include the following: 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Item No.	Title and Criteria	Yes	N/A	Description Attached
10.	RADIATION SAFETY PROGRAM (Continued)			
10.13.4	Frac-Tagging Operations (Continued)			
	— Receiving, controlling, and handling tracer material during well injections.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	— Handling, controlling, and disposing of any unused tracer materials.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	— Securing, maintaining control, and posting of areas involved with frac-tagging operations using radioactive materials.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	• Containment and/or decontamination of a spill or "sandout" (or "fluid reversal") involving tracer material during frac sand operations. The procedure includes, among other items, radiation surveys, licensee contact information, steps to be taken by the licensee and the client in the event that a "sandout" (or "fluid reversal") occurs when the licensee has already left the client's site, and steps to be taken by the licensee and the client to evaluate flowback or production wastes for the presence of tracer material.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	• Disposal of radioactive materials resulting from frac-tagging operations (such as a sandout, fluid reversal, or flowback) at (i) a licensed low level radioactive waste disposal facility; (ii) decay-in-storage using holding tanks and subsequent unrestricted release; or (iii) a request for alternate waste disposal under 10 CFR 20.2002, "Method for Obtaining Approval of Proposed Disposal Procedures." The procedure includes a description of who will be responsible for the disposal of radioactive materials resulting from frac-tagging operations occurring at client's facilities, and the method for making a determination of the concentration of licensed material (picocuries/gram) in these operations.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	• Actions to be taken in the event of an explosion, leak and contamination event, and the incapacitation of a lone well logging supervisor."	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10.14	Radioactive Collar and Subsidence or Depth Control Markers			
	• A statement that: "We will only use radioactive markers where each individual marker contains only quantities of licensed material not exceeding the exempt quantities authorized in 10 CFR 30.71, "Schedule B."	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
10.15	Neutron Accelerators Using Licensed Material			
	• A statement that: "We will not use neutron generators (accelerators) in our well logging operations."	<input type="checkbox"/>	<input type="checkbox"/>	

N/A

N/A

From: [Associated Wire Line Services](#)
To: [Alldredge, Casey](#)
Subject: [External_Sender] license renewal
Date: Tuesday, January 4, 2022 2:45:48 PM
Attachments: [img006.pdf](#)
[survey meter list.docx](#)

Casey, I have tried to address each item of concern or question you may have in regard to our license renewal. If you need additional information just let me know and I'll be glad to comply with your requests.

Thank you for your patience!

Merle Callis

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In regard to item 10.3 Radiation Monitoring Instruments, the first option should have been the only one checked. I can confirm that Associated Wire Line Services, Inc. will implement the model radiation survey meter calibration program published in Appendix H of NUREG-1556, Volume 14, Revision 1. We have maintained this policy for 40+ years and maintain records of such.

Included with this email is an attachment that shows a list of all the survey meters that we have and use.

10.5 Associated Wire Line Services, Inc. will in lieu of developing a bioassay program, provide a commitment that we will not allow any individual to use more than (i) 1.85 GBq [50 mCi] of iodine-131 at any one time or in any 5-day period at field stations or at temporary job sites, (ii) or more than 3.7 GBq [0.1 curie] of H-3 or (iii) more than 3700 GBq [100 Ci] of gaseous H-3.

Associated Wire Line Services, Inc. will perform tracer studies in single well applications and have submitted step-by-step operating and emergency procedures for conducting tracer studies in single well applications that meet the guidance in Section 8.10.13.1 of NUREG-1556, Volume 14, Revision 1. " Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Well Logging, Tracer, and Field Flood Licenses, 10 CFR 39.45 and 10 CFR 39.63.8".

All training records are kept by the RSO for a minimum of 3 years along with copies of the quizzes and dates of oral examinations.

In regard to semi-annual maintenance, all ejector tools are inspected for defects in accordance with 10 CFR 39.43(b). If any defects are identified, repairs are made and recorded, or equipment is taken out of service and these operations are performed by a logging supervisor.

Waste Disposal: all waste, empty vials, absorbing pads, rubber gloves, etc. are placed into plastic containers with the date they were placed into disposal written on the container before being placed in the underground storage bunker for a minimum of 6 months. The date of disposal along with a description of the contents, the vial numbers, survey meter readings at surface and at 1 meter away from container, and signature of logging supervisor are recorded on the waste disposal log.

Associated Wire Line does not perform any procedures that would involve waste associated with potential sandout, flowback, or screenout. The only service we provide is tracer surveys

in disposal wells or injection wells using I-131. Tracer material will not be released in a well unless it is actively being injected into which eliminates the possibility of fluid flowing back and possible contamination.

Thank you,

Associated Wire Line Services, Inc.

ph: 580.229.0731

fx: 580.229.0340

CONDITIONS OF CONTRACT

WELL OWNER/OPERATOR AGREEMENT

All services rendered subject to the terms and conditions contained in the current price schedule of Associated Wire Line Services, Inc. In part, these terms and conditions are as follows:

- 1. Customer agrees to pay AWLSI for all services and/or materials the net amounts charged upon the Service Receipt to which these Conditions of Contract are attached, at the office of said company in Healdton, Oklahoma on or before the 20th day of the month following date of said Service Receipt, and in the event of default to pay an additional interest calculated at the rate of (10%) per annum from and after the date of such service receipt.**
- 2. Customer accepts full responsibility for returning well to production. Customer agrees that, because of the uncertain and unknown conditions, and hazards existing in connection with the rendering of AWLSI services, and because of the physical conditions existing in oil and gas wells, not subject to control of AWLSI, AWLSI does not guarantee the results of its service.**
- 3. Customer agrees that, should any of AWLSI's tools or equipment be lost or destroyed in the rendition of its service, customer will use all reasonable diligence and facilities available to recover the same, and to reimburse AWLSI for the reasonable value of any tools, instruments, or personal property that cannot be recovered, or for the cost of repairing any damage to items recovered.**
- 4. Customer accepts full responsibility for decontamination of the job site, well head, and the AWLSI personnel and equipment contaminated by radioactive material injected into the well, if said contamination is due to radioactive material being reversed from the well or the well screens out, or mechanical failure of any contractor's equipment. Customer agrees that the decontamination will be in accordance with State and/or Federal regulations and to concentration limits specified for release to unrestricted use. In this event, AWLSI personnel on location, will immediately contact well owner or operator and implement operating and emergency procedures for dealing with sandouts and well returns. AWLSI will conduct radiation monitoring as required by 10 CFR 39.69(a) and decontaminate environment, equipment, or personnel before releasing site or before releasing for unrestricted use. AWLSI will implement approved procedures for disposal of sandout and well returns material.**
- 5. Customer agrees to provide a pre-constructed pit or suitable containers specifically for material reversed from the well in the event of a screen out.**

ASSOCIATED WIRE LINE SERVICES, INC.

List of survey meters

1. **BICRON**, model SURVEYOR, serial # A733A
2. **EON**, model PSM-700, serial # 075434
3. **NDS-PROD**, model ND-500A, serial #11777
4. **NDS-PROD**, model ND-500A, serial #4074
5. **Victoreen**, Model # 493, serial # 3433
6. **NDS-PROD**, Model PCWT, serial #16654

From: [Alldredge, Casey](#)
To: [Associated Wire Line Services](#)
Subject: RE: Re: Associated Wire Line NRC Renewal; Request for Info
Date: Thursday, December 30, 2021 8:05:00 AM

No problem at all. I hope your procedure and recovery goes smoothly.
Casey

From: Associated Wire Line Services <associatedwireline@gmail.com>
Sent: Wednesday, December 29, 2021 12:47 PM
To: Alldredge, Casey <Casey.Alldredge@nrc.gov>
Subject: [External_Sender] Re: Associated Wire Line NRC Renewal; Request for Info

Casey, I will be out of the office for a few days due to a minor surgery. I will do my best to provide the answers to your questions and provide any statements or materials that you need to complete our license renewal in a timely fashion. I may have several questions as well as I work on your requests.

Thanks for your patience and assistance.
Merle Callis

On Wed, Dec 29, 2021 at 8:15 AM Alldredge, Casey <Casey.Alldredge@nrc.gov> wrote:

Good morning,
I finished reviewing your renewal application and have a few questions/clarifications. Please see the attached word document. Could you please answer the attached questions and sign and date the page? Could you also sign and date the checklist that you provided last week?
If you have any questions, please let me know.
Thanks,

Casey Alldredge
Health Physicist
Materials Licensing and Decommissioning Branch
Region IV, USNRC

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Thank you,

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