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Containing:		Logging	Source (OWL)							
22. FOREIGN OBLIGATIONS	BY COUNTRY AND PERC	ENTAGE (US	se separate sheet if n	ecessary)					-	
23. ADDITIONAL INFORMATI See cover letter	ION ON CONSIGNEES, EN	ID USES, ANI	D PRODUCT DESCRIP	NON <i>(Use sepa</i>	rate sheet if necessary	0				
24. The applicant certifies correct to the best of		s prepared i	in conformity with Ti	tle 10, Code of	Federal Regulations;	and that all li	nformation i	n this applic	atio	
25. AUTHORIZED OFFICIAL	a. SIGNATURE	02	5NV	ľ	Andrew Neil - (	Corporate	Radiation	Safetv Of	īc	

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PRINTED ON RECYCLED PAPER



15151 Sommermeyer • Houston, TX 77041 • Phone: 713-996-1299 • Fax: 713-996-1270

December 9, 2005

Ms. Margaret M. Doane Deputy Director Office of International Programs U.S. Nuclear Regulatory Commission Mail Stop: 4E21 One White Flint North 11555 Rockville Pike Rockville, Maryland 20852-2738

# RE: <u>Combined Specific Export and Import Application for Multiple Countries</u> <u>Pursuant to 10 CFR, Part 110</u>

Dear Ms. Doane,

PathFinder Energy Services, Inc. hereby submits this request for a multi-country specific license to export, re-export and import certain U.S. origin byproduct material pursuant to 10 C.F.R. Part 110. This request has been prepared to take into account the Nuclear Regulatory Commission (NRC) final rule "Export and Import of Radioactive Materials: Security Policies", published in the Federal Register (70 FR 37985) on July 1, 2005 that amends 10 C.F.R. Part 110 and becomes effective December 28, 2005. The requested time interval for this license is 10 years.

This license is intended to include Category 2 radioactive material listed in Appendix P to Part 110, but in particular PathFinder's Americium-241/Beryllium (Am-241/Be) and Cesium-137 (Cs-137) byproduct material ("sources"). Although no individual source owned by PathFinder meets or exceeds Category 2 limits, some combined source shipments would meet or exceed threshold limits based on the "sum of the fractions" calculation.

The following information is presented in support of the license application:

# 110.32 Information required in an application for a specific license

- (a) Name and address of applicant PathFinder Energy Services, Inc 15151 Sommermeyer Street Houston, TX 77041
- (b) Name and address of supplier of equipment or material Same as applicant

(c) Country of origin of equipment or material, and any other countries that have processed the material prior to its import into the U.S.

All sources are of U.S. origin

(d) Names and addresses of all intermediate and ultimate consignees, other than intermediate consignees performing shipping services only

PathFinder Energy Services, Inc. and its foreign affiliates currently have licensed operations in the following countries and request that these locations be placed on the combined export and import license as ultimate consignees:

## <u>USA</u>

PathFinder Energy Services, Inc. 15151 Sommermeyer Street Houston, TX 77041-5332

#### **United Kingdom**

PathFinder Energy Services, Ltd 1 Howe Moss Drive Kirkhill Industrial Estate Dyce, Aberdeen Scotland AB21 OGL

#### Egypt

PathFinder Energy Services, Egypt 2, Saudi Co. Buildings Off Nozha St., Nasr City Cairo, Egypt

## **United Arab Emirates**

PathFinder Energy Services, BV Oilfields Supply Center Ltd. Building B-30 P.O. Box 1518 Dubai United Arab Emirates

#### <u>Brazil</u>

PathFinder Energy Services UNAP- Uniao National de Perfuracao Ltda Av. Prefeito Aristeu Ferreira da Silva, 2185 Novo Cavaleiros Macae, Rio de Janeiro, CEP 27930-070 PathFinder provides Oilwell logging services in a very competitive market. It is a time sensitive business, where Customers frequently require tools and sources in a very short timeframe. We kindly request that the following countries be placed on the combined export and import license in order to alleviate any delay due to the NRC amendment process that could ultimately disrupt our commercial business. Prior to shipping any sources, PathFinder would supply all advance notification and documentation requirements as specified in 10 CFR 110.50 :

#### **Nuclear Suppliers Group**

Argentina	Australia	Austria						
Belarus	Belgium	Bulgaria						
Canada	Cyprus	Czech Republic						
Denmark	Finland	Latvia						
Luxemburg	Netherlands	New Zealand						
Norway	Poland	Portugal						
Republic of Korea	Romania	Russia						
Slovak Republic	Slovenia	France						
Germany	Greece	Hungary						
Ireland	Italy	Japan						
South Africa	Spain	Sweden						
Switzerland	Turkey	Ukraine						
<u>Americas</u>								
Mexico	Venezuela	Columbia						
Trinidad	Paraguay							
Middle East								
Algeria	Qatar	Yemen						
Abu Dhabi	Saudi Arabia							
<u>Asia Pacific</u>								
Thailand	Indonesia	Malaysia						
Brunei	Singapore							
(e) Dates of proposed first and last shipments								

- (e) Dates of proposed first and last shipments First - December 29, 2005 Last – December 31, 2015
- (f) Description of the equipment or material including, as appropriate, the following:
  1. Maximum quantity of material in grams or kilograms (TBq for byproduct material) and its chemical and physical form.
  - Special form, sealed, Oil Well Logging (OWL) sources containing Am-241/Be (max activity of the per source) and Cs-137 (max activity of the per source).

7. Description of end use by all consignees in sufficient detail to permit accurate evaluation of the justification for the proposed export or import, including the need for shipment by the dates specified:

- The sources described in this license application are used for the purposes of well logging, where "well logging" is defined in 10 CFR, Part 39 as "all operations involving the lowering and raising of measuring devices or tools which contain licensed material or are used to detect licensed material in wells for the purpose of obtaining information about the well or adjacent formations which may be used in oil, gas, mineral, groundwater, or geological exploration".
- (g) For proposed imports of material listed in Table 1 of Appendix P to this part, a copy of the applicant's authorization to receive and possess the radioactive material to be imported for each recipient.
  - See attached copy of applicants NRC radioactive material license # 17-2763-01
  - See attached copy of applicants Texas DSHS radioactive material license # L05236
- (h) For proposed exports of material listed in Table 1 of Appendix P to this part, pertinent documentation that the recipient of the material has the necessary authorization under the laws and regulations of the importing country to receive and possess the material. Pertinent documentation shall consist of a copy of the recipient's authorization to receive and possess the material to be exported or a confirmation from the government of the importing country that the recipient is so authorized.

- As detailed under (d) above, and prior to shipping any sources, PathFinder will supply all advance notification and documentation requirements as specified in 10 CFR 110.50

Finally, the granting of the license requested is essential to PathFinder Energy Services, Inc. and its foreign affiliates from a commercial standpoint, and would not be inimical to the common defense and security of the United States.

The sources covered in this license request are owned by PathFinder and utilized solely by trained PathFinder personnel at all times.

Enclosed with this letter is a completed NRC Form 7 and other supplementary materials, in addition to the required licensing fee of \$1600.00 (Sixteen hundred dollars). If you have any questions regarding this license request or require any additional information to perform your review, please do not hesitate to contact me at the telephone number or email address provided below.

Sincerely,

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2e5 Nel

Andrew Neil Corporate Radiation Safety Officer

Telephone: (713) 996-1726 Email: andrew.neil@pathfinderlwd.com

# ATTACHMENTS:

- NRC Form7
- Copy of PathFinder's NRC materials license
- Copy of PathFinder's Texas DSHS materials license
- PathFinder check for license application

File: PL033