



Weatherford®

Withhold from Public Disclosure for security reasons under 10 CFR 2.390 and
10 CFR 110.50(b)(7)
Request waiver of affidavit requirement under 10 CFR 2.390(b)(1)(i)(B) (ii)

March 16, 2009

Scott Moore
Deputy Director, Office of International Programs
U.S. Nuclear Regulatory Commission
11555 Rockville Pike, Rockville, Maryland 20852

Re: New Combination Export/Import License Application for Weatherford-Iraq

Dear Mr. Moore,

Weatherford International, Inc. (including subsidiaries and affiliate companies)¹ requests a combination import & export license for 10 CFR §110, Appendix P, Category 2 radioactive byproduct materials including Cs-137, Am-241/Be, and Co-60, accelerator produced material as Co-57, and minute quantities of source material all of which are to be used with providing well logging services in Iraq. Further details can be found on NRC Form 7.

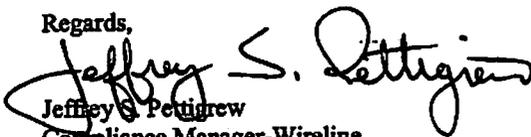
As Iraq is listed as an embargoed destination in 10 CFR §110.28, 10 CFR §170.31 fee categories 15.A. and 15.J imply that Commission and Executive Branch review would be required, the fee for such a license being \$15,500, therefore we are tendering NRC Form 629 authorizing a payment by credit card in that amount.

Weatherford will initially work in the Basra area of Southern Iraq under the sponsorship of the [REDACTED] [REDACTED]. Later we expect to obtain contracts with oil companies in the Erbil, Northern Iraq-Kurdistan.

The process of obtaining import and use authorization for radioactive material from the Iraqi government is currently in progress. Weatherford therefore requests that information required by 10 CFR §110.32(d) and "pertinent documentation" required by 10 CFR § 110.32(h), be submitted no later than 24 hours prior to the export rather than with this license application.

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
Compliance Manager-Wireline
Weatherford International, Inc.

Enc: NRC Form 7, NRC Form 629
Weatherford NRC RML 42-26891-01
NSSI Texas RML L02991

¹ Previously NRC export/import licenses have been tendered under the name of Precision Energy Services, Inc., A Weatherford Company.

Weatherford International, Inc
515 Post Oak Blvd
Houston, TX 77027
Phone: 713.693.4922
Fax: 832.615.3403

www.weatherford.com

PCB109.00
(P)

NRC FORM 7 (8-2006) 10 CFR 110	U.S. NUCLEAR REGULATORY COMMISSION	APPROVED BY OMB: NO. 3160-0027	EXPIRES: 06/30/2009 Estimated burden per response to comply with this mandatory collection request: 2.4 hours. This submission is reviewed to ensure that the applicable statutory, regulatory, and policy considerations are satisfied. Send comments regarding burden estimate to the Records and FOIA/Privacy Services Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to 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.
APPLICATION FOR NRC EXPORT/IMPORT LICENSE, AMENDMENT, OR RENEWAL (See Instructions on Page 5)			

PART A. FOR NRC USE ONLY	<input checked="" type="checkbox"/> PUBLIC OR <input type="checkbox"/> NON-PUBLIC	DATE RECEIVED MAR 19 2009
LICENSE NUMBER EX-109.00	DOCKET NUMBER	ADAMS ACCESSION NUMBER

PART B. TO BE COMPLETED FOR ALL LICENSES, AMENDMENTS, OR RENEWALS
(If more space is needed to complete any of the items, use Pages 3-4 first, and then attach additional sheets, if necessary.)

1. NAME AND ADDRESS OF APPLICANT/LICENSEE Weatherford International Inc. & Subsidiaries & Affiliate Companies ATTN: Jeff Pettigrew 515 Post Oak Blvd., Suite 600 Houston, TX 77027-9408	1a. NAME OF APPLICANT'S CONTACT Jeff Pettigrew	1b. APPLICANT'S REFERENCE NUMBER IRAQ-Mar 2009
	1c. PHONE NUMBER (713) 693-4922	1d. FAX NUMBER (832) 615-3403
	1e. E-MAIL ADDRESS jeffrey.pettigrew@weatherford.com	
2. TYPE OF NRC LICENSE REQUESTED (Check One) <input type="checkbox"/> EXPORT (Parts B, C, E) <input type="checkbox"/> IMPORT (Parts B, D, E) <input checked="" type="checkbox"/> COMBINED EXPORT/IMPORT (Parts B, C, D, E) <input type="checkbox"/> AMENDMENT/RENEWAL Existing License Number: _____		

3. CONTRACT NUMBER(S) Various	4. FIRST SHIPMENT DATE 06/01/2009	5. LAST SHIPMENT DATE 09/30/2017	6. PROPOSED EXPIRATION DATE 09/30/2017
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PART C. TO BE COMPLETED FOR EXPORT ONLY OR COMBINED LICENSES, AMENDMENTS, OR RENEWALS
(If more space is needed to complete any of the items, use Pages 3-4 first, and then attach additional sheets, if necessary.)

7. NAME(S) / ADDRESS(ES) OF SUPPLIERS AND/OR OTHER PARTIES TO THE EXPORT Weatherford International Inc. & Subsidiaries & Affiliate Companies 500 Winscott Road Fort Worth, TX 76126 or 16210 West Hardy Road Houston, TX 77060-1664 NSSI/Sources & Services, Inc. 5711 Etheridge Street Houston, Texas 77087-4009	8. NAME(S) / ADDRESS(ES) OF INTERMEDIATE FOREIGN CONSIGNEE(S) 	9. NAME(S) / ADDRESS(ES) OF ULTIMATE FOREIGN CONSIGNEE(S) Weatherford Oil Tool Middle East Ltd
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7a. LIST FUNCTIONS PERFORMED/SERVICE PROVIDED Applicant/Licensee	8a. INTERMEDIATE USE(S) Sponsor/Agent	9a. ULTIMATE END USE(S) Well Logging at various locations in Iraq
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10. DESCRIPTION OF RADIOACTIVE MATERIALS, SEALED SOURCES, NUCLEAR FACILITIES, EQUIPMENT, OR COMPONENTS Appendix P, Category 2 consignments of Am-241, Am-241/Be, and Cs-137, contained in sealed sources for use in oil and gas well logging operations for export and import to and from Iraq. Additional information on Page 3	10a. MAX TOTAL VOLUME / ELEMENT WGT (KG), OR TOTAL ACTIVITY (TBq) See Page 3	10b. MAX ENRICHMENT OR WGT % N/A	10c. MAX ISOTOPE WGT (KG) N/A
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11. FOREIGN OBLIGATIONS (BY COUNTRY AND BY PERCENTAGE OF MAXIMUM TOTAL VOLUME) N/A
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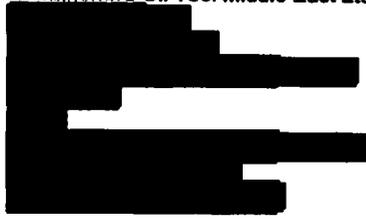
NRC FORM 7
(8-2008)
10 CFR 110

U.S. NUCLEAR REGULATORY COMMISSION

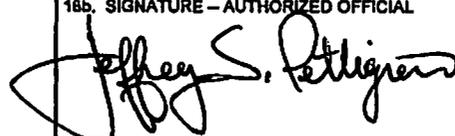
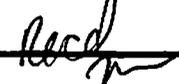
**APPLICATION FOR NRC EXPORT/IMPORT
LICENSE, AMENDMENT, OR RENEWAL (Continued)**

LICENSE NUMBER 40100	DOCKET NUMBER	ADAMS ACCESSION NUMBER	<input checked="" type="checkbox"/> PUBLIC OR <input type="checkbox"/> NON-PUBLIC
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PART D. TO BE COMPLETED FOR IMPORT ONLY, OR COMBINED LICENSES, AMENDMENTS, OR RENEWALS
(If more space is needed to complete any of the items, use Pages 3-4 first, and then attach additional sheets, if necessary.)

12. NAME(S) / ADDRESS(ES) OF FOREIGN SUPPLIERS AND/OR OTHER PARTIES TO IMPORT Weatherford Oil Tool Middle East Ltd 		13. NAME(S) / ADDRESS(ES) OF INTERMEDIATE CONSIGNEE(S)  NSSI/Sources & Services, Inc. 5711 Etheridge Street Houston, Texas 77087		14. NAME(S) / ADDRESS(ES) OF ULTIMATE CONSIGNEE(S) SAME AS BOX 7	
12a. NRC EXPORT LICENSE NUMBER(S) (if applicable)		13a. LICENSE NUMBER(S) / EXPIRATION DATE(S) NSSI/Texas L02991/Timely Renewal		14a. LICENSE NUMBER(S) / EXPIRATION DATE(S) Weatherford NRC 42-26891-01, Expiry 9 Sep 2017	
		13b. INTERMEDIATE USE(S) 3rd Party Service Provider/Temporary Storage		14b. INTERMEDIATE USE(S) Storage and/or services related to Import/export of well logging sources	
15. DESCRIPTION OF RADIOACTIVE MATERIALS, SEALED SOURCES, NUCLEAR FACILITIES Appendix P, Category 2 consignments of Am-241, Am-241/Be, and Cs-137, contained in sealed sources for use in oil and gas well logging operations for export and import to and from Iraq. Additional information on Page 3.			15a. MAX TOTAL VOLUME / ELEMENT WGT (KG), OR TOTAL ACTIVITY (TBq) See Page 3	15b. MAX ENRICHMENT OR WGT % N/A	15c. MAX ISOTOPE WGT (KG) N/A
16. FOREIGN OBLIGATIONS (BY COUNTRY AND BY PERCENTAGE OF MAXIMUM TOTAL VOLUME) N/A					

PART E. TO BE COMPLETED FOR ALL LICENSES, AMENDMENTS, OR RENEWALS

17. ADDITIONAL INFORMATION PROVIDED ON PAGES 3, 4, AND/OR ON SEPARATE SHEETS? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		17a. COPIES OF RECIPIENTS' AUTHORIZATIONS PROVIDED? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
18. CERTIFICATION: I, the applicant's authorized official, hereby certify that this application is prepared in conformity with Title 10, Code of Federal Regulations, and that all information provided is correct to the best of my knowledge.			
18a. PRINT NAME AND TITLE OF AUTHORIZED OFFICIAL Jeffrey S. Pettigrew, Compliance Manager - Wireline Logging Services		18b. SIGNATURE - AUTHORIZED OFFICIAL 	18c. DATE 3/16/2009 

MAR 19 2009

NRC FORM 7
(8-2008)
10 CFR 110

U.S. NUCLEAR REGULATORY COMMISSION

APPLICATION FOR NRC EXPORT/IMPORT LICENSE, AMENDMENT, OR RENEWAL (Continued)

LICENSE NUMBER 10B10900	DOCKET NUMBER	ADAMS ACCESSION NUMBER	<input checked="" type="checkbox"/> PUBLIC OR <input type="checkbox"/> NON-PUBLIC
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ADDITIONAL INFORMATION (Reference applicable block numbers from page 1 and/or page 2 for each entry)

For Entire Application, Including Cover Letter:

Withhold from Public Disclosure for security reasons under 10 CFR 2.390 and 10 CFR 110.50(b)(7). Request waiver of affidavit requirement under 10 CFR 2.390(b)(1)(i) (2)(ii).

As in previous licenses, please add the following to our license conditions:

Licensee is exempt from submitting information required by 10 CFR §110.32(d) and "pertinent documentation" required by 10 CFR § 110.32(h) with its application for named, and unnamed recipients (ultimate or intermediate consignees) in foreign countries, until 24 hours prior to shipment. If at any time throughout the duration of the license, the licensee or its foreign affiliate(s) will not maintain control of the exported material, the information and pertinent documentation required by 10 CFR §110.32, must be received by NRC in advance of the transfer, and in accordance with the notification requirements of 10 CFR §110.50.

Copy of NRC Radioactive Material License 42-26891-01 for Weatherford International, Inc. & Subsidiaries & Affiliate Companies attached.

Copy of Texas Radioactive Material License L02991 for NSSI/Sources & Services, Inc. (potential US intermediate consignee) attached. License L02991 is currently under timely renewal as per its accompanying cover letter.

BOX 10a. & 15a. MAXIMUM TOTAL ACTIVITY
Appendix P, Category 2 not to exceed

[Redacted]

Byproduct (Accelerator-produced) material, not to exceed

[Redacted] (this is less than the the applicable quantity set forth in 10 CFR §30.71, Schedule B for exempt quantities and it is unclear whether an export license is necessary to Iraq, but is listed here in any case)

[Redacted]

Used for the calibration of natural gamma ray detection logging instruments/tools

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MAR 19 2009