

United States Nuclear Regulatory Commission
2100 Renaissance BLVD.
Suite 100
King of Prussia, PA 19406
Attn: James R. Cassata

January 19th, 2015

Dear Mr. Cassata,

Nabors Completion & Production Services, Co. (NCPS) wishes to respond to the request made by the Nuclear Regulatory Commission (NRC) in regards to clarification of the requirements listed in NUREG 1556, Volume 15, Sections 5.4, 5.5 and 5.6.

Items Requested:

1. With regard to the criteria listed in Section 5.4, NUREG 1556, Volume 15, "Consolidated Guidance about Materials Licenses—Program-Specific Guidance about Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Materials Licenses," dated November 2000, here to referred to as "NUREG 1556 Vol. 15", please submit a statement whether NCPS has performed, documented, and reviewed all required surveillances to date (such as all required inventories, leak tests, radiation surveys, and annual program reviews). Please list the results of any negative or exceptional findings if appropriate. If required surveillance items are not, or will not, be completed prior to the change of control, then please provide the reasons, any corrective actions that will be taken to remedy and the date these corrective actions will be completed.

NCPS has performed, documented, and reviewed all required surveillances to date, such as all required inventories, leak tests, radiation surveys, and annual program reviews. All items which are included under the description of "Surveillance Records" will be reviewed before the time of the integration of the two separate entities. All items which are included under the description of "Surveillance Records" will be reviewed before any transfer of records.

2. With regard to the criteria listed in Section 5.5, NUREG 1556, Vol. 15, please provide a statement that NCPS will continue to maintain all records after the change of control that are required by the NRC materials license and associated regulations, especially those important to safe and effective decommissioning of the license.

NCPS will continue to maintain all records after the change of control that are required by the NRC materials license and associated regulations, especially those important to safe and



effective decommissioning of the license. At this time all records related to the existing Radiation Safety Program and all NRC licensed material will remain at their current locations. At this time there are no planned changes regarding facilities where licensed material is used or stored. At this time there are no planned decommissioning efforts.

3. With regard to the criteria listed in Section 5.6, NUREG 1556, Vol. 15, please provide a statement for the new holding or parent company representative to read, sign, and date to indicate that they have read, understood, and support all NCPS statements made in your reply to this request for additional information and with the contents of your change of control application letter dated November 10, 2014.

Please see the attached document.

Respectfully,

A handwritten signature in black ink, appearing to read "Dustin L. Jones", is written over a circular stamp or seal.

Dustin L. Jones
HSE Radiation & Explosives Manager
Radiation Safety Officer

NABORS COMPLETION & PRODUCTION SERVICES CO.

1380 Route 286 East

Indiana, PA 15701

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C & J ENERGY SERVICES, INC.

HEADQUARTERS

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C&J Energy Services _____

United States Nuclear Regulatory Commission

2100 Renaissance BLVD.

Suite 100

King of Prussia, PA 19406

Attn: James R. Cassata

January 20, 2015

Dear Mr. Cassata:

C&J Energy Services, Inc. ("C&J") wishes to respond to the Nuclear Regulatory Commission ("NRC") in regards to an information request in email form ("NRC Email") made by the NRC to Nabors Completion & Production Services, Co. ("NCPS") on Wednesday, January 14, 2015.

Line Item 3 of the NRC Email requests that NCPS provide a statement from a representative of the new holding or parent company stating that it has read, understood, and supports all statements made by NCPS in its reply to the NRC Email dated January 19, 2014 ("Reply Letter"), and additionally, that it supports NCPS' statements contained in that certain Change of Control Application Letter, dated November 10, 2014 ("Application Letter").

C&J notes that the proposed Transaction described in the Application Letter has not been completed yet. As a result, a representative from C&J Energy Services, Ltd., the "new holding or parent company" referred to in the NRC Email, is technically unable to make the above representations requested by the NRC because C&J Energy Services, Ltd. does not yet exist in the form described in the Application Letter. However, the NRC has indicated via an email dated January 21, 2015 that an acknowledgement from a representative of C&J Energy Services, Inc. would be acceptable in this regard.

In consideration of the foregoing, C&J hereby acknowledges that:

1. It has read, understood and supports all of NCPS' statements regarding the requirements listed in NUREG 1556, Volume 15, Sections 5.4, 5.5 and 5.6, as contained in the Reply Letter;
2. It has read, understood and supports all NCPS statements as contained in the Application Letter;
3. It recognizes that NCPS possesses an existing NRC radioactive materials license with responsibilities and requirements to be met;

4. There is an expectation for the continued need for this license;
5. The existing radiological safety and security system currently maintained by NCPS must be maintained at all times; and,
6. Any changes in status of current or future organizations that would affect said existing radiological safety and security system will be communicated to the NRC as soon as possible to minimize the risk of the licensed material adversely affecting; public health and safety, the Nation's common defense and security, and the environment.

Please do not hesitate to contact us should you have additional questions or concerns, and thank you in advance for your time.

Respectfully,

A handwritten signature in black ink, appearing to read "George Doggett". The signature is fluid and cursive, with a large loop at the end.

George Doggett,
Senior HSE Manager,
C&J Energy Services, Inc.