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OFFICE OF SECRETARY
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May 17, 1993

Mr. Ivan Selin, Chairman
U.S. Nuclear Regulatory Commission
Washington D.C. 20555

Re: Comments on Proposed Revisions to CFR Parts 170 & 171

Dear Sir:

Due to the downturn in the oil industry, the industry has lost half a million jobs and has been operating in a depression for right at 10 years.

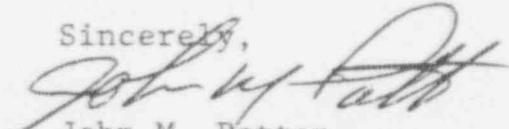
The imposing of annual fees generated due to the Omnibus Act of 1990 has resulted in a 70% reduction in NRC licensees. The outrageous increase in licensing service fees (primarily inspection fees) do nothing more than benefit the major (publicly held) well logging companies because it allows the NRC to circumvent exemptions granted for small entities to alleviate the annual fees. Independent well logging companies simply cannot afford to pay these increased fees.

The fee structure the NRC has adopted has proven by our own records to be a dismal failure. There is absolutely no way that the well logging companies can recover their costs by passing them on to their customers.

The rig count is below 700 nationally. Major oil companies are selling properties in the United States at a never-heard-of-before pace. The major oil companies are making investments outside the continental United States, as the public record will validate. The major service companies are following suit by relocating their equipment and personnel outside the country.

We will certainly appreciate your consideration in this matter.

Sincerely,


John M. Patton
President

JMP:bp

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