

**PRAIRIE** wireline  
service

DOCKET NUMBER PR 71, 170 & 171  
PROPOSED RULE (56FR 14870)

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MAILED  
US MAIL

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April 25, 1991

DEPT. OF ENERGY  
DOCKETING & SERVICE  
BRANCH

Secretary of the U. S. Nuclear Regulatory Commission  
Washington, DC 20555

Attn: Docketing and Service Branch

Re: Proposed Revisions to 10 CFR 170 and 171

Prairie Wireline Service hereby protests your proposed revisions to license fees under Part 170/171, dated April 5, 1991. Public Law 101-508 requires that the NRC fairly and equitably allocate fees among licensees. We feel this requirement is being blatantly ignored in these revisions.

Within the license class "well loggers" there should be recognized a division between large and small well logging companies. Over 80% of the logging business is done by a few major companies. In turn, these large companies have more facilities, more logging units, and many more well logging jobs over which to spread their costs than small companies do.

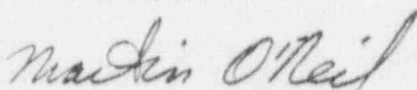
As a "small entity", Prairie Wireline Service objects to any annual fees being allocated based on license possession only. This is clearly unfair apportionment of fees.

Our gross revenue directly attributable to radioactive services this past year amounted to approximately \$40,000. This is a small figure by big company standards yet a significant amount to us. Your proposed annual fees would consume 25% of this gross revenue, and likely all of our net from these services. I would like to add that we are the only company based in Montana that offers these type of logs.

Prairie Wireline Service hereby requests that any annual fee be determined and allocated by number of wells logged per year and/or annual gross revenues from services using radioactive materials. An industry-wide survey should provide the data necessary to establish such a system. We would be glad to help in any way needed.

Prairie Wireline has contacted Mr. Keith Moon of Support Consultants and asked him to assist us in discussing these matters with your agency. He will be contacting you in the near future. I ask that you cooperate with him in every way possible to address our concerns.

Sincerely,



Martin O'Neil, President  
Prairie Wireline Service  
License #25-17317-01

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