

Mail Control Number: 655096
Docket Number : 3037854
License Number : 49-29310-01
Licensee Name : Front Range Mobile Imaging, LLC



January 13, 2026

Via E-Mail (R4Licensing@nrc.gov)

Nuclear Materials Licensing Branch
U.S. Nuclear Regulatory Commission, Region IV
1600 E. Lamar Boulevard
Arlington, TX 76011-4511

Re: Request for Approval of Indirect Transfer of Control: Radioactive Materials License 49-29310-01

Dear U.S. Nuclear Regulatory Commission,

I am writing on behalf of Front Range Mobile Imaging, LLC (the "Licensee"), holder of Radioactive Materials License **49-29310-01** (the "License"). This letter serves as formal notification of an anticipated transfer of control of the Licensee and request for your office's consent. The transfer of control will occur at the parent-entity level. Front Range Mobile Imaging, LLC will remain the License holder.

The Licensee is a wholly owned subsidiary of Heritage Imaging Holdings, LLC (the "Parent"). Under the proposed transaction (the "Transaction"), the members of Parent (the "Sellers") will sell 100% of their membership interest in the Parent to Heritage Purchaser, LLC (the "Buyer").

Following completion of the Transaction, Buyer will become the indirect owner of the Licensee. However, the Licensee itself will remain unchanged, and we anticipate all information currently listed on the License will remain unchanged. The Transaction will not impact control over licensed activities. After closing, the License will continue to be held by the Licensee, but with an upstream ownership change as shown in Attachment 1. The day-to-day operations under the License are intended to remain unchanged after the closing of the Transaction, with operations taking place at the same location and using the same materials, facilities, procedures, and personnel, including the same Radiation Safety Officer. The Licensee's name and tax identification numbers will also remain the same.

The Licensee is committed to maintaining full compliance with all applicable U.S. Nuclear Regulatory Commission regulations governing radioactive materials.

We respectfully request your office's consent to the indirect transfer of control described herein.

To support our request, please find attached the following:

- Attachment 1, Organizational Chart Reflecting Licensee's Organizational and Management Structure
- Attachment 2, Responses to Transfer of Control Questionnaire



Should you require any additional information or documentation regarding this matter, please do not hesitate to contact Evan Ryland or Amber Maynard:

Evan Ryland

Holland & Knight LLP
511 Union St, Ste 2700
Nashville, TN 37219
Phone: (615) 850-6053
Email: Evan.Ryland@hklaw.com

Amber Maynard

Holland & Knight LLP
511 Union St, Ste 2700
Nashville, TN 37219
Phone: (615) 850-8465
Email: Amber.Maynard@hklaw.com

We appreciate your attention to our request and look forward to working with your office to ensure all necessary documents and information are provided to support your review of this indirect transfer of control.

Sincerely,



Steve Coppess MD | Chief Executive Officer
steve@heritageimaging.com

418 E. College Drive, Cheyenne, WY 82007

(208) 947-7000 / info@heritageimaging.com / heritageimaging.com

cc: Amber Maynard, Holland & Knight LLP
Dan Silverboard, Holland & Knight LLP
Stephen McKay, Holland & Knight LLP
Luke Sturgeon, Holland & Knight LLP

ATTACHMENT 1
ORGANIZATIONAL AND MANAGEMENT STRUCTURE CHART

[\[Attachment 1 redacted\]](#)

ATTACHMENT 2

RESPONSES TO TRANSFER OF CONTROL QUESTIONNAIRE

Information Needed For Transfer of Control Application

Region: NRC Region 4

Telephone: (615) 850 - 6053

Contact: Evan Ryland

Fax: (615) 244 - 6804

Information Needed for Transfer of Control

Licensees must provide full information and obtain **prior written consent** before transferring control of the license. Provide the following information concerning changes of control by the applicant (transferor and/or transferee, as appropriate). If any items are not applicable, so state.

1. **Describe any planned changes in the organization, including but not limited to, transfer of stocks or assets and mergers, change in members on Board of Directors, etc. Provide the new licensee name, mailing address, and contact information, including phone numbers. Clearly identify when the amendment request is due to a name change only.**

Front Range Mobile Imaging, LLC (the "Licensee") is a wholly owned subsidiary of Heritage Imaging Holdings, LLC (the "Parent"). Upon closing of the proposed transaction, the members of Parent (the "Sellers") will sell 100% of their membership interests in the Parent to Heritage Purchaser, LLC (the "Buyer"). The Buyer will subsequently be the indirect owner of the Licensee.

This transaction will result in an indirect change of ownership of the Licensee. There are no anticipated changes to the Licensee's name, Federal Tax ID, location, Radiation Safety Officer, operations, equipment, or procedures.

2. **Describe any changes in personnel or duties that relate to the licensed program. Include training and experience for new personnel and any changes in the training program.**

There are no planned changes in personnel or duties that relate to the licensed program pursuant to this indirect transfer of control.

3. **Describe any changes in the location, facilities, equipment, radiation safety program, use, possession, waste management, or other procedures that relate to the licensed program.**

There are no planned changes in the location, facilities, equipment, radiation safety program, use, possession, waste management, or other procedures that relate to the licensed program pursuant to this indirect transfer of control.

4. **Describe the status of the licensee's facilities, equipment, and radiation safety program, including any known contamination and whether decontamination will occur prior to transfer. Include the status of calibrations, leak tests, area surveys, wipe tests, training, quality control, and related records.**

There are no planned changes to the status of the Licensee's facilities, equipment, and radiation safety program pursuant to this indirect transfer of control. There is no known contamination, and all calibrations, leak tests, area surveys, wipe tests, training, quality control, and related records are current and will remain unchanged.

5. **If current decommissioning funding plans (DFP) will be changed as a result of the transfer, the revised DFP should be submitted. If other financial assurance documents will be changed as a result of the transfer, confirm that all financial assurance instruments associated with the license will be held in the transferee's name before the license is transferred, and as required by 10 CFR 30.35(f), the licensee must, within 30 days, submit financial instruments reflecting such changes.**

There are no planned changes to the Licensee's current decommissioning fund plans (DFP) pursuant to this indirect transfer of ownership.

6. **Confirm that all records concerning the safe and effective decommissioning of the facility will be transferred to the transferee or to NRC, as appropriate. These records include documentation of surveys of ambient radiation levels and fixed and/or removable contamination, including methods and sensitivity.**

The Licensee, in addition to the Buyer and Parent companies, confirm that all records concerning the safe and effective decommissioning of the facility will remain with the Licensee. There are no planned changes to these records pursuant to the indirect transfer of control.

7. **Confirm that both transferor and transferee agree to transferring control of the licensed material and activity, and the conditions of transfer, and that the transferee has been made aware of any open inspection items and its responsibility for possible resulting enforcement actions.**

The Transferor and Transferee agree to the indirect transfer of control. The licensed material and activity will remain in the custody of and be conducted by Licensee as if no transfer were taking place. There are no known open inspection items pertaining to the licensed activities.

8. **Confirm that the transferee will abide by all constraints, conditions, requirements, representations, and commitments of the transferor or that the transferee will submit a complete description of the proposed licensed program.**

The Licensee and its upstream owners will continue to abide by all constraints, conditions, requirements, representations, and commitments related to the licensed activities. As noted, there are no planned changes to the operations of the Licensee pursuant to this indirect transfer of control.

9. **The transferee, in the case of fuel cycle facilities, shall provide documentation showing that it is financially qualified to conduct normal operations. The information can be in the form of income statements and balance sheet forecasts.**

This question is not applicable to the licensed activities.