


Memo

From: David W. Boston 
 File: 0750.007
 Date: September 16, 2008
 Re: Export Classification and Dual-Use Status of Owen Oil Tools LP Explosives (non-EBW) Products

Export Classification. The commodities listed in Table 1 been reviewed by the Bureau of Industry and Security (BIS) of the U.S. Department of Commerce and have been determined to be commercial charges containing energetic materials and to be controlled for export purposes under Export Commodity Classification Number 1C992. In Table 1, the "CCATS No." designation refers to the formal BIS document publishing the ECCN classification. These documents may be obtained from the OCS website at: <http://www.ocsresponds.com/ref/ref-export.htm#CCATS>.

Description	Commodity Model No.	CCATS No.
Bi-directional boosters	VMD	G063374
Cartridges and pellets	VMSTC	G061467
Casing cutters	VMCC	G061456
Detonating cord	VMDC	G063379
Detonators	VMD	G063374
Igniters	VMD	G063374
Perforators	VMP	G060610
Power charges	VMPC	G063401
Tubing cutters	VMTC	G061453

Table 1: 1C992 Commodities

Dual-Use Status. The BIS defines¹ dual-use commodities as those that "... have both commercial and military or proliferation applications". Owen Oil Tools products are commercial products designed

¹ <http://www.bis.doc.gov/ExportLicensingQandA.htm>

exclusively for use in preparing and maintaining sub-surface oil and gas wells. They are not designed for or suitable for military or proliferation applications. It is my opinion that the Owen Oil Tools products listed above are not dual-use commodities.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Boston", with a long horizontal flourish extending to the right.

David W. Boston
President, Owen Compliance Services, Inc.