

March 27, 2019

Director General  
Trade and Anti-Dumping Programs Directorate  
Canada Border Services Agency  
100 Metcalfe St., 11th Floor  
Ottawa, Ontario K1A 0L8  
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**Re: Insulated Tubing & Vacuum Insulated Tubing ("IT/VIT") - Use as OCTG and Dismantling Process**

Dear Sir/Madam,

Since 1980, Hallmark Tubulars Ltd. has been a supplier of premium oil country tubular goods (OCTG) and line pipe products used for drilling and completions in Western Canada. Hallmark offers a full range of services from engineering, transportation and inventory management support with over 130 employees and locations in Calgary, Nisku, Valleyview, Grand Prairie, Bonnyville and Vermillion, Alberta. Hallmark has also joint ventures in St. John's, NL (East Coast Tubulars Ltd) and Inuvik, NWT (Mackenzie Integrated Tubular Services).

We are writing today to help clarify the makeup of IT/VIT to assist in your classification of this product regarding the application of various trade sanctions to this product.

IT/VIT is a tube-in-tube product, meaning that a piece of OCTG (inner tube) is installed inside a second piece of OCTG (outer tube) and welded at the ends. A vacuum is created between the two pieces of tube to provide a level of thermal insulation.

Hallmark has been selling IT/VIT into Western Canada since the early 2010's for a variety of Oil and Gas applications, most notably in Steam Assisted Gravity Drainage (SAGD) well pairs. The IT/VIT can be used instead of traditional tubing to help maintain high quality steam to the formation. Traditional OCTG tubing is used as an alternative.

OCTG, particularly API 5CT Standard, is an area of Hallmark's expertise. It is our belief that IT/VIT should be considered OCTG as it used in the same application in oil and gas wells as standard tubing. Furthermore, IT/VIT is made up of two pieces of tubulars that is manufactured to the same standard, API 5CT, as OCTG. For this reason, it is our belief that imported IT/VIT should have the same anti-dumping duties applied to it as standard OCTG.

For example, a common IT/VIT product that Hallmark supplies is 139.7 mm 25.30 kg/m L80 (outer tube) x 114.3 mm 18.75 kg/m L80 (inner tube) with a premium OCTG connection. Both tubes are API 5CT sizes, weights and grades, finished with an Industry-standard OCTG threaded-and-coupled connector.

Another reason why IT/VIT should be considered OCTG is that these two pieces can very easily be dismantled by cutting the welded ends and separating the two pieces of tubulars. These pieces could then be supplied to the Canadian market as standard OCTG, which would currently circumvent any existing anti-dumping duties.

It would be our pleasure to offer our knowledge on this product. If we could be of further assistance, please do not hesitate to contact us.

Sincerely,



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