



March 18, 2019

Director General  
Trade and Anti-dumping Programs Directorate  
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cc. Western Alliance Tubulars Ltd.

**Re: Insulated & Vacuum Insulated Tubing ("IT/VIT") - Use as OCTG and Dismantling Process**

Dear Sir/Madam,

Hunting Energy Services PLC is a global company with over eighty locations in North America, Asia, Europe, Africa, and the Middle East. We offer products and services to the upstream oil and gas industry. Please refer to our company website for more information on our products and services.

In Calgary, Canada, we operate a manufacturing facility that serves the Oil and Gas industry with a wide variety of products, including coupling manufacturing and threading services for our proprietary semi-premium, premium connections and API connections. Hunting, since the outset of IT/VIT imports from China into Canada in 2011, has provided the threading for the majority of the IT/VIT product that has come into Canada from China. The reason for this is that the oil and gas industry has a very high regard for our connection technology, our manufacturing quality and our field services technicians deployed to install this critical well component.

Our knowledge of Oil Country Tubular Goods (OCTG) and the American Petroleum Institute's specifications pertaining to the manufacture and handling of these specialized tubes is our expertise. We can warrant that IT/VIT would be considered OCTG as it is used in down hole, oil and gas applications, as casing and tubing in both steam injection and thermal production wells. The product itself follows API5CT specifications as the outer tube and inner tube must be made in accordance to the governing specifications of API5CT, latest edition.

IT/VIT when delivered to us comes as a plain end product (unthreaded). At our facilities, it would be very easy to dismantle IT/VIT by simply cutting off the welded ends and separating the inner and outer tubes. The resulting separated tubes would be API5CT casing/tubing. The cost of separating the tubes would be minimal and easily accomplished.

As an example, for IT/VIT size of 7", 23#, L80 (outer tube) X 5 1/2" 15.5# L80 (inner tube) range 3 (Length 12.8 meters or so) when cut and separated would result in:

- 7", 23#, L80 R3 API5CT that can be threaded as an API, semi-premium or premium connection.
- 5 1/2", 15.5# L80 R3 API5CT that can be threaded as an API, semi-premium or premium connection.

IT/VIT are made with many different outer and inner tube designs therefore the pipe OD, wall thickness, and grade could potentially involve all casing/tubing offered in API5CT. We do not have any proof whatsoever that anti dump/countervail measures have been avoided by way of the above, we merely wish to draw your attention to the possibility.

Thank you for your time to review the above and know that I am available to answer any other questions you may have.

Sincerely,

Chris Wallace  
Managing Director