

[REDACTED]

[REDACTED]

March 13, 1992

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BY TELECOPIER: 202-326-2050

Investigation Office  
Bureau of Competition  
Federal Trade Commission  
Washington, D.C. 20580

Re: Hart-Scott-Rodino Filing Requirements

[REDACTED] U.S. person, proposes to sell to Company B, a U.S. person, a drilling rig for a price in excess of \$15 million. The drilling rig, built in [REDACTED] in 1980, is

[REDACTED] Company A is a drilling contractor that is paid for performing drilling operations, to date. All of these operations

Company B will immediately lease the [REDACTED]

Based on our conversation [REDACTED]

[REDACTED] the United States, and no sales in or into the United States are attributable to that asset. Company A is a provider of services and the services it has

result of Company A's drilling operations, Company A has no control over where that oil is produced

[REDACTED]

[Redacted]

Hy Rubenstein, Esq.  
March 13, 1992  
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Please call me immediately if I have misunderstood your position. Thank you for your assistance in this matter.

Very truly yours,

[Redacted Signature]

3-17-92 Called  
and Confirmed.

[Redacted]  
agree