# UNITED STATES DEPARTMENT OF COMMERCE BUREAU OF INDUSTRY AND SECURITY WASHINGTON, D.C. 20230

In the Matter of:

FMC Technologies, Inc. 1803 Gears Road Houston, Texas 77067

Respondent

#### ORDER RELATING TO FMC TECHNOLOGIES, INC.

The Bureau of Industry and Security, U.S. Department of Commerce ("BIS"), has notified FMC Technologies, Inc. ("FMC Technologies") of its intention to initiate an administrative proceeding against FMC Technologies pursuant to Section 766.3 of the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2009)) (the "Regulations"),<sup>1</sup> and Section 13(c) of the Export Administration Act of 1979, as amended (50 U.S.C. app. §§ 2401-2420 (2000)) (the "Act"),<sup>2</sup> through issuance of a proposed charging letter to FMC Technologies that alleged that FMC Technologies committed 78 violations of the Regulations. Specifically, these charges are:

<sup>&</sup>lt;sup>1</sup> The violations alleged to have been committed occurred during 2003 to 2007. The Regulations governing the violations at issue are found in the 2003 to 2007 versions of the Code of Federal Regulations. *See* 15 C.F.R. Parts 730-774 (2003-2007). The 2009 Regulations govern the procedural aspects of this case.

<sup>&</sup>lt;sup>2</sup> Since August 21, 2001, the Act has been in lapse. However, the President, through Executive Order 13222 of August 17, 2001 (3 C.F.R., 2001 Comp. 783 (2002)), which has been extended by successive Presidential Notices, the most recent being that of July 23, 2008 (73 Fed. Reg. 43,603 (July 25, 2008)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. §§ 1701-1707).

# Charges 1-6 15 C.F.R. § 764.2(a) - Engaging in Prohibited Conduct by Exporting Valves Without the Required Licenses

On six occasions between on or about December 8, 2005 and on or about January 22, 2007, FMC Technologies engaged in conduct prohibited by the Regulations by exporting butterfly valves or check valves, items classified under Export Control Classification Number ("ECCN") 2B350 and controlled for reasons of chemical and biological weapons proliferation, to China, Mexico, Tunisia and Venezuela without the Department of Commerce licenses required by Section 742.2(a) of the Regulations. In so doing, FMC Technologies committed six violations of Section 764.2(a) of the Regulations.

## Charges 7-78 15 C.F.R. § 764.2(a) - Engaging in Prohibited Conduct by Reexporting Valves Without the Required Licenses

On 72 occasions between on or about October 20, 2003 and on or about April 6, 2007, FMC Technologies engaged in conduct prohibited by the Regulations by reexporting butterfly valves, items classified under ECCN 2B350 and controlled for reasons of chemical and biological weapons proliferation, from its warehouses in Singapore, the United Arab Emirates ("UAE") or the United Kingdom to Angola, Bahrain, Chad, China, India, Kazakhstan, Kuwait, Malaysia, Oman, Pakistan, Qatar, the Republic of the Congo, Saudi Arabia, Singapore, Turkmenistan, the UAE, Venezuela and Vietnam without the Department of Commerce licenses required by Section 742.2(a) of the Regulations. In so doing, FMC Technologies committed 72 violations of Section 764.2(a) of the Regulations.

WHEREAS, BIS and FMC Technologies have entered into a Settlement

Agreement pursuant to Section 766.18(a) of the Regulations, whereby they agreed to

settle this matter in accordance with the terms and conditions set forth therein; and

WHEREAS, I have approved of the terms of such Settlement Agreement;

IT IS THEREFORE ORDERED:

FIRST, that a civil penalty of \$610,000 is assessed against FMC Technologies, which shall be paid to the U.S. Department of Commerce within 30 days of the date of this Order. Payment shall be made in the manner specified in the attached instructions.

SECOND, that pursuant to the Debt Collection Act of 1982, as amended (31 U.S.C. §§ 3701-3720E (2000)), the civil penalty owed under this Order accrues interest as more fully described in the attached Notice, and if payment is not made by the due

date specified herein, FMC Technologies will be assessed, in addition to the full amount of the civil penalty and interest, a penalty charge and an administrative charge, as more fully described in the attached Notice.

THIRD, that the timely payment of the civil penalty set forth above is hereby made a condition to the granting, restoration, or continuing validity of any export license, license exception, permission, or privilege granted, or to be granted, to FMC Technologies. Accordingly, if FMC Technologies should fail to pay the civil penalty in a timely manner, the undersigned may enter an Order denying all of FMC Technologies' export privileges for a period of one year from the date of entry of this Order.

FOURTH, that the proposed charging letter, the Settlement Agreement, and this Order shall be made available to the public.

This Order, which constitutes the final agency action in this matter, is effective immediately.

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Kevin Delli-Colli Acting Assistant Secretary of Commerce for Export Enforcement

Entered this  $13^{+-}$  day of <u>August</u>, 2009.

## UNITED STATES DEPARTMENT OF COMMERCE BUREAU OF INDUSTRY AND SECURITY WASHINGTON, D.C. 20230

In the Matter of:

FMC Technologies, Inc. 1803 Gears Road Houston, Texas 77067

Respondent

### SETTLEMENT AGREEMENT

This Settlement Agreement ("Agreement") is made by and between FMC

Technologies, Inc. ("FMC Technologies") and the Bureau of Industry and Security, U.S.

Department of Commerce ("BIS") (collectively, the "Parties"), pursuant to Section

766.18(a) of the Export Administration Regulations (currently codified at 15 C.F.R. Parts

730-774 (2008)) (the "Regulations"),<sup>1</sup> issued pursuant to the Export Administration Act

of 1979, as amended (50 U.S.C. app. §§ 2401-2420 (2000)) (the "Act").<sup>2</sup>

WHEREAS, FMC Technologies filed a voluntary self-disclosure with BIS's

Office of Export Enforcement in accordance with Section 764.5 of the Regulations

concerning the transactions at issue herein;

<sup>&</sup>lt;sup>1</sup> The violations alleged to have been committed occurred during 2003 to 2007. The Regulations governing the violations at issue are found in the 2003 to 2007 versions of the Code of Federal Regulations. *See* 15 C.F.R. Parts 730-774 (2003-2007). The 2009 Regulations govern the procedural aspects of this case.

<sup>&</sup>lt;sup>2</sup> Since August 21, 2001 the Act has been in lapse. However, the President, through Executive Order 13222 of August 17, 2001 (3 C.F.R., 2001 Comp. 783 (2002)), which has been extended by successive Presidential Notices, the most recent being that of July 23, 2008 (73 Fed. Reg. 43,603 (July 25, 2008)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. §§ 1701-1707).

Settlement Agreement FMC Technologies, Inc. Page 2 of 5

WHEREAS, BIS has notified FMC Technologies of its intention to initiate an

administrative proceeding against it, pursuant to the Act and the Regulations;

WHEREAS, BIS has issued a proposed charging letter to FMC Technologies that

alleged that FMC Technologies committed 78 violations of the Regulations, specifically:

#### Charges 1-6 15 C.F.R. § 764.2(a) - Engaging in Prohibited Conduct by Exporting Valves Without the Required Licenses

On six occasions between on or about December 8, 2005 and on or about January 22, 2007, FMC Technologies engaged in conduct prohibited by the Regulations by exporting butterfly valves or check valves, items classified under Export Control Classification Number ("ECCN") 2B350 and controlled for reasons of chemical and biological weapons proliferation, to China, Mexico, Tunisia and Venezuela without the Department of Commerce licenses required by Section 742.2(a) of the Regulations. In so doing, FMC Technologies committed six violations of Section 764.2(a) of the Regulations.

### Charges 7-78 15 C.F.R. § 764.2(a) - Engaging in Prohibited Conduct by Reexporting Valves Without the Required Licenses

On 72 occasions between on or about October 20, 2003 and on or about April 6, 2007, FMC Technologies engaged in conduct prohibited by the Regulations by reexporting butterfly valves, items classified under ECCN 2B350 and controlled for reasons of chemical and biological weapons proliferation, from its warehouses in Singapore, the United Arab Emirates ("UAE") or the United Kingdom to Angola, Bahrain, Chad, China, India, Kazakhstan, Kuwait, Malaysia, Oman, Pakistan, Qatar, the Republic of the Congo, Saudi Arabia, Singapore, Turkmenistan, the UAE, Venezuela and Vietnam without the Department of Commerce licenses required by Section 742.2(a) of the Regulations. In so doing, FMC Technologies committed 72 violations of Section 764.2(a) of the Regulations.

WHEREAS, FMC Technologies has reviewed the proposed charging letter and is

aware of the allegations made against it and the administrative sanctions which could be

imposed against it if the allegations are found to be true;

WHEREAS, FMC Technologies fully understands the terms of this Agreement

and the Order ("Order") that the Assistant Secretary of Commerce for Export

Enforcement will issue if he approves this Agreement as the final resolution of this matter;

Settlement Agreement FMC Technologies, Inc. Page 3 of 5

WHEREAS, FMC Technologies enters into this Agreement voluntarily and with full knowledge of its rights;

WHEREAS, FMC Technologies states that no promises or representations have been made to it other than the agreements and considerations herein expressed;

WHEREAS, FMC Technologies neither admits nor denies the allegations contained in the proposed charging letter;

WHEREAS, FMC Technologies wishes to settle and dispose of all matters

alleged in the proposed charging letter by entering into this Agreement; and

WHEREAS, FMC Technologies agrees to be bound by the Order, if entered;

NOW THEREFORE, the Parties hereby agree as follows:

1. BIS has jurisdiction over FMC Technologies, under the Regulations, in connection with the matters alleged in the proposed charging letter.

2. The following sanction shall be imposed against FMC Technologies in complete settlement of the alleged violations of the Regulations relating to the transactions specifically detailed in the voluntary self-disclosure and the proposed charging letter:

a. FMC Technologies shall be assessed a civil penalty in the amount of \$610,000, which shall be paid to the U.S. Department of Commerce within 30 days of the date of the Order.

b. The timely payment of the civil penalty agreed to in Paragraph 2.a is hereby made a condition to the granting, restoration, or continuing validity of any export license, permission, or privilege granted, or to be granted, to FMC Technologies. Failure to make timely payment of the civil penalty set forth above Settlement Agreement FMC Technologies, Inc. Page 4 of 5

may result in the denial of all of FMC Technologies' export privileges for a period of one year from the date of imposition of the penalty.

3. Subject to the approval of this Agreement pursuant to Paragraph 8 hereof, FMC Technologies hereby waives all rights to further procedural steps in this matter (except with respect to any alleged violations of this Agreement or the Order, if entered), including, without limitation, any right to: (a) an administrative hearing regarding the allegations in any charging letter; (b) request a refund of any civil penalty paid pursuant to this Agreement and the Order, if entered; and (c) seek judicial review or otherwise contest the validity of this Agreement or the Order, if entered.

4. Upon entry of the Order and timely payment of the \$610,000 civil penalty, BIS will not initiate any further administrative proceeding against FMC Technologies in connection with any violation of the Act or the Regulations arising out of the transactions specifically detailed in the voluntary self-disclosure and in the proposed charging letter.

5. BIS will make the proposed charging letter, this Agreement, and the Order, if entered, available to the public.

6. This Agreement is for settlement purposes only. Therefore, if this Agreement is not accepted and the Order is not issued by the Assistant Secretary of Commerce for Export Enforcement pursuant to Section 766.18(a) of the Regulations, no Party may use this Agreement in any administrative or judicial proceeding and the Parties shall not be bound by the terms contained in this Agreement in any subsequent administrative or judicial proceeding.

7. No agreement, understanding, representation or interpretation not contained in this Agreement may be used to vary or otherwise affect the terms of this

Settlement Agreement FMC Technologies, Inc. Page 5 of 5

Agreement or the Order, if entered; nor shall this Agreement serve to bind, constrain, or otherwise limit any action by any other agency or department of the U.S. Government with respect to the facts and circumstances addressed herein.

8. This Agreement shall become binding on the Parties only if the Assistant Secretary of Commerce for Export Enforcement approves it by entering the Order, which will have the same force and effect as a decision and order issued after a full

administrative hearing on the record.

9. Each signatory affirms that he has authority to enter into this Settlement Agreement and to bind his respective party to the terms and conditions set forth herein.

BUREAU OF INDUSTRY AND SECURITY U.S. DEPARTMENT OF COMMERCE

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Thomas Madigan Director Office of Export Enforcement

Avgust 11, 200 Date:

FMC TECHNOLOGIES, INC.

General Counsel and Secretary

Date:

## PROPOSED CHARGING LETTER

#### CERTIFIED MAIL - RETURN RECEIPT REQUESTED

FMC Technologies, Inc. 1803 Gears Road Houston, Texas 77067

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Attention: Peter D. Kinnear President and Chief Executive Officer

Dear Mr. Kinnear:

The Bureau of Industry and Security, U.S. Department of Commerce ("BIS"), has reason to believe that FMC Technologies, Inc. of Houston, Texas ("FMC Technologies") has committed 78 violations of the Export Administration Regulations (the "Regulations"),<sup>1</sup> which are issued under the authority of the Export Administration Act of 1979, as amended (the "Act").<sup>2</sup> Specifically, BIS charges that FMC Technologies committed the following violations:

## Charges 1-6 15 C.F.R. § 764.2(a) - Engaging in Prohibited Conduct by Exporting Valves Without the Required Licenses

As described in greater detail in the attached Schedule A, which is incorporated herein, on six occasions between on or about December 8, 2005 and on or about January 22, 2007, FMC Technologies engaged in conduct prohibited by the Regulations by exporting butterfly valves or check valves, items classified under Export Control Classification Number ("ECCN") 2B350 and controlled for reasons of chemical and biological weapons proliferation, to China, Mexico, Tunisia and Venezuela without the Department of Commerce licenses required by Section 742.2(a) of the Regulations. In so doing, FMC Technologies committed six violations of Section 764.2(a) of the Regulations.

<sup>&</sup>lt;sup>1</sup> The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2009). The violations charged occurred during 2003 to 2007. The Regulations governing the violations at issue are found in the 2003 to 2007 versions of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2003-2007)). The 2009 Regulations govern the procedural aspects of this case.

<sup>&</sup>lt;sup>2</sup> 50 U.S.C. app. §§ 2401- 2420 (2000). Since August 21, 2001, the Act has been in lapse and the President, through Executive Order 13,222 of August 17, 2001 (3 C.F.R., 2001 Comp. 783 (2002)), which has been extended by successive Presidential Notices, the most recent being that of July 23, 2008 (73 Fed. Reg. 43,603 (July 25, 2008)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. §§ 1701-1707).

FMC Technologies, Inc. Proposed Charging Letter Page 2 of 3

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## Charges 7-78 15 C.F.R. § 764.2(a) - Engaging in Prohibited Conduct by Reexporting Valves Without the Required Licenses

As described in greater detail in the attached Schedule B, which is incorporated herein, on 72 occasions between on or about October 20, 2003 and on or about April 6, 2007, FMC Technologies engaged in conduct prohibited by the Regulations by reexporting butterfly valves, items classified under ECCN 2B350 and controlled for reasons of chemical and biological weapons proliferation, from its warehouses in Singapore, the United Arab Emirates ("UAE") or the United Kingdom to Angola, Bahrain, Chad, China, India, Kazakhstan, Kuwait, Malaysia, Oman, Pakistan, Qatar, the Republic of the Congo, Saudi Arabia, Singapore, Turkmenistan, the UAE, Venezuela and Vietnam without the Department of Commerce licenses required by Section 742.2(a) of the Regulations. In so doing, FMC Technologies committed 72 violations of Section 764.2(a) of the Regulations.

\* \* \* \* \*

Accordingly, FMC Technologies is hereby notified that an administrative proceeding is instituted against it pursuant to Section 13(c) of the Act and Part 766 of the Regulations for the purpose of obtaining an order imposing administrative sanctions, including any or all of the following:

- The maximum civil penalty allowed by law of up to the greater of \$250,000 per violation or twice the value of the transaction that is the basis of the violation;<sup>3</sup>
- Denial of export privileges; and/or
- Exclusion from practice before BIS.

If FMC Technologies fails to answer the charges contained in this letter within 30 days after being served with notice of issuance of this letter, that failure will be treated as a default. 15 C.F.R. §§ 766.6 and 766.7 (2009). If FMC Technologies defaults, the Administrative Law Judge may find the charges alleged in this letter are true without a hearing or further notice to FMC Technologies. The Under Secretary of Commerce for Industry and Security may then impose up to the maximum penalty on each of the charges in this letter.

FMC Technologies is further notified that it is entitled to an agency hearing on the record if it files a written demand for one with its answer. 15 C.F.R. § 766.6 (2009). FMC Technologies is also entitled to be represented by counsel or other authorized

<sup>&</sup>lt;sup>3</sup> See International Emergency Economic Powers Enhancement Act of 2007, Pub. L. No. 110-96, 121 Stat. 1011 (2007).

FMC Technologies, Inc. Proposed Charging Letter Page 3 of 3

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representative who has power of attorney to represent it. 15 C.F.R. §§ 766.3(a) and 766.4 (2009).

The Regulations provide for settlement without a hearing. 15 C.F.R. § 766.18 (2009). Should FMC Technologies have a proposal to settle this case, FMC Technologies or its representative should transmit it through the attorney representing BIS named below.

The U.S. Coast Guard is providing administrative law judge services in connection with the matters set forth in this letter. Accordingly, FMC Technologies' answer must be filed in accordance with the instructions in Section 766.5(a) of the Regulations with:

U.S. Coast Guard ALJ Docketing Center 40 S. Gay Street Baltimore, Maryland 21202-4022

In addition, a copy of FMC Technologies' answer must be served on BIS at the following address:

Chief Counsel for Industry and Security Attention: Thea D. R. Kendler Room H-3839 United States Department of Commerce 14th Street and Constitution Avenue, N.W. Washington, D.C. 20230

Thea D. R. Kendler is the attorney representing BIS in this case; any communications that FMC Technologies may wish to have concerning this matter should occur through her. Ms. Kendler may be contacted by telephone at (202) 482-5301.

Sincerely,

l Thomas Madigan Director Office of Export Enforcement

Enclosures

FMC Technologies, Inc. Proposed Charging Letter Schedule A Page 1 of 1

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Charge No.	Export Date	Destination	Commodity Decription	ECCN	Total Value	Order #	Violation
1	8-Dec-05	VENEZUELA	Butterfly Valves	2B350	\$288	2122998	15 C.F.R. § 764.2(a)
2	28-Jul-06	VENEZUELA	Butterfly Valves	2B350	\$404	2144784	15 C.F.R. § 764.2(a)
3	8-Nov-06	VENEZUELA	Butterfly Valves	2B350	\$524	2144784	15 C.F.R. § 764.2(a)
4	14-Dec-06	CHINA	Butterfly Valves	2B350	\$7,159	2156842	15 C.F.R. § 764.2(a)
5	18-Dec-06	TUNISIA	Check Valves	2B350	\$16,298	2134493	15 C.F.R. § 764.2(a)
6	22-Jan-07	MEXICO	Butterfly Valves	2B350	\$16,851	2160819	15 C.F.R. § 764.2(a)

FMC Technologies, Inc. Proposed Charging Letter Schedule B Page 1 of 3

Charge No.	Reexport Date	Reexport Location	Destination	Commodity Decription	ECCN	Totai Vaiue	Order #	Violation
7	20-Oct-03	U.A.E.	BAHRAIN	Butterfly Valves	2B350	\$3,596	7516	15 C.F.R. § 764.2(a)
8	20-Oct-03	U.A.E.	SAUDI ARABIA	Butterfly Valves	2B350	\$15,063	7528 7517	15 C.F.R. § 764.2(a)
9	13-Nov-03	United Kingdom	CHAD	Butterfly Valves	2B350	\$629	A002253	15 C.F.R. § 764.2(a)
10	19-Nov-03	United Kingdom	CHAD	Butterfly Valves	2B350	\$1,259	A002253	15 C.F.R. § 764.2(a)
11	3-Dec-03	United Kingdom	CHAD	Butterfly Valves	2B350	\$3,433	A002253	15 C.F.R. § 764.2(a)
12	3-Dec-03	Singapore	U.A.E.	Butterfly Valves	2B350	\$6,132	S000045	15 C.F.R. § 764.2(a)
13	5-Mar-04	United Kingdom	KAZAKHSTAN	Butterfly Valves	2B350	\$2,571	A002727 A002728	15 C.F.R. § 764.2(a)
14	11-Mar-04	United Kingdom	KAZAKHSTAN	Butterfly Valves	2B350	\$4,509	A002727 A002728	15 C.F.R. § 764.2(a)
15	17-Mar-04	U.A.E.	OMAN	Butterfly Valves	2B350	\$6,442	8146	15 C.F.R. § 764.2(a)
16	18-Mar-04	U.A.E.	SAUDI ARABIA	Butterfly Valves	2B350	\$2,877	8229	15 C.F.R. § 764.2(a)
17	25-Mar-04	U.A.E.	OMAN	Butterfly Valves	2B350	\$1,510	8275	15 C.F.R. § 764.2(a)
18	25-Mar-04	U.A.E.	QATAR	Butterfly Valves	2B350	\$1,333	8248	15 C.F.R. § 764.2(a)
19	29-Mar-04	United Kingdom	KAZAKHSTAN	Butterfly Valves	2B350	\$2,844	A002792	15 C:F.R. § 764.2(a)
20	6-Apr-04	U.A.E.	QATAR	Butterfly Valves	2B350	\$970	8294	15 C.F.R. § 764.2(a)
21	9-Apr-04	United Kingdom	KAZAKHSTAN	Butterfly Valves	2B350	\$3,743	A002793 A002993	15 C.F.R. § 764.2(a)
22	12-Apr-04	Singapore	VIETNAM	Butterfly Valves	2B350	\$2,825	S000491	15 C.F.R. § 764.2(a)
23	25-Apr-04	Singapore	VIETNAM	Butterfly Valves	2B350	\$1,412	S000491	15 C.F.R. § 764.2(a)
24	29-Apr-04	United Kingdom	KAZAKHSTAN	Butterfly Valves	2B350	\$4,237	A002793 A002993	15 C.F.R. § 764.2(a)
25	22-Sep-04	Singapore	INDIA	Butterfly Valves	2B350	\$2,673	S001257	15 C.F.R. § 764.2(a)
26	26-Oct-04	U.A.E.	SAUDI ARABIA	Butterfly Valves	2B350	\$1,079	D000797	15 C.F.R. § 764.2(a)
27	1-Nov-04	U.A.E.	SAUDI ARABIA	Butterfly Valves	2B350	\$360	D000797	15 C.F.R. § 764.2(a)
28	17-Nov-04	U.A.E.	QATAR	Butterfly Valves	2B350	\$687	D000930	15 C.F.R. § 764.2(a)
29	17-Nov-04	U.A.E.	QATAR	Butterfly Valves	2B350	\$2,448	D000932	15 C.F.R. § 764.2(a)
30	30-Nov-04	U.A.E.	KUWAIT	Butterfly Valves	2B350	\$1,436	D000946	15 C.F.R. § 764.2(a)
31	8-Dec-04	U.A.E.	PAKISTAN	Butterfly Valves	2B350	\$6,906	D001006	15 C.F.R. § 764.2(a)
32	14-Dec-04	U.A.E.	QATAR	Butterfly Valves	2B350	\$2,006	D000932	15 C.F.R. § 764.2(a)
33	19-Dec-04	U.A.E.	QATAR	Butterfly Valves	2B350	\$2,062	D000930	15 C.F.R. § 764.2(a)
34	27-Dec-04	U.A.E.	PAKISTAN	Butterfly Valves	2B350	\$1,362	D001006	15 C.F.R. § 764.2(a)
35	12-Jan-05	U.A.E.	SAUDI ARABIA	Butterfly Valves	2B350	\$4,312	D001174	15 C.F.R. § 764.2(a)
36	10-Feb-05	U.A.E.	SAUDI ARABIA	Butterfly Valves	2B350	\$1,698	D001174	15 C.F.R. § 764.2(a)
37	16-Feb-05	U.A.E.	QATAR	Butterfly Valves	2B350	\$2,724	D001368	15 C.F.R. § 764.2(a)
38	13-Jun-05	U.A.E.	PAKISTAN	Butterfly Valves	2B350	\$1,776	D001916	15 C.F.R. § 764.2(a)
39	23-Jun-05	U.A.E.	PAKISTAN	Butterfly Valves	2B350	\$1,817	D001916	15 C.F.R. § 764.2(a)
40	7-Jul-05	U.A.E.	QATAR	Butterfly Valves	2B350	\$2,687	D002122	15 C.F.R. § 764.2(a)
41	3-Aug-05	United Kingdom	VENEZUELA	Butterfly Valves	2B350	\$288	2111548	15 C.F.R. § 764.2(a)
42	4-Aug-05	U.A.E.	KUWAIT	Butterfly Valves	2B350	\$6,881	D002124	15 C.F.R. § 764.2(a)

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FMC Technologies, Inc. Proposed Charging Letter Schedule B Page 2 of 3

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Charge No.	Reexport Date	Reexport Location	Destination	Commodity Decription	ECCN	Total Value	Order #	Violation
43	17-Aug-05	U.A.E.	QATAR	Butterfly Valves	2B350	\$15,417	D002313	15 C.F.R. § 764.2(a)
44	6-Sep-05	U.A.E.	QATAR	Butterfly Valves	2B350	\$1,343	D002328	15 C.F.R. § 764.2(a)
45	16-Oct-05	U.A.E.	SAUDI ARABIA	Butterfly Valves	2B350	\$1,776	D002485	15 C.F.R. § 764.2(a)
46	10-Nov-05	United Kingdom	CHAD	Butterfly Valves	2B350	\$3,140	A005899	15 C.F.R. § 764.2(a)
47	16-Nov-05	U.A.E.	QATAR	Butterfly Valves	2B350	\$3,057	D002734	15 C.F.R. § 764.2(a)
48	18-Jan-06	U.A.E.	QATAR	Butterfly Valves	2B350	\$3,440	D003107	15 C.F.R. § 764.2(a)
49	13-Feb-06	U.A.E.	QATAR	Butterfly Valves	2B350	\$8,652	D003227	15 C.F.R. § 764.2(a)
50	22-Feb-06	U.A.E.	QATAR	Butterfly Valves	2B350	\$486	D003279	15 C.F.R. § 764.2(a)
51	6-Mar-06	Singapore	CHINA	Butterfly Valves	2B350	\$1,713	S002989	15 C.F.R. § 764.2(a)
52	20-Mar-06	U.A.E.	SAUDI ARABIA	Butterfly Valves	2B350	\$9,851	D003418 D003419	15 C.F.R. § 764.2(a)
53	11-Apr-06	U.A.E.	SAUDI ARABIA	Butterfly Valves	2B350	\$932	D003421	15 C.F.R. § 764.2(a)
54	19-Apr-06	U.A.E.	QATAR	Butterfly Valves	2B350	\$764	D003536	15 C.F.R. § 764.2(a)
55	19-Apr-06	U.A.E.	QATAR	Butterfly Valves	2B350	\$5,594	D003536 D003537	15 C.F.R. § 764.2(a)
56	16-May-06	U.A.E.	QATAR	Butterfly Valves	2B350	\$764	D003537	15 C.F.R. § 764.2(a)
57	26-Aug-06	U.A.E.	QATAR	Butterfly Valves	2B350	\$1,747	D004253	15 C.F.R. § 764.2(a)
58	7-Sep-06	U.A.E.	KUWAIT	Butterfly Valves	2B350	\$3,729	D004338	15 C.F.R. § 764.2(a)
59	10-Oct-06	U.A.E.	KUWAIT	Butterfly Valves	2B350	\$984	D004338	15 C.F.R. § 764.2(a)
60	10-Oct-06	U.A.E.	QATAR	Butterfly Valves	2B350	\$16,427	D004443 D004444	15 C.F.R. § 764.2(a)
61	19-Oct-06	U.A.E.	QATAR	Butterfly Valves	2B350	\$5,120	D003098 D004195	15 C.F.R. § 764.2(a)
62	12-Nov-06	U.A.E.	QATAR	Butterfly Valves	2B350	\$821	D004778	15 C.F.R. § 764.2(a)
63	12-Nov-06	U.A.E.	QATAR	Butterfly Valves	2B350	\$873	D004778	15 C.F.R. § 764.2(a)
64	3-Dec-06	U.A.E.	KUWAIT	Butterfly Valves	2B350	\$10,061	D004779	15 C.F.R. § 764.2(a)
65	5-Dec-06	U.A.E.	QATAR	Butterfly Valves	2B350	\$5,055	D004565	15 C.F.R. § 764.2(a)
66	14-Dec-06	U.A.E.	TURKMENISTAN	Butterfly Valves	2B350	\$3,093	D004459	15 C.F.R. § 764.2(a)
67	22-Dec-06	U.A.E.	QATAR	Butterfly Valves	28350	\$1,633	D002991	15 C.F.R. § 764.2(a)
68	8-Jan-07	United Kingdom	ANGOLA	Butterfly Valves	2B350	\$1,454	A008550	15 C.F.R. § 764.2(a)
69	16-Jan-07	U.A.E.	KUWAIT	Butterfly Valves	2B350	\$10,493	D005127 D005128	15 C.F.R. § 764.2(a)
70	17-Jan-07	United Kingdom	ANGOLA	Butterfly Valves	2B350	\$1,725	A009173	15 C.F.R. § 764.2(a)
71	7-Feb-07	U.A.E.	SINGAPORE	Butterfly Valves	2B350	\$12,893	XSH0077 XSH0079	15 C.F.R. § 764.2(a)
72	12-Feb-07	U.A.E.	MALAYSIA	Butterfly Valves	2B350	\$4,312	D005337	15 C.F.R. § 764.2(a)
73	25-Feb-07	U.A.E.	KUWAIT	Butterfly Valves	2B350	\$937	D004779	15 C.F.R. § 764.2(a)
74	25-Feb-07	U.A.E.	QATAR	Butterfly Valves	2B350	\$3,279	D004828 D005101	15 C.F.R. § 764.2(a)
75	26-Feb-07	United Kingdom	ANGOLA	Butterfly Valves	2B350	\$1,551	A009173	15 C.F.R. § 764.2(a)
76	15-Mar-07	U.A.E.	KUWAIT	Butterfly Valves	2B350	\$5,903	D005127 D005128	15 C.F.R. § 764.2(a)
77	21-Mar-07	United Kingdom	ANGOLA	Butterfly Valves	2B350	\$575	A009173	15 C.F.R. § 764.2(a)

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Charge No.	Reexport Date	Reexport Location	Destination	Commodity Decription	ECCN	Total Value	Order #	Vioiation
78	6-Apr-07	United Kingdom	REPUBLIC OF THE CONGO	Butterfly Valves	2B350	\$4,434	A009586 A009587	15 C.F.R. § 764.2(a)