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Attorney in charge: Morten Ulland Henriksen

**THE NORWEGIAN COMPETITION ACT SECTION § 18
SIMPLIFIED NOTIFICATION ("FORENKLET MELDING") OF CONCENTRATION**

Halliburton AS' acquisition of 100% of the shares in Optime Subsea AS

Advokatfirmaet Schjødt AS, Reg. No. 996 918 122

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1. CONTACT DETAILS

1.1 The Notifying Party

Name: Halliburton AS
Address: Eldfiskvegen 1,
4056 Tananger
Org.no.: 968 967 983

1.2 The Notifying Party's representative

Name: Advokatfirmaet Schjødt AS
Attn.: Morten U. Henriksen
Address: Tordenskiolds gate 12
P.O. Box 2444 Solli
NO-0201 Oslo, Norway
Phone: +47 404 68 550
E-mail address: morten.henriksen@schjodt.com

1.3 Target company

Name: Optime Subsea AS
Address: Merdevegen 1
3676 Notodden
Org.no.: 988 810 401

1.4 Target company's representative

Name: Advokatfirmaet Thommessen AS
Attn.: Espen Randen
Address: Ruseløkkveien 38
0251 Oslo
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2. THE TRANSACTION

2.1 Introduction

- (1) The transaction entails that Halliburton AS, a wholly owned subsidiary of the Halliburton group, (hereinafter "**Halliburton**" or the "**Notifying Party**") will acquire 100% of the shares in Optime Subsea AS (hereinafter "**Optime**" or "**Target**") (collectively hereinafter the "**Parties**") (the "**Proposed Transaction**").

2.2 Description of the Proposed Transaction

- (2) The Proposed Transaction is regulated by a share purchase agreement dated 20 December 2024, whereby Halliburton will acquire 100% of the shares in Optime from Optime Holding AS (the "**Seller**").
- (3) Through the purchase of 100% of the shares, Halliburton will obtain sole control over Optime.
- (4) The Proposed Transaction is subject to customary conditions including approval from the Norwegian Competition Authority and will not be completed before the necessary clearance has been obtained.

2.3 The rationale for the Proposed Transaction

- (5) The Proposed Transaction will combine the complementary subsea businesses of Halliburton and Optime to drive innovation and further enhance subsea service delivery throughout the subsea project lifecycle. This will benefit oil and gas ("**O&G**") customers and their offshore projects, and ultimately consumers.

3. MERGER FILING OBLIGATION

- (6) The Notifying Party's acquisition of 100% of the shares in, and control over Optime, triggers an obligation to notify the Proposed Transaction to the Norwegian Competition Authority since the Parties have an individual and combined turnover in Norway exceeding the turnover thresholds, cf. the Norwegian Competition Act (the "**NCA**") Section 18, cf. Section 17, and item 5 below.
- (7) Further, the requirements for notifying the Proposed Transaction by way of simplified notification is met, as the Parties do not have combined market shares over 20% on any markets in which there is a horizontal overlap and do not have individual nor combined market shares over 30% on any markets in which there is a vertical overlap, cf. the Norwegian Regulation for the Notification of Mergers (the "**Regulation on Notifications**") Section 3(1) no. 3 b) and c). This will be elaborated further under item 6 below.

4. THE PARTIES

4.1 The Notifying Party – Halliburton AS

- (8) Founded in 1919, the Halliburton group is a global full-scale provider of products and services to the energy industry. The Group is incorporated in the United States, and it has today more than 40,000 employees in approx. 70 countries. The Group today comprises of over 250 legal entities that mainly comprise of holding companies and local entities established in one of the 70 countries Halliburton is present and that have the have the legal right and capability to deliver all of Halliburton's products and services as described below in paragraph 10. A list of Halliburton's largest subsidiaries globally is included in **Appendix 1**

Appendix 1: List of Halliburton's largest subsidiaries globally

- (9) The Halliburton Group's Norwegian business is mainly carried out through Halliburton AS, (org.no. 968 967 983), a wholly owned subsidiary of Halliburton Global Holdings Limited. The ultimate parent company, Halliburton Company is publicly traded on the New York Stock Exchange. A certificate of ownership showing the ownership structure from Halliburton up to the ultimate parent company, Halliburton Company is included as **Appendix 2**.

Appendix 2: Certificate of ownership Halliburton AS

- (10) Halliburton serves the O&G industry throughout the lifecycle of the reservoir – from locating hydrocarbons and managing geological data, to drilling and formation evaluation, well construction and completion, and optimizing production through the life of the field. Halliburton Group's complete product and service offering is divided into the following two main business areas:

- (i) **Completion and Production**¹; delivers cementing, stimulation, specialty chemicals, intervention, pressure control, artificial lift, and completion products and services. The segment consists of the following product service lines:
- Artificial Lift: provides services to maximize reservoir and wellbore recovery by applying lifting technology, intelligent field management solutions, and related services throughout the life of the well, including electrical submersible pumps.
 - Cementing: involves bonding the well and well casing while isolating fluid zones and maximizing wellbore stability. The cement product service line also provides casing equipment.
 - Completion Tools: provides downhole solutions and services to our customers to complete their wells, including well completion products and services, intelligent well completions, liner hanger systems, sand control systems, multilateral systems, and service tools.
 - Multi-Chem: provides customized specialty chemicals and services for completion, production, midstream, and downstream to optimize flow assurance and integrity.
 - Pipeline & Process Services: provides a complete range of pre-commissioning, commissioning, maintenance, and decommissioning services to the onshore and offshore pipeline and process plant construction commissioning and maintenance industries:
 - Production Enhancement: includes stimulation services and sand control services. Stimulation services optimize reservoir production through a variety of pressure pumping services and chemical processes, commonly known as hydraulic fracturing and acidizing. Sand control services include fluids and chemicals for the prevention of sand production of unconsolidated reservoirs.
 - Production Solutions: provides customized well intervention solutions to increase well performance, which includes coiled tubing, hydraulic workover units, downhole tools, pumping services, and nitrogen services.

¹ Halliburton does not have artificial lift or Multi-chem business in Norway.

(ii) **Drilling and Evaluation;** provides field and reservoir modeling, drilling, fluids, evaluation and precise wellbore placement solutions that enable customers to model, measure, drill, and optimize their well construction activities. The segment consists of the following product service lines:

- Baroid: provides drilling fluid systems, performance additives, completion fluids, solids control, specialized testing equipment, and waste management services for drilling wells, completion, and workover operations.
- Drill Bits and Services: provides roller cone bits, fixed cutter bits, hole enlargement and related downhole tools and services used in drilling wells. In addition, coring equipment and services are provided to extract formation cores for rock properties evaluation.
- Project Management: provides integrated solutions by leveraging the full line of our well construction, well completion, and well intervention services to solve customer challenges throughout the entire well lifecycle, including project management and integrated asset management.
- Landmark Software and Services: provides cloud based digital services and artificial intelligence solutions on an open architecture for subsurface insights, integrated well construction, and reservoir and production management.
- Sperry Drilling: provides drilling systems and services that offer directional control for precise wellbore placement while providing important measurements about the characteristics of the drill string and geological formations while drilling wells. These services include directional and horizontal drilling, measurement-while-drilling, logging-while-drilling, surface data logging, and rig site information systems.
- Testing and Subsea: provides acquisition and analysis of dynamic reservoir information and reservoir optimization solutions through a broad portfolio of well testing tools, data acquisition services, fluid sampling, surface well testing, subsea safety systems, and underbalanced applications.
- Wireline and Perforating: provides open-hole logging services that supply information on formation evaluation and reservoir fluid analysis, including formation lithology, rock properties, and reservoir fluid properties. Also offered are cased-hole and slickline services, including perforating, pipe recovery services, through-casing formation evaluation and reservoir monitoring, casing and cement integrity measurements, and well intervention services.

(11) As to the potential overlap with the Target (as further described below), subsea well completion and intervention systems and services constitute a small part of Halliburton's total business globally [REDACTED]

[REDACTED] Their offering globally mostly comprises of the production and offering of traditional workover control system ("WOCS") subsea completion systems. These systems are fixed installations connected to the offshore facility/rig using "umbilicals" normally procured by customers for each O&G field as part of a larger well-service contract.

(12) Part of Halliburton's offering within subsea completion and intervention systems is supplied in cooperation with others, where Halliburton has entered into alliances related to innovative subsea safety systems for applications in completion and intervention operations. This includes

Remotely Operated Control System ("**ROCS**") (through an alliance agreement with Optime), Subsea Control & Intervention Light System ("**SCILS**") (through an alliance agreement with Optime), and Trident-OVS Light Well Intervention System (through an alliance agreement with Trendsetter Engineering).

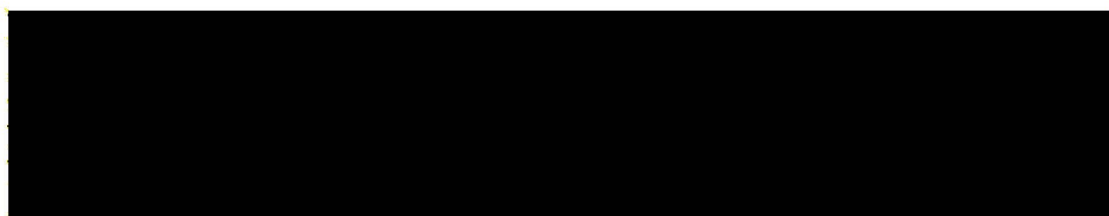
(13) More specifically, Halliburton's alliance agreement with Optime includes the promotion, marketing and sale of subsea well services (the "**Alliance Agreement**"), in the form of subsea well completion and intervention services using the following two systems:


- (i) ROCS, which is a subsea control system, more specifically a completion landing string umbilical-less control system. ROCS simplifies and makes subsea well completion more efficient by eliminating the necessity for topside IWOCS (defined below) and large umbilicals.
- (ii) SCILS, which is an Intervention Workover Control System ("**IWOCS**"). This is an advanced subsea system which simplifies and makes well access and well intervention more efficient by integrating wireless communication, thereby eliminating the reliance on umbilicals, and requiring less people and topside equipment to operate (reducing the risk of injuries) which reduces mobilization time and cost for the customer.

(14)



(15)



(16) As mentioned above, Halliburton also has an alliance agreement with Trendsetter Engineering through which they deliver Trident-OVS Light Well Intervention System, for open water mechanical and hydraulic intervention from mobile offshore drilling units ("**MODU**") or multi-service vessels ("**MSV**"). Even though both the Trident-OVS Light Well Intervention System and SCILS both can be considered subsea well intervention systems, these do not have the same function; SCILS (which is a "pure" control system without barrier elements) would instead be a potential control system for the Trident-OVS Light Well Intervention System, which has a more specific control mechanism and additional functions related to securing well access for injecting fluids and performing downhole operations from a vessel or rig. 



(17) In addition, Halliburton AS, the Halliburton Group has control in the following businesses in Norway:

- Easywell Solutions AS, org. no. 981 242 017, a company specializing in reservoir completion products (wholly owned subsidiary of Halliburton International GmbH),
- Landmark Graphics AS, org. no. 971 106 541, supplier of integrated E&P technical and economic software and services which support decision making about finding, drilling, and producing oil and gas (wholly owned subsidiary of Halliburton Landmark Holdings UK Ltd),
- Resoptima AS, org. nr. 995 145 073, a company specializing in the development and sales of software to the O&G industry. (wholly owned subsidiary of Landmark Graphics AS),
- Halliburton Eiendom 1 AS, org.no. 968 967 983), development and maintenance of the commercial property Ekofiskveien 1 in Tananger in Sola municipality (wholly owned subsidiary of Halliburton AS).

(18) For further details about the Notifying Party and the Halliburton group, please refer to: <https://www.halliburton.com/>

4.2 Target – Optime Subsea AS

(19) Optime Subsea AS (org.no. 988 810 401) is an early-stage company (founded in 2015) engaged in the business of developing and supplying subsea technology and systems. It has offices in Notodden, Kongsberg and Oslo in Norway and Houston in the US.

(20) Optime develops, produces, supplies and performs services within subsea technology and systems. More specifically, Optime offers two main products² on the market:

- ROCS (see Section 4.1 above);
- SCILS (see Section 4.1 above);

(21) Both ROCS and SCILS are offered through sale and rental contracts to customers, with sales accounting for approximately ■ % , rental ■ % and service personnel ■ % of their turnover. In addition, Optime provides installation, engineering, operation, training and support services in relation to their own products.

(22) Optime's market presence is mostly limited to the Norwegian Continental Shelf ("**NCS**"). Globally sales and rentals of the products are generally done through the Alliance Agreement with Halliburton, and where Optime functions as a sub-contractor to Halliburton. The Alliance Agreement was entered into to enable Optime to expand its sales of the products to the rest of the world, excluding Norway and Norwegian customers – where Optime already had an established customer base. Optime thereby benefits from Halliburton's infrastructure, presence and track record on a global scale.

(23) Optime Subsea AS has one subsidiary, Optime Subsea Service AS (org. no. 914 083 060). The subsidiary has no employees or activities other than owning Optime's ROCS and SCILS units that are used for rental. Rental to customers is managed by Optime itself, which receives the rental income from the customers and pays rent to Optime Subsea Service AS.

² For the sake of completeness Optime also offers a Hyperbaric Test System to a limited number of customers. This is a subsea pressure chamber enabling the customers to test, monitor and document their products in numerous different environments and scenarios.

- (24) For further details about Optime, please refer to: <https://www.optimesubsea.com/>

5. TURNOVER

Involved undertakings	Turnover in Norway
Halliburton	██████████
Optime Subsea	mNOK 116,4
Total	██████████

6. THE CRITERIA FOR SUBMITTING A SIMPLIFIED NOTIFICATION ARE MET

6.1 General

- (25) As described above under Section 4.1, Halliburton is a full-scale supplier of products and services to the energy industry, including subsea completion and intervention products and services. The product and service offering includes conventional subsea completion systems (normally) offered as part of a larger well service package. Halliburton does also offer umbilical-less subsea well intervention systems and completion systems produced by third-parties through the alliances with Optime and Trendsetter Engineering.

- (26) As described above under Section 4.2, Optime develops and supplies umbilical-less subsea well completion and intervention systems (SCILS and ROCS) and affiliated well services related to these systems. However, Optime only offers these systems directly to O&G operators (by rental or sale) on the NCS. Outside of the NCS, under the Alliance Agreement the systems are generally sold exclusively through Halliburton.

- (27) Both Parties offer products and services to subsea well completion and subsea well intervention, but there is a limited horizontal overlap (well below 20%) between the Parties' business globally. Within subsea well completion systems and affiliated services the horizontal overlap is limited due to Halliburton only producing conventional subsea well completion systems and the offering of the umbilical-less system ROCS is fully contingent on the Alliance Agreement.⁴ Within subsea well intervention systems and affiliated services the horizontal overlap is even more absent due to Halliburton not having any customers globally ██████████
██████████

6.2 Limited horizontal overlap (below 20%)

6.2.1 Subsea Well Completion Systems and Services

- (28) To Halliburton's knowledge, neither the EC nor the Norwegian Competition Authority ("**NCA**"), have assessed the market for subsea well completion systems and affiliated services in previous decisions.

- (29) The Notifying Party submits that the relevant product market comprises of an overall market for subsea completion products and services, i.e. solutions. A broad understanding would also

³ Halliburton's total group turnover of USD ██████████ in Norway in 2023 has been calculated to NOK based on Norges Bank's exchange rate for 2023 which was 10,5647 NOK pr. 1 USD.

⁴ As shown by Halliburton's and Optime's respective contribution to the Alliance, the Parties' product and service offering is highly complementarily to the extent that they are part of a chain flow and as such, they may be purchased on a single contract basis.

be in line with the EC's previous decisional practice in relation to well completion products and services.⁵

- (30) In any event, since the Proposed Transaction would not lead to any competition concerns regardless of market definition, the Parties would for the purpose of this notification apply the narrowest possible delineation of the hypothetical market for subsea well completion systems and affiliated services.
- (31) Much, the same, the exact delineation of the geographic market could in our case be left open, due to [REDACTED] resulting in the transaction not leading to any competitive concerns on a hypothetical NCS market.
- (32) Optime provides subsea well completion systems and services in connection with ROCS. Optime's market share on a global market for subsea well completion products and services is [REDACTED], consisting of sale of units to both Halliburton under the Alliance Agreement and third parties such as Equinor, AkerBP and Wintershall DEA.⁷ On a national market, Optime's market share is [REDACTED], which consists of sales of systems and affiliated services to Aker BP, Wintershall DEA and Equinor.
- (33) Halliburton offers some conventional subsea well completion systems and affiliated services in addition to the Alliance Agreement on a global basis [REDACTED]. The estimated market share of Halliburton on a hypothetical global market for subsea well completion systems and affiliated services is approximately [REDACTED]. The Parties' estimated combined market share on such a market would thus be [REDACTED]. Post-Transaction, the Parties will continue to meet competition from large competitors such as [REDACTED].

6.2.2 Subsea Well Intervention systems and affiliated services

- (34) To Halliburton's knowledge, neither the EC nor the Norwegian Competition Authority ("NCA"), have assessed the market for subsea well intervention systems and affiliated services in previous decisions.
- (35) Halliburton submits that there is basis for establishing an overall market for subsea well intervention products and services, consisting of integrated subsea well intervention products and services which cover the lifecycle of an offshore O&G field from start of production. These

⁵ See Case COMP/M.197 *Shell Petroleum N.V./Halliburton Company/WellDynamics* para. 20.

⁶ As the Parties' Alliance Agreement [REDACTED]

⁷ Optime's market share on the global market for subsea well completion systems and services is calculated based on the parties' best estimate based on the total size of the global market and Optime's own turnover. The global market is estimated to be approx. USD [REDACTED] in 2023 and is based on publicly available information about largest competitors' turnover and tenders announced. Optime's turnover in 2023 was approx. MNOK [REDACTED] (calculated based on Norges Bank's exchange rate for 2023 which was 10,5647 NOK pr. 1 USD)

⁸ Information on the total value of a hypothetical NCS market for subsea well completion systems is not readily available due to many of the suppliers' operating globally and not reporting their turnover based on region. The total market size has therefore been calculated based on the number for estimated units in operation in 2023. According to Optime's best estimation there are approx. [REDACTED]

⁹ Halliburton's market share on the global market for subsea well completion systems and services is calculated based on the parties' best estimate based on the total size of the global market and Halliburton's own turnover. The global market is estimated to be approx. USD [REDACTED] in 2023 and is based on publicly available information about largest competitors' turnover and tenders announced. Halliburton's turnover in 2023 was approx. USD [REDACTED]

systems and services are used for safe well access for subsea well installation and completion, diagnostics, maintenance, repairs and enhanced production.

- (36) In any event, since the Proposed Transaction would not lead to any competition concerns regardless of market definition, the Parties would (as done for subsea well completion products above) for the purpose of this notification apply the narrowest possible delineation of the hypothetical market for subsea well intervention systems and affiliated services. The purpose of the subsea well intervention system is to facilitate and control well access in connection with certain intervention operations which includes work repair, maintenance and other work carried out for the purpose of optimizing the productivity of the well.
- (37) The exact geographic delineation of the relevant product market could in any event be left open in our case [REDACTED] meaning that the transaction would not lead to any competition concerns on a hypothetical NCS market for subsea well intervention systems and services.
- (38) Optime provides subsea well intervention services with SCILS. Optime's market share on a global market for subsea well intervention products and services is [REDACTED] consisting of sale of units to both Halliburton under the Alliance Agreement and third parties such as AkerBP and Wintershall DEA.¹⁰ On hypothetical NCS market, Optime's market share is [REDACTED], which consists of sales and rental of modules together with affiliated services to Equinor, AkerBP and Wintershall DEA.
- (39) [REDACTED]
[REDACTED] Halliburton has not delivered subsea well intervention systems and affiliated services to customers globally in 2023. If one takes into account the alliance agreements, Halliburton holds an estimated market share of approximately [REDACTED] on the global market for subsea well intervention systems and services.
- (40) The parties' combined market share on a global market for subsea intervention systems and services would thus be approximately [REDACTED]. Post-Transaction, the Parties will continue to meet competition from competitors such as [REDACTED]. Additionally, many operators have the necessary systems, equipment and personnel in-house.

¹⁰ Optime's market share on the market for subsea well intervention systems and services is calculated based on the parties' best estimate based on the total size of the global market. The global market is estimated to be approx. USD [REDACTED] in 2023 and is based on publicly available information about largest competitors' turnover and tenders announced. Optime's turnover in 2023 was approx. MNOK [REDACTED] (calculated based on Norges Bank's exchange rate for 2023 which was 10,5647 NOK pr. 1 USD)

¹¹ Information on the total value of a hypothetical NCS market for subsea well intervention systems is not readily available due to many of the suppliers' operating globally and not reporting their turnover based on region. The total market size has therefore been calculated based on the number for estimated units in operation in 2023. According to Optime's best estimation there are approx. [REDACTED]

¹² Halliburton's market share on the market for subsea well intervention systems and services is calculated based on the parties' best estimate based on the total size of the global market. The global market is estimated to be approx. USD [REDACTED] in 2023 and is based on publicly available information about largest competitors' turnover and tenders announced. Halliburton's turnover in 2023 was approx. USD [REDACTED]

6.3 Hypothetical vertical overlap

(41) There is no vertical overlap between the Parties' activities on any market today. A finding of a hypothetical vertical overlap would presuppose a division between subsea well completion and intervention systems on the one side and affiliated subsea well completion and intervention services on the other side, whereby one considers that the parties have vertically overlapping business under the Alliance Agreement. [REDACTED]

(42) Halliburton is of the opinion that there is no basis for establishing such a division between systems and affiliated services, based on the current supply and demand situation. As described above, Halliburton considers that the systems and affiliated services would be part of the same overall market for subsea well intervention and subsea well completion, respectively. A vertical overlap would thus only be hypothetical, especially since Halliburton is only active on the market for subsea well intervention system and services through its alliance agreements.

(43) In any event, the combined market shares would well below 30% on any hypothetical upstream or downstream market.

6.4 Conclusion

(44) Based on the above, the Parties will not have a combined market share over 20% on any relevant product market, cf. the Regulation on Notifications Section 3(1) no. 3 a).

(45) The Parties would not either have individual or combined market shares above 30% on any vertically overlapping market, regardless of the definition of the relevant market, cf. the Regulation on Notifications Section 3(1) no. 3 c).

(46) The legal requirement for submitting a simplified notification is therefore met, cf. the Regulation on Notifications Section 3(1) no. 3 a) and c).

7. COMPETITORS, CUSTOMERS AND SUPPLIERS

7.1 The global market for subsea well completion systems and services

7.1.1 Five most important competitors

(47) Halliburton's five most important competitors on the global market for subsea well completion systems and services:

Name	Contact information
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

(48) Optime's five most important competitors on the global market for subsea well completion systems and services:

Name	Contact information
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]

7.1.2 *Five most important suppliers*

(49) Halliburton's five most important suppliers on the global market for subsea well completion systems and services:

Name	Contact information
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]

(50) Optime's five most important suppliers on the global market for subsea well completion systems and services:

Name	Contact information
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7.1.3 *Five most important customers*

(51) Halliburton's five most important customers on the global market for subsea well completion systems and services:

Name	Contact information

(52) Optime's five most important customers on the global market for subsea well completion systems and services:

Name	Contact information

7.2 The global market for subsea well intervention systems and services

7.2.1 Five most important competitors

(53) Halliburton's five most important competitors on the global market for subsea well intervention systems and services:

Name	Contact information
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]

(54) Optime's five most important competitors on the global market for subsea well intervention systems and services:

Name	Contact information
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]

7.2.2 Five most important suppliers

(55) Halliburton's five most important suppliers on the global market for subsea well intervention systems and services:

Name ¹³	Contact information
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]

(56) Optime's five most important suppliers on the global market for subsea well intervention systems and services:

¹³ As elaborated under para. 14-15 does not have their own production of well intervention systems and only offer these through the Alliance Agreements with Optime Subsea and Trendsetter Engineering. Halliburton thus only have two suppliers on this potential market.

Name	Contact information
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

7.2.3 *Five most important customers*

(57) Halliburton's five most important customers on the global market for subsea well intervention systems and services:

Name	Contact information
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

(58) Optime's five most important customers on the global market for subsea well intervention systems and services:

Name	Contact information
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

8. ANNUAL REPORTS

(59) The annual report and annual accounts for Optime Subsea AS and Halliburton Group's Norwegian entities as listed in para 17 are available via: www.brreg.no.

¹⁴ As elaborated on in para. 15, [REDACTED]

(60) The annual accounts for Halliburton are attached as **Appendix 3**.

9. APPENDIXES

10. OTHER RELEVANT COMPETITION AUTHORITIES

(61) The transaction would not trigger a merger filing requirement in any other jurisdictions.

Yours sincerely
ADVOKATFIRMAET SCHJØDT AS

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Attorney

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